

Land at Brooklands Farm, Whitstable

Focused Regulation 18 Consultation –
Representations

Contents

1. Executive Summary	3
2. Introduction	4
3. Spatial Strategy	6
4. Whitstable	7
5. Land at Brooklands Farm	8
6. Sustainability Appraisal	15
7. Responses to matters raised in the previous consultation	19
8. Summary	24

Appendices

Appendix 1: Brooklands Farm Accessibility Review

Appendix 2: Environmental Statement Non-Technical Summary

1. Executive Summary

- 1.1 Hallam Land Management (“HLM”) is promoting the Land at Brooklands Farm (“the Site”) (SLAA ref: SLAA104) which is allocated for a residential-led mixed use development at Policy W4 of the draft Local Plan. The Site was included as a draft allocation (Policy W4) in the previous draft Canterbury District Local Plan to 2040, which was consulted upon in 2024.
- 1.2 An outline planning application of the Site was submitted for the Site and validated on 2 May 2025 (ref. CA/25/00779). The description of development is as follows and the proposed development aligns with the emerging draft allocation policy:

“Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.”
- 1.3 The Focused Regulation 18 Consultation Plan has been prepared following the updated National Planning Policy Framework (“the Framework”) requirements in December 2024, including new standard method figure setting the local housing need for the district. The Plan also focuses on material changes to individual policies, including new draft site allocations, amendments to the current draft strategic site allocations, but the Plan does not fundamentally change the overall spatial strategy.
- 1.4 We are pleased to see that Land at Brooklands Farm (Policy W4) is not subject to any substantial changes, and would expect the Site to be included as an allocation within the Regulation 19 Plan to be consulted upon in Spring 2026 (according to the latest Local Development Scheme (June 2025)).
- 1.5 Therefore, regardless of the changes to the Plan, Land at Brooklands Farm remains a key strategic allocation and HLM supports the aim and focus on shifting the modal share towards sustainable travel throughout the district.
- 1.6 HLM support the Council’s development vision and delivery approach of delivering homes in line with the identified local need using the Government’s standard method, as well as transport infrastructure and economic growth.
- 1.7 HLM fully supports the Plan’s vision in focusing growth within South Whitstable and in particular the continued draft allocation of Brooklands Farm for a comprehensive mixed-use development (Policy W4). We agree that the Site can form a logical urban extension to the existing settlement and can make a significant contribution to meeting local housing and infrastructure needs.
- 1.8 These representations set out the ways in which Policy W4 can help to fulfil the Council’s Strategic Objectives through protecting existing assets and housing and infrastructure delivery; thus, securing significant benefits for existing and future residents of Whitstable and Canterbury City Council through the delivery of a highly sustainable development.
- 1.9 As no amendments to Policy W4 are identified in the Consultation Plan, HLM will not address the specific wording of the Policy, but HLM will also respond to the comments and representations raised in the previous consultations. HLM will continue to work with the Council and stakeholders to deliver a sustainable and well considered development.

2. Introduction

- 2.1 The representations have been prepared by Nexus Planning (ID: WR213), on behalf of Hallam Land Management (“HLM”), in response to the consultation on the Canterbury City Council draft District Local Plan 2040.
- 2.2 HLM is promoting the Land at Brooklands Farm (“the Site”) (SLAA ref: SLAA104), which measures 82.26ha and is located to the south of Whitstable and to the south-west of Chestfield and comprises draft Policy W4 in the consultation Plan (previously Policy W5 in the 2022/23 draft Canterbury District Local Plan to 2045 consultation Plan). The proposals at the Site will deliver a highly sustainable development on the edge of one of the most sustainable settlements in the District.
- 2.3 HLM submitted an outline planning application (ref. CA/25/00779) for the Site which was validated on 2 May 2025 in order to support the development of the draft allocation. The application is currently under consideration with responses from technical consultees and third parties being considered at the time of writing.
- 2.4 Whilst not a policy itself, the emerging Plan identifies land to the south of Whitstable as a Strategic Development Area (SDA), focusing on new sustainable communities, key infrastructure and environmental improvements. Together with Policies W4-W6, five additional sites have been allocated in this area (Policies N20-N24), covering a range of uses including residential, business and employment, and Gypsy and Traveller.
- 2.5 N20 is a new residential allocation for approximately 150 dwellings at Land to the east of Chestfield Road, which will complement the allocation at Land at Brooklands Farm (W4); proposals for N20 must be coordinated with and provide connections into W4, as well as making proportionate contributions to the infrastructure being delivered within Land at Brooklands Farm. Together, these allocations will form a logical extension to the south of Chestfield.
- 2.6 The SDA is required to deliver 33ha of publicly accessible open space (including allotments and play facilities); 4ha of publicly accessible sports facilities; approximately 1,870 new homes (30% affordable homes and 10% older persons housing); minimum of 4,000sqm of business floorspace; a new local centre; a six form (FE) secondary school; a two FE primary school; a SEND school; new connectivity; new road junctions to the A299 and highways improvements; park and bus facilities; and enhancement to biodiversity and habitat.
- 2.7 Draft Policy W4 continues to allocate the Site, which is being promoted by HLM, for a comprehensive mixed use development, to include:
 - a. Approximately 1400 new dwellings, including affordable, older persons, accessible and self-build housing;
 - b. A community hub to include a local centre, business space and mobility hub;
 - c. New two FE primary school;
 - d. SEND school;
 - e. Local shopping and community uses; and
 - f. On-site open space.
- 2.8 As can be seen from above, Land at Brooklands Farm provides a substantial proportion of the social and transport infrastructure, and the economic uses to support growth and therefore forms a key part of the South Whitstable SDA, integral to future growth at Whitstable and neighbouring coastal towns.

- 2.9 HLM supports the Plan’s continued draft allocation of the SDA, as outlined within Policy W4; as well as the development spatial strategy in so far as identifying Whitstable as the secondary focus for development in the District (SS3(3)) after Canterbury City itself, having regard to the important role the coastal settlements play in the District.
- 2.10 No further amendments have been identified in the Focused Regulation 18 Consultation Plan and as such HLM continues to support the draft allocation (Policy W4) and it is evident that the Council consider the Site to be a key and integral part of the emerging spatial strategy for growth in the District.

Approach to the Representations

- 2.11 The Framework states, at paragraph 36, the tests of soundness that Local Plan and Spatial Development Strategies are examined against, as follows, with the Consultation Plan being considered in the light of these tests:
- a. Positively prepared: providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b. Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. Effective: deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d. Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”
- 2.12 These representations respond to key parts of the Consultation, highlighting the specific policy, paragraph, or supporting evidence document being addressed. They are structured as follows:
- a. Section 3 addresses the Council’s spatial strategy, including housing needs and strategic objectives;
 - b. Section 4 addresses Policy W3 and Whitstable as a focus for growth;
 - c. Section 5 addresses Policy W4 the Land at Brooklands Farm allocation and Section 6 considers the Sustainability Appraisal;
 - d. Section 8 addresses responses received in the previous consultation.
- 2.13 This submission concludes at Section 9 that HLM supports the allocation of Policy W4 in the draft Local Plan and would welcome further discussions with the Council to discuss the final details of the allocation prior to the publication of the Regulation 19 pre-submission Plan.

3. Spatial Strategy

Housing Needs

- 3.1 As set out in the Development Topic Paper (2025), the Council identify a local housing need (“LHN”) of 1,215 dwellings per annum (dpa) for Canterbury over the 2024/25-2042/43 plan period (increased from 1,149 dpa from the previous Regulation 18 draft Local Plan (2024)). This is a figure based upon the Government’s Standard Method, which is a minimum housing figure, and we are therefore satisfied this is correct at this present point in time. The increase is primarily as a result of the standard methodology now being based on dwelling stock data and a 5-year averaged affordability ratio.
- 3.2 The LHN will however need to be kept under review as the emerging local plan progresses to ensure it is based upon the latest available data. The Planning Practice Guidance then notes that the standard method figure can be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination in public (ID: 2a-008-20190220). We support the Council’s housing delivery approach, alongside the economic growth and additional investment in local transport infrastructure, which aligns with national policy and guidance.
- 3.3 The Council have a record of failing the Housing Delivery Test with recent scores of 67% in 2023, 75% in 2022, 65% in 2021, and 87% in 2020 and 2019, demonstrating not enough new homes are being delivered in the district. The Council is now without an up to date local plan which is a similar position for several other Kent councils.
- 3.4 In order for plans to be positively prepared, and therefore ‘sound’, the Framework requires unmet need from neighbouring areas to be accommodated where practical and consistent with achieving sustainable development (para 36a). The Council’s Duty to Cooperate Compliance Statement 2024, as was the case in the same titled 2022 Statement, indicates that each authority is working towards their own Strategic Housing Market Assessment, their own individual housing targets and to provide in full within their own administrative area. Whilst Statements of Common Ground have been agreed between the district and other local Councils, the Compliance Statement has not been updated at this stage, and therefore we assume the strategy has remained the same. Such matters will need to be kept under review.

Local Plan Period

- 3.5 The amendment to the proposed plan period, now covering 2024/25 to 2042/43, is noted. This revision ensures alignment with the Framework’s requirement (paragraph 22) that plans must span at least 15 years from adoption, as the revised period covers 19 years.

4. Whitstable

Policy W3 – Whitstable Urban Area

- 4.1 Policy W3 sets out the overarching Policy position for the Whitstable urban area. HLM support the general need to make effective use of brownfield land in sustainable locations.
- 4.2 Part 9 of the Policy stipulates – sports and leisure facilities, including those provided alongside education provision, will be protected and enhanced. New sports facilities at the Brooklands Farm (Policy W4) strategic site will be co-located, where appropriate, to create an accessible sports hub which will be sustainably designed to combat climate change and provide social benefits.
- 4.3 HLM accept this in principle, however, as raised in the previous representations, consider that there would be logic in locating the sports facility within a reasonable proximity that would complement the existing Chestfield Cricket Club sports facility to the north-eastern part of the Site, which is an existing and well-ran Club and is well supported by the local community. Centrally and collectively locating the new sports facilities in the scheme with links to the existing facilities would improve the sports facilities in this location, catering for and being in an accessible location for existing residents and offers the most holistic approach to sports provision.

Policies N20-N24 – Whitstable Area New Allocations

- 4.4 The Focused Regulation 18 Consultation Plan includes five new allocations in the Whitstable Area:
- N20 Land east of Chestfield Road (residential)
 - N21 Land at Golden Hill (residential and (Gypsy and Traveller)
 - N22 Land at Beresford Road (residential)
 - N23 Land to the southwest of Joseph Wilson Business Park (business and employment)
 - N24 Land Lying to the West of Golden Hill (Gypsy and Traveller)
- 4.5 It is noted that allocation N20 will complement Brooklands Farm (Policy W4), forms a logical extension to the southern edge of Chestfield and would benefit from the facilities and linkages within Brooklands Farm. However, It is important that N20 is designed in coordination with Policy W4, ensuring a coherent layout and design, but given Policy N20 is reliant on facilities within Brooklands Farm to make it sustainable, sequentially, Policy N20 can only be delivered once the delivery of significant components of Brooklands Farm, such as the slip road, local centre and primary school, has been implemented. Table G.1 of the Topic Paper (August 2025) indicates the delivery of Policy N20 from 2031/32-2034/35, however for the aforementioned reasons, HLM considers it should come forwards towards the latter end of the Plan period, to align with the relevant delivery of land at Brooklands Farm.
- 4.6 Furthermore, N20 should make proportionate contributions to the infrastructure being delivered through W4, including education and the east-facing slip-road junctions on the A299. HLM would be happy to engage with the promoter of Policy N20.

5. Land at Brooklands Farm

Policy W4 - Land at Brooklands Farm

- 5.1 Brooklands Farm is located on the edge of Whitstable, one of the most sustainable settlements in the District (Canterbury, Whitstable and Herne Bay). The allocation of the Site can provide significant economic, social and environmental benefits to the area, including a spectrum of housing to create a balanced and sustainable community; infrastructure delivery including new schools, employment land, community facilities, transport connections / improvements and highways slips; new public open space; and green and blue infrastructure.
- 5.2 This is demonstrated through the submitted outline planning application, which addresses the emerging policy.
- 5.3 HLM fully support the strategy in that the south of Whitstable can support the strategic growth to meet the identified needs.
- 5.4 As set out above, the Council recognise the importance of promoting and progressing its coastal towns, and the EDTS identifies the significant potential Whitstable has to unlock and stimulate economic growth. Development and housing allocation can therefore make significant steps towards facilitating economic growth.
- 5.5 Furthermore, Whitstable's growth has been meaningfully reduced in recent times, compared to Canterbury and Herne Bay. This is due to the low levels of planned growth in the settlement within previous Local Plans. As a result, the demographic structure of Whitstable is becoming increasingly older and socio-demographic issues increase. Therefore, the draft Local Plan has an opportunity to rebalance this trend and to maintain the settlement's status as an urban area within the hierarchy.
- 5.6 Given the above, it is demonstrable that in order to achieve a balanced approach to growth that secures a range of economic, social and environmental benefits across the District, significant additional allocations will need to be made at Whitstable as part of any Plan.
- 5.7 Furthermore, urban extensions on greenfield sites are required at Whitstable that have the capacity to accommodate meaningful growth, green infrastructure and importantly a range of services and facilities on site. These sites would also provide greater opportunities to accommodate the specific housing needs of Whitstable, noting that brownfield sites are likely to be more suitable for higher density development and therefore smaller 1 and 2 bedroom units.
- 5.8 Taking this into account, the land being promoted by HLM at Brooklands Farm, Whitstable represents a wholly logical urban extension to the settlement that could accommodate approximately 1,350 dwellings, including a significant proportion of 3 and 4 bedroom family homes, substantial green infrastructure, a 2FE primary school, SEND and local centres that include community facilities.
- 5.9 We therefore wholly support Policy W4 in general through the allocation for a comprehensive mixed use development. HLM's representations to the 2024 Regulation Plan makes key observations on the draft policy and we do not repeat those points below. We do however make the following key observations, which we would welcome the opportunity to discuss with officers in due course prior to the publication of the pre-submission version of the Local Plan.
- 5.10 The Council's Housing Trajectory, as set out in the Development Topic Paper (2024) indicated the anticipated first year of completions for the development would be in 2030/31, with delivery phased over an 11-year period (Table G.1: Strategic and Housing Allocations). In the Focused Regulation 18 Topic Paper (2025) the trajectory has pushed first deliveries back to 2031/32. However, for the reasons set out below we do not consider this to be necessary.

- 5.11 HLM submitted an outline planning application in May 2025 (Validated 2 May 2025), in order to support the Plan through Examination and demonstrate the developability of Brooklands Farm (Policy W4). As such, the following trajectory is anticipated:
- a. Submission of Outline planning application, Validated - 2 May 2025;
 - b. Determination of Outline planning application – early-mid 2026 on publication of the Regulation 19 Local Plan or submission of the Local Plan for examination;
 - c. Submission of the first Reserved Matters Application and discharge of pre-commencement conditions – early-mid 2027;
 - d. Preliminary works on Site – late 2027;
 - e. First housing completions – late 2028.
- 5.12 As set out above and in the submitted Planning Statement at section 4.21, we consider the Site to be capable of delivering housing in 2028, thereby contributing positively to the Council’s five-year housing land supply.

1. Development Mix

1(b) – Non-residential development

- 5.13 Parts 1(b)(i) and (iv) of Policy W4 set out the requirements for the community uses / local centre facilities across the Site, with a community hub on the western part of the Site as a focal area for the community, to contain – a local centre comprising commercial (understood to be for smaller operators that you would typically find on a high-street, such as a hairdressers, vets, café, etc.), shopping and community uses, business space and mobility hub; and the eastern side to provide local shopping and community uses to meet local needs.
- 5.14 HLM fully supports the requirement to provide community facilities and local centres to ensure a sustainable development with high quality facilities in close proximity to their homes and in order to establish placemaking and a strong sense of place for the future residents. However, these must be located appropriately to maximise their associated benefits, avoid competition and ensure functionality and vitality for its lifetime.
- 5.15 However, as mentioned in our previous representations, the policy is considered to be overly prescriptive regarding the location and type of development within the hubs and the quantum in each. At the current time the masterplan provided within the policy is indicative, whereas the policy is rather rigid. HLM consider the policy should be amended to allow flexibility and choice.
- 5.16 The submitted application sets out how the Proposed Development has been subject to extensive pre-application discussions and a Design Review Panel (DRP), which has confirmed the suitability of a single local centre in order to ensure long-term vitality. The Proposed Development, therefore, includes the provision of a single new community hub within the western part of the Site, containing a mobility hub, commercial and community space, alongside flexible business / employment space. Additionally, 3000sqm (footprint) of business space is proposed to the southeast of the Site within a standalone employment area. The overall quantum of non-residential commercial floorspace remains consistent with the requirements of Policy W4.
- 5.17 Part 1 (b)(ii) of the Policy W4, requires the provision of an on-site two FE primary school, which would be 3ha in size. We understand from discussions with Officers that the size requirement in Policy W4 is incorrect and will be

corrected to 2.05ha, which we support. As such, the submitted planning application demonstrates that the Proposed Development will provide a new 2FE primary school and a SEND school, both 2.05ha in size.

1(c) – Open Space

5.18 Part 1 (c) of the Policy requires the delivery of open space, and the outdoor sports provision should include a new cricket pitch and facilities for Chestfield Cricket Club. The application has been prepared in collaboration with the Council and local community and demonstrates that the Proposed Development will provide the following:

- One full-size cricket pitch with six wickets – complementing Chestfield Cricket Club.
- One senior football pitch and one 9v9 football pitch for youth and adult play.
- Two mini soccer 7v7 pitches and three mini soccer 5v5 pitches supporting grassroots football.
- Two tennis/netball courts - providing flexible multi-use game spaces.
- Four boules courts - catering to a wide range of users.
- One pickleball court - supporting this growing sport within the community.

3. Landscape and Green Infrastructure

3(b) – Provide 20% biodiversity net gain

5.19 Policy W4, alongside Policy SS1 (Environmental strategy for the district) (5) requires development across the District to incorporate measures to deliver a minimum 20% biodiversity net gain, which shall be in line with Policy DS21 (Supporting biodiversity recovery).

5.20 HLM understand that this is a political aspiration of the Authority, and we support the principle and sentiment of Policy W4, SS1 and DS21 seeking to improve biodiversity improvements in developments and creating sustainable and more efficient places is acknowledged. As such, the application demonstrates that the Proposed Development will provide at least a 20% BNG, which complies with Policy W4 and exceeds the requirements set out in the Environment Act.

3(c) – Golden Plover

5.21 Policy W4 requires the green and blue infrastructure strategy to assess the site’s potential to be functionally linked land for golden plover, in line with Policy DS17, which includes provisions to determine whether there is the potential for a site to be functionally linked land with an SPA, SAC and/or RAMSAR and assess the potential value of the site.

5.22 The Shadow Habitat Regulations Assessment that accompanies the application demonstrates that the requirement to assess the Site’s potential for golden plover has been undertaken and the development of the Site would have a negligible impact. Therefore, the policy wording is now superfluous, and it is recommended that the Part 3(c) is omitted accordingly, but HLM can provide further clarity as requested by the Council.

3(i) – Incorporation of the existing structure of the landscape into the masterplan – including hedgerows

5.23 The Policy requires existing hedgerows to be incorporated into the masterplan proposals to enhance the historic field pattern and strengthen habitat connectivity, and to use the native hedgerow planting for boundary treatment to soften impact of development.

5.24 The application demonstrates that the Proposed Development would include:

- The introduction of additional hedgerow trees into the existing hedgerow bordering the south of the proposed allotments.
- The infilling and strengthening of existing boundary hedgerows bordering South Street, Chestfield Road and Rayham Road with additional hedgerow trees.
- The introduction of additional hedgerow trees into the hedgerow to be retained north of the A299 road embankment.
- The reinstatement and further strengthening of affected tree, scrub and hedgerow vegetation on the embankment to the north of the A299.

