**SPECIFIC REASONS WHY THE BROOKLANDS FARM SITE, CHESTFIELD SHOULD NOT BE INCLUDED IN THE CANTERBURY DISTRICT LOCAL PLAN 2045: A STATEMENT SUBMITTED BY THE GRASMERE VILLAGE RESIDENTS’ASSOCIATION (GVRA) COMMITTEE**

**1 Introduction**

1.1 These specific points of objection to the inclusion of the Brooklands Farm site in the draft Canterbury District Local Plan 2045 are submitted by the Grasmere Village Residents’ Association (GVRA) Committee. This association is a formally constituted body representing the 42 households located on the unadopted section of Grasmere Road.

**2. Features and history of the Brooklands Farm site**

2.1 Brooklands Farm lies within an area which has long been regarded as an Area of High Landscape Value. It was identified once more as location of High Landscape Value in the current Canterbury District Local Plan 2017 and remains so (see the map and statements contained page 10 of that current Plan).

2.2 The farmland itself lies in, and provides a wide panoramic view of, the valley of the Swalecliffe Brook with the Blean Hill ancient forests on its’ southern side. It directly abuts the historic Blean Forest area. The Brooklands Farm name is indicative of the site’s long-standing association with the Swalecliffe Brook.

2.3 The Brook itself runs down through its’ valley to Chestfield and Swalecliffe and on to the sea at Swalecliffe. It has historically been a source of flooding in some of the low-lying London clay areas, including housing and other areas, through which it runs to the sea.

2.4 Current Environment Agency flood risk maps (see Environment Agency future flood risk information on the gov.uk website) show areas of increasing high flood risk to be associated with the Brook in future years, exacerbated by the effects of abnormal rainfall levels associated with global warming.

2.5 A number of long established popular registered footpaths cross the site which provide the public with opportunities for open rural walking and simply enjoying the countryside and its wildlife, with no overbearing roads or buildings spoiling the view. Use of footpaths through any built-up urbanised areas bear no comparison.

2.6 It is also an area of high biodiversity value with rare butterflies and breeding birds. As such its ecological, biodiversity and landscape value would be seriously and adversely impacted by a major housing development and associated facilities of the scale proposed.

2.7 A major part of the attractiveness of the view over the green valley of the Swalecliffe Brook is its rural tranquillity. Little or no convincing consideration is given to these impacts, including the loss of its High Landscape Value, specifically attributed to it by Canterbury City Council’s (CCC’s) current Local Plan 2017, if any Brooklands Farm development were to proceed. We believe that the footpath running along the northern edge of the site and the view to the Blean from it should be regarded as a protectable asset.

2.8 Instead, what is being proposed for the Brooklands Farm site by CCC officials in the draft Local Plan 2045 is for it to be replaced with its’ proposed 1300 dwellings, a 3FE primary school, a SEND school, and other buildings which will destroy its’ wildlife environment and scenic value. It will also destroy a large area of farming land dating back to at least the 18th century.

**3. Implications of the nature of the Brooklands Farm siteits scenic value and wildlife environment**

3.1 Given these facts, along with the clear adverse landscape and biodiversity impacts in both the short and long term, it is asserted that, more properly, it would be appropriate for the Brooklands Farm Site to be nominated as a Green Gap between the existing building line of Whitstable/Chestfield and the edge of Blean Woods and Radfall settlement, rather than being proposed for inclusion in the draft Local Plan as a site said to be suitable for the construction of large new housing estates and associated facilities.

3.2 It is further asserted that, significantly, development of this site would be in obvious conflict with the last two points contained in the CCC Strategic Objectives set out in the table on page 7 of the draft Canterbury District Local Plan 2045. These read:

* Protect and enhance our rich environment and valued landscapes, creating a network of spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities; and
* Reduce the causes of climate change and adapt to ensure that all district developments enable the carbon emissions reduction and increased resilience as quickly as possible.

