

## W4 Brooklands Farm

We are against the inclusion of Brooklands Farm [W4] in the Local Plan

The inclusion of this land is wrong because this land is part of a wider scheme that introduced the new Thanet Way A299 and so has been protected from development for the last 30 years, as fringe land of the Old Thanet Way A2990 through a presumption against development on the land outside the urban boundary.

This strategy was instigated because it was recognised that a built up of traffic on the Old Thanet Way would be materially harmful to the economic prosperity of the coastal towns, so control measures were thus introduced to specifically restrict development. Protection was explicitly awarded to the fringe land of the Old Thanet Way because development on these sites between Benacre and Chestfield would lead to calls for the upgrading of the Old Thanet Way again.

In particular these policies were also expressly designed to reject development that will infill between the Old and New Thanet way. Full evidence of the provenance and motivations for its protection is provided. (KCC Planning 1991, 1994 LP, 2006, and 2017 Local Plans).

Development of this site will be harmful because it will be a major negative step change to this setting, causing serious environmental harm to the locality. Its side effect will reintroduce the traffic, pollution and noise, that was specifically removed by the building of the New Thanet Way A299 and is thus contrary to the approved approach of diverting traffic onto the new road. Inclusion of this site runs counter to the historic protection awarded to this important area of open land that is foundational to this setting.

It is easy to forget but when the new Whitstable and Herne ByPass was introduced, large areas of open land was consumed and part of that investment was to introduce new protection measures as part of a scheme, designed to prevent the Old Thanet Way from becoming as busy as it was before the new one was built. Indeed the state of the road in the 1990s on a regular basis could only be described as armageddon with stationary traffic and unwelcome pollution along the stretch of this road.

So when the new Whitstable Bypass was introduced, planning policies were established to:

- i) protect the visual amenity and open plan character of the area.
- ii) protect the Old Thanet Way from becoming as busy as it was before the road was built
- iii) take positive advantage of the road's altered status for amenity value.

The contribution of these open areas to the vicinity is described in the original background policy Technical Paper 3 Landscape Conservation and Open Space (1994) shown here.

... Thanet Way ... course to rejoin the Thanet Way at Eddington Roundabout.

### **Amenity Importance of the Study Area and Policy Implications**

- 5.9 The study area has a vital role in providing the landscape setting of the coastal towns and their associated settlements (see Appendix 7). It also acts as a recreational resource, being the closest open countryside to these towns.
- 5.10 Because of the amenity importance, both visual and recreational, it is vital to safeguard it from large scale expansion of development. The majority of the area is outside the urban boundary, there is therefore, a presumption against development of fresh land. Further detailed policy consequences are described below.
- 5.11 **Benacre Wood to Chestfield:** This is a predominantly open landscape, a wide valley from Benacre Wood to Chestfield. This extensive, open landscape is therefore very vulnerable to the impact of new development. Parts of this area also form the setting to the Blean Woods SLA complex. It is an attractive landscape and has a rural character worthy of conservation. It is vital to the setting of south Whitstable and Chestfield and is an area valued for the public access it provides for the adjacent urban population. **Canterbury District Local Plan Deposit Draft Proposals:-**
- a) area identified as open space protection;
  - b) extension is also proposed to the Blean Woods SLA to the west and south of Chestfield to include the setting to the main woodland and pieces of outlier woodland - Convicts and Longtye Woods.

- 5.16 Any additional development along this road would also lead to extra traffic and highway accesses. Indeed any such additional traffic on the existing Thanet Way would eventually lead to calls for an upgrading of the road. This would therefore be contrary to the approved approach of diverting traffic onto the modern realigned A299. Apart from Canterbury District Local Plan Deposit Draft allocations, new development will therefore not normally be permitted accessing onto the Thanet Way.

Since then subsequent protection measures have consistently been applied by CCC. In chronological order these are: Technical Paper 3 1994, C24 (2006), OS9 (2017).

Furthermore, that scheme recognised that when the bypass was introduced that only 50% of the traffic ever came off because 50% was local traffic, so the maths is actually quite critical especially given that car volumes have increased, and piecemeal development has occurred feeding further traffic onto the Old Thanet Way and the road is becoming more and more congested. With regards to the NPPF, in brief sustainable development does not compromise the ability of future generations to meet their own needs. When the bypass was created plans specifically included control measures to future proof the Old Thanet Way to prevent the requirement for road-enlargement, because there would be nowhere to expand the Old Thanet Way into without expensive compulsory purchases. The acute risk, is that this piecemeal addition, on land expressly identified to have a presumption against development because of its key role in the scheme that brought us the new thanet way, will cause us to sleepwalk into the eventual need to upgrade the road which is not sustainable in NPPF terms and is contrary to the NPPF fundamental objective that the ability of future generations to meet their own needs should not be compromised. This is undesirable for

road users, local residents, and the town as a whole because more traffic, pollution and noise will spill into the residential roads as drivers seek new paths of least resistance.