5.25 The application demonstrates the retention and enhancement of hedgerows where possible. The Framework allows for compensation and a net gain in hedgerow units will be required in all respects. As such, HLM request that flexibility is incorporated into the Policy to include “where possible”.

3(m) – Conserve or enhance the PRow network

5.26 The Policy requires the existing PRow network across the Site to be conserved or enhanced to ensure key views are protected. It is inevitable and unavoidable that through the development of the Site, there will be changes to views across the Site, as a result of the built development proposed. A Landscape and Visual Impact Assessment has been completed as part of the planning application process to identify the key views and the extent to which they will be impacted and mitigated through the design.

5.27 The planning application demonstrates the PRow network has been enhanced to both support active travel but also enhance viewing corridors, Furthermore, the application demonstrates how the Proposed Development will deliver walking routes between the new 2FE primary school and SEND School to the Whitstable Secondary School through the creation and enhancement of new and existing PRow.

4. Access and Transportation

4a(i) Walking and cycling upgrades to CW21 and CW38; 4a(iii) Walking and cycling connections to Site 12 in Policy CF1; and 4a(v) Walking and cycling connections to Herne Bay via A2990 Thanet Way and downgrading Molehill Road to a green lane

5.28 Parts 4a(i), 4a(iii) and 4a(v) all require upgrades to walking and cycle connections to the CW21 and CW38, Site 12 in Policy CF1 and to Herne Bay respectively. These policy requirements are very broad in description at this stage, without detailed justification. HLM would welcome the opportunity to work with the Council to scope out the nature of any upgrades and what is appropriate having regard to relevant tests. Given the likely on-going nature of such discussions, the policy could refer to upgrades as detailed in separate documents, such as the Council’s IDP.

5.29 Nevertheless, the planning application demonstrates how the Proposed Development will:

- Enhance walking and cycling connections to Chestfield and Crab and Crinkle Way through improvements to the CW21 which continues through the Site. Improvements to PRoW could be achieved but are not proposed to be upgraded as it crosses third party land.
- Deliver a cycle crossing at the junction between Millstrood Road and Thanet Way to improvement connections between the Site and Site 12.

4(a)(ii) New and improved cycle connection to Whitstable via the Crab and Winkle Way

5.30 HLM fully support the requirements to deliver appropriate enhancements to cycle and pedestrian improvement networks noting the potential associated benefits for existing and future residents. HLM will be delivering improvements to the Crab and Winkle Way and other walking and cycling routes in Whitstable. This will provide a direct route from the Site to Whitstable Train Station and other connecting routes to the high street and the seafront. Enhancements to the route, as a whole, would be more beneficial than the delivery of a new bridge to Harbour Street, as envisaged by the Policy, which will only save circa 1 minute in travel time.

5.31 HLM have identified potential active travel improvements at the following locations:

- a. Millstrood / South Street – dropped kerb and tactile paving
- b. Junction at Millstrood / Bellevue – removal of guard rails and dropped kerb
- c. Virginia Road / South Street - dropped kerb
- d. Ham Shades Lane – dropped kerb and tactile paving
- e. Church Street – dropped kerb and tactile paving
- f. Clover Rise / Grasmere Road – dropped kerb
- g. Richmond Road – dropped kerb and tactile paving
- h. Ridgeway PRoW – CIL funded upgrade
- i. 143 Chestfield Road – dropped kerb and tactile paving
- j. Radfall Recreational Ground – dropped kerb and tactile paving
- k. Chestfield / Molehill – dropped kerb and tactile paving
- l. Chestfield Barn – dropped kerb and tactile paving
- m. 66 Chestfield Road – dropped kerb and tactile paving
- n. Chestfield and Swalecliffe Station – new station cycle parking bays

5.32 However, HLM do not consider it is necessary to provide improvements in locations further away from the Site, where there is no robust justification. Specifically in reference to the pedestrian and cycle bridge from Old Bridge Road to Teynham Road and then off road to the harbour. The Infrastructure Delivery Plan indicates an estimated cost of £3.5m (Council’s estimate) to complete the Crab and Winkle Way that is linked to Policy W4.

- 5.33 Brookbanks, on behalf of HLM, has reviewed the requirements for the Bridge (Appendix 1) and do not consider it to provide any material benefits, as there are alternative railway crossing points in close proximity that provide a similar travel time (approximate 1-minute longer) to the harbour to that which would be provided through the erection of the Bridge.
- 5.34 Furthermore, any residents from the development making cycling and walking trips along the Crab and Winkle Way will have reached destinations (such as the secondary school, Whitstable rail station and places of work) prior to reaching and needing to travel over the railway line, with few users needing to make trips to the town centre or to the harbour for their every day to day needs. As such, any travels beyond the railway line would likely be for leisure and infrequent, which is not considered to be proportionate to justify a new bridge or new off-road cycle routes.
- 5.35 As such, HLM do not consider the new pedestrian and cycle bridge is required to make the development of Brooklands Farm acceptable.

5. Phasing and delivery

5a – New access from the A299

- 5.36 HLM support the principle of delivering new access from the A299.
- 5.37 However, the Council's estimates show that the cost of the slip roads would be in the region of £20 million, a significant contribution for any scheme.
- 5.38 HLM understand that the slip roads are expected to be funded through proportionate contributions made from other developments in the local area, including Policy W5 (Land south of Thanet Way – see Part 4(e)). However, the planning application for Policy W5 (Land South of Old Thanet Way (ref. CA/23/00379)) has been granted permission and does not include a contribution. As such, it does not appear that other developments providing these contributions and HLM is concerned that the funding will rest solely in their hands.
- 5.39 HLM do however note that five new site allocations are proposed within the area, including allocation N20, which are expected to complement the Brooklands Farm allocation. Given their proximity and potential reliance on improved access infrastructure, HLM consider it reasonable that these allocations should also be required to make proportionate financial contributions toward the delivery of the slip roads. HLM would welcome the opportunity to discuss the Council's approach to any wider funding streams.

5(b) - The local centre to be delivered prior to occupation of 25% of the total dwellings. The eastern local centre shall be provided prior to the occupation of 80% of the total dwellings.

- 5.40 Notwithstanding the comments earlier regarding the requirements of the western and eastern community / local centre facilities, the allocation concept masterplan envisages two community hubs that are likely to be delivered in two separate phases. As has been demonstrated through various pre-application meetings, the Design Review Panel and the planning application, there is only one local centre proposed to be delivered. HLM is open to early delivery of the infrastructure, however, the policy must be worded with flexibility to ensure provision of the local centre is viable through sufficient footfall and attractive to end users, and not too early in the development.

5(d) – The primary school site and the SEND school site must be transferred prior to the occupation of 100 dwellings

- 5.41 HLM's previous representations identified there is capacity in the existing primary schools in the area and this is supported by the recent planning application at Land South of Old Thanet Way (ref. CA/23/00379), with the KCC Development Contributions consultation response confirming there is currently sufficient capacity in the Primary School Planning Group to accommodate the development.
- 5.42 As such, providing the schools at an early stage is not considered to be necessary at this stage but plainly this is not something that remains static. HLM therefore consider it would be beneficial to include flexibility, with a tailpiece stating the land should be transferred prior to the occupation of 100 dwellings or "*...other alternative trigger agreed with the Local Planning Authority*" to ensure an appropriate trigger can be agreed at the application stage.
- 5.43 HLM note that in Table 7.2 of the Focused Consultation Topic Paper, the Council considers the Brooklands Farm scheme to be deliverable, which HLM supports. However, the Council anticipates the first completions to occur in 2031/32. Based on HLM's delivery trajectory outlined in above, it is evident that the development could deliver first completions earlier, with Q2 2028 representing a more realistic and achievable timeframe.
- 5.44 In light of this accelerated trajectory, it is important that infrastructure trigger, such as the timing of land transfer for the primary and SEND schools, are aligned with the actual phasing of development, as well as road construction and service provision. HLM is actively working with officers through the planning application process to establish appropriate infrastructure phasing. These triggers should reflect both the technical work undertaken and the evolving delivery programme, ensuring that obligations are proportionate and responsive to the pace of development.

6. Sustainability Appraisal

- 6.1 Appendix G Site Assessment Appendix C Site scoring matrix (August 2025) setting out the latest assessment. The Sustainability Appraisal has not changed the scoring for Land at Brooklands Farm from the 2024 version (Appendix C of the Development Topic Paper (2024) – Summary of SLAA and SA Outcomes), other than reducing the impact on SAO 4: Geology and minerals from significant negative effect to neutral, which is discussed below.
- 6.2 Appendix B of the SA Report for the Focused Consultation (August 2025) sets out the consultation response summary, including responses from the Council on HLM’s revised scoring set out in the previous Regulation 18 Consultation representations.
- 6.3 Our response to the SA’s conclusions is discussed in more detail below and reference is made to the Environmental Statement submitted with the planning application. The non-technical summary of the Environment Statement can be found at Appendix 2.

SAO 3: Biodiversity

- 6.4 We maintain our position from the previous representations and do not believe that the Site should be considered as having significant negative effects in regard to biodiversity for the reasons set out and as demonstrated in the Environmental Impact Assessment submitted with the planning application.
- 6.5 The Environmental Statement identifies only a significant effect at a local scale to dormice and great crested newts, with only short-term minor adverse effects on birds and bats during the construction phase. In accordance with the Council’s SA scoring system, significant negative effects are identified for two species at the local level only. However, with the long-term ecological improvements to be delivered, through new habitats and conservation measures, the impacts will overall be positive for local biodiversity.

SAO 4: Geology

- 6.6 Part of the Site is within a Mineral Safeguarding Area: Brickearth. The SA has revised the score from significant negative effects to neutral. HLM support this conclusion given the recognised minerals on Site are solely along and beneath the Swalecliffe Brook, Ancient Woodland and Local Wildlife Site, which makes it unviable to obtain.

SAO 5: Landscape

- 6.7 The Council’s Appendix G Site Assessment document sets out that *“Comments noted. Due to the size of the site, character of the area and existing views, development would have a significant adverse impact on the surrounding open countryside. The SA of the SLAA does not mark based on how the site compares to other sites. It is a factual assessment of the Site without considering other sites or mitigation measures”*.
- 6.8 This response replicates the comments from the Council as published in the 2024 Appendix G of the SA (Appraisal of Site Allocations and Alternatives).
- 6.9 HLM can confirm that a full landscape visual impact assessment has been produced and submitted with the planning application, which has fed into Environmental Statement, as well as the evolving scheme to ensure landscape led approach to ensure an integrated and attractive environment is delivered through mitigation. However, the assessment does conclude that significant adverse effects would arise throughout the construction and operation phases of the development.

6.10 As such, HLM accept the Council's scoring regarding SAO 5: Landscape.

SAO 6: Water

6.11 The Council comment that *"The SA of SLAA does not take into account mitigation, such as SuDS. As per the SA matrix, by using detailed river network mapping the site is identified to be within 10m of a water body, as there is a water course running through the site. Therefore a score of significant negative effects is still considered appropriate"*.

6.12 We maintain our position from the previous representations and do not believe that the Site should be considered as having significant negative effects in regard to water or flood zones. A Flood Risk Assessment and Drainage Strategy is appended to the Hydrology and Flood Risk Chapter of the Environmental Statement, and it is concluded that the proposed development would result in a minor adverse or positive effect on water quality, which does not meet the threshold of a significant negative effect. On this basis, the score should be updated to at worst a minor negative effect.

SAO 7: Flood Zone

6.13 We maintain our position from the previous representations and do not believe that the Site should be considered as having significant negative effects in regard to flood zone. It is agreed that the Site does contain some small areas of Flood Zones 2 and 3 along the Swalecliffe Brook. However, the Flood Risk Assessment and Drainage Strategy which is appended to the Hydrology and Flood Risk Chapter of the Environmental Statement, concludes that the proposed development would result in a minor adverse or positive effect on off-site flooding and flood resilience, which does not meet the threshold of a significant negative effect. On this basis, the score should be updated to at worst a minor negative effect.

6.14 The area at risk of flooding is limited and the development has been located outside of this to ensure residents are safe from the flood risk areas and in respect of good design. These areas have been retained as public open space and mitigation and SuDS will also be delivered to make improvements both on and off-site.

SAO9: Heritage

6.15 In regard to heritage, the Council's response to HLM's previous representations state

"Comments noted. The SA of SLAA does not take into account the layout or design of a site or mitigation. As agreed the site is adjacent to several Grade 2 Listed Buildings (Brooklands Cottage/Brooklands Farmhouse, Barn to north east of Rayham Farm, and Rayham Farm). Therefore, development could have an adverse impact on the assets and / or their setting. The site is also adjacent to Chestfield, and in close proximity to Canterbury and Whitstable Railway and Whitstable Station Conservation Areas. As set out in the SA matrix any site which could have an adverse effect on a nationally designated heritage asset (such as a Listed Building) is scored as having significant negative effect against SA Objective 9 Historic Environment sub-objective Heritage. Therefore it is still considered appropriate to score SLAA104 as having significant negative effects on SA Objective 9: Historic Environment."

6.16 As there is no alternative threshold for heritage assets, the assessment criteria is overzealous in this context, but HLM accept the scoring on the basis of the methodology.

6.17 However, Chapter 12 of the Environmental Statement and accompanying appendices sets out the Heritage and Archaeology impacts of the proposed development on Site. This concludes that the impacts of the proposed development through construction and operational phases, even without mitigation, would not have a significant

effect in EIA terms. Although without mitigation strategies in place, the proposed development would have a significant effect on archaeology during the construction phase.

- 6.18 HLM however consider that the masterplan demonstrates any issues regarding impacts on heritage assets can be addressed through offsets and an archaeological programme of works through trial trenching evaluation can be delivered to ensure the operational phase.

SAO 13: Transport

- 6.19 The Council's response states *"SLAA104 is a large-scale development (circa 79.13ha) and the potential for new residents to be car dependent, so even with the provision of A299 slips there will be significant negative effects on the highways network. Therefore, the current score is still considered appropriate. However, the delivery of the A299 slips and their wider benefits are recognised in the reasons for selection of the site as a draft allocation."*
- 6.20 The planning application includes a detailed Transport Assessment and Chapter 8 of the Environmental Statement (Transport, Accessibility and Movement) concludes that during the construction and operational phase of the development the highways and transportation effects would likely be negligible.
- 6.21 As a result, HLM consider the Site should be considered as having minor negative effects in regard to transport.

SAO14: Sustainable communities

- 6.22 The Council's commentary on HLM's representations, states:

"The SA of SLAA reflects pre-mitigation scoring, so policy requirements in relation to school provision is not taken into account. Therefore the inclusion of a Primary and SEND school on site, to provide facilities to meet the District need, were not considered within the SA of the SLAA."

Access to education is based on the distance to existing education facilities, so the minor positive effects identified follows the SA matrix.

The mixed score given reflects the potential conflict of the site with neighbouring uses (A299) which clearly follows the methodology in the SA matrix. Mitigation would be required to some extent and as mentioned the SA of SLAA reflects pre-mitigation scoring only.

Irrespective of these points, the overall scoring for SA objective 14 is significantly positive with minor negative effects. Therefore, even if access to education was changed to significant positive effects, which would be contrary to the purpose of the SA of SLAA, it would not change the overall score. As set out in the methodology positive effects in one sub category, cannot cancel negative effects in another sub category within an SA objective. Therefore, no changes are proposed."

- 6.23 In this case, the mixed score has been given in the SA due to the potential conflict with neighbouring uses, in this case the A299. The Council consider mitigation is required to some extent and no mitigation is taken into consideration in the methodology. The A299 abuts the southern part of the Site and it is acknowledged there could be effects, such as noise, that requires mitigation. Noise monitoring has been carried out to inform the planning application and Chapter 10 of the Environmental Statement (Noise and Vibration) confirms that good design and ventilation can mitigate the impact and formal noise screening would benefit houses in close proximity to the A299 required. Overall, noise levels will achieve relevant British Standards following mitigation.

6.24 The Council state that even if access to education was changed to significant positive, it would not change the negative effects in another sub-category, and whilst it is not an uncommon relationship between development and a road, on the basis that there is a neighbouring use in close proximity to the Site, the Site has a mixed score.

Summary

6.25 In light of this revised scoring as a result of technical work for the planning application and Environmental Impact Assessment, as well as the Council's updated scoring for geology, HLM request the Council review these matters and align the scoring with HLM's assessment. In this scenario the Site would score better, reinforcing its appropriateness as an allocation in the draft Local Plan.

6.26 HLM acknowledge that mitigation cannot be considered through the scoring, however, as demonstrated above, with mitigation, the impacts of each SA objective will be significantly reduced.

7. Responses to matters raised in the previous consultation

7.1 Under Section 2 of the Focused Regulation 18 Topic Paper (Consultation on the Regulation 18 draft Local Plan (March 2024)), the Council confirm that the Canterbury District Local Plan to 2040: Consultation summary report (September 2024) sets out responses received to the Regulation 18 draft Local Plan consultation (2024) and all representations have been taken into account, with any comments made during the 2024 consultation in relation to elements not included in the Focused Regulation 18 Local Plan (2025) will be carried forward as part of the production of the Regulation 19 draft Local Plan.

7.2 The appendices to the Consultation summary report, which set out individual responses, are not currently part of the Council's evidence base, however the report does state the following:

“For Policy W4 – Land at Brooklands Farm, the most significant concerns related to increased traffic and transport infrastructure, sewerage issues, healthcare provision, and impacts on the environment and biodiversity. There were also substantial concerns about flooding risks and the preservation of green space and farmland. Many highlighted the area's overpopulation due to numerous other recent developments, stressing the need to maintain water supplies and reduce pressure on schools. Additional concerns included pollution, negative effects on residents' health and well-being, and inadequacies in local infrastructure and facilities. There was also opposition to the proposal without specified reasons and a view that the scale of development is too large. Comments further noted that the housing would not be affordable or targeted towards local people, and the development would negatively impact the local area's character and potentially increase crime.”

7.3 In this section of the representations, we respond directly to these points, to address any concerns raised by local residents, interest groups or organisations, as set out in the summary above.

Loss of agricultural land

7.4 This raises issues regarding the purported loss of agricultural land.

7.5 In terms of Agricultural Land Classification, the planning application submission documents confirms the Site forms predominantly Grade 3b, with a small area of Grade 4 land located on the north-east boundary. The Site is therefore not considered under Best and Most Versatile Land under national planning policy.

7.6 The Council has identified a clear and significant housing need in the district, with evidence showing that there is insufficient land in built up areas to accommodate the needs. Therefore, it is inevitable that greenfield, including agricultural, land will be required to meet those needs in full and in an efficient and effective way. The loss of agricultural land is of course only one consideration when determining whether a site can deliver sustainable development. Having regard to other designations and constraints across the local authority area, the Council has rightly confirmed that Brooklands Farm is one of the most suitable sites for development, a position HLM fully agree with.

Impact on biodiversity and the environment

7.7 Whilst specific comments have not been identified, the proposed development provides opportunities for a substantial amount of green infrastructure and landscaping, with amenity and recreational open space delivered on Site to limit visits to the Blean Woodland Complex. The plans submitted with the planning application demonstrates the green infrastructure strategy, which includes provision of parks and open space, sports pitches, and a circular walking route.

- 7.8 The application for the proposed development demonstrates that all existing landscape features, such as hedgerows, trees, woodland and watercourses will be retained, protected and enhanced, with new broadleaved woodland, trees, hedgerows, growing spaces, areas of parkland, conservation grassland, swales and wetland habitats introduced. As such, the new public open spaces will deliver a variety of habitat areas that protect existing and enhance site wide habitats, biodiversity and wildlife connectivity.
- 7.9 Protected species and habitats on the Site will therefore be enhanced and protected, and a Biodiversity Net Gain of over 20% will be achieved, exceeding the relevant policies.