3.3 Let’s be honest about the latest draft Local Plan 2045. What it is doing with its proposal for the Brooklands Farm development is;

* Encouraging urban sprawl;
* Building on and removing valuable farming land;
* By proposing large development in the Swalecliffe Brook valley, increasing the chances of future flooding elsewhere in Chestfield and Swalecliffe given climate change;
* Failing, as CCC’s own declared policies put it, to “protect and enhance our rich environment and valued landscapes, creating an network of spaces, supporting wildlife and biodiversity”;
* Similarly failing also to “reduce the causes of climate change and adapt to ensure that all district developments enable the carbon emissions reduction and increased resilience as quickly as possible”;
* Incorrectly asserting unsubstantiated “biodiversity net gains”, when swathes of historic green field farming land would be removed and concreted over and wildlife living areas would be destroyed. This is just fallacy.

3.4 Finally, there is also nothing more in the CCC documentation than a vague reference to traffic modelling. No substantive estimated details of traffic impacts and only minimal details are provided of the necessary highways’ improvements and their impacts - eg on the historic village of Chestfield – are given. Have any proper detailed traffic assessments been undertaken and, if so, where can they be viewed?

3.5 In reality it appears much of the road provision and analysis content is, in reality, no more than soundbite waffle.

**4. Loss of Best and Most Versatile Farmland**

4.1 The National Planning Policy Framework (NPPF) requires the Local Planning Authorities should seek to use areas of poorer quality land in preference to that of a higher quality and, if agricultural land is to be proposed for development, the economic and other benefits of that land should be fully set out and taken into account. The housing evidence base for this site which supports its draft Local Plan proposal does not address this NPPF requirement. Historic maps (see The History of Chestfield published by the Chestfield History Society) show the Brooklands farmland has been and remains long existing and viable farmland.

4.2 Significant areas of the Brooklands Farm land, which has existed as a farming area since at least the 1800s, have and still are farmed for cereal crops, and it is therefore likely that these are Grade 3a rather than Grade 3b land. Grade 3a is Best and Most Versatile (BMV) agricultural land and its development for housing would be contrary to both policy EMP 12 (Agricultural Land) of the current Local Plan and policy DS12 (Rural Economy) of the current draft Local Plan.

4.3 The housing evidence base for this site which supports its draft Local Plan proposal does not address this requirement.

**5. Flood Issues**

5.1 Part of the proposed Brooklands Farm development site is in Flood Zone 3. There is therefore a high probability of flooding which will be exacerbated by future climate change not least due to run off from extensive concreted over areas. It is long established that the Swalecliffe Brook and its tributaries cause flooding in Chestfield and parts of Swalcliffe (see Environment Agency latest future flood risk maps on the gov.uk website). More incidences of abnormally heavy rainfall in future as a result of climate change will serve to increase the incidences of future flooding. This cannot be just ignored.

5.2 Extensive published knowledge of the flooding caused to central Chestfield and parts of Swalecliffe by the upper catchment of the Swalecliffe Brook indicate that any substantial further development of the main valley origin and this catchment down through Chestfield and Swalecliffe is likely to cause future flooding problems – see gov.uk risk of flooding map for Swalecliffe Brook – see most recent gov.uk flooding map for the Swalecliffe Brook.

5.3 Local inhabitants would therefore be reasonable in demanding proof, before the proposal to include Brooklands Farm is finalised and sent to the Planning Inspectorate, that proper and effective steps can be taken and paid for by any future developer to prevent any increase in flood risk, including into the longer term, from future downpours, e.g. from very extensive sustainable drainage/water storage provision or other greater protection. Greater rainfall intensity is already causing historically novel issues in the Whitstable area, such as the flooding in Joy Lane from a line of downpours arriving from the sea.