The major flaw in the slipway plan is that it's only accommodating eastbound traffic. So it will exacerbate the already high traffic levels of traffic flowing west bound towards the Long Reach roundabout making the situation even worse still. See appendix A.

The NPPF states;

The purpose of the planning system is to contribute to the achievement of sustainable development. **At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs\***

Resolution 42/187 of the United Nations General Assembly.

Furthermore the NPPF states that:

9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, **but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.**

These points made here are also applicable to our points regarding 'South Whitstable - strategic development area: 3.13, 3.14' and also Bodkin Farm W6.

Over the last few years residents have seen a noticeable increase in the speed with which vehicles travel round and exit off the Tesco roundabout. Particularly from vehicles entering the roundabout from Tesco heading to Herne Bay and cars travelling from the direction of Long Reach. This has been exacerbated following the recent reconfiguration of the turning into Millstrood Road, which seems to have increased the net speed of vehicles on the roundabout. This has the knock on effect that cars are exiting the roundabout onto Millstrood Road northbound faster, which causes problems for vehicles heading southbound from Millstrood Road to the roundabout, because of account of the queuing traffic to get onto the roundabout some vehicles prematurely overtake to get into the right hand lane and are crossing into the path of the vehicles leaving the roundabout.. There have been several near misses with cars doing this as oncoming cars entering Millstrood Road find south bound cars on their side of the road. A child cycling was nearly knocked off their bike at this junction recently.

It is our concern that the development of this site in such close proximity to this roundabout will increase pressure. This will be further compounded by the nearly 500 properties currently under construction and the 220 properties and 300 space park and bus recently agreed. Plus any new developments planned as part of the new local plan, as all traffic in Whitstable uses the Thanet Way to exit the town at some point. It is Whitstable's artery and the councils redirection of non local traffic off the road into the new Thanet way and its strategic plan to stop new development along it to stop it becoming as busy as it was before

the new road has so far stopped this artery from becoming blocked. Each new development cumulatively increases the risk and therefore the need to upgrade the road.

Pressure at the Borstal Hill roundabout is now critical, which may be somewhat attributed to piecemeal development (at odds with the scheme), and is now quite dangerous to pedestrians and cyclists. Indeed this has been confirmed by Kent Highways [ref....] although they have no solution owing to the configuration complexities on this junction.

NPPF makes it clear that achieving sustainable development means that the planning system needs to support an economic objective. The strategy that had delivered the new Thanet Way Bypass A299, was instigated in part because it determined the build up of traffic levels on the Old Thanet Way is materially harmful to the economic prosperity of the coastal towns. Therefore pursuing a policy that deliberately creates new traffic on the Old Thanet Way compromises economic prosperity and is therefore contrary to the aims of the NPPF.

The site is sufficiently distant from buses and train stations at both Whitstable and Chestfield mandating use of motor vehicles for transport.

Bus services are exceptionally poor. The #5 bus is the only service and has a sparse timetable with gaps of several hours before each bus.

Brooklands Farm lies in an 'Area of High Landscape Value' according to the existing 2017 Canterbury local plan, with views to the distant Blean. It also acts as a link providing valuable connectivity for wildlife. We are extremely concerned that development on this site will have a serious impact on the unspoiled local wildlife site at Convicts Wood as well as impacting the Thorndon wood nature reserve. Human habitation in such close proximity to these ancient woodlands will bring noise, light pollution, domestic pets etc into an area which has been natural for hundreds of years. We cannot mitigate for residents installing security and garden lighting. This can only have a negative impact on biodiversity and the whole ecosystem for creatures reliant on this habitat.

The importance of this open farm land that has some public access must not be underestimated. It provides biodiversity and habitats for the other species that live there and for those living nearby, the presence of these green elements bring the advantages and positive effects that seeing and being around green and nature have on the many different aspects of our lives. This piece of land really does have intrinsic value to the human habitat, it contributes in multiple ways and substantially improves the well-being of residents in the area.

Due to the London clay this area is prone to flooding. The Swalecliffe Brook floods onto the farmland. At present heavy rain sits on the farmland before it disperses. We are therefore extremely worried about water runoff from any urban developments creating additional problems. For example Chestfield Road at the junction with South Street floods regularly since the new Thanet Way was built.