Drainage and flooding

- 7.10 It is understood that local residents have raised concerns with regard to flooding, primarily sewage and foul drainage.
- 7.11 The Site does contain areas of Flood Zone 2 and 3, which are limited to parts adjacent to the Swalecliffe Brook. The proposed developed areas would be located entirely Flood Zone 1, with the areas at risk of flooding contained within green infrastructure. The Site also contains areas at risk of surface water flooding, however, this has been considered fully through the masterplan, including management and controls at source, including on-plot water butts, and rain gardens, permeable paving and tree planting, where appropriate.
- 7.12 The application demonstrates that the Proposed Development includes a SuDS Network, which forms part of the Site's Green Infrastructure framework providing a drainage and ecological, as well as recreational function. Attenuation basins are proposed across the Site to store all storm water generated from the development up to and including the 1 in 100-year 45% climate change storm event. Importantly, the SuDS features are fully integrated into the landscape design, taking advantage of the linear green corridors to convey water runoff to the attenuation basins. This retains the largely open nature of the drainage system and provides a treatment train for any runoff from the Site.
- 7.13 Throughout the pre-application process, Brookbanks has held discussions with the LLFA and Southern Water on a drainage strategy for the project. The LLFA and Environment Agency have not raised an in-principle objection to the planning application on flooding grounds.
- 7.14 The planning application material confirms that during heavy rainfall the existing wastewater treatment works becomes overwhelmed with the increase levels of surface water entering the existing combined network, resulting in capacity issues in the network.
- 7.15 It is understood that Southern Water has committed to investing circa. £25 million into upgrading the Swalecliffe Wastewater Treatment Works, to replace the storm overflow pipe and reduce the amount of surface water entering the system., including an additional 1,800 cubic metres of water storage, provision of 2,000 slow drainage water butts in Tankerton homes, and reviewing pathfinder projects.
- 7.16 The proposed development has the opportunity to deliver real improvements to these existing issues, including:
- a. Assisting the operational capacity of the wastewater treatment centre by reducing time to discharge untreated effluent;
 - b. installing Sustainable Drainage Systems (SuDS) to control and manage attenuation at source;

- c. Creating attenuation basis and burns on-site to capture more storm / rainwater, slowing the flow to the Swalecliffe Brook;
- d. Rainwater harvesting to capture and store rainwater on residential properties; and
- e. Opportunities to hold back foul water during storm events through the use of pumping stations with telemetry, which allows to capacity to be available in the network.

7.17 Implementation of these features will be established through the planning application process and as the design of the scheme evolves in discussion with the LLFA and Southern Water.

7.18 As such, there is not considered to be an impact in respect of flood risk.

7.19 Regarding services, such as water supplies, Southern Water will be required to provide connections for water to serve the proposed development, but this matter sits outside the planning remit.

Transport / movement

7.20 Transport modelling has been carried out on behalf of HLM and in discussions with KCC Highways to ensure there would be no significant or severe impacts on the local network through the provision of appropriate mitigation, as required.

7.21 The application demonstrates that the Proposed Development of Brooklands Farm includes the delivery of new on/off east bound slips to the Thanet bound carriageway of the A299, which will have positive benefits to the existing road network in the wider Whitstable area, as confirmed within the Council's evidence base. The Brooklands Farm site is unique in its ability to offer this strategic infrastructure improvement.

7.22 HLM is supportive of the Council's approach to public transport infrastructure improvements and is committed to facilitating this with delivering diversions / extensions to the existing bus routes, on-site pedestrian and cycle connections, and upgrades to existing off-site routes for a variety of users.

7.23 The planning application submission material shows how well-located Brooklands Farm is to a range of everyday local amenities, including schools, medical centres, food stores, and other existing sustainable transport options, such as train and bus services. The reports also detail the range of potential improvements that can be delivered as part of the proposed development, including connections to active travel modes (such as enhancing walking, cycling and public transport), a mobility hub, as well as making part of South Street local access only. The new Local Centre is located within the heart of the Proposed Development and accessible via extensive active travel network. Future residents will therefore be within a 15-minute walking and/or cycling distance of essential day to day facilities.

7.24 Beyond the Site, the Transport Assessment ('TA') submitted as part of the application identifies existing key walking and cycling routes which can effectively connect to the Site and proposes several improvements to enhance these routes to be more accessible via walking and cycling. These include: the provision of additional dropped kerbs and tactile paving, the upgrading of PRoW routes to facilitate cycles and the provision of new cycle parking at Chestfield and Swalecliffe Station (as outlined in paragraph 5.31).

7.25 Regarding public transport, a new hopper bus service is to be provided which would connect the Site to Whitstable Town and local facilities, and includes for additional bus stops on Chestfield Road to accommodate route No. 5 and 917 as well as the new bus service. With an internalised bus service all new residents and proposed uses on the site

will be within 400m of bus stops, ensuring that opportunity is available to all to use, with the aim of reducing private uses. The potential route of this service is identified with the TA, but covers the Tesco Extra; Millstrood Road near Whitstable School; Whitstable Town Centre; Whitstable Railway Station; and Chestfield and Swalecliffe Station. The frequency proposed is Monday to Saturday with a 30min frequency between the hours of 6am and 8pm, after which the frequency will be hourly. Bus stops within the development site will include bus shelters with seating and lighting as well as having real time travel information. Given the above, the Brooklands Farm site will take up and create opportunities to maximise the use of sustainable transport modes, in accordance with national policy.

Community infrastructure

- 7.26 The representations raise concerns with the inadequacy of the existing infrastructure and services in Whitstable.
- 7.27 Brooklands Farm, like any site, will need to ensure that it suitably mitigates any potential impacts on existing infrastructure and services. However, due to the strategic scale of the Site, it has the ability to provide an extensive range of services and facilities on-site, in addition to off-site financial contributions. As per the draft allocation and as set out in these representations, Brooklands Farm will deliver a significant amount of infrastructure for the local area, including green open space, cycle and footway enhancements, new schools, and flexible community hubs that can be used for health care facilities.
- 7.28 Noting the above, Policy W4 requires the delivery of an extensive array of infrastructure, much of which is on-site, including:
- a. commercial (minimum 880m²) and local shopping and community uses (minimum 350m²);
 - b. business space (minimum 4,000m²), including flexible working space;
 - c. a mobility hub to serve residents and businesses;
 - d. a two FE Primary school, with early years provision;
 - e. a SEND school;
 - f. new tree planting;
 - g. new open space, including new parks, children’s play areas and outdoor sports provision, such as a new cricket pitch for Chestfield Cricket Club, pickleball court, multiple football pitches, and tennis/netball courts/multi-use games area;
 - h. realignment of South Street;
 - i. east-facing slip-road junctions on the A299;and
 - j. cycle and pedestrian network improvements;
- 7.29 The application demonstrates that the Proposed Development can deliver an abundance of social infrastructure, including space for a healthcare facility in the local centre, two schools, shops, sports facilities, and employment space; whilst contributions would be made to healthcare, education, and other local services. The emerging Plan also identifies a new six FE secondary school with sixth form at Bodkin Farm (Policy W6). The planning application for this site remains under consideration at the time of writing (ref. CA/24/00224)

Pollution

7.30 The Air Quality Environmental Statement Chapter (Chapter 9) confirms the proposed development of Land at Brooklands Farm will include construction management plans to ensure the construction phase implements appropriate and best practice mitigation to manage dust impacts. Additionally, the traffic associated with the proposals is considered to have a negligible impact on local air quality with the scheme design aiming to reduce traffic and building related emissions, through a site-specific travel plan to encourage alternative modes of transport, and pedestrian and cycle infrastructure.

7.31 Additionally, the Environmental Health Officer raises no objections to the application on pollution grounds.

Other matters

7.32 Concern appears to have been raised with regard to the development not being affordable or targeted towards local people. A Section 106 legal agreement will be prepared with the planning application to secure 30% of the proposed development (387 homes) as affordable. The affordable homes will be dispersed throughout the Site and will comprise a mix of house types and size, with 66% being set aside for affordable or social rent, 25% first Homes and 9% affordable home ownership, as required by emerging Policy DS1. Affordable housing will be managed by affordable providers operating in Canterbury, will be available for those people on the Council's housing register

7.33 The responses include reference to the perceived increase in crime. The proposed development will be required to achieve Secure by Design standards to design out crime. Additionally, a Crime Impact Statement was submitted with the planning application to address the requirements of draft Policy DM7 (Health and Crime Impact Assessments). The report sets out that crime local to the Site and in Whitstable as a whole is generally low and provides recommendations for mitigation and enhancement measures as relevant, which can be secured through the detailed design stage of the planning process.

10. Summary

- 8.1 HLM support the continued allocation of Policy W4 within the draft Local Plan and would welcome further discussions with the Council and the local community to discuss the final details of allocation prior to the submission of the Regulation 19 pre-submission Plan.

Appendix 1 - Brooklands Farm Accessibility Review



BROOKBANKS

Brooklands Farm

Whitstable

Accessibility Review

Hallam Land Management

Document Control Sheet

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Contents

1	Introduction	1
2	Background	2
3	Site Accessibility.....	5
4	Walking and Cycling Route Review	12
5	Walking and Cycling Improvements	24
6	Public Transport Improvements	30
7	Site Sustainability Policy Review	33
8	Potential for Modal Shift	37
9	Summary and Conclusions.....	38

Tables

Table 2-1: Modal split by 2011 & 2021 Census	3
Table 2-2: Workplace Destinations (All Modes)	4
Table 2-3: Workplace Destinations within Canterbury district by mode	4
Table 3-1: Trip Purpose by day of the week	5
Table 3-2: Local education facilities & distance	6
Table 3-3: Local Health and Facilities & distance	7
Table 3-4: Local Public Transport Facilities and distances.....	8
Table 3-5: Walking / cycling access to existing recreational and leisure facilities	9
Table 7-1: Policy Site W4 - Access and Transportation	35

1 Introduction

- 1.1** Brookbanks is commissioned by Hallam Land Management to provide a sustainability appraisal for the land situated to the north and south of South Street, Whitstable, Kent, known as Brooklands Farm (referred to as 'the Site' in this report) which is being promoted through the emerging Canterbury Local Plan for a residential-led development.
- 1.2** Previously, Brookbanks completed several preliminary highway network reviews which considered the potential impact within the local road network. This was carried out in conjunction with Kent County Council and utilised the area wide traffic model. This demonstrated that the development could be delivered and would support local highway interventions. The highway interventions include the provision of east facing slip roads to connect with Chestfield Road, from the A299. A preliminary design for the slip roads arrangement has been completed and agreed in principle with KCC.
- 1.3** For sustainable development to be delivered, it is crucial to consider all modes of travel. This assessment considers the opportunities for the future residents to walk, cycle and use public transport. The purpose of this report is to highlight the sustainable credentials of the site and to provide a qualitative review of the options available for further improvement opportunities. This will add to the evidence-base related to the site and provide continual support for the emerging local plan.
- 1.4** This appraisal considers the following:
 - Review of the existing walking, cycling and public transport networks
 - Review of the existing facilities within Whitstable to identify key desire lines.
 - Consideration for future connections between the site and Whitstable to improve pedestrian links.
 - Consideration for future connections between the site and Whitstable to improve cycling links.
 - Consideration for future connections to improve public transport connectivity.
 - Delivering of facilities to support internalisation.
 - Identifying how a sustainable site will support modal shift towards environmentally friendly modes of travel.

present mode share information for 2011 and 2021.

- 2.6** Travel restrictions brought in due to the COVID-19 pandemic were active during the 2021 census which had an impact on the percentage of employees working from home. Therefore, the mode share information shown in **Table 2-1** presents two scenarios, in which working from home has been excluded from the second scenario.

Method	Includes Working from Home		Excludes Working from Home	
	2011	2021	2011	2021
Work mainly at or from home	13%	34%		
Underground, metro, light rail,	0%	0%	0%	0%
Train	6%	2%	7%	3%
Bus, minibus or coach	2%	2%	3%	3%
Taxi	0%	0%	0%	0%
Motorcycle, scooter or moped	1%	0%	1%	0%
Driving a car or van	66%	51%	75%	78%
Passenger in a car or van	4%	3%	5%	5%
Bicycle	2%	2%	2%	2%
On foot	6%	5%	7%	8%
Other method of travel to work	0%	1%	0%	1%
Total	100%	100%	100%	100%

Table 2-1: Modal split by 2011 & 2021 Census

- 2.7** It is noted that the number of people working from home increases significantly between 2011 and 2021. This is not unexpected due to the travel restrictions put into place during the COVID-19 pandemic. Following the exclusion of those people working from home, the mode choice for travelling to work are largely similar between 2011 and 2021. Notable difference is a decrease in people travelling to work via train, this suggests that there is a latent demand which a sustainable strategy could target.
- 2.8** This suggests that as people return to normal working practises, as identified within the 2011 statistics, the 2011 mode share is likely to be representative of the future travel habits.
- 2.9** The 2011 data (excluding working from home) shows that 19% of residents will travel by non-car modes to their place of work.

Workplace Destinations

- 2.10** To understand why residents travel by the modes that they do, key workplace destinations has been extracted from the 2011 Workplace Census Destination data for the MSOA area, these are summarised in **Table 2-2** below.

Workplace Location	%
Canterbury	66%
Swale	7%
London	5%
Thanet	5%

Medway	4%
Ashford	3%
Dover	3%
Maidstone	3%
Shepway	2%
Tonbridge & Malling	1%
Dartford	1%

Table 2-2: Workplace Destinations (All Modes)

2.11 Table 2-2 shows that 66% of residents work within the Canterbury district, the district includes Canterbury, Whitstable, and Herne Bay as key workplace destinations. Table 2-3 below provides a break down the main areas within the Canterbury District and the mode by which they travel.

%	Location	Mode						
		Train	Bus	Taxi	Motorcycle	Car (inc. Passenger)	Walk	Cycle
45%	Whitstable	1%	3%	0%	1%	70%	20%	5%
27%	Central Canterbury	0%	9%	0%	1%	85%	2%	3%
15%	Herne Bay	0%	3%	0%	1%	80%	10%	6%
12%	Outer Canterbury	0%	7%	0%	1%	88%	2%	2%

Table 2-3: Workplace Destinations within Canterbury district by mode

2.12 The above table shows that most residents that live in the Whitstable also work in Whitstable (45%) with Central Canterbury being the next key destination (27%). Those that work in Whitstable 29% travel by modes other than the private car, those that travel to Herne Bay for work, 20% will use non-car modes and those working in Canterbury travel by non-car modes reduces to 15/12%. It is evident that where accessibility by non-car modes is achievable, residents will use alternative modes to the private car.

Summary

- 2.13** The site is located on the edge of the existing urban area of Whitstable with good opportunities for connecting to the existing footway and cycling network. The existing residents within this part of Whitstable 81% travel to work by car/ Motorcycle and 19% by walking/cycling/ PT (2011 Census). In reviewing where residents work, 66% work within the Canterbury District of which 30% work in Whitstable, 17% within Canterbury central, 10% within Herne Bay and the remaining 9% within the outer areas of Canterbury.
- 2.14** Given the high number of residents living and working within Whitstable, there is the opportunity to encourage new residents to use more sustainable modes and increase the proportion of walking/cycling or PT as their main mode of transport.

3 Site Accessibility

Introduction

- 3.1** This section assesses the developments' location and accessibility to all non-car modes and the proximity of the site to local facilities, schools, shops and health care etc.
- 3.2** Section 2 considered the modes by which residents travel to their place of work, however over a typical day residents make many other trips. A review of the National Travel Survey (NTS) data Table NTS0504b identifies the typical trips made by residents living in England in 2022 over a typical week by purpose, the results of which are summarised in **Table 3-1** below.

Trip Purpose	Monday - Friday	Saturday	Sunday
Commuting/ business	28%	13%	13%
Education/ Escort Education	26%	11%	8%
Shopping	16%	26%	21%
Visiting Friends	10%	21%	24%
Sport/ Entertainment	7%	10%	8%
Holiday	3%	8%	10%
Other including just walking	10%	11%	16%
	100%	100%	100%

Table 3-1: Trip Purpose by day of the week

- 3.3** **Table 3-1** shows that Monday – Friday 54% of trips are associated with Working and Education although 46% are associated with other trips such as shopping and visiting friends. On the weekend, trips associated with work and education are circa 20% with the rest being other trips associated with shopping, visiting and recreational type activities. Therefore, whilst the emphasis is work and education related trips as these are the predominate movements in the peak hours, overall, throughout the day the trips associated with shopping and leisure activities also need to be considered in an aim to reduce the daily movements of vehicles from a site. To do this a detailed review of access to local facilities has been carried out.

Local Amenities

- 3.4** Below are the distances to key local facilities & amenities from the development site together with maps highlighting the distances from each facility. The distances identified in the tables are taken from Google Maps route planner which considers the best routes and local topography and taken from the edge of the site. To the centre of the site would be an additional 400m (+5mins walk time).
- 3.5** In terms of accessibility, LTN 1/20 states in para 2.2.2

'Two out of every three personal trips are less than five miles in length (8km)- an achievable distance to cycle for most people, with many shorter journeys also suitable for walking. For Schoolchildren the opportunities are even greater: three quarters of children live within a 15-minute cycle ride of a secondary school, while more than 90% live within a 15-minute walk of a primary school.'

Manual for Streets states in para 4.4.1

‘Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to about 800m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS13 states that walking offers the greatest potential to replace short car trips, particularly those under 2 km. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents.’

- 3.6 Typically, a 2km walking distance takes approximately 25mins (80m per min), therefore based on the above, facilities that are within a 25min walking or cycling distance are considered to be within a reasonable distance to be able to be accessed by new residents.

Education

- 3.7 **Table 3-2** below identifies the location and distance of the nearest Secondary School and Primary Schools to the site by walking and cycling. **Figure 3-1** below shows the 800m catchments (10min walk) of existing primary schools including the proposed primary school on the site and 1600m catchment (20min walk) for the Secondary Schools.

Local amenity	Location	Distance (m)	Walking time	Cycling time
Education				
The Whitstable Secondary School & 6 th Form & Day Nursery	Bellevue Road	1.0Km (from South Street)	15min	4min
St. Marys Catholic Primary School	Northwood Road	2.0Km (South St)	27min	6min
Swalecliffe Community Primary School	Bridgefield Road	2.1Km (Rayham Road/ Lismore Road)	28min	8min
Whitstable Junior & Infant School	Oxford Street	2.1Km (South Street)	30min	10min

Table 3-2: Local education facilities & distance

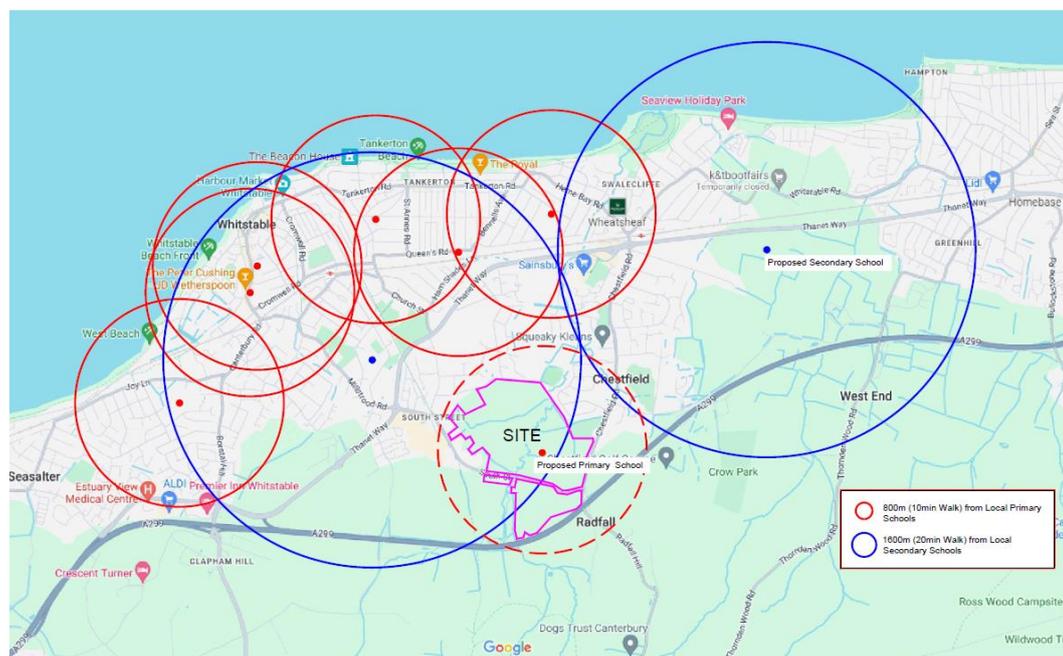


Figure 3-1: Catchments of existing & proposed education facilities within Whitstable

- 3.8** **Figure 3-1** shows that in terms of walking, a new Primary School on the site will be within a 10min walk for all new residents. The existing Secondary School will be within a 20min-25min walk of the site or within a 6-7min cycle which will ensure that the site meets the standard distances identified in LTN1/20 and therefore able to encourage the use of non-car modes for education type trips.
- 3.9** The provision of the new Primary School will not only facilitate new residents on the site but will also benefit existing residents who are currently located more than a 10min walk from the existing Primary Schools which are primarily located to the north of Thanet Way. The new school will therefore assist in reducing car trips associated with peak hour school journeys from both new and existing residents.

