

Consultations Team
Canterbury City Council
14 Rose Lane
Canterbury, CT1 2UR

12 October 2025

Subject: **Objection to Proposed Site Allocations in the Draft Local Plan (Focused Consultation 2025)**

Dear Consultations Team,

We are writing to formally object to the proposed site allocations in the current Draft Local Plan, specifically concerning The Plan's proposals for the Whitstable area. *we find the plan unacceptable due to its negative impact on the local environment, existing infrastructure, and the character of the community in Whitstable.* While we acknowledge the district's need for new housing, these specific proposals do not represent sustainable development and have not adequately addressed their impact on key issues (making the Plan unsound).

Our objections focus on the following sites and specific material considerations:

Site N20: Land East of Chestfield Road (opposite Brooklands)

- Proposed development: Approximately 150 new dwellings.
- Grounds for objection:
 - Highway safety and traffic congestion: The development of 150 houses will significantly increase vehicle movements on Chestfield Road and its junction with A2990 Thanet Way, which is already congested, particularly at peak times. There are significant concerns that the local road network cannot safely absorb this additional traffic. Also, in light of the proposed Brooklands development, this extra 150 houses would see Chestfield extended almost up to the Blean woods.
 - Character of the area: The proposal fails to respect the existing character of the surrounding area, with lower-density development in the Chestfield Conservation Area. The proposed density of new housing is out of keeping with the semi-rural feel of this location.
 - Noise pollution: Development on this site would expose new residents to noise from the nearby A299. The mitigation measures detailed in the plan appear to be inadequate.

Site N21: Land at Golden Hill (opposite Whitstable Heights)

- Proposed development: 70 houses and a Traveller site.
- Grounds for objection:
 - Impact on landscape: The development is visually prominent and would be *damaging* to the area's landscape character.
 - Sustainable access: While plans mention a principal access via a different site (W6), the reliance on Golden Hill as a secondary route for construction and residents adds to local road pressure.
 - Over-development: The cumulative effect of 70 additional dwellings and a new Traveller site on this site, following previous development proposals, represents an excessive impact that is unsustainable and out of character with the area.

Site N23 – Land southwest of Joseph Wilson Business Park

- Grounds for objection:
 - This site is in an Area of High Landscape Value. CCC wants to remove this status, but it has no *independent and properly evidenced* landscape assessment to support this. Policy N23 suggests providing landscaping so it cannot be seen from the surrounding countryside, however the JW Industrial Estate failed to provide any useful screening last time they extended into the countryside.

Site N24: Gypsy and Traveller pitch.

- Grounds for objection:
 - Insufficient Detail: The consultation document does not provide enough detail on these sites for the public to make a properly informed comment. The council must provide a transparent assessment of how these proposals impact the environment, infrastructure, and community.
 - Visual and landscape impact, because the site is on the top of a hill and can be seen from the countryside to the south.

Site W4: Brooklands Farm

Significant new information has been learned about this site following the recent planning application, emphasising the unsuitability of the site for any large development.

- Grounds for objection:
 - Highway safety. The construction of houses on this site would unacceptably increase traffic on A2990 Old Thanet Way and worsen existing highway safety problems around the Long Reach roundabout and further west along the A2990 to the A299. CCC think the answer is to build a new A299 junction at Chestfield Road, but the developer would need to build-up funding from selling houses on the site before it could finance the new junction, meanwhile the congestion and safety problems would become worse. The developer may never build this junction, leaving us with worse problems and no solution.
 - Highway safety. The proposed new A299 junction would turn Chestfield Road into a short-cut for any driver wanting to avoid the ever-increasing delays on the Old Thanet Way. In the evening peak

the route from the A299 at Yorkletts to Chestfield via the new junction would be almost twice as quick as driving through Long Reach roundabout. The extra traffic caused by the new junction would create highway safety problems in Chestfield and on the Radfall Hill route to Canterbury.

- Impact on wildlife and biodiversity: Surveys carried out for the planning application show that Brooklands Farm is home to protected species such as hazel dormice, bats and slow worms, as well as hundreds of other wildlife species some of which are rare. The proposed development could never provide an increase in Biodiversity.
- Flooding. No-one has provided convincing evidence that this development could be built without causing increased risk of flooding both on and off the site, especially under future scenarios of climate change.

Cumulative impact

Our overarching concern is that the plan considers these sites in isolation, failing to assess the cumulative effect of all these developments on Whitstable's services, character, and infrastructure.

- Infrastructure strain: Existing services such as schools, health facilities, and local roads already operate at or near capacity. The proposed total of over 2,100 new homes will place an unsustainable burden on these services.
- Environmental: The plan mentions the need to protect sensitive landscapes and key environmental assets. However, the continued development on greenfield sites and the pressure these place on resources like water supply is a significant concern.

In addition to the comments we have already made, we have the following comments about serious problems that have become apparent recently.

We further object to the proposed new site N20 Land East of Chestfield Road for the following reasons:

1. The impact of all the proposed Local Plan developments on the levels of traffic, pedestrian safety hazards and air quality on A2990 Thanet Way, A290 Clapham Hill and the Radfall Hill / Tyler Hill route to Canterbury (NB it appears CCC has not modelled these issues).
2. The single access to the proposed site onto Chestfield Road is in an area where the road is prone to flooding, so that in these situations there is a risk that access to / from the site may not be possible.
3. Adverse effect on the Chestfield Conservation Area, which currently benefits from a semi-rural environment.

We further object to the proposed new site N21 Land at Golden Hill for the following reasons:

1. The cumulative impact of all the proposed Local Plan developments on the levels of traffic, pedestrian safety hazards and air quality on A2990 Thanet Way and A290 Clapham Hill (NB it appears CCC has not modelled these issues).
2. The ever-growing levels of traffic and delays due to pedestrian crossings along the A2990 Thanet Way will lead to ever-increasing numbers of drivers choosing alternative routes parallel to the A2990 i.e. through unsuitable residential roads. These alternative routes include (a) through Tankerton or (b) Chestfield Road and the A299 if the Brooklands Farm plan is approved.

We further object to new site N23 Land South of Joseph Wilson Industrial Estate because it lies in the current Area of High Landscape Value, and because the Industrial Estate have failed to effectively screen their existing buildings from the Area of High Landscape Value.

Noting what we have learned from the recent planning application, **We object to site W4 Brooklands Farm** on grounds of the highway safety of:-

1. Chestfield Road, due to significantly raised levels of traffic and pedestrians trying to cross the road. (Note that the new A299 junction would enable drivers to use A299 and Chestfield Rd to bypass increased delays on A2990 Old Thanet Way, especially in peak periods).
2. Radfall Hill: substantially increased traffic levels (especially if the new A299 junction is built) would endanger pedestrians because this road has substandard pedestrian pavements and insufficient room to build better ones.
3. A299 Thanet Way near Yorkletts: increased risk of cars crashing into static queues extending back from A2990 junctions at Prospect Retail Park and A290.
4. A290 Clapham Hill: increased traffic levels would cause increased risk to pedestrians and cyclists trying to cross the A290 near Long Reach roundabout and nearby bus stops.
5. South Street: substantially increased traffic levels would endanger cyclists using on-road Crab & Winkle cycle route near junction with Millstrood Road.
6. Millstrood Road and South Street, due to potential conflicts between pedestrians and increased levels of traffic. For example, where pedestrians walk between Tesco's and the Thanet Way footbridge, and conflicts between pedestrians / cyclists using National Cycle Route 1 and increased flows of traffic on Millstrood Road.
7. Planned slip roads at the proposed A299 / Radfall Hill junction, due to conflicts between traffic using the slip roads at speed and pedestrians trying to cross them. The pedestrian routes here include public footpath CW28 (Chestfield to The Blean woods) and the Radfall Hill footway which links houses in Radfall to Chestfield. There is already a similar hazard at Clapham Hill, where the A299 slip roads have no pedestrian crossings, leading to difficulty for pedestrians using the A290 pedestrian pavement and difficulty for Whitstable residents trying to walk to the Wraik Hill nature reserve and viewpoint.

We also object to Policy W4 as the improved accessibility created by the new A299 junction would trigger opportunistic development along the A299 corridor and would be almost impossible to stop under the present planning regulations. The effects of such developments have not been assessed.

Noting what we have learned from the recent planning application, **we object to the plan to build houses and a secondary school at Bodkin Farm (site W6)** for the following **additional** reasons: -

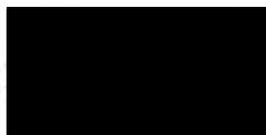
1. Highway Safety: the pedestrian pavement of Herne Bay Road under the railway bridge at Chestfield Station is too narrow to be used safely by large numbers of teenagers as well as other commuters and parents / children walking to and from Swalecliffe Primary School.
2. Other safety issues: the platform width at Chestfield Station is too narrow to be used by large numbers of teenagers waiting for (and alighting from) trains. This issue has already been raised by British Transport Police.
3. Green Gap. The site lies in the officially recognised Green Gap between Chestfield and Herne Bay and therefore should not be used for urban development. The only reason it was justified in the draft Plan was that it would provide a much-needed secondary school for the benefit of the community. However, having demonstrated above that it is unsuitable for the intended secondary school, the proposed development should be removed from the draft Local Plan. If this development goes ahead, it will serve as a precedent for other developments in the Green Gap, which will then cease to exist.

For these reasons, we formally ask the council to reconsider these allocations. The relevant sections of the Draft Local Plan are unsound. We request that these concerns are taken into consideration during the decision-making process.

Yours faithfully



Andrew Campbell



Patrica Campbell