

Alexander Gunyon

From: Ali Tappenden [REDACTED]
Sent: 03 June 2024 09:50
To: Consultations
Subject: I object to the development of Brooklands Farm, Policy W4, Land at Brooklands Farm


Categories: Blue category

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Ali Tappenden attached a document

Ali Tappenden ([REDACTED]) has attached the following document:

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Snapshot of the item below:

I object to the overall draft local plan 2040 developed by Canterbury City Council with specific objection to the development of Brooklands Farm, Policy W4, Land at Brooklands Farm.

There is insufficient underground infrastructure throughout the entire area, with fresh water supply and sewage and wastewater removal being of primary concern. Developments throughout the area are being tacked on to the existing pipework causing frequent and disruptive leaks in water supply, and regular problems with flooding throughout Whitstable, the village of Chestfield and the surrounding road network. I can find no reference to addressing this problem in the draft plan.

There is zero maintenance to the water system with neither fresh nor foul systems being upgraded or even maintained to preserve a consistent and safe supply and removal of fresh and waste water to existing homes and businesses. The sewage system relies upon old and unsuitable pipes which all pass through the sewage treatment works at Swalecliffe. This wastewater treatment works is already over capacity and being investigated by the Environment Agency. It is, in its current form, unable to cope with the proposed additions to its workload. Sewage generated in Whitstable and the surrounding towns end up at Swalecliffe. It is estimated that 1400 houses, proposed at Brooklands Farm, could add 420 tonnes of water and sewage to the network on a daily basis. This is in addition to the extra 540 tonnes of water and sewage generated daily by the other 1800 (est) houses already under construction. These figures do not allow for rainfall, and the surface water run off produced, which adds to the network, and is, of course, unpredictable,

albeit we know that heavy rainfall now forms part of our changing climate. The only upgrade that Southern Water have undertaken to date is to install a larger and longer outfall pipe, thus enabling them to discharge sewage further out at sea. Hardly a solution to the problem.

Any rainfall seems to result in Southern Water discharging raw sewage into the sea and polluting water that is not only the life source for fish and shellfish, sea birds and mammals, and is a vital part of the ecosystem too, it also threatens to destroy the livelihoods of those who rely on the sea. Whitstable experiences the most releases of sewage per year in Kent, Tankerton (a popular swimming beach) being the most affected.

There is an oyster farming business at Whitstable, who have had to stop selling their oysters on several occasions due to incidents involving pollution. There have been signs displayed by Canterbury City Council warning people not to collect and eat shellfish from the beach at Swalecliffe. The sea, and all the industries that require it to be clean and usable are jeopardised by current and proposed developments. Tourism is a major part of Whitstable's economy - who will want to visit a town where the water is so polluted it becomes dangerous to both wildlife and human life?

The Swalecliffe Brook runs through the proposed development area at Brooklands Farm, and into a SSSI at Long Rock (Swalecliffe). There is plenty of wildlife living both in the Brook and beside it which will be affected by any development which will destroy the habitat and ecosystem of this stream/river. The immense risk of pollution throughout any construction phase with water run off from building alongside the future water run off from the landscape consisting of concrete and very limited green spaces will also add a long term risk of pollution to the watercourse. This will go on to damage and destroy the SSSI where the Brook reaches the estuary. Allowing such damage could well be an offence under the Natural Environment and Rural Communities Act 2006. I note that this consequence is not addressed in the draft plan.

The fresh water in Kent is currently supplied solely by Bewl Water, on the boundary of Kent and East Sussex. It is a reservoir which is topped up by water from the River Medway when the river flow exceeds 275 million litres per day. There are plans to increase the capacity of the reservoir by up to 30% to try and supply the ever growing demand for water in Kent. This would potentially cause the environmental degradation of the River Medway and its ecosystems. The solution suggested by Canterbury City Council is to create a reservoir by flooding the valley at Broad Oak. This plan has been on the table for easily 5 decades and has never been put in place. It does not make it clear in the local plan what type of reservoir this will be ie. where is the water coming from? Should this be an aquifer filled reservoir, this will potentially cause damage to all the surrounding water courses and the environment. Clarification from Canterbury City Council is required. It is unlikely that the Broad Oak Reservoir proposal will be in place before any proposed developments go ahead as evidenced by the number of building projects already in existence around Canterbury, Herne Bay, Whitstable and the area's villages. I would suggest that this evidence of ongoing building in the area shows complete disregard for providing safe and sustainable fresh water for the residents living under the jurisdiction of Canterbury City Council. The right to sanitation is an element of 'the right of everyone to an adequate standard of living for himself and his family' - Article 11 of the International Covenant on Economic, Social and Cultural Rights or ICESCR.