Health & Retail

- 3.10** **Table 3-3** below identifies the location of the key Health and retail facilities that are within a reasonable walking or cycling distance from the site and **Figure 3-2** below identifies the 800m catchment for the various health and retail facilities including the proposed local centre within the site.

Local amenity	Location	Distance (m)	Walking time	Cycling time
Health				
Chestfield Medical Centre	Reeves Way	1.8Km (From Rayham Rd)	23min	5min
Chestfield Dental Practice	Chestfield Road	1.4Km (From Chestfield Rd)	18min	4min
Whitstable & Tankerton Hospital	Northwood Road	1.5Km (From Rayham Road/ Lismore Road)	20min	6min
Food stores				
Tesco Food Store inc. Pharmacy & Opticians	Millstrood Road	450m (From South St)	7min	2min
Sainsbury's Food Store	Reeves Way	1.6km (From Rayham Rd)	22min	5min
Other Facilities				
Whitstable Post Office	Cromwell road	1.8Km (From Rayham Rd)	24min	8min
Swalecliffe Post Office	Herne Bay Road	1.9Km (From Chestfield Rd)	26min	6min
		2.1Km (From Rayham Rd)	29min	7min
Whitstable High Street	High Street	2.2Km (From South St)	30min	9 min
Harbour Market – Whitstable	Harbour Street	2.6Km (From Rayham Rd/ South St)	34min	9min

Table 3-3: Local Health and Facilities & distance

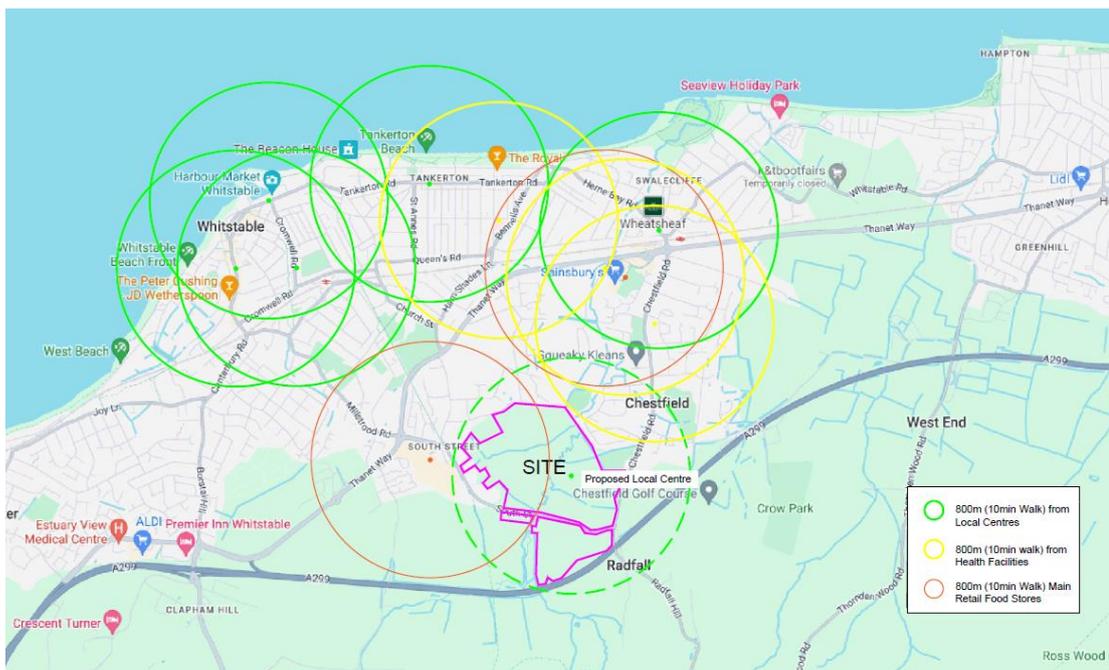


Figure 3-2: 800m catchment of existing health and food store facilities

3.11 The above shows that whilst the local health facilities are beyond a 10min walk of the site, they are within the 2km walking distance and well within an acceptable cycling distance of the site. In terms of food stores, the site is within an easy walking/cycling distance of the Tesco store and will benefit from on-site local facilities which will be within a 10min walk for new residents, and a short distance from existing residents.

Public Transport

3.12 **Table 3-4** below identifies the location of the local bus and train services to the site and the distance and time taken to travel by foot or by cycle.

Local amenity	Location	Distance (m)	Walking time	Cycling time
Public Transport				
Whitstable Train Station	Old Bridge Road	1.7Km (From South Street)	22min	6min
Chestfield & Swalecliffe Train Station	Herne Bay Road	2.1Km (From Rayham Road/ Chestfield Road)	28min	7min
Bus Stops (5,914,915, 916)	Grasmere Road/ Clover Rise	210m (From Rayham Road)	3min	1min
Bus Stops (5,916)	Millstrood Road	280m (From South Street)	4min	2min
Bus Stops (5,914,915, 916,917)	Chestfield Road	400m (From Chestfield Road)	5min	1min

Table 3-4: Local Public Transport Facilities and distances

3.13 The nearest bus route to the site is Route No.5, **Figure 3-3** below identifies the location of the bus stops served by Route No.5 within the local area and the catchment from each stop that is within a 5min walk / 400m. **Figure 3-3** also shows other existing bus stops served by other routes including The Triangle and the proposed Park and Ride facility on Thanet Way. The distances from the local train stations are shown as 1600m (20min walk).

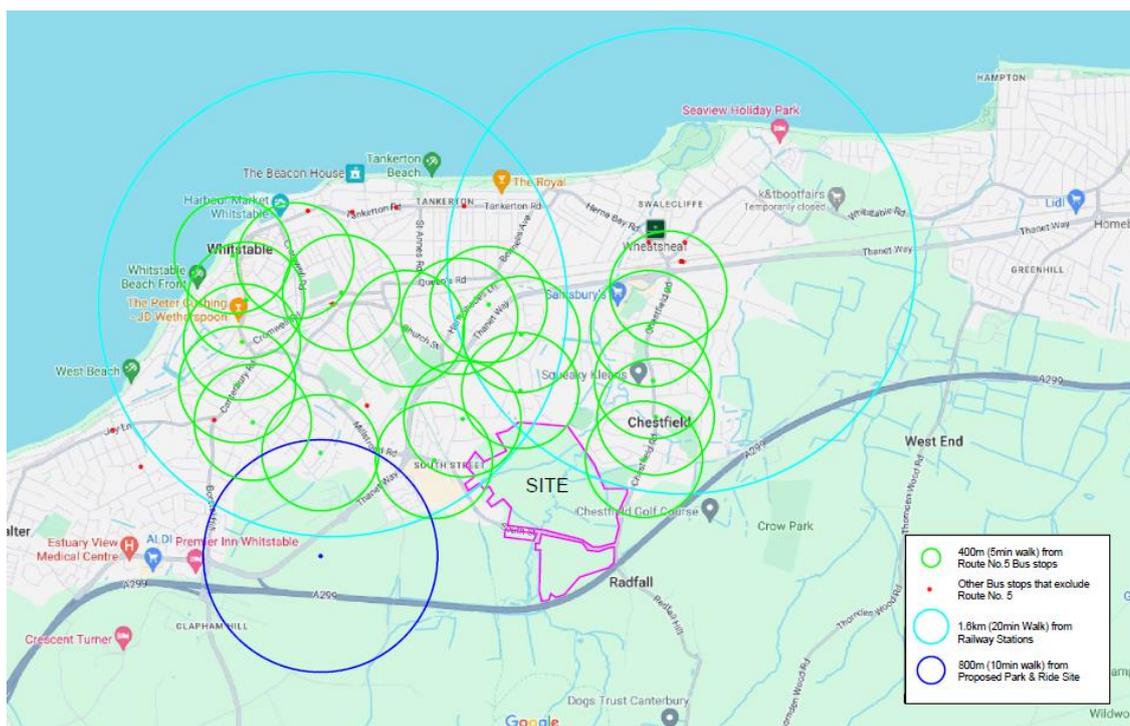


Figure 3-3: Catchments of existing Public Transport facilities & Proposed Park & Ride.

3.14 The above shows that part of the site is within a 5min walk of the existing bus services and within a 20min walk of the existing railway stations. For commuting, distances greater than 2km will typically be made by walking although the existing stations are also within easy cycling distance. The bus stop catchments show that many local facilities available in Whitstable are within close proximity to the local bus stops. Further measures to improve PT access are covered in Section 6.

Recreational & Leisure facilities

3.15 **Table 3-5** below identifies the location of the existing recreational and leisure facilities to the site and the distance and time taken to travel by foot or by cycle.

Local amenity	Location	Distance (m)	Walking time	Cycling time
Recreational				
Chestfield Cricket Ground	Grasmere Road	700m (From Rayham Road)	9min	2min
Radfall Recreation Ground	Chestfield Road	290m (From Chestfield Road)	4min	1min
Chestfield Golf Course	Chestfield Road	750m (From Chestfield Road)	10min	2min
Whitstable Sports Centre/ PLYR Football Academy	Bellevue Road	1.0Km (from South Street)	14min	4min
Whitstable Town Football Club	Grimshill Road	1.6Km (From South Street)	22min	7min

Table 3-5: Walking / cycling access to existing recreational and leisure facilities

3.16 The development proposal will also include new open recreational areas and play areas which will be within 800m of new residents.

3.17 The above figures and tables demonstrate that the site benefits from being within reasonable walking/cycling

distance to existing local facilities many of which are within a 2km walk or 5km cycle. The development site will also include several on site facilities which will be within 800m of properties including a new primary school and shops making it a walkable neighbourhood.

- 3.18 Trips made by residents throughout a typical day, will be for a variety of different purposes and the above table demonstrates that the site is not only accessible to public transport, large food stores and schools but also to local recreational areas and sports facilities ensuring a wide range of facilities are accessible by non-car modes.

Public transport facilities

Bus

- 3.19 Whitstable is served by a range of public transport services, which mainly serve the town centre and connect with Herne Bay and Canterbury. The closest services to the site are located on Chestfield Road, Grasmere Road and Millstrood Road which are all served by Route No.5 operated by Stagecoach. Route No.5 operates between Canterbury and Seasalter, calling at Whitstable train station and Chestfield & Swalecliffe Station. Route No. 5 provides an hourly service Monday to Saturday with four services on Sunday.
- 3.20 The bus stops local to the site also include several other services including 914,915 & 916 which are all school bus services providing single pick up and drop off journeys.
- 3.21 A notable bus service that is operated by Stagecoach is known as the ‘triangle’ route. This provides a circulatory route between Canterbury, Whitstable, and Herne Bay although the closest bus stop to the site that serves the triangle route is located on Harwich Street which is a 30min walk from South Street or a 9min cycle. This service operates a frequency of 1 bus every 15 minutes Monday to Saturday and every 20 minutes on Sunday. The existing bus services are identified in **Figure 3-4** below.



Figure 3-4: Existing Bus services in Whitstable.

Rail

- 3.22** Whitstable train station is the closest station and is 1.7Km from the site (South Street) operated by southeastern railways and is located on Old Bridge Road. This station provides the following onward connections.
- Margate - two services per hour having a journey time of 23 minutes.
 - Faversham – two services per hour having a journey time of 8 minutes.
 - London Victoria - one service per hour having a journey time of 1hr 36 minutes (some journeys require change at Faversham)
 - London St Pancras - one service per hour with a journey time of 1hr 14 minutes (some journeys require a change at Faversham)
- 3.23** The facilities available at Whitstable Station include:
- 32 Cycle Stands
 - Taxi Rank
 - 43 Car Parking Spaces
- 3.24** To the northeast of the site is Chestfield & Swalecliffe Station, this station is also operated by southeastern railways located off Herne Bay Road 2.1km from the Chestfield Road/ Rayham Road accesses to the site.
- Margate - two services per hour having a journey time of 23 minutes.
 - Faversham – two services per hour having a journey time of 11 minutes.
 - London Victoria - one service per hour having a journey time of 1hr 40mins (some journeys require change at Faversham)
 - London St Pancras - one service per hour having a journey time of 1hr 28 minutes (some journeys require change at Faversham)
- 3.25** There are no cycle or car parking facilities at the Chestfield & Swalecliffe station and access to the platforms is by steps only.

Summary

- 3.26** This section identifies that over a typical day, the type of trips made by residents will vary and whilst in the peak hours the higher proportion of trips will be attributed to working and education type trips, throughout the day other trips such as shopping, leisure, holidays and visiting will take place.
- 3.27** Distances from the site have therefore been reviewed to access existing local facilities within Whitstable including schools, retail, public transport, leisure, employment, and recreational facilities that are within a 2km walk or a 5km cycle. The results show that within 2Km walk of the site, many existing facilities will be available for new residents although a wider range will be accessible by cycle. The existing Secondary School is within an acceptable walking/cycling distance and the development site will include several new facilities including a new primary school and local centre which will be within an 800m (10min) walkable neighbourhood.
- 3.28** The above demonstrates that the site is in a location that is accessible to both existing and new local facilities by modes other than the private car.

4 Walking and Cycling Route Review

Introduction

- 4.1** Section 3 identifies that there a range of facilities local to the site and also some further afield towards the town centre or to the north/east of the site which would be accessed from Rayham Road or Chestfield Road.
- 4.2** This section therefore includes a more detailed review of the routes that residents are likely to use to access the existing local facilities which for the purpose of this TN includes:
- Whitstable Town Centre – shopping facilities
 - Train Stations
 - Whitstable Train Station
 - Chestfield & Swalecliffe Train Station
 - Education
 - Whitstable Community College
 - Proposed Secondary School off Thanet Way
 - Primary Schools
 - Supermarkets
 - Tesco Food store
 - Sainsbury’s Food Store
 - Employment
 - John Wilson Industrial Estate
 - Medical
 - Whitstable and Tankerton Hospital
 - Chestfield Medical Centre
- 4.3** The primary routes considered to be used to access the above facilities includes South Street & Millstrood Road (West of the Site), Virginia Road/ Lismore Road & Clover Rise (North of the Site) and Chestfield Road (East of the Site). A detailed assessment of these routes is provided in this section which is based on a review of Google Maps and a recent site visit attended on 12th February 2024 which involved walking the routes identified.

Cycling in Whitstable

- 4.4** Whitstable benefits from having a good range of cycling routes within the town that serve both Whitstable but also the neighbouring towns of Herne Bay and Canterbury. Below is an extract from the Draft Local Cycling and Walking Implementation Plan (LCWIP) which includes the aims and aspirations of increasing the trips made by walking and cycling.



Figure 4-1: Whitstable existing and proposed cycle network – Extract from LCWIP

4.5 Figure 4-1 shows that there are a number of strategic routes within close proximity to the site. Route W12 is the closest to the site identifying a proposed route through the site to join the Crab & Winkle Way and a route via Grasmere Road and onto Molehill Road.

Crab & Winkle Way

4.6 The Crab & Winkle Way is a 7.6mile cycle ride between Canterbury and the harbour in Whitstable and takes its name from the six-mile railway line which ran between the towns of Canterbury and Whitstable. The route from Whitstable to Claves Wood is shown in **Figure 4-2** below.



Figure 4-2: Crab and Winkle Way

- 4.7 The Crab and Winkle Way is a shared footway/ cycleway route which is off road from its junction with South Street/ Millstrood Road. The route continues along South Street as an on-road route and continues as a mix of on-road and off-road along its length. The photo below is the start of the Crab and Winkle off road route at the South Street/ Millstrood Road junction.



Photo 01- View from South Street/ Millstrood Road junction

- 4.8 Connection opportunities to the Crab and Winkle Way are reviewed in Section 5.

Walking and Cycling Route Review

Route 1 – To Whitstable Town Centre

- 4.9 The Town Centre is a 30min walk from the edge of the site, so may be too far for some residents to walk but would be suitable for cycling as it is only 9min (from South Street) via the Crab & Winkle Way. The route is identified on **Figure 4-3** from Google Maps below.

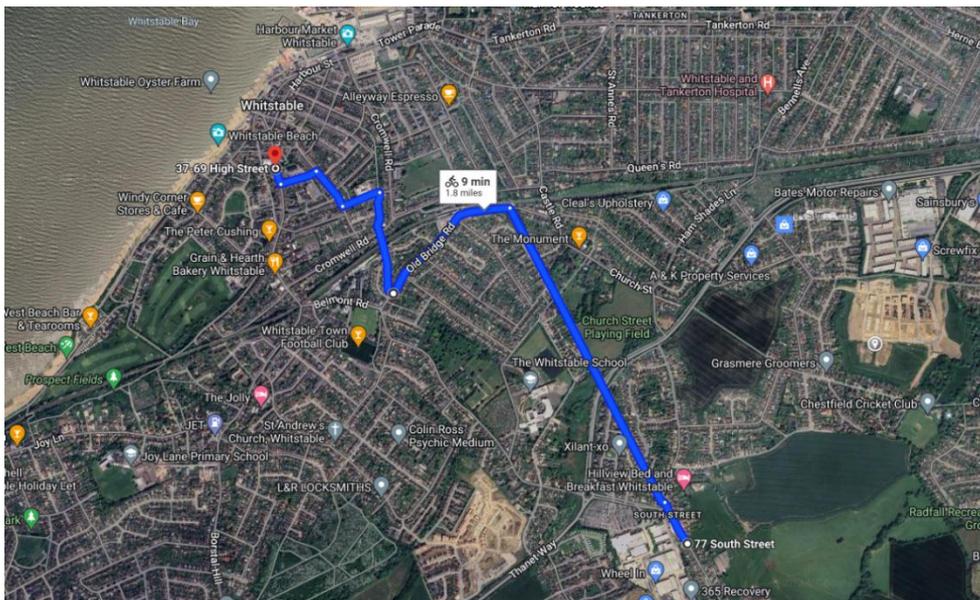


Figure 4-3: Cycling Route to Town Centre - Google Maps

- 4.10 The off-road section of the Crab & Winkle Way through Whitstable from South Street includes street lighting

and residents will be able to use this route from South Street up to Old Bridge Road to access Whitstable Station and town centre. Cyclists are directed from South Street onto the Crab & Winkle Way via a short sections of on-road cycle route and dropped kerbs. The route then continues under Thanet Way via a subway (see photo 2 below).