Food Security. The government guidance seeks to protect the best and most versatile agricultural land from significant inappropriate or unsustainable development proposals and to promote the sustainable management of all soils. This farmland has been used for agriculture for generations and should continue as farmland.

The existing medical facilities for the whole town are just coping we understand from the head of the Whitstable Medical Practice. We are already seeing hundreds of homes being built without provision for additional capacity. Further homes should not be built until infrastructure and facilities are grown to accommodate the new residents. existing residents should not suffer as a result of building more and more homes. developments (especially large ones) need to be looked at holistically, not in piecemeal developments which puts strain on existing services and offer no benefits to the existing and new populations. The same is true of dentists.

According to the ONS predictions for population growth, this plan is building six times the growth rate for this district. Where is it substantiated that we need to build six times the growth rate for this district? We note that students are skewing population figures because we have two large universities in the city (40K students of the 69,293 total population of Canterbury, i.e. 66% of the population are students; to draw a comparison in Birmingham only 6.96 % are students). Given the size of this skew, surely this needs to be taken into account when deciding housing requirements.

We appreciate that houses need to be built however in this area along the fringe land of the Old Thanet way we are currently seeing hundreds of houses being built. This is resulting the destruction of the character of the area when we need to conserve it as an attractive place for not only residents but also visitors who are essential to our economy. Expansion should be made where it will make less of an impact. Canterbury is a city; Whitstable and Herne Bay are towns and the proposed expansion of Brooklands Farm will increase Chesterfield's population by over 65%. This does not qualify as sustainable.

## Sewage

Turning to Sewage we want to dispel the myth advanced by Southern Water that sewage is released into the sea on the grounds of 'Storm Overflow'.

You will recall that Kent had an extremely unusual dry period in 2022. We barely had a drop of rain in Whitstable in spring and early summer and the ground was dry and grass lawns struggling. However in that period Southern Water released storm overflows on almost a daily basis. The table below is

a bite sized but typical extract that gives a sense of the myth that it is storms driving these releases. In the period covered in this table we didn't have storms and we didn't even have rain, yet sewage was released almost daily.. The same pattern can be observed across multiple months during this exceptional dry period and high temperatures.

Despite claims by Southern Water, there is something fundamentally wrong with capacity in

this area. This table is just for Tankerton, which shows the frequency of 'storm overflows'. The Whitstable table has a similar release profile. We ask that this fundamental infrastructure requirement is fixed as a matter of urgency before new developments come on line.