Over the last few years, our area has had what seems to be an annual hosepipe ban imposed by the water supply company. This in itself would prove that there is insufficient fresh water to sustain the existing residents, let alone adding thousands more people to the population of Whitstable alone by building 1400 houses at Brooklands Farm.

Another crucial part of the infrastructure required to sustain the lives of any future residents is that of health care. Dr Ribchester spoke at the consultation evening in Whitstable and stated that to provide the existing level of care to the proposed population would require a further 31 GPs. He also stated that all of the rooms in the three existing health centres, Whitstable, Chestfield and Estuary View are to capacity, so where would these additional GPs be housed? More to the point - where are the additional GPs coming from? We have a national shortage of doctors, according to the Royal College of General Practitioners in July 2022, a shortfall of 6,000. Where do Canterbury City Council propose to provide both suitable buildings to house the doctors and where do they propose finding the doctors? The same situation applies to dentists, yet another example of demand exceeding supply. I have heard from council officers that they are talking with the NHS but this is not a substantive answer to the question. We simply cannot increase our population by many thousands of people without having their most basic needs provided for.

The other aspect of health provision further to that of the GP, is the need for hospitals. The closest A&E departments are now Ashford and Margate. Those two hospitals are struggling to cope with demand currently, and an increase in population numbers due to development will only serve to put even greater pressure on an already over worked hospital system. It should also be remembered that a report in 2022 found that up to 45 babies may have survived had they had better care from both the William Harvey Hospital and the Queen Elizabeth the Queen Mother Hospital. Is it in the interests of our communities to build huge numbers of houses without ensuring that the health care is not already in place?

Part of the infrastructure that is being proposed is the building of schools. Whitstable, Canterbury and Herne Bay need additional school buildings to accommodate the number of school age children who currently live in the area - that is not in doubt. It is however stated by the Office for National Statistics that the birth rate is declining, therefore the requirement for additional school spaces is also declining. It seems that when a proposal for building a school is included in a development plan, the plan gets through the planning application, only to find that by the end of the profitable (to the developers) stage of the build, the developers use figures, such as a declining population to withdraw the school from the project. How do Canterbury City Council propose to ensure that these schools are built should the proposed developments go ahead?

Further to the need for additional school buildings, we will need teachers. The whole country has a shortage of qualified teachers across its educational institutions. In 2023 government figures showed that the target for secondary school teachers had been missed by 50%. How do Canterbury City Council propose to ensure that there are sufficient teachers to educate the children coming to or being born in the area?

Why are developments currently being built and lived in without the necessary provision for the families who are already living here? Canterbury City Council merely responds by saying that schools are in the draft plan - is this just a way of bribing our communities to believe that this level of development should continue so that we get a school or two?

The schools proposed for the site at Brooklands Farm are a primary school and a SEN school. There appears to be an assumption that families living at the proposed site would have their children attend the local school. This is not the case currently, so why would it change? Families will want to choose the right school for their children, or apply for a place at their chosen school and be offered a place elsewhere as happens currently. I do not believe that Canterbury City Council has any say as to how school places are allocated, so children will be being transported in and out of the proposed development at school drop off and collection times, thus causing more chaos on the roads than at present - on roads that Canterbury City Council are not planning to improve. Families are not going to put their vulnerable small children on buses, therefore they will be driven to their allocated school. My granddaughter travelled over three miles each way to primary school despite applying for a place in a school only a mile away - this was not an unusual scenario. It is also of note, that the minimal traffic modelling so far does not include the study of traffic at school drop off and collection times, which is by far the worst time for traffic queues around Whitstable. If the likelihood of road closures (fixing more burst water or gas mains) is added to these times of day, the town will become gridlocked resulting in children being late for school and parents and other workers being late for work. Whitstable already struggles with traffic at these times of the day without the addition of the people who will eventually live in the houses under construction currently, let alone the unacceptable numbers if the proposed development at Brooklands Farm were to go ahead.

A major part of the above ground infrastructure is the road network. Over the last few months, Whitstable has had periods of time where it is almost impossible to access the town by road. The roads have been dug up for gas and water repairs, sometimes with regularity when the initial leak (water or gas) has been allegedly mended, but has actually caused a further leak which then leads to the road being dug up yet again. At the time of writing, a water leak in Chestfield Road has led to three different leaks and the closure of the road to traffic. The displaced traffic has had to use South Street and The Thanet Way A2990 leading to queues and congestion.

A gas main replacement in Millstrood Road led to the road being closed for several weeks. This road is the main access road to the local secondary school, and again caused chaos and queues.