Photo 02 – Crab & Winkle Way passing beneath Thanet Way

- 4.11** At Old Bridge Road, there is an advisory on road cycle route (approx. 1-1.5m wide) on both sides of the carriageway leading to Whitstable Station, the route for cyclists then continues off road all the way to Stream Walk, using the existing underpass beneath the railway line which comes out onto Cromwell Road.
- 4.12** The route then continues off road to Hamilton Road where, cyclists can continue off-road to Stream Walk or continue on-road along Hamilton Road and Regent Street which are residential roads. Access onto High Street is made via Gladstone Road which is a no-through road serving a few residential properties and a public car park, again suitable for on road cycling.

Route 2 – To Whitstable Train Station

- 4.13** The route to Whitstable Train Station via Crab & Winkle Way from South Street and would take around 22mins to walk or 6 mins to cycle. The route is shown in **Figure 4-4** below.

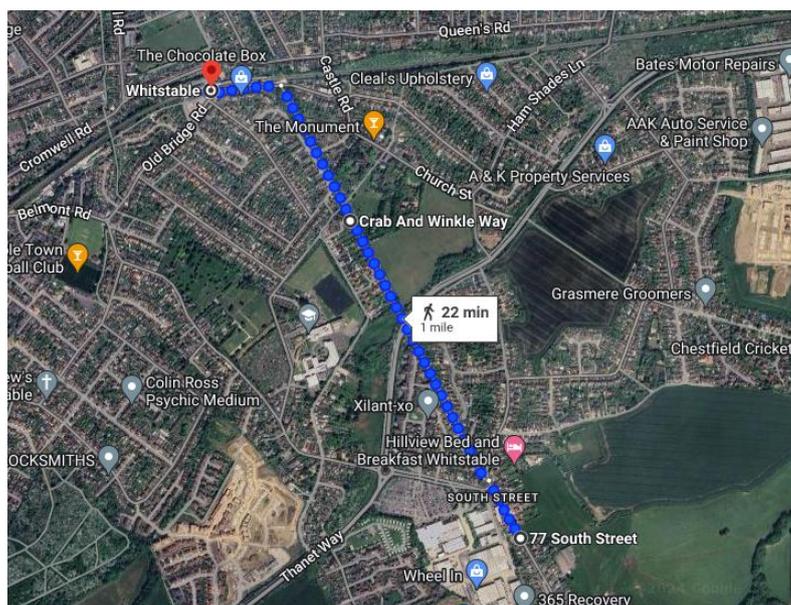


Figure 4-4: Pedestrian Route to Whitstable Train Station - Google Maps

- 4.14 South Street from the proposed site access, has a footway provision on the western side of the road which varies in width between 1.5m – 2m. The road is subject to a 30mph speed limit and has street lighting.
- 4.15 The junction of Millstrood Road with South Street does not include any dropped kerbs so residents with Prams or wheelchairs would have difficulty in crossing at this point.
- 4.16 Old Bridge Street, at the northern end of the Crab & Winkle Way, is a residential road with footways approximately 2m wide on both sides of the carriageway and is street lit.
- 4.17 The junction of Old Bridge Road and Whitstable Station is a tabletop junction arrangement which acts as a traffic calming feature as well as enabling easy access for walking and cycling to the station.

Virginia Road/ South Street/ Church Street

- 4.18 For those living at the northern side of the site, the route to the Station would be via Virginia Road (26min walk/ 8min cycle). This route joins South Street to the west continuing north to cross Thanet Way and then onto Church Street as illustrated in **Figure 4-5** below.

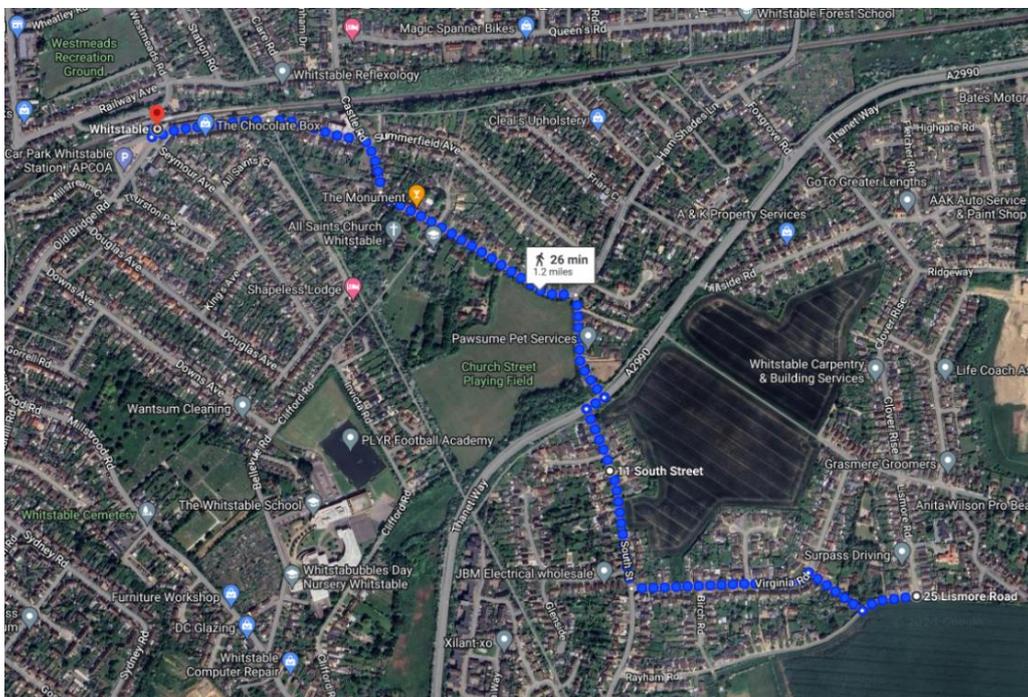


Figure 4-5: Northern route to Whitstable Train Station - Google Maps

- 4.19 Virginia Road is a residential road with footways provided on both sides of the carriageway and has street lighting. There are, however, no dropped kerbs on Virginia Road close to the junction with South Street. This route has low vehicle movements and speeds and therefore would be suitable for on-road cycling.
- 4.20 South Street north of Virginia Road is a no through road and includes a footway provision on the western side of the road of approximately 1.5m wide. This road is Street lit and as it is a cul-de-sac, the vehicle movements and speeds are low suitable for on-road cycling. There are dropped kerbs and tactile paving provided at various key locations where pedestrians will need to cross on this section of South Street.
- 4.21 To cross Thanet Way and join Church Street on the north side, there is an uncontrolled crossing in the form of a pedestrian refuge island which includes dropped kerbs and tactile paving. This is also identified as a cycle route.
- 4.22 On Church Street from Thanet Way, the footway is on the eastern side of the road and a short section of footway is provided on the western side (from the crossing point on Thanet Way). To enable pedestrians to cross onto the eastern footway dropped kerbs and tactile paving are provided. This road is subject to a

30mph speed limit and includes street lighting and considered suitable for on-road cycling.

- 4.23** Continuing along Church Street, at the junction of Ham Shades Lane, there are no dropped kerbs to facilitate pedestrians across. In addition, the footway on the eastern side of Church Street terminates approximately 25m to the west of Ham Shades Lane requiring pedestrians to cross. There are no formal crossing points to facilitate this movement.
- 4.24** The footway continues along the southern side of Church Street and is approximately 1.5m – 2m wide although narrows close to All Saints Nursery School and at which point pedestrians would need to use the front area of the All Saints Nursery School, which is open for pedestrians to use although not a formal footway, or they would need to cross to the northern side of Church Street, although the northern footway is limited and stops at the Junction with Juniper Close at which point the footway on the southern side of Church Street continues.
- 4.25** At the junction of Ivy House Road dropped kerbs are provided to facilitate north-south movements although these do not include tactile paving.
- 4.26** The road continues north as Castle Road with footway widths of 1.5m – 2m. At the junction with The Bridge Approach, which provides access to Whitstable station entrance, there are footways on both sides of the carriageway which are approximately 2m in width.
- 4.27** Along this route the improvements that are considered appropriate are in the form of dropped kerbs and tactile paving at various locations.

Route 3 – To Tesco/ Whitstable School / Primary Schools

- 4.28** The Tesco Extra food store is served off Millstrood Road which includes a pedestrian footway. The route that residents from South Street would take would be via the existing footway provision that is provided on South Street and Millstrood Road which in turn leads into the access for the store (7min walk/ 2min cycle). For residents walking/cycling from the northern part of the site, the most direct route would be along Rayham Road or Virginia Road (13min walk/ 3min cycle).
- 4.29** Virginia Road is described in detail above (Route 2). Rayham Road is an unsurfaced shared road forming part of a PRow/ Bridleway and serves a small number of residential properties. This route is close to the sites northern boundary however this route is not level so may not be a suitable route for all especially during the wet weather seasons. This route is also unlit.
- 4.30** South Street, south of Virginia Road, has a footway of approximately 2m along its eastern side which continues up to the junction with Rayham Road, at which point the footway continues along the western side. There are several dropped kerbs associated with driveways which would allow pedestrians with prams/ wheelchairs to be able to cross although there are no designated crossing points. South Street is Street lit and a residential road with low vehicle movements and speeds making it suitable for on road cycling.
- 4.31** Millstrood Road includes a pedestrian crossing point although this is west of the Tesco access and not on the desire line for those accessing the store from the northern side of the site/ northern part of South Street. As advised earlier dropped kerbs and tactile paving are required on Millstrood Road close to the junction with South Street.
- 4.32** The route to Whitstable School would continue along Millstrood Road as illustrated in **Figure 4-6** below, from South Street access this route would take residents 15mins to walk or 4mins to cycle. From the northern edge of the site, it would take residents around 22mins to walk or 6min to cycle.

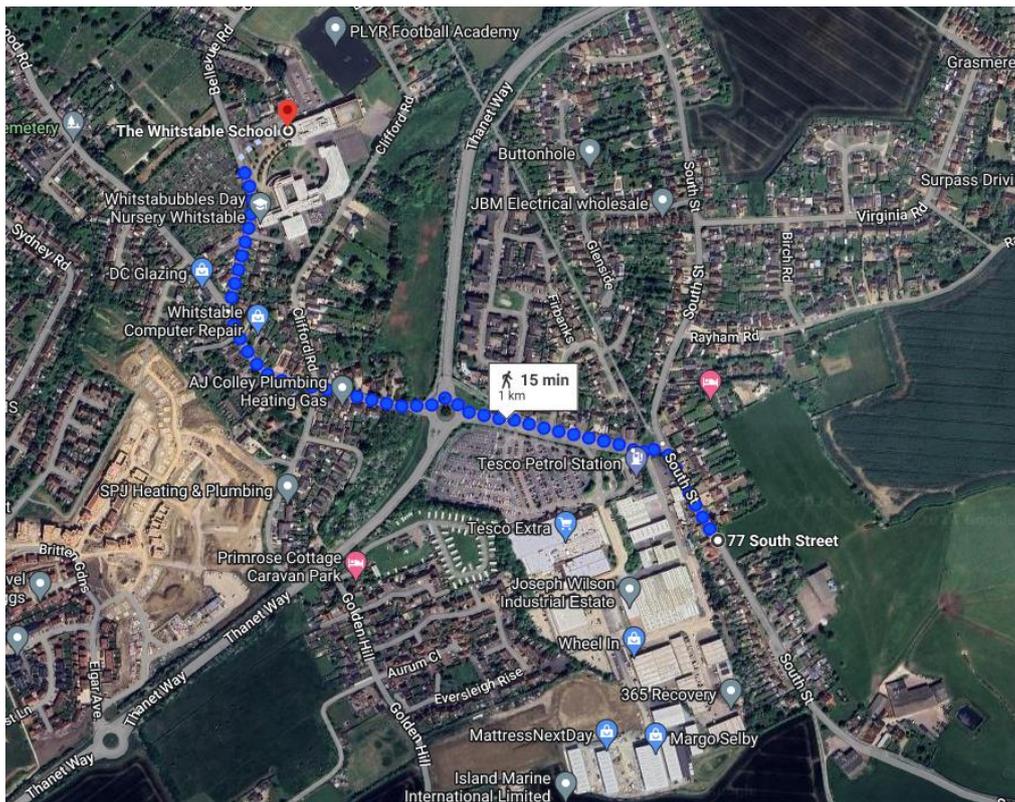


Figure 4-6: Route from South Street to Whitstable School - Google Maps

- 4.33** Along Millstrood Road (east of Thanet Way) the footway on the southern side stops adjacent to Olympia Way where dropped kerbs and a pedestrian refuge island are provided. On the northern side of Millstrood Road, dropped kerbs and tactile paving together with a pedestrian refuge island are provided to facilitate movements across Olympia Way.
- 4.34** To cross Thanet Way, there is a pedestrian footbridge although it has steps and would not be suitable for cyclists. Millstrood Road west of Thanet Way, has a footway along the northern side which is 1.5m -2m in width. This section of Millstrood Way is predominantly residential and street lit. At the junction of Clifford Road there are dropped kerbs but no tactile paving.
- 4.35** At the junction of Bellevue Road which serves Whitstable School, there is no formal crossing point and the footway on Bellevue Road is only provided along the western side. If walking on the northern side of Millstrood Road, pedestrians would not be able to cross over to the western side of Bellevue Road as there is guard railing restricting this movement, pedestrians would instead be required to walk in the road before being able to join the footway. The footway on the western side of Bellevue Road is however 3m in width as a shared footway/cycleway route. For access into the school, pedestrians and cyclists would need to cross Bellevue Road.
- 4.36** Prior to the junction with Bellevue Road, pedestrians could alternatively use Clifford Road (unsurfaced shared road) and use the PRow that continues through to the school, although this route is relatively narrow and not overlooked or lit.
- 4.37** Along this route dropped kerbs and tactile paving are required at the junction of Millstrood Road/ South Street and improvements to the junction of Millstrood Road/ Bellevue Road.
- 4.38** The nearest primary schools to the site are at least 2km from the site which would be considered too far for many to walk although they are only a 6-10min cycle which may be acceptable for staff. The development proposal however includes for an on-site Primary School which will be easily accessible within a 10min walk.

Route 4 – Sainsbury’s/ John Wilson Business Park/ Chestfield Medical Centre

4.39 The route to Sainsbury’s / John Wilson Business Park & Chestfield Medical Centre is likely to be made from the north of the site (22min walk/ 4 min cycle) or the east via Chestfield Road (see Route 5). The potential route from north of the site is shown in **Figure 4-7** below.

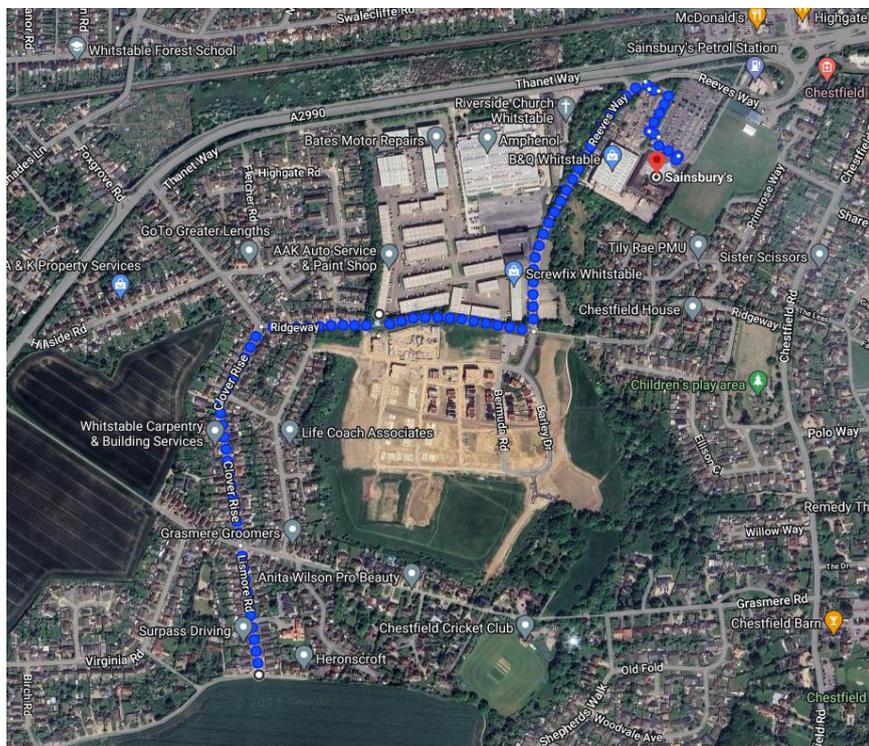


Figure 4-7: Route from northern edge of the site to Sainsbury’s - Google Maps

- 4.40** From the north of the site, the route would be via Lismore Road which is a residential road with footways provided on both sides of the carriageway approximately 2m wide and a 30mph speed limit together with street lighting. This route would be considered suitable for on-road cycling. The route continues north crossing Grasmere Road onto Clover Rise, however no dropped kerbs to facilitate the north-south route are provided at this junction.
- 4.41** Clover Rise is also a 30mph residential Road, with 2m wide footways on both sides of the carriageway and street lighting. On the eastern side of the road at the junction with Richmond Road there are no dropped kerbs provided to facilitate the north-south movement.
- 4.42** To access the John Wilson Business Park and Sainsbury’s food store the route via the Ridgeway would be the quickest route. Ridgeway is a PRow and Bridleway which from Clover rise to Reeves Way is a surfaced route. The Draft Local cycling and walking Implementation Plan identifies the Ridgeway to be upgraded to facilitate cyclists (W20) which will be CIL funded, this is shown in **Figure 4-1**.
- 4.43** Reeves Way has footways on both sides of the carriageway and a shared footway/cycleway along the eastern side joining both Sainsbury’s and John Wilson Business Park. This route is subject to a 30mph speed limit and has street lighting.

Route 5 – Chestfield and Swalecliffe Station

- 4.44** Residents from the northern edge of the site accessing the Chestfield and Swalecliffe Station would use route 4 as advised above and continue onto Thanet Way. At this point a controlled staggered pedestrian crossing is provided allowing safe passage across Thanet Way and joining with the Thanet Way off-road cycle route which continues from Clapham Hill junction in the west to Eddington Junction to the east.
- 4.45** Chestfield & Swalecliffe Station is on the eastern side of Herne Bay Road which can be crossed using the

existing controlled pedestrian crossing.

- 4.46** As an alternative to using the above routes, pedestrians/ cyclists could also use the Byway via Grasmere Road which links to Chestfield Road. This route is identified in the draft local cycling and walking implementation plan as an on-road route proposed from the northern boundary of the site to Chestfield Road.
- 4.47** For residents to the eastern side of the site Chestfield Road would be the route used, this road has a 1.5m-2m wide footway on the eastern side until 106 Chestfield Road when footways are provided on both sides of the carriageway. The footway on the eastern side stops at 143 Chestfield Road, and whilst there are dropped kerbs associated with private driveways there are no formal crossing points. The footway on the eastern side continues north of property 139 separated from the road by a wide verge.
- 4.48** The western footway continues up to the access that serves the Radfall Recreation Ground car park at which point pedestrians will need to cross Chestfield Road to the eastern side although there are no crossing points other than use of existing driveways to facilitate this movement.
- 4.49** North of the recreation field, the footway continues along the eastern side of Chestfield Road only until Chestfield Barn. Prior to this, at the junction with Molehill Road pedestrians need to cross a forked priority junction arrangement although only one dropped kerb is provided. (see photo below)



Photo 03 – Chestfield Road/ Molehill Road junction

- 4.50** North of Molehill Road the footway continues along the road edge on the eastern side of Chestfield Road varying in width from 1.5m – 2m. At Chestfield Barn pedestrians are required to cross to the western side where the footway provision is set back from the carriageway by a wide verge. There are no formal crossing points to facilitate this movement.
- 4.51** At the junction with Grasmere Road dropped kerbs are provided at this junction to facilitate the north-south movement along Chestfield Road. North of Grasmere junction footways are provided on both sides of Chestfield Road until No.66 Chestfield Road where the footway on the western side stops. The eastern footway continues although again there are no formal crossing points provided to cross back onto the eastern side.
- 4.52** The footway on the eastern side continues crossing Polo Way where dropped kerbs are provided. The footway on the western side appears in short sections but is not continuous. The eastern footway continues to Thanet Way and dropped kerbs are provided at the various junctions along this route.
- 4.53** At the Thanet Way junction, pedestrians can either cross onto the western side of Chestfield Road via the existing refuge island at the roundabout junction and then walk further west to use the controlled signal crossing and then continue back east to use the signal crossing on Herne Bay Road to access the station or alternatively use the pedestrian refuge island on the Thanet Way eastern arm which is a much shorter route. Crossing via the refuge island on Thanet Way is however difficult due to the high volume of vehicles and

speeds approaching and departing from the junction.

