



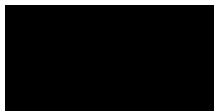
Consultation response - Draft Local Plan to 2045.

1 message

Rosalyn Bower-Smith [REDACTED]

16 January 2023 at 15:15

To: "consultations@canterbury.gov.uk" <consultations@canterbury.gov.uk>



Dear Sir

Re: Canterbury City Council Draft Local Plan.

Site W5 Land at Brooklands Farm.

I write to object to the proposed development at Brooklands Farm, Site W5, for the following reasons.

1. Loss of agricultural land

The NPPF states that local planning authorities should use areas of poorer quality land. This farmland is Grade 3a. To use this land would be counter to policy DS12 of the draft local plan.

Food security should be an absolute priority and therefore agriculture land should not be used for housing/commercial development or road building.

2. Landscape

Brooklands Farm is within an "area of high landscape value" (see page 10 of the 2017 Plan), with views across the valley and a footpath that crosses the site. There is little impact from the A299 because it is screened by trees and landscape. The development at Brooklands would fundamentally change the character of the landscape. The land at Brooklands also forms part of the gap that exists between South Street/South Tankerton and Chestfield. It is important that this gap be maintained and any development would effectively close the gap and mean that these urban areas coalesce.

3. Biodiversity.

The Canterbury Landscape Character and Biodiversity Appraisal designates the site as being within LCA 10 Chestfield Wooded farmland. This is an area of high biodiversity value with rare butterflies and breeding birds. As such its ecological, biodiversity and landscape value would be adversely impacted by a development of this scale. Limited consideration is given to these impacts within the evidence base. A public right of way runs along the northern edge of the W5 site. The view from this highway is a protectable

4. Development outside urban area

The land at Brooklands Farm is outside the settlement boundary of Whitstable and it has not been adequately demonstrated that its development is necessary to meet local needs.

4. Flood risk

Part of the site is within Flood Zone 3. There is a high probability of flooding which will be exacerbated by climate change. It is long established that the Swalecliffe Brook and its tributaries cause flooding in Chestfield and parts of Swalecliffe.

There is a great knowledge of the flooding caused to central Chestfield and even parts of Swalecliffe by the upper catchment of the Brook should indicate that any development of the main valley from the edge of Chestfield west to Dargate and/or beyond Foxes Cross Road. Local people would be reasonable in demanding proof, before the LP is sent to The Planning Inspectorate, that steps can be taken and afforded by the developer to prevent any increase in flood risk from downpours, e.g. from very extensive sustainable drainage / water storage provision or greater protection. Greater rainfall intensity is already causing historically novel issues in town, such as the flooding in Joy Lane from a line of downpours arriving from the sea.

5. Environment/sewage effluent.

In combination with other housing developments (including those already under construction), the planned housing would add to the sewage effluent pollution problem on the beach at Swalecliffe. Southern Water's sewage works appear to be unable to safely process Whitstable's sewage after heavy rainfall, particularly if 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 unclear, but it appears the replacement would be another "short" outfall but with 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

7. Traffic impacts.

The proposed off-slip from the A299 onto Chestfield Road would lead to extensive through traffic using Chestfield Road and South Street, particularly on summer weekends (when Long Reach roundabout queues can stretch back onto the A299) and weekday evenings. This through-traffic is likely to include heavy vehicles. The summer weekend traffic has not been modelled and the effects are unquantified.

8. Lack of consultation.

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.

Conclusions.

1. The proposed development at Brooklands will result in the loss of important agricultural land.
2. There will be a negative affect on the countryside from the encroaching housing, if the site allocation is adopted.
3. There will be negative affects on ecology, biodiversity and landscape.
4. The site allocation, if adopted, will create additional sewage effluent pollution at Swalecliffe beach.
5. I would support the recommendation made by Whitstable Society that the whole of the W5 site be defined as Green Gap.

Your faithfully

R M Bower-Smith