The Thanet Way A299 was due to be closed in both directions to undertake repairs caused by subsidence. Kent County Council had to rethink the closure to both carriageways after it was closed for one day due to a fatal accident last year on the London bound carriageway. The Thanet Way A2990 and the surrounding roads were gridlocked by the traffic that would normally have used the A299. It should not take the tragic death of a young woman for the authorities to realise how busy the roads are, and that they would need to rethink the closure for repairs to take place. Those repairs were carried out using a contraflow system and have been completed, but not without causing traffic jams and delays during the period of the works.

Roads have been subject to traffic queues where current developments are being built. The contractors have had to access utilities for the new build properties, which has involved digging up the roads and causing delays to everyone trying to go about their business in the area. Further development will only add to the disruption of residents' lives because our existing road networks cannot handle any increase in traffic or road works.

Most of the roads around Whitstable are unsuitable for heavier traffic and the increased usage that a further (estimated) 3,000 or more cars will bring. Adding a

slip road as proposed in the draft local plan will not in reality alleviate the traffic problems in Whitstable. People will still want to access the town using the existing roads which are unable to cope with current traffic, and the addition of the proposed slip roads will merely cause Chestfield Road and South Street to be used as rat runs. There will also be increased traffic on both the road through Radfall and Tyler Hill and the Blean Road for people travelling to Canterbury.

Regarding the transport aspect of the draft local plan - do the officers really believe that the residents of Whitstable will all get on the bus? It is an unrealistic fantasy which if we believe the comments made by the officers at consultation evenings, they are proposing this concept so that money is not spent on any road improvements. The attitude was also that they would provide the bus lanes (where?) and if the residents chose not to use the bus, they could sit in the inevitable traffic jams.....It was also acknowledged by one officer that there would definitely be more cars on the roads if the proposed developments go ahead. How can the public have any confidence in the bus travel part of the plan, when the designers of the plan cannot provide definitive answers to questions?

Canterbury City Council has not considered the detail of the bus concept, as was seen in consultations when the officer whose responsibility is the travel aspect floundered over every question. A recent article in the Whitstable Gazette concerned a change in bus routes and the problems that have arisen for bus users. Councillor Ricketts, the cabinet member for Tourism, Movement and Rural Development stated that 'bus companies are privately owned businesses and that Canterbury City Council wants Stagecoach to provide a comprehensive service but has no sway over its commercial decisions'. How do Canterbury City Council propose to provide a suitable bus service for the numbers of people they intend to accommodate in the 1400 houses proposed for Brooklands Farm?

Herewith a list of examples where residents could not be expected to use public transport: people with any kind of disabilities, people attending, or taking someone to a medical appointment, people taking a pet to the vet, people taking a large family anywhere, people wanting to buy a large or a quantity of items whilst shopping or doing the weekly household shop, people taking different aged children to different schools and needing to be there within a certain time frame, people attending appointments, people whose working hours are not 9 - 5, people who need to carry items with them in the course of their business, people taking large packages to a post office.....The list is endless and further evidences that the idea to stop people using cars lies in some sort of alternative reality.

A further negative impact of the idea of stopping people using cars is likely to be to our high streets. Part of the local plan is to reduce the number of parking spaces and to increase the cost of the remaining spaces. I suspect that this will be of no benefit to the traders in our towns as it is more likely to lead people to go to out of town shopping centres where the parking is free such as Westwood Cross.

Whilst on the subject of high streets, how does Canterbury City Council propose to regenerate them? Canterbury has a depressing shopping centre especially with the buildings that housed Debenhams and Nasons being boarded up. Do the Council really believe that in these days of internet shopping that high streets will suddenly spring back into life? Surely the large spaces that were department stores would be better used for converting into flats to help address the alleged housing crisis? What are the reasons that this is not being proposed? Canterbury has already seen the conversion of industrial buildings being converted, why not these empty shops?

Whitstable has been left with a high street full of cafes, estate agents, nail bars, barbers, hairdressers and a handful of artisan type gift shops. The shopping

primarily cater for tourists, and the other businesses for services that you cannot get online. Does Canterbury City Council believe that new residents of current and proposed developments will rejuvenate our high streets? It is more likely that they will shop in the large supermarkets and do the rest of their shopping online - how does this help the small independent retailers who are present in our high street? Herne Bay has a fairly lively shopping centre as it has managed to retain 'ordinary' shops due to having a very different tourist industry to Whitstable. There has been a new parade of shops constructed on the old bus depot site with accommodation above. I understand that the shop units have not been filled and are being converted to residential dwellings. This indicates that although Herne Bay's shopping centre is surviving, there is no call for further retail outlets. I am also led to believe that the Co-Op mini supermarket on the old Golf Course Site is also to close due to lack of business. These shops are included in planning applications to presumably 'tick the infrastructure box' but the reality is, they are not profitable. Retail outlets are proposed as part of the Brooklands Farm development. I suspect that these shops too will find that they are financially not viable in that location, as residents will primarily use the larger supermarkets at both Whitstable and Herne Bay - and not on the bus!