5.4 The surface of the fields already naturally retains rainwater due to its relatively high clay content which is resistant to the soaking-in of surface water. The ‘waterlogging-plus’ builds across the whole site even without adding in extra the run-off from the extra roads, hard standings and roofs of any development proposed. In other words, the Brooklands Farm area already has no extra water holding capacity. We believe vague reference to “sustainable drainage systems”, with no details provided, is simply seeking to sidestep the issue.

**6. The inadequacy of foul water drainage provision in the area of the proposed development and surrounding areas**

6.1 In combination with other housing developments (including those already under construction), the large Brooklands Farm housing development proposed would add to the sewage effluent pollution problem on the beaches at Swalecliffe. Southern Water’s sewage works are unable to safely process Whitstable’s sewage after, particularly as they use the Short Sea Outfall. The effect on people’s health is not known because there is no reporting system for beach users who become infected. Southern Water’s plans for replacing the Short Sea Outfall are currently unclear and unapproved, but it appears that any replacement would be another “short” outfall but with somewhat higher capacity. It would therefore be likely to result in sewage effluent being blown back onto the beach when winds are from the west or north (i.e. on-shore).

6.2 It would also have to be shown that any increase in effluent treatment provision could deal with not only all the existing housing arisings but also any new arisings from additional housing proposed under the Local Plan 2045. There is no demonstration of such provision, or even consideration of it, in the Local Plan 2045 documentation.

**7. Movement and transportation**

7.1 We will start this section by going to page 90 of the draft Local Plan 2045 and the sub-section entitled “4. Access and Transportation” for the proposed Brooklands Farm development.

7.2 Careful reading of that subsection reveals an important missing fact that it provides no detail as to how additional traffic from the extensive Brooklands Farm site – and indeed other proposed Whitstable development sites - to and from Canterbury, of which there will be many, will be catered for.

7.3 There is mention of the A299 and A2990 but these run east to west not north to south so are essentially irrelevant for Canterbury journeys. The other content of this section is all about mainly local journeys. So let us consider the more important Canterbury journeys.

7.4 In reality, there are only two realistic options:

* Use of South Street to the Radfall Road on through the Thornden Wood Road, through Blean Woods, and Hackington Road through Tyler Hill and on down St Stephens Hill into Canterbury via either St Stephens or Beaconsfield Road;
* Use of South Street the other way onto the Old Thanet Way (A2990) up Clapham Hill onto the A290 through Honey Hill, Blean Hill and down into Canterbury via the Whitstable Road.

7.5 Both these alternative routes will face major problems with large increases in peak traffic, particularly the Thornden Wood and Hackington Road option which is narrow and width restricted for most of its length. There is also unavoidable roadside parking throughout the day in Tyler Hill village, leaving only half road passing down much of its length.

7.6 The Brooklands Farm site with its’ proposed 1300 dwellings, a 3FE primary school, a SEND school, and other buildings will be a day long major traffic generator to and from Canterbury as will much of the other proposed Whitstable area development. The draft Local Plan 2045 does not address in any substantive way how the Canterbury journeys will be properly and efficiently addressed and catered for.

7.7 Additionally, the proposed off-slip from the A299 onto South Street and hence onto the Chestfield Road would lead to extensive through traffic passing through the Chestfield conservation area village onto the overloaded onto the complex multi-roundabout system at the northern end of Chestfield Road leading to further overloading of it, particularly on summer weekends (when Long Reach roundabout queues can stretch back onto the A299) and weekday evenings.

7.8 The fact that residents along Chestfield Road have not been made aware of these issues as part of the formal consultation process surely contravenes clause 16 of the NPPF which states that “Plans should ….. be shaped by early, proportionate and effective engagement between plan-makers and communities”. We are unaware of any such engagement.

7.9 These Movement and Transportation issues have not been fully and openly addressed by CCC officials in the current draft Local Plan.

**8. Summary and conclusion**

8.1 Publicly declared policies and legislation are there to be fully and properly followed by local authorities, including CCC, not put aside and disregarded. The proposed Brooklands Farm development proposals are both ill-conceived, improperly analysed and cannot be properly justified.

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