Event ID	Site Number	Bathing Site	Outfall	Last Activation Start	Last Activation End	Duration (hrs)	Activity
422561	12548	TANKERTON	TANKERTON CIRCUS	17/06/2021 00:04	17/06/2021 01:16	1.2	Genuine
422421	12548	TANKERTON	TANKERTON CIRCUS	16/06/2021 22:21 PM	16/06/2021 23:17 PM	0.93	Genuine
422419	12548	TANKERTON	TANKERTON CIRCUS	16/06/2021 22:52 PM	16/06/2021 23:12 PM	0.33	Genuine
422276	12548	TANKERTON	TANKERTON CIRCUS	16/06/2021 21:42 PM	16/06/2021 22:05 PM	0.37	Genuine
422279	12548	TANKERTON	TANKERTON CIRCUS	16/06/2021 21:47 PM	16/06/2021 22:02 PM	0.25	Genuine
417011	12548	TANKERTON	SWALECLIFFE NO1	04/06/2021 22:42 PM	04/06/2021 23:17 PM	0.58	Genuine
416588	12548	TANKERTON	SWALECLIFFE NO1	04/06/2021 09:59	04/06/2021 22:39 PM	12.67	Genuine
416593	12548	TANKERTON	GORREL NO1	04/06/2021 10:20	04/06/2021 14:24 PM	4.05	Genuine
416748	12548	TANKERTON	TANKERTON CIRCUS	04/06/2021 12:39	04/06/2021 12:55	0.25	Genuine
416565	12548	TANKERTON	TANKERTON CIRCUS	04/06/2021 09:37	04/06/2021 10:10	0.55	Genuine
414179	12548	TANKERTON	SWALECLIFFE NO1	28/05/2021 01:48	28/05/2021 03:07	1.3	Genuine
414032	12548	TANKERTON	SWALECLIFFE NO1	27/05/2021 13:41 PM	27/05/2021 14:56 PM	1.23	Genuine
414025	12548	TANKERTON	SWALECLIFFE NO1	27/05/2021 13:17 PM	27/05/2021 13:34 PM	0.28	Genuine
411690	12548	TANKERTON	SWALECLIFFE NO1	24/05/2021 18:27 PM	24/05/2021 20:05 PM	1.62	Genuine
411597	12548	TANKERTON	SWALECLIFFE NO1	24/05/2021 14:41 PM	24/05/2021 15:50 PM	1.13	Genuine
411029	12548	TANKERTON	SWALECLIFFE NO1	23/05/2021 23:59 PM	24/05/2021 00:38	0.65	Genuine
410043	12548	TANKERTON	SWALECLIFFE NO1	22/05/2021 17:48 PM	22/05/2021 21:24 PM	3.6	Genuine
409826	12548	TANKERTON	SWALECLIFFE NO1	22/05/2021 07:15	22/05/2021 08:46	1.52	Genuine
409280	12548	TANKERTON	SWALECLIFFE NO1	20/05/2021 08:04	20/05/2021 09:11	1.12	Genuine
409258	12548	TANKERTON	SWALECLIFFE NO1	20/05/2021 07:10	20/05/2021 08:02	0.87	Genuine
408800	12548	TANKERTON	SWALECLIFFE NO1	19/05/2021 06:07	20/05/2021 02:00	19.87	Genuine
409086	12548	TANKERTON	TANKERTON CIRCUS	19/05/2021 18:01 PM	19/05/2021 18:27 PM	0.42	Genuine
408951	12548	TANKERTON	TANKERTON CIRCUS	19/05/2021 11:51	19/05/2021 12:07	0.27	Genuine
408786	12548	TANKERTON	GORREL NO1	19/05/2021 06:02	19/05/2021 09:25	3.37	Genuine
408785	12548	TANKERTON	TANKERTON CIRCUS	19/05/2021 05:58	19/05/2021 06:55	0.95	Genuine
408784	12548	TANKERTON	TANKERTON CIRCUS	19/05/2021 05:50	19/05/2021 06:45	0.92	Genuine
408413	12548	TANKERTON	SWALECLIFFE NO1	18/05/2021 13:31 PM	18/05/2021 21:45 PM	8.22	Genuine
408416	12548	TANKERTON	GORREL NO1	18/05/2021 13:37 PM	18/05/2021 15:14 PM	1.62	Genuine
408414	12548	TANKERTON	TANKERTON CIRCUS	18/05/2021 13:33 PM	18/05/2021 13:59 PM	0.42	Genuine
407761	12548	TANKERTON	SWALECLIFFE NO1	17/05/2021 15:51 PM	17/05/2021 23:18 PM	7.43	Genuine
407760	12548	TANKERTON	GORREL NO1	17/05/2021 15:51 PM	17/05/2021 18:28 PM	2.62	Genuine

We contacted Imperial College London who are experts in the field of Water Treatment Works (WTW) across the country. Their data confirms that the Swalecliffe WTW does not have the required capacity to meet current population demands let alone a growing population.

PERMIT_NUMBER_UWWTWs	COMPANY_NAME	DWF (m3/d)	FFT (m3/d)	FFT/DWF	System Duration 2021
A01102	SOUTHERN WATER	7608	17712	2.328076	874.16

The current FFT/DWF **ratio** for Swalecliffe WWTW is equal to  $17712/7608 = 2.328076$

As detailed in the Imperial College paper, this **ratio** should be equal to **3**, meaning that the hydraulic design capacity of the works should be able to cope with three times the DWF value hitting it at any one time. This ratio does not include a measure of what the storm tanks can hold because the storm tanks are not part of the treatment capacity. Ideally the FFT of Swalecliffe should be  $3 \times 7608 = 22,824 \text{ m}^3/\text{d}$

This means that Swalecliffe WWTW is already under capacity for the waste it should be able to deal with. There is a shortfall currently of  $22,834 - 17,712 = 5,122 \text{ m}^3/\text{d}$

It is therefore struggling to treat the waste from the current Population Equivalent, a number that will only increase with additional housing.

Furthermore the planned reconfiguration works that the Swalecliffe plant is undertaking shall only increase the volume of wastewater that can be held on site which does not equate to an increase in the works design capacity (i.e. FFT remains the same). So the works will still not be able to treat the desired volume of 3 x DWF, and as DWF increases with the population being served, this gap will only increase.

We have contacted Southern Water on numerous occasions about this matter and they have ignored our requests for information.

We are very concerned about the future sustainability of piecemeal developments across the district managing their own waste water treatment works. Who is going to maintain these ad-hoc works in 50 years time.

The water and gas infrastructure is also very Old in this area and frequently the roads are closed in Chesterfield and particularly Millstrood Road which was closed at least 6 times in the last year because of failing legacy infrastructure.

No further development should take place until the central treatment works has capacity in its system.