- 4.54** For this route dropped kerbs and tactile paving at key crossing points are required.
- 4.55** As part of application Ref: 24/00224 – Land at Bodkin Farm, Whitstable which includes for circa 300 dwellings and a new secondary school and an 80-bed care home, a new footway is proposed along the southern side of Thanet Way from the Herne Bay junction to the Bodkin Farm site which will also include new signal-controlled crossing facilities as illustrated in **Figure 4-8** below. This facility will assist future residents accessing the proposed Secondary School and also facilitate pedestrians across Thanet Way to Chestfield and Swalecliffe Train Station.

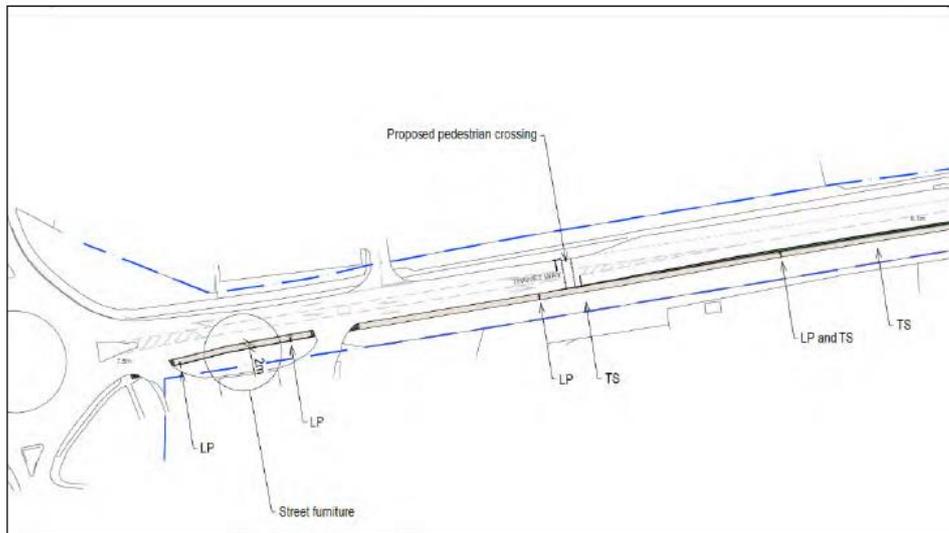


Figure 4-8: Proposed footway and controlled crossing on Thanet Way east of Herne Bay/ Chestfield – Extract from RPS TA dated 1st February 2024 for app ref: 24/00224

Route 6 - Whitstable and Tankerton Hospital

- 4.56** The Whitstable and Tankerton Hospital is situated to the north of the site which accessed from the northern edge of the site would be 1.5km (20min walk) or a 6min cycle. The quickest route would be via Lismore Road and Clover Rise to Thanet Way, Lismore Road, and Clover Rise up to Ridgeway have been described in detail in Route 4. North of Ridgeway, Clover Rise has footway provision on both sides of circa 1.5m – 2m wide and street lighting. This is a 30mph residential road and therefore considered suitable for on-road cycling. At the junction of clover Rise / Thanet Way, there is an existing foot bridge which includes ramped access making it suitable for cyclists. The route to the Hospital continues along Foxgrove Road which is a 30mph residential Road with footway provision of circa 1.5m on both sides of the carriageway and is street lit.
- 4.57** At the junction of Foxgrove Road and Ham Shades Lane, the route continues north-eastward across the railway line. The bridge across the railway line is narrow and as such has traffic signal control. The approach on the southwestern side has an on-road marked footway with a solid white line on the southern side of the road which is approximately 1-1.5m wide which is over a short distance before it joins to a footway that continues across the bridge. The section across the bridge includes wooden bollards which is expected to protect pedestrians from vehicles, however these bollards reduce the footway width and given that this is signal controlled it is considered that the provision of these bollards is unnecessary.
- 4.58** The footway on the eastern side continues across the bridge and onto Bennells Avenue, where, as with the southern side of the bridge, there is a short section of on-road footway marked by a solid white line approximately 1-1.5m wide. This then joins a footway up to its junction with Swalecliffe Road/ Queens Road/ Pier Avenue at which point pedestrians will be required to cross the road to continue along Piers Avenue. Dropped kerbs are provided to enable pedestrians to cross Bennells Avenue onto Pier Avenue, although it uses a dropped kerbed access on one side.
- 4.59** Along Pier Avenue, there are footways provided on both sides of the carriageway of 1.5m-2m in width

separated from the road by a wide verge, this road is a residential road subject to a 30mph speed limit and therefore suitable for on-road cycling. Piers Avenue joins Northwood Road which also includes footways of circa 2m on both sides and provides access to the Whitstable and Tankerton Hospital. This route is identified in **Figure 4-9** below.

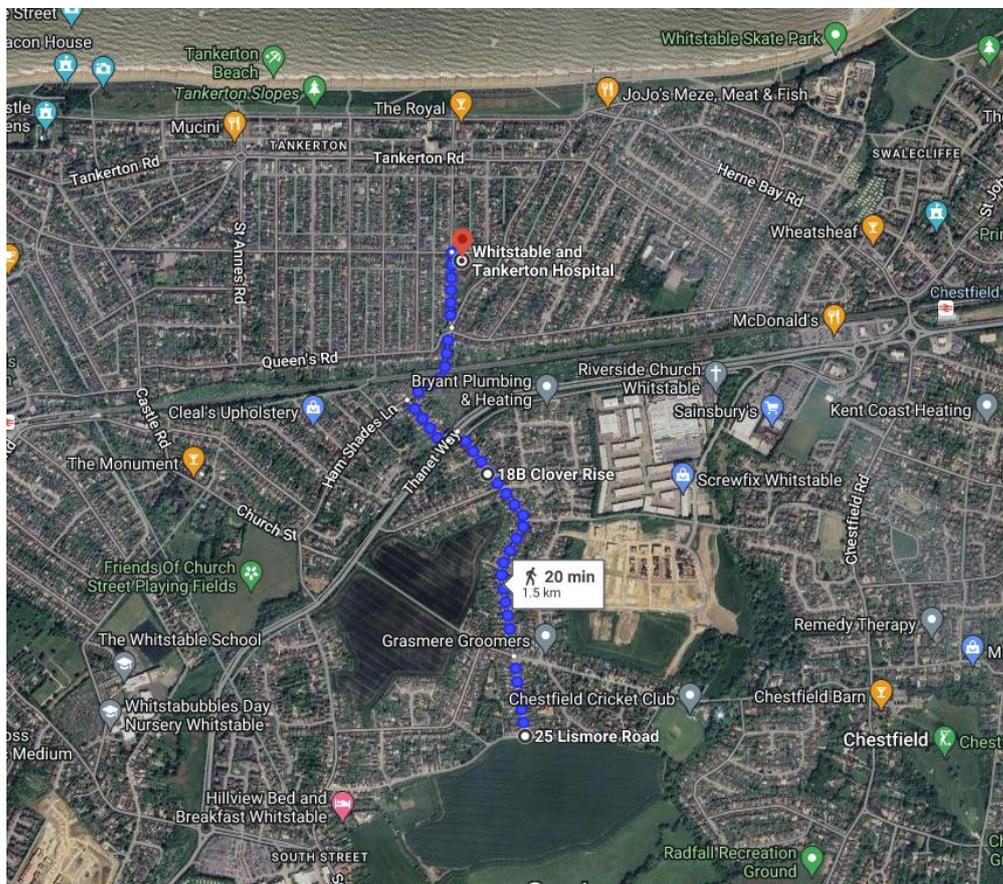


Figure 4-9: Route from northern edge of the site to Whitstable & Tankerton Hospital - Google Maps

4.60 It is considered that this route is suitable for both walking and cycling and no improvements are considered necessary.

Summary

- 4.61** In summary, there are several locations where the provision of dropped kerbs and tactile paving should be provided to facilitate pedestrian movements across various roads. The overall footway widths and conditions of footway along the routes assessed is however considered good and there is also a good level of street lighting is provided.
- 4.62** Access to Whitstable Secondary School is acceptable by foot although to cycle students will need to use the Crab & Winkle Way although improvements will be required to provide a connection from the Crab & Winkle Way. Potential improvements are identified in Section 5.
- 4.63** Whilst there is footway provided along Chestfield Road the provision is not continuous and requires pedestrians to change from one side to the other at various times along the route. Improvements to facilitate these movements through the provision of uncontrolled crossings and dropped kerbs with tactile paving is required.
- 4.64** Cycling to access local facilities is generally considered to be achievable using the local residential road or via

the existing off road/ on road cycle route network.

- 4.65 Chestfield Road is subject to a 30mph speed limit along much of its length and would be considered suitable for on-road cycling, however further investigation in terms of potential improvements to calm vehicle speeds and / or on-road cycle lanes should be undertaken.
- 4.66 A plan illustrating the key measures identified is provided in **Figure 4-10** below.

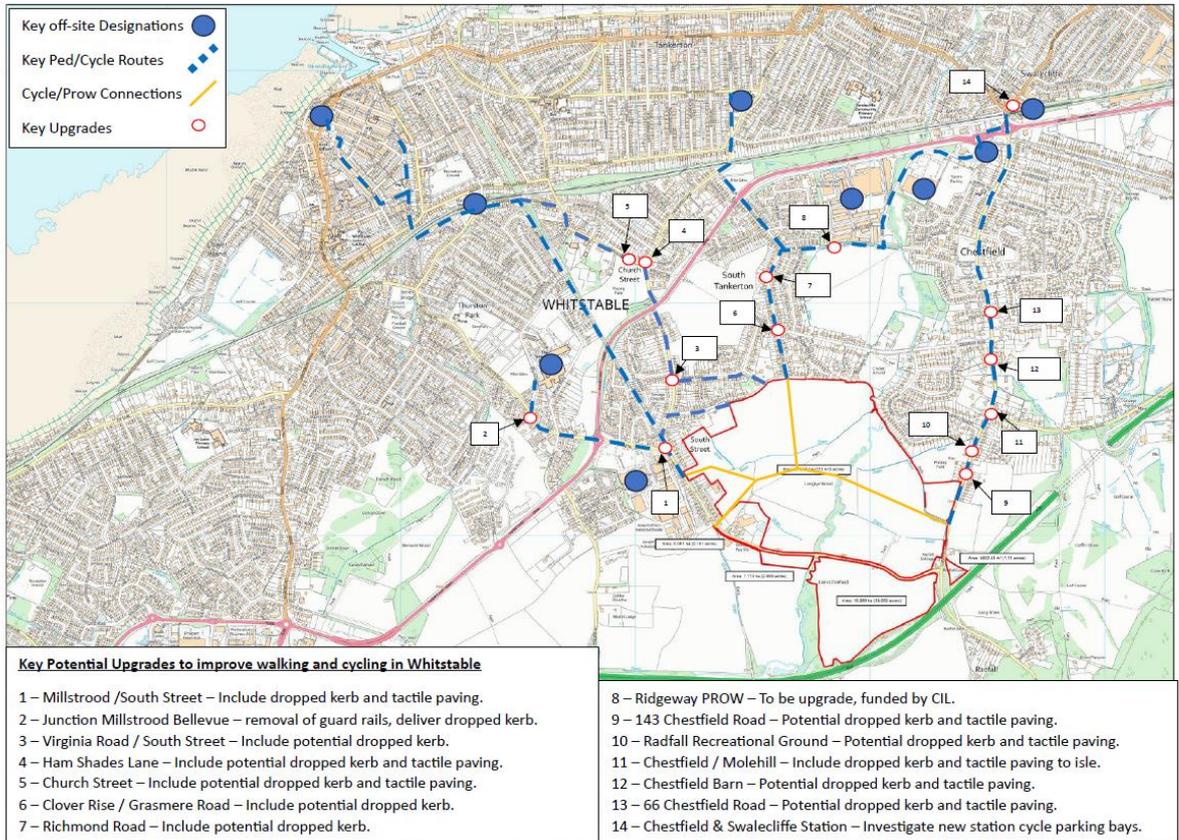


Figure 4-10: Key off-site improvements.

5 Walking and Cycling Improvements

The Proposed Site Network

- 5.1 The proposed masterplan for the site includes a comprehensive network of walking and cycling routes. This will embed a hierarchy into the onsite sustainable network. The objective of the on-site network is to facilitate the safe movement of pedestrians and cyclists within the development and to provide connections into the wider hinterland.
- 5.2 The primary route will commence from the site access points and provide the main spine through the site. The masterplan will include a range of character areas and the design of the primary route will vary depending on the character of the area. The primary sustainable route is likely to mirror the main vehicular route and to reflect the higher traffic flows the design of the primary route will include segregated walking and cycling paths.
- 5.3 Extending outwards from the primary route, the secondary routes will provide access to the wider development. The design of the secondary routes is likely to be varied, having a greater mix of on road cycling and off-road pedestrian/cycle routes.
- 5.4 The third-tier routes will extend from the secondary routes and penetrate the individual housing clusters. The design will reflect the reduced speed of vehicles and will include sections off on carriageway routes. The Concept Opportunities illustrated in **Figure 5-1** below provides the access opportunities to the site.



Figure 5-1: Concept Opportunities Plan

- 5.5 The proposed development will include a range of onsite facilities including a Primary School, SEND School, Local Centre, local employment, inclusive open space and recreational areas, enabling residents to be able to complete shorter trips (instead of accessing some of the destinations discussed in Section 4), within the site area by walking or cycling or use of the proposed bus services.

Detailed Review of Off-Site Connections

- 5.6 To deliver a sustainable development it is vital to ensure there are no barriers that could inhibit the attractiveness of walking and cycling. A review of the desirable facilities has been carried out which indicates that the future desire line is likely to be predominantly to the western and northern sides of the site.
- 5.7 The review included in Section 4 identifies that there are several suitable routes for pedestrians and cyclists beyond the site area which will provide access to existing facilities including the railway stations, secondary schools, supermarkets, employment, and medical facilities.
- 5.8 Improvements to these routes are primarily provision of dropped kerbs and tactile paving where pedestrians need to cross from one side of the road to the other due the footways terminating or at junctions. The footway widths are generally considered suitable width and condition and all routes are street lit. **Figure 4-10** identifies the locations of some of these upgrades, but a couple of key areas that are considered necessary to be reviewed in more detail include:
 - Cycle link to Whitstable Secondary School
 - Crossing facilities on Chestfield Road & potential traffic calming.

Cycle Link to Whitstable School

- 5.9 From the site, there are two potential routes that students attending the Whitstable Secondary School can take, this would be via the Crab & Winkle Way or via Millstrood Road. As advised in Section 4, Millstrood Road and the crossing of Thanet Way is not suitable for cyclists as the existing bridge across Thanet Way is a stepped footbridge.
- 5.10 The Crab & Winkle Way is the safest route as it is an off-road route and therefore more suitable for school children. There is an existing footway connection between Clifford Road and Invicta Way onto the Crab & Winkle Way, this appears to be around 2-3m in width although is bound by fences on either side as shown in Photo 04 below.



Photo 04 – Existing PRoW connection between Invicta Way & Crab & Winkle Way

- 5.11 This route is identified in the Draft Local Cycling and Walking Implementation plan (2022) as being improved (W6) through CIL funding. On the basis that this upgraded this would provide an off-road cycle link to Whitstable School. The potential cycle route is identified in **Figure 5-2** below.



Figure 5-2: Potential cycle link to Whitstable School via Crab & Winkle Way

5.12 To facilitate cycle movements along Millstrood Road and Thanet Way extensive improvements would be necessary which would include the provision of a shared footway/cycleway along Millstrood Road and a new at grade-signal controlled crossing on Thanet Way as identified in **Figure 5-3** below.

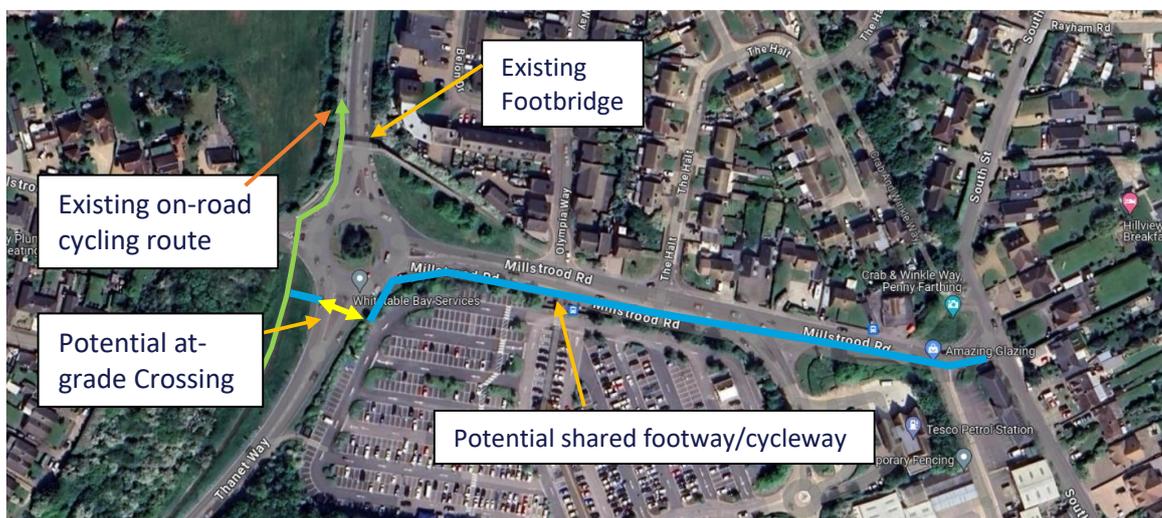


Figure 5-3: Potential Footway/cycleway improvements – Millstrood Road/ Thanet Way

5.13 The improvements identified in **Figure 5-3** would however be subject to a review of land ownership and may not all be deliverable. In addition, whilst improvement may be provided on the eastern side, students accessing the school would need to continue cycling on-road along Millstrood Road to the west side of Thanet Way, therefore it is considered that the majority of students cycling to school would prefer to use the Crab & Winkle Way and we would advise that the upgrades to improve the PRoW(identified in Figure 5-2) would be undertaken to provide a safer, primarily off road, route.

Chestfield Road Improvements

- 5.14 Access to the site will include a new access onto Chestfield Road from which a new Primary School and local facilities will be served. In addition, on the eastern side of the development area access to the proposed SEND school and employment uses are also proposed.
- 5.15 Chestfield Road has a 30mph speed limit and footway provision along its length, although this provision varies from being on one side and sometimes on both sides of the road. To assist residents both from the site travelling to the local facilities outside of the development and those accessing the new facilities from outside of the site, the following improvements are considered necessary.
 - Provide safe crossing facilities.
 - Provide traffic calming to slow vehicle speeds.
- 5.16 The predominate footway along Chestfield Road is on the eastern side of the road with only two sections where the footway is terminated namely at 143 Chestfield Road and at Chestfield Barn. The development proposal will provide a new pedestrian/cycle link from the site onto the western side of Chestfield Road which is likely to be close to 108 Chestfield Road where there is an existing footway.
- 5.17 The footway on the western side however only continues up to the Radfall Recreation Ground access and therefore it is recommended that a new centre refuge island is provided to enable residents to easily cross the road, this could alternatively be a controlled signalled crossing. To facilitate a 2m wide refuge island the road will need to be widened at this location, however it is considered that this can be achieved within the extent of public highway.
- 5.18 From this point, the footway on the eastern side continues up to Chestfield Barn where pedestrians need to cross to the western side, but then cross back to the eastern side shortly after as the footway on the western side stops at Willow Way. There are no formal crossing points at this location, and it is considered that these are provided to aid pedestrians across the road in this location as illustrated in **Figure 5-4** below.

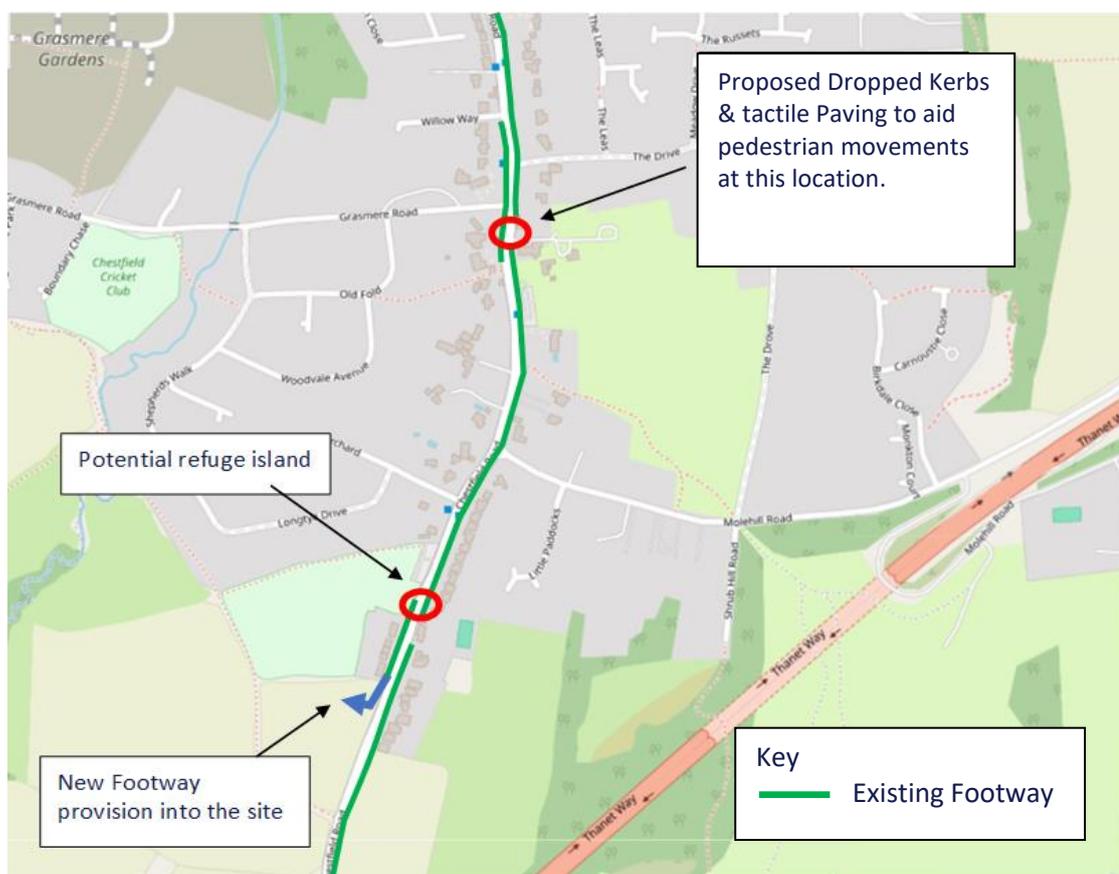


Figure 5-4: Potential crossing facilities on Chestfield Road

5.19 In addition to the above pedestrian crossing facilities, the opportunity to reduce vehicle speed is also considered appropriate as part of these proposals which could be in the form of priority working arrangements. The type and number of measures will be considered in more detail as part of a Transport Assessment.

Potential Cycle Connections

5.20 In addition to the above, the opportunity exists to contribute towards the provision of an East-West (Crab & Winkle Way to Herne Bay) route which would require the provision of an on-road cycle route from the site along Chestfield Road up to Molehill Road. Molehill Road would be downgraded to a Quiet Lane/ Green Way enabling on-road cycling up to Thornden Wood Road at which point there would be a short section of an on-road cycling to join Hawthornden Street that serves a new residential development where it is likely that either a segregated cycle route is available, or on-road cycling would be considered suitable. The route would then continue north along Greenhill Road which is a residential road and considered likely to be suitable for on-road cycling. The route would continue up to Thanet Way where via an existing controlled crossing east of Lidl, cyclists could then join the existing cycle route along Thanet Way.

5.21 The route would continue through the site and on the western side of the site, the route would join with the existing Crab & Winkle Way. A plan illustrating this route is identified in **Figure 5-5** below.

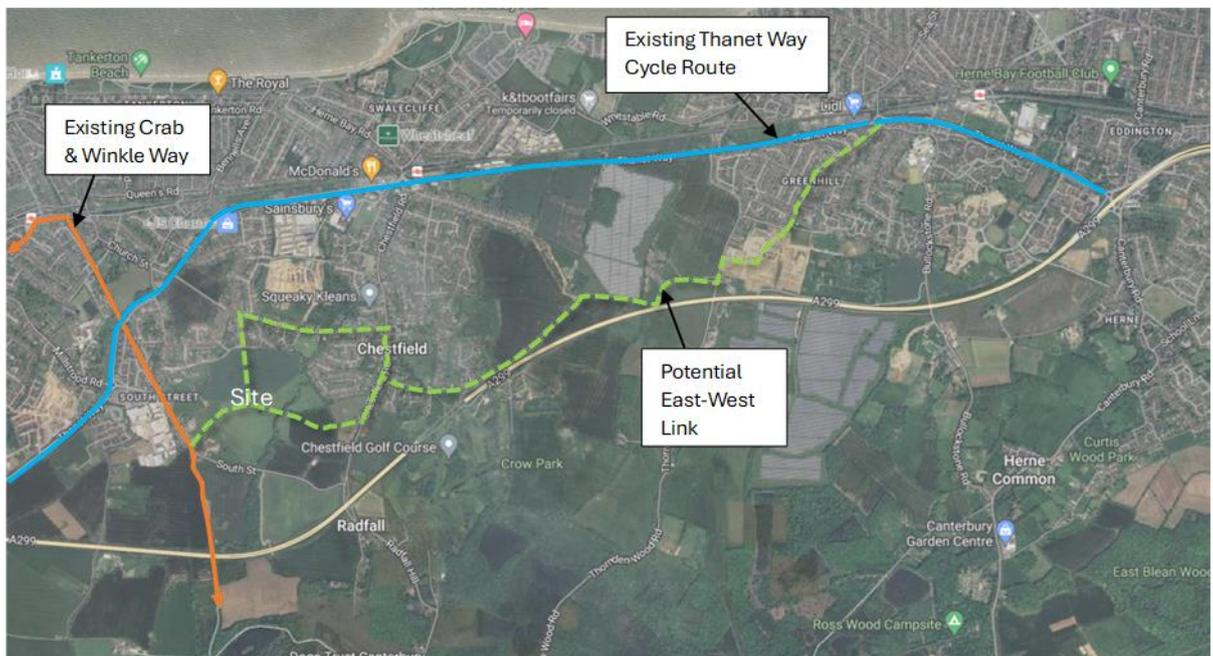


Figure 5-5: Potential strategic Cycle Routes

5.22 The above takes into consideration the proposals identified in the Draft Local Cycling and Walking Implementation plan (LCWIP) which identifies the downgrading of Molehill Road to make it suitable for on-road cycling. The LCWIP also includes for an on-road route along Chestfield Road north of Molehill Road to join Grasmere Road which in turn joins Lismore Road into the proposed site.

5.23 This is a strategic route benefiting the wider community and as such as part of this proposal it is considered that a contribution is provided for much of the scheme with the measures close to the site including the on-road cycle route on Chestfield Road to Molehill and South Street to the Crab & Winkle Way being implemented as part of the development proposal.

Summary

- 5.24** This section considers the proposed facilities to be provided as part of the site and the off-site improvements that could be implemented to improve accessibility to the site by walking and cycling.
- 5.25** The on-site facilities will include a network of footways and cycleways to provide a high level of connectivity to the existing networks and the facilities proposed on the site. The facilities on site will include Primary School, SEND School, Local Centre, local employment, inclusive open space, and recreational areas which will be within 800m of new residents providing a walkable neighbourhood. These new local facilities would also provide additional amenities and facilities to the existing residents adjacent to the Site, improving the opportunity for these existing residents to make short walks or cycling trips.
- 5.26** For access to local existing facilities a review of the routes that would be most regularly used by residents was undertaken in Section 4 and it was concluded that apart from improved formal crossing points, there are two key measures that are reviewed in more detail, these include:
- Cycle link to Whitstable Secondary School
 - Crossing facilities on Chestfield Road & potential traffic calming.
- 5.27** The conclusion is that for cycle access to Whitstable Secondary School the safest route would be via the Crab & Winkle Way, as this is an off-road route and there is a proposed link to Invicta Way which will enable a continued cycle route for student to use, the proposal for this link upgrade is identified in the LCWIP. For students walking to the school, this can be safely accommodated along Millstrood Road and via the existing footbridge.
- 5.28** On Chestfield Road, improvements are proposed to aid pedestrian movements which could include the provision of formal un-controlled or signal controlled crossings, in addition the opportunity exists to provide traffic calming measures to reduce vehicle speeds along this road.
- 5.29** Other potential measures to which the development could contribute towards would be an east-west cycle link that would connect the Crab & Winkle Way to Greenhill/ Herne Bay.
- 5.30** The measures identified will assist in making accessibility to the existing facilities in the local area more accessible to both new and existing residents.

6 Public Transport Improvements

Introduction

- 6.1 Public transport is fundamental to delivering a sustainable development, providing opportunities for mass transit to locally important service centres.
- 6.2 This section considers the opportunities available to divert existing bus services into the site and/or provide a new service, this section also considers potential accessibility improvements to the railway stations.
- 6.3 A review of the potential bus trips generated by the development site has been carried out based on the census data. This has determined that sufficient bus patronage to support a bespoke new service may be provided which would link the development site to the facilities within Whitstable.
- 6.4 The delivery of the development will be based on a strategy to encourage sustainable trips. A package of measures will be introduced to maximise trips by sustainable modes.

Bus Service Opportunities

- 6.5 The existing bus route that passes closest to the site is Route No.5, the opportunity therefore exists to potentially divert this service into the site. Given the routing of this service, it is considered that a diversion could not go through the site, but instead provide a diverted service from Chestfield Road as illustrated in Figure 6-1 below.

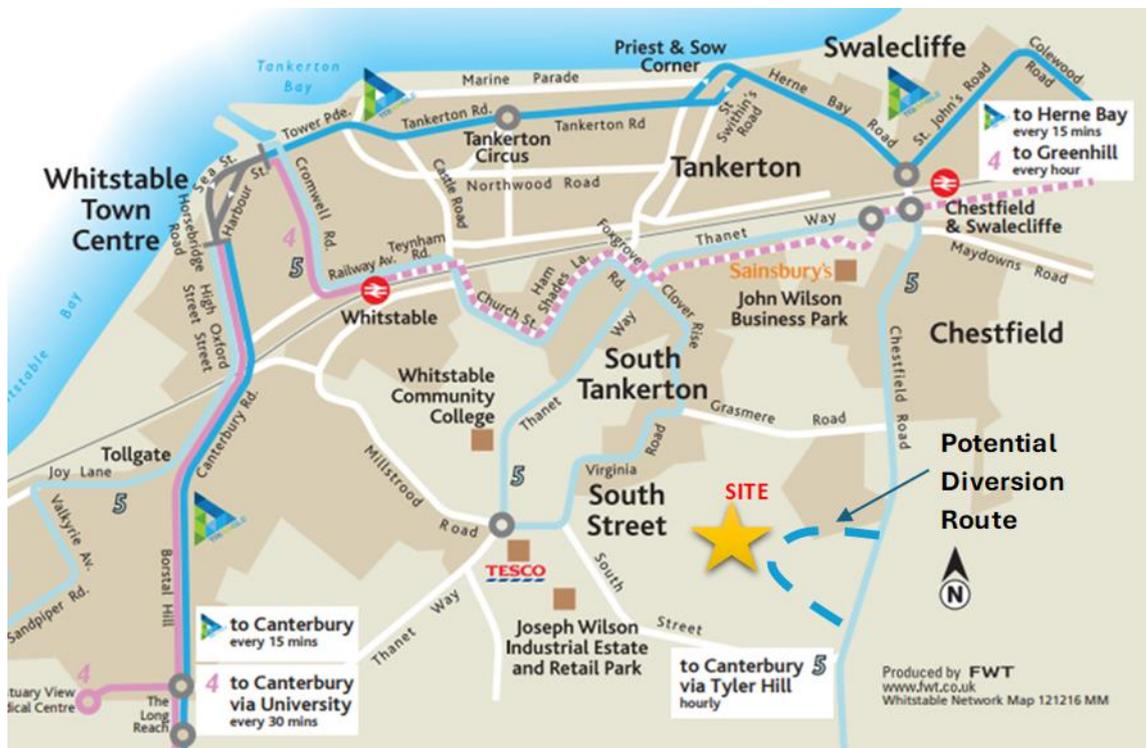


Figure 6-1: Potential Diversion of Bus Route No. 5

- 6.6 The benefits of utilising route No.5 is that its route includes all of the key destinations that residents are likely to travel to and also continues to Canterbury where a high proportion of work-related trips are made.
- 6.7 Alternatively, the opportunity exists to provide a new service to the site that could provide a loop service to

include key off site facilities within Whitstable including Tesco food store, Whitstable School, Whitstable Train Station, Sainsbury's/ local employment area & Chestfield & Swalecliffe Train Station. This route is illustrated in **Figure 6-2** below.



Figure 6-2: Potential New Bus Route

- 6.8** The diversion of route No.5 would be considered the most viable option as this is an existing service and includes a wider catchment area that would be of a greater benefit to new residents. The service is currently operating as an hourly service Monday to Saturday, the opportunity exists to increase the frequency of this service to provide a 30min service making it a more attractive means of travel.
- 6.9** The provision of a new local bus service, whilst could provide a frequent service, the benefits would be only to those accessing the local area and in the long term unlikely to remain a viable service. The new route could potentially continue to Canterbury although this could reduce the frequency of the service and would also effectively be duplicating the route that bus service No.5 takes and therefore a diversion into the site is likely to be most viable option.
- 6.10** Initial discussions are currently underway with Stagecoach to consider if the option of diverting the existing service into the site from Chestfield Road is achievable.

Railway Accessibility Improvements

- 6.11** The measures identified in Sections 4 & 5 of this report include a variety of improvements to aid walking and cycling from the site. Both Whitstable Station and Chestfield & Swalecliffe Station are accessible by foot and cycle, and at Whitstable Station there are 32 Cycle Stands available, however at the Chestfield & Swalecliffe Station, there is currently no cycle parking available and access to the station platforms are via steps. To encourage residents to cycle to Chestfield & Swalecliffe Station, the opportunity exists to contribute towards the provision of cycle parking on the existing public highway outside the station as illustrated in **Figure 6-3** below.



Figure 6-3: Potential location for cycle parking at Chestfield & Swalecliffe Station

Summary

- 6.12** This section considers the opportunities available to improve accessibility to public transport. For access to bus services, the opportunity exists to potentially divert existing bus route No.5 into the site from Chestfield Road. An alternative would be to provide a new bus service, although it is considered that this would effectively mirror the route that Route No.5 makes and therefore may not be viable in the long term.
- 6.13** For access to the railway stations, access by foot and cycle is easily achievable with the improvements identified in Sections 4 and 5 although at Chestfield & Swalecliffe Station, there are currently no cycle parking facilities and therefore the opportunity exists to provide cycle parking at the steps that lead to the eastbound platform.
- 6.14** The provision of these Public Transport improvements will further enhance the accessibility options available to the site reducing the need to travel by private car.

7 Site Sustainability Policy Review

Transport Strategy

7.1 The development will be built upon a sustainable strategy that encompasses the following objectives:

- Objective one: Reducing the need to travel.
- Objective two: maximise sustainable modes.
- Objective three: mitigate residual impacts.

Objective One: Reducing The Need to Travel

7.2 The fundamental objective of a sustainable strategy is to reduce the unsustainable movement of people, typically characterised as a single occupancy trip. The encouragement of sustainable movement of people within the development is the first objective of a sustainable development.

7.3 The Emerging Draft Canterbury District Local Plan to 2040 holds a list of policies that will form the Local Development Framework for the District. Policy W4 – Land at Brooklands Farm will allocate the site for development. The policy requires the design and layout of the site to create a complete, compact, and well-connected neighbourhood, where every day needs can be met within a 15-minute walking or short cycle to support the local economy, promote health, wellbeing, and social interaction. This will address climate change by reducing car dependency.

7.4 The careful consideration of the land uses delivered on-site can fundamentally affect the travel characteristics of the future residents. The future residents will have a range of demands that need to be addressed. In relation to journey purpose, this can be broken down into a broad spectrum. Typically, journey to school and commuting will represent the greatest proportion of trips, especially in the morning and evening peak periods. This is then followed by shopping, which is typically carried out outside the peak periods of trouble demand. However, when considering all the possible journey purposes other a whole day shopping accounts for the greatest single journey purpose, equating to 18% of all trips as identified within the National Travel Survey (NTS).

7.5 This demonstrates that by delivering a range of facilities within the confines of the development, a significant portion of the daily demands of the future residents can be addressed.

7.6 The development will deliver primary school provision at a level that will provide sufficient headroom to ensure every child will have a place. The NTS (National Travel Survey) identifies that in the morning peak 49% of trips are associated with education and the provision of a primary school within the development will remove a significant need to travel externally.

7.7 As demonstrated within the method of travel to work statistics, indicating within **Table 2-1**, the Covid 19 pandemic significantly increased the number of people working from home. The periods of national lockdown have long since gone but the effect on travel characteristics remain, with companies now acknowledging the many benefits of that flexible working arrangements can bring. To facilitate homeworking, the flexibility of the housing types delivered will consider, providing opportunities for home office space.

7.8 The development would also include a local centre that will provide shopping opportunities for the future residents together with a Transport Mobility Hub. A Mobility Hub concentrates ethos of sustainable movement in one place, providing an interchange between modes of travel. The onsite walking and cycling routes will provide strong connections into the hub which shall coincide with the central bus stop location. The Mobility Hub could also include additional office space to maximise the availability to work locally.

Objective Two: Maximise Sustainable Modes

- 7.9 The next objective is to recognise that after catering for daily demands internally within the development, there will always be a need for some trips to be carried out externally. The next objective is to encourage those trips that are necessary to be carried out by a sustainable mode.
- 7.10 A Transport Topic paper, including modelling, informs the transport policies for the emerging local plan. It shows that without intervention vehicle queuing and delay at the A299/Long Reach Interchange will worsen. The modelling also shows that town centre congestion and residential parking usage will worsen without intervention.
- 7.11 Therefore, the paper suggests a reduction in non-residential parking and an out-of-town car park. It supports the Park and Ride facility on Thanet Way west of the site. These interventions will also improve the site's connection to the town centre without the use of motor car.
- 7.12 The report also proposes cycle route improvements which will improve accessibility for residents of the site to walk and cycle to the town centre and also with an East-West route movements between Crab & Winkle Way to Herne Bay.
- 7.13 The draft Cycle and Walking Implementation Plan includes a list of actions that will improve the local cycle and walking infrastructure. These will improve walking and cycling permeability in the local area and embed the site in the active travel network.
- 7.14 As identified previously the development could provide a financial contribution towards the delivery of a bespoke bus service or increasing the frequency of an existing service that runs nearby the site. This will provide a strong connection between the site and the facilities available within Whitstable and the opportunities to continue their travel by non-car modes.

