



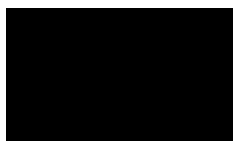
CCC Consultations <consultations@canterbury.gov.uk>

Objection to Site W5 Land at Brooklands Farm CCC Draft Local Plan

1 message

W J Croft [REDACTED]
To: consultations@canterbury.gov.uk

16 January 2023 at 14:26



16/01/2023

Dear Sir

Re: Canterbury City Council Draft Local Plan.

Site W5 Land at Brooklands Farm.

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

1. Loss of best and most versatile agricultural land

The National Planning Policy Framework requires that local planning authorities should 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 taken into account. The housing evidence base which supports the draft local plan does not address this requirement.

The land is currently farmed for cereal crops and is therefore likely that it is Grade 3a rather than 3b, Grade 3A is best and most versatile agricultural land and its development for housing would be contrary to policy EMP 12 of the current local plan and policy DS12 of the draft local plan.

Given that shortages of wheat and other cereal crops that have been highlighted by our dependence on imports from the war in Ukraine, surely agriculture land should be protected for the growing of crops rather than being concreted over /destroyed and used for development. We need our own food security in this country. Once lost our farmland and countryside is lost forever.

2. 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. The central south and western end of Whitstable has made substantial contributions in previous local plans in taking on new commuter residents working in Canterbury or in London without the appropriate investment needed in infrastructure of many and possibly all types. Sites W5, W6 and W7 may be being put forward to generate S106 contributions for new new slips on the New Thanet Way at Radfall designed to relieve pressure on the Old Thanet Way roundabout, in an echo of the strategy for funding the East By-pass for the City of Canterbury elsewhere in the Local Plan

3. Landscape Impact

The 2017 Canterbury Local Plan shows Brooklands Farm within an “area of high landscape value” (see page 10 of the 2017 Plan). The Canterbury Landscape Character and Bio diversity Appraisal dated as recently as October 2020 designates this site as being within LCA 10 Chestfield wooded farmland. It is in an area of high biodiversity value with rare butterflies and breeding birds and the Brook (of **Brooklands Farm**) and it’s banks are home to water voles, stickleback and newts as well as a plethora of other wildlife.

It provides a wide panoramic view of the valley of the Swalecliffe Brook with the forested Blean hills in the distance. Footpath CW27 crosses the site and is popular with local residents for rural dog-walking and simply enjoying the countryside and its wildlife. The A299 Thanet Way is not visible, being screened by trees and landscape.

A major part of the attractiveness of the view over the green valley of the Swalecliffe Brook is its rural tranquillity. As you walk along the footpath you can hear the water flowing in the Brook and the wind in the trees. It’s a wonderful place to unwind.

The development would totally change the nature of the valley and just being able to see the Blean over the rooftops wouldn’t be the same. Indeed, ironically, the green patches to be left by full approval for W5 to the south of the new Thanet Way are to be designated as Green Gap using the Green Gap policy of the draft LP.

Those considerations, along with landscape and biodiversity impacts in the short and long term, should be requiring all of the gap between the existing building line of Whitstable/Chestfield and the edge of Blean Woods and Radfall settlement be proposed as Green Gap and should not be included in the draft local plan as a strategic site for a development of estates.

It is noted that when the A299 was approved by ccc in the 1990’s an agreement was made by the council that the area between the old Thanet way and the new Thanet Way (A299) would not be allowed to be infilled with housing development . The 2020 appraisal furthermore notes :- Strong rural character pervades despite proximity to the urban area and route of the A299. A crisp well defined urban edge abuts well managed agricultural farmland providing a rural farmed setting to the adjacent coastal settlement. All of this would be lost by these proposals. Limited consideration is given to these impacts within the evidence base.

The ecological biodiversity and landscape value would be adversely impacted by a development on this site.

4. Flood risk

The evidence base states that the site is within Flood Zones 2 & 3. This is incorrect the site is within Flood Zone 3. There is therefore 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. Having grown up in a house overlooking this landscape I can confirm that the Fields turn into an extensive lake when the Brook overflows.

Greater rainfall intensity is already causing historically novel flooding issues in and around Whitstable.

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

6. 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. There will be increased traffic, air and noise pollution.

7. 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 which states that "Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities."

In Conclusion

1. The proposed development at Brooklands will result in the loss of best and most versatile and important agricultural land.
2. There will be a negative affect on the countryside from the encroaching suburbanising impact on the countryside. This car dependant urban sprawl would merge Whitstable into Chestfield which presently has its own distinct identity. This seems to contradict the government directive to protect the character of local communities. There will be increased traffic, noise and air pollution destroying the rural nature of this setting. This is covered in great detail by The Whitsable Society objection so I refer to them and support there reported findings.

3. The site allocation, if adopted, will create additional sewage effluent pollution at Swalecliffe beach.

4. I would support the recommendation made by Whitstable Society that the whole of the W5 site be defined as Green Gap.

5. There is a total lack of proposed (or existing) infrastructure to support the scheme , public transport, roads, sewage, and inadequate school provision & medical facilities, which others will have dealt with more knowledgeably and more fully than I have here.

6. Given the government current U turn on housing quotas and its directive to protect green spaces, actively look for brown fill sites and bring back into use unused housing stock this local plan seems to be now out of date in proposing a scheme which delivers far more units than are required for the predicted local population increase. The rural nature and agricultural value of Site W5 Brooklands Farm should be being preserved for our long term food security and it should be taken into account the long term danger/ impact of concreting over this green space (the green lungs of the area (and threat to it's bio diversity) given the huge impact that global warming & the climate emergency is having on our lives and land.

Yours faithfully,

Wendy J Croft

P.s. I strongly object to the draft local plan to Zone Canterbury and build a hugely expensive new ring road that local people don't want. The Zoning would destroy local communities and the ring road would increase traffic pollution, noise, air quality in rural areas and destroy swathes of the countryside. People don't want their movements restricted and monitored in this way . This plan seems to have been modelled on the Ghent model which has a completely different terrain (flat) and culture (of cycling) to Canterbury and also Oxford which is only a trial to be consulted on rather than a scheme which relies on a ring road being built first.

W J Croft