With regard to the actual building proposals for Brooklands Farm - who is the housing for? The existing new build sites in the area are not selling, and certainly are not 'affordable' to local people. The draft local plan is very misleading in its implication that these houses are required for our existing communities. Why has a large amount of the development at Whitstable Heights been sold en bloc to Lewisham Borough Council? This is most definitely not for our local people. How many local families are there on the housing waiting list? Where are the homes that they need? I note that the plan at DS2 makes reference to 'social or affordable rent'. I am concerned about the use of the word 'or' in this section - why would a developer want to invest in social housing, surely there is more profit to be made in affordable housing? Ultimately the only people that benefit from these proposed developments are the landowners and the development companies - it is certainly not the people of Whitstable.

Your own proposals for Site W4 (page 82 of the draft local plan) is describing a self sufficient community, which contradicts the stated 'Whitstable Vision' and policies W1, W2 and W3. If the proposal at Brooklands Farm is to develop an area with garden city principles which is its own community base, why does it need to be on prime agricultural land? Surely this proposal could be built anywhere? Is Canterbury City Council considering Brooklands Farm because it saves them or the developers spending money on providing the necessary infrastructure to a more outlying position? Does Canterbury City Council have complete disregard for the existing population and their quality of life, and the fact that Whitstable quite simply does not have the underground or overground infrastructure to sustain this level of development?

The wilful destruction of agricultural land which is currently in use for both arable crops and pasture for cattle, for building is jeopardising national food security. How can it be considered that the garden of England which has done and could continue to grow food should be covered in concrete? Oliver Dowden has stated to the media that Brits should stockpile food in case of enemy attack (Daily Express 22nd May 2024). Where is this food to come from if we are unable to produce it ourselves? Government figures in the United Kingdom Food Security Report 2021 states that the UK was producing about 60% of its domestic food consumption by economic value, part of which is exported. This means that just under half of the food on plates is produced in the UK including the majority of grains, meat, dairy

and eggs. Where will we even achieve this level of food production if prime land is used for building?

Not only will prime agricultural land be destroyed, but the habitats of insects, fish, birds and mammals. It is all very well offering 'mitigation' but it does not mean that our wildlife is not being displaced in a manner which will permanently remove them from our landscape. These creatures are an irreplaceable part of the ecosystem and the food chain upon which we, as humans, ultimately depend. There are protected species on the land in question at Brooklands Farm, and in the water of The Brook: slow worms, skylarks, bats, great crested newts and many other species including birds of prey such as buzzards, red kites, kestrels, barn owls and sparrow hawks. Destroying this landscape should be considered an environmental crime. How do Canterbury City Council propose to justify their collaboration in supporting such an act?

In summary, the underground and overground infrastructure for the whole area are not fit for purpose for the existing populations of Whitstable, Canterbury and Herne Bay, let alone the additional population explosion proposed by Canterbury City Council. No construction should be allowed to go ahead until the infrastructure is brought up to date to sustain the current residents.

Sewage removal and fresh water supply should be addressed immediately in order to stop the constant pollution of the sea and to preserve everything and everyone that depends on the cleanliness of our waters.

Health and education provision should be put in place before a deliberate increase in population.

The transport network should be improved straight away and the current residents asked to start using the public transport rather than waiting for 3,000 or more cars to arrive.

Food security must be addressed, and the preservation of the natural landscape and everything within it.

In my opinion, this local plan is a work of fantasy, created by Canterbury City Council to satisfy central government. It does not consider the residents of the whole area, and should it be allowed to go ahead, will cause considerable distress to large numbers of people. There appears to be opportunity for Local Authorities to challenge the government regarding the numbers of houses required by using the Revised National Planning Framework introduced in December 2023. Despite asking Canterbury City Council to look into these changes, they seem to be in denial that such a challenge can be put forward, and are carrying on regardless, despite very obvious local opposition. I would suggest that the needs of local residents are being completely ignored by the council officers involved in this process, and that we are being patronised and treated with contempt. I would like to see Canterbury City Council represent the constituents, remove the draft local plan, and use the legislation available to present a plan that both satisfies the people and produces a plan that is both acceptable and sustainable.

Alison Tappenden