Objective Three: Mitigate Residual Impacts

- 7.15 After reducing the need to travel outside the development and maximising the opportunities for sustainable travel, the final step in a transport strategy is to mitigate any residual impacts.
- 7.16 The application for the development will be supported by a Transport Assessment (TA). This will assess the residual impact development and identify a range of highway interventions necessary to mitigate the impact.
- 7.17 In support of the local plan, Brookbanks have already carried out initial assessments on the likely impact of the development, which identifies a range of locally sensitive junctions that may need to be improved together with the delivery of the eastbound on-off slip roads at the new Chestfield Road junction.
- 7.18 The initial assessments have demonstrated that improvements to the road network can be carried out to ensure the development will not have a significant impact. Furthermore, the delivery of the slip roads will have a greater benefit to the operation of the local road network beyond just serving the needs of the development.

Policy W4 – Land at Brookbanks Farm

- 7.19 Within the Draft Canterbury District Local Plan 2040, the site identified as Policy site W4 identifies potential measures to improve accessibility to the site for non-car modes which are reviewed in **Table 7-1** below.

Policy Site W4 – Access and Transportation (Non-car modes policies)	
A) Provide safe and convenient pedestrian and cycle connectivity including:	Brookbanks Policy Compliance Review
i) Walking and cycle connections to Chestfield and to the Crab and Winkle Way including upgrade of CW21 and upgrade of CW38;	PRoW route CW21 continues through the site and will be improved as part of the development site. PRoW route CW38 starts from a point off Chestfield Road close to South Street junction and continues eastward across the Chestfield Golf Course. It is considered that this route could potentially be improved but not upgraded as it crosses third party land.
ii) New and improved cycle connections to Whitstable via the Crab & Winkle Way including extension of the Crab & Winkle Way traffic free route to the harbour and pedestrian/cycle bridge from Old Bridge Road to Teyham Road;	Potential improvements to the Crab & Winkle Way are identified in Sections 4 & 5. The existing Crab & Winkle Route currently uses a route called Stream Walk which provides a more direct route from the site to the facilities in the town centre. The time to cycle from the point where the Crab & Winkle joins Old Bridge Street to the centre of High Street or to Harbour Street via Stream Walk is currently 3mins. Via a new bridge as suggested would reduce the time to Harbour Street by potentially 1min but would provide no difference to the High Street. It is considered that improvements to the existing routes would be far more beneficial.
iii) New and improved walking and cycle connections to Site 12 in Policy CF1;	The primary route for walking and cycling to Site 12 would be along Thanet Way although a crossing would be required at the junction with Millstrood Road for cyclists.
iv) New and improved walking and cycling connections to school locations, both within the site and surrounding communities;	Improvements will be made to connect to the Secondary School and a new Primary School & SEND School will be provided on site including connections for both future and existing residents. Details of walking routes to the Secondary school are included in Sections 4 & 5.
v) New and improved walking and cycling connections to Herne Bay via A2990 Thanet Way and including the investigation of downgrading Molehill Road to a green lane; and	See proposals in Sections 4 and 5 (crossing of Thanet Way). Investigations to downgrade Molehill Road would be made See Section 5.
vi) Improvements to the PRoW network crossing and around the site as required.	As above
B) Provide good public transport facilities through the site with a new bus route connecting residential areas and the community hub to adjacent local areas and Whitstable town centre.	See section 6
D) Provide pedestrian and cycle only access from Rayham Road.	Access onto Rayham Road would only be suitable for walking as it is an unsurfaced route and may not be suitable for cyclists.

Table 7-1: Policy Site W4 - Access and Transportation

- 7.20** It is considered that the site has the potential to deliver the improvements identified as part of the planning policy with an exception to the provision footway/cycleway bridge from Old Bridge Road to Teyham Road which is not considered to provide any material benefit to the development site and other improvements identified in this report are considered to be of greater benefit.

8 Potential for Modal Shift

- 8.1** This report has identified the existing modes used by residents for their journeys to work, the key workplace destinations and the typical trip purpose made by residents throughout a typical week. In addition, this report considers the key routes that residents accessing facilities outside of the site would use and where improvements to these routes should be provided to make accessibility easier.
- 8.2** This report also identifies the key facilities that will be provided on site making the site a walkable neighbourhood and the opportunities to provide bus services into the site which will ensure that the majority of residents and proposed facilities are within approximately a 5min walk of a bus service. All sustainable routes and services will link to the onsite Mobility Hub which will facilitate other modes such as hiring of electric scooters or cycles and electric car hire. Other measures identified include potential offsite controlled crossing provisions and new cycle routes.
- 8.3** A Transport Assessment and Travel Plan will be prepared to support a planning application on the site and will consider in more detail the opportunities for modal shift, however based on the findings of this report it is considered that the greatest opportunity for modal shift will be during the peak periods. Currently around 80% of people travel to work by car (2011 Journey to work Census) although around 57% work within Whitstable, Herne Bay or Central Canterbury which can be accessed by PT or cycle. Therefore, it is considered that with the measures identified in this report there is the potential to provide a significant shift in modes which is likely to result in an increase in PT and cycling.

9 Summary and Conclusions

Summary

- 9.1** This report has been prepared to demonstrate the proposed site allocation on Brooklands Farm is in an accessible location to access existing facilities within Whitstable by non-car modes and that access to areas for work related trips can be achieved by modes other than the private car.
- 9.2** The site is situated to the southern edge of the existing urban development of Whitstable and access from the site is achievable from various locations including South Street/ Chestfield Road and Lismore Road/ Rayham Road, enabling residents to be able to easily access the wider area of Whitstable.
- 9.3** Based on the 2011 census data, around 80% of residents travel to work by car, although 30% work within Whitstable, 10% in Herne Bay and 17% within Central Canterbury which are accessible by walking, cycling or Public Transport.
- 9.4** This report therefore reviews the key routes that residents are likely to use to access local facilities within Whitstable to ensure that connectivity can be easily made by walking or cycling. This review concludes that the improvements needed include the provision of formal crossing locations which will primarily be in the form of uncontrolled crossings and potential traffic calming along Chestfield Road to reduce vehicle speeds.
- 9.5** Other measures identified may include new cycle links and contributions towards the measures identified within the Draft Local Cycling and Walking Implementation Plan (LCWIP).
- 9.6** In addition to the main walking routes to local facilities, the opportunity exists to contribute towards an east-west link from the Crab & Winkle Way on South Street to the existing cycle route along Thanet Way at Herne Bay. This route would incorporate an on-road route along South Street, Chestfield Road, Molehill Road and Greenhill Road in Herne Bay. This route forms part of the aspirations identified within the LCWIP although the provision of this route would be subject to further detailed assessment.
- 9.7** This report also considers accessibility by public transport. The walking/cycling routes are considered suitable for access to the existing train stations within Whitstable although the opportunity exists to contribute towards new cycle parking at the Chestfield & Swalecliffe Station to encourage cycle use to this station. The opportunity also exists to divert bus route No.5 into the site from Chestfield Road, subject to discussions with Stagecoach. An alternative would be to provide a new bus service through the site which would serve the local area, although it is considered that the route would be similar to Bus Route No.5 and may not be viable in the long term.
- 9.8** The proposed development will include a range of onsite facilities including a Primary School, SEND School, Local Centre, local employment, inclusive open space, and recreational areas, enabling residents to be able to complete shorter trips within the site area by walking or cycling or use of the proposed bus services.
- 9.9** The development proposal will ensure that the site is a walkable neighbourhood through the provision of a comprehensive network of footways and cycleways and access to bus services will be within a 5min walk of the majority of residents. All sustainable routes and services will also link to the onsite Mobility Hub which will facilitate other modes such as hiring of electric scooters or cycles and electric car hire.
- 9.10** A Transport Assessment to support an application for this site will include a more detailed review of the potential measures identified within this report and the likely levels for modal shift supported by a residential Travel Plan.

Conclusions

- 9.11** This report demonstrates that the site is within an area that can be easily accessed by non-car modes and that access to existing local facilities can easily be made by walking and cycling. The opportunities also exist

to further improve accessibility through the provision of bus services, new cycle routes and improved crossing facilities.

- 9.12** The development site will also include several on-site facilities which will be connected within the residential area through a strategic network of footways and cycleways.
- 9.13** Overall, the site is well located to achieve the aims and objectives of the draft Local Cycling and Walking Implementation Plan and the Central Governments aims and objectives to increase the level of walking and cycling made reducing the need to travel by the private car.

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Appendix 2 - ES Non Technical Summary

LAND AT BROOKLANDS FARM, WHITSTABLE

APRIL 2025

ENVIRONMENTAL STATEMENT - NON TECHNICAL SUMMARY



CONTENTS

01	Introduction	Page 2	16	Climatic Factors	Page 40
02	EIA Methodology	Page 4	17	Mitigation and Monitoring	Page 42
03	The Existing Site	Page 5	18	Cumulative Impacts	Page 43
04	Alternatives and Design Evolution	Page 6			
05	The Proposed Development	Page 8			
06	Planning Policy Framework	Page 10			
07	Socio-Economic and Human Health	Page 11			
08	Transport, Accessibility and Movement	Page 13			
09	Air Quality	Page 15			
10	Noise and Vibration	Page 17			
11	Hydrology and Flood Risk	Page 19			
12	Heritage and Archaeology	Page 21			
13	Ecology	Page 23			
14	Ground Conditions	Page 33			
15	Landscape and Visual Impact	Page 35			

1. INTRODUCTION

1.1 This Environmental Statement (ES) has been prepared to accompany the outline planning application that is being submitted by Nexus Planning on behalf of Hallam Land Management Ltd (“Hallam”) to Canterbury City Council for:

“Outline application with all matters reserved apart from principal means of access from South Street and Chestfield Road for a proposed mixed use development of up to 1350 dwellings, including a mix of market housing, affordable housing, older persons housing (Class C2 / C3); a mixed use Local Centre to include homes alongside retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a two-form entry primary school (Use Class F) and a SEND school (Use Class F); business/employment space (Use Classes B2, B8 and E(g)); open space and the laying out of green infrastructure including habitat creation, drainage infrastructure, earthworks, pedestrian and cycle route; and new A299 east off / east on slip roads to the south of Chestfield.”
 (“the Proposed Development”)

At

Land at Brooklands Farm, Whitstable (“the Site”)

1.2 The Site lies in the administrative area of Canterbury City Council (hereafter referred to as “the Council”).

1.3 The main document (Volume 1) together with the accompanying Appendices (Volume 2) and this Non Technical Summary (“NTS”) form the ES for the Proposed Development.

1.4 The main document is divided into 18 chapters.

Part One

Chapter 1	Introduction
Chapter 2	EIA Methodology
Chapter 3	The Existing Site
Chapter 4	Alternatives and Design Evolution
Chapter 5	The Proposed Development
Chapter 6	Planning Policy Framework

1.5 The second part of the ES describes the findings of the specialist environmental assessments of each topic. Each topic is assessed in relation to the environmental effects the Proposed Development will have on that topic. It identifies mitigation measures that are required. The following technical chapters are:

Part Two

Chapter 7	Socioeconomic and Human Health
Chapter 8	Transport, Accessibility and Movement
Chapter 9	Air Quality
Chapter 10	Noise
Chapter 11	Hydrology and Flood Risk
Chapter 12	Heritage and Archaeology
Chapter 13	Ecology
Chapter 14	Ground Conditions

Chapter 15	Landscape and Visual Impact
Chapter 16	Climatic Factors
Chapter 17	Mitigation and Monitoring
Chapter 18	Cumulative Impacts

- 1.6 In addition, a number of technical reports, information and diagrams on specific issues have been produced. These provide detailed information on surveys and research on which the assessment of environmental effects has been based. These are included as Appendices (Volume 2) to the main volume.
- 1.7 This NTS has also been prepared as a separate report, summarising the findings of the ES in non-technical language.
- 1.8 The consultant team comprises the following specialists and experienced consultants:

Nexus Planning	EIA coordinators Part One Planning Policy Framework Socioeconomics Health Impact Mitigation and Monitoring Cumulative and Interactive Effects
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Brookbanks	Transport Air Quality Noise and Vibration Hydrology and Flood Risk Ground Conditions Climatic Factors
Orion Heritage	Heritage and Archaeology
Define	Landscape
FPCR	Ecology

2. EIA METHODOLOGY

- 2.1 This ES has been prepared in accordance with the requirements set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (“The EIA Regulations”). Details of specific methods used for each of the technical assessments are provided in the relevant technical ES Chapter. The content and conclusions of the ES are based on assessment of ‘Proposed Development’ as set out in Chapter 5.
- 2.2 In line with the EIA Regulations and best practice guidance, a formal request for a Scoping Opinion and Scoping Report were submitted to the Council at the start of the assessment process.
- 2.3 The Scoping Report concluded that the following environmental issues associated with the Proposed Development should be considered within the ES:
- Socioeconomic and Human Health;
 - Transport, Accessibility and Movement;
 - Air Quality
 - Noise and Vibration;
 - Hydrology and Flood Risk
 - Heritage and Archaeology;
 - Ecology;
 - Ground Conditions;
 - Landscape and visual
 - Climate Factors.

- 2.4 As part of the formal scoping process the Council consulted with a number of external statutory consultees such as Natural England, Lead Local Flood Authority, Historic England and other non-statutory consultees as the Council deemed appropriate.

EIA Assessment Methodology

- 2.5 The EIA Regulations require that the ES should, where possible, identify, describe and assess the likely significant impacts of the Proposed Development on the environment.
- 2.6 Each of the technical Chapters assesses the impacts of the Proposed Development at both the construction (including demolition) and operational phases. The significance of both positive and negative impacts has been determined within each topic chapter.
- 2.7 The cumulative impact of a number of developments has been assessed within each topic chapter and brought together in Chapter 18.

3. THE EXISTING SITE

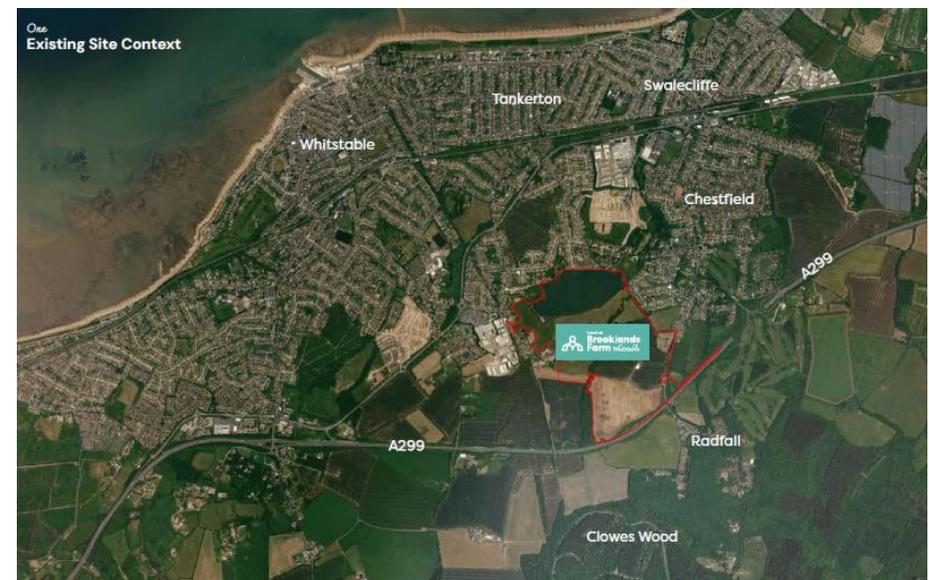
- 3.1 The Site is located entirely within Canterbury District and comprises 78.99 hectares of agricultural land.
- 3.2 The Site is bound by residential development and Chestfield Cricket Club to the north, with South Street forming the southern boundary in the south and west. Further east, the A299 forms the southern boundary. Chestfield Road forms the eastern boundary.
- 3.3 The majority of the Site is located within Flood Zone 1, however Swalecliffe brook runs diagonally north-east to south of the Site, this is located within Flood Zone 2 and 3.
- 3.4 Ancient Woodland, known as Longtye Wood runs parallel with Swalecliffe Brook through the site.
- 3.5 Public Right of Way routes continue through the Site as Footpath CW21 and Footpath CW27. Footpath CW21 connects to Footpath CW22 which is known as the Crab & Winkle Way. Bridleway CW27A also continues along Rayham Road to the north of the Site.
- 3.6 The landform within the Site is gently undulating, ranging in elevation from approximately 32m above Ordnance Datum (AOD) in its northern section and 35m AOD near to its southern edge, to around 11m AOD in its centre, adjoining Swalecliffe Brook.

Site is Surrounding Land Use and Site Context

- 3.7 Brooklands Farm is located on the southern edge of Whitstable, one of the most sustainable settlements in the district that offers a wide range of services and facilities. To the north of the site, much of the Site is backed by existing residential

development off Rayham Road. A large industrial estate is located to the west of the Site, opposite South Street, which contains a large Tesco Extra providing future occupiers easy access to everyday goods.

- 3.8 In terms of sustainable transport modes for journeys further afield, Bus Services local to the Site include route No. 5, 914, 915, 916 and 917. Route No.5 travels closest to the Site with the opportunity to divert into the Site. Moreover, the nearest Railway Stations include Whitstable Railway Station and Chestfield & Swalecliffe Train Station which are within a 30min walk/ 10min cycle.
- 3.9 In terms of heritage assets, Brooklands Cottage and Brooklands Farmhouse to the south-west of the Site, and Rayham Farm and the Barn to the North East of Rayham Farm to the north of the Site are Grade II Listed Buildings, and the Canterbury and Whitstable Railway and Whitstable Conservation Area runs part way along the western side of South Street.



4. ALTERNATIVES AND DESIGN EVOLUTION

Consideration of Alternative Locations and Land Use

4.1 The consideration of alternative sites for the Proposed Development is heavily influenced by the context provided by the emerging Canterbury Local Plan. The Site is a draft allocation in the emerging Local Plan under Policy W4 which forms part of a wider Strategic Development Area (SDA) to the South of Whitstable. As such, no further consideration of alternative locations is required in accordance with the EIA Regulations.

4.2 Similarly, with regards to consideration of alternative land uses, the acceptable use of the Site has been determined through the Local Plan process with the resulting draft allocation of the Site providing for:

(a) Approximately 1400 new dwellings including affordable housing, older persons housing, accessible housing, self building housing and an appropriate housing mix in line with Policies DS1 and DS2.

(b) Non-residential development:

(i) Provision of a community hub on the western part of the site as focal area for the community containing a mix of uses including:

(1) Local centre including commercial (minimum 880sqm) and local shopping and community uses (minimum 350sqm);

(2) Business space (minimum 4,000sqm) including flexible working space; and

(3) A mobility hub to serve residents and businesses.

(ii) Provision of a new 2FE Primary School (2.05ha) with early years provision, located adjacent to the community hub;

(iii) Provision of a SEND School (2.05ha), at an appropriate location within the site;

(iv) Provision of local shopping and community uses to meet local needs on the eastern part of the site; and

(v) Proportionate land and build contributions towards early years, primary, secondary and SEND education plus proportionate contributions for primary healthcare and other necessary off-site community infrastructure.

(c) Open space: new on-site open space will be provided in line with Policy DS24, and the outdoor sports should include a new cricket pitch and facilities for Chestfield Cricket Club.

4.3 Having regard to the above, no further consideration of alternative locations is required in accordance with the EIA Regulations.

4.4 Best practice guidance in carrying out an EIA suggests that it is good practice to consider the evolution of a site in the absence of the development proposed (i.e. a 'no development' scenario). However, in view of the above, this scenario is considered to be highly unlikely and, as such, no detailed consideration has been given to the "no development scenario" beyond this chapter.

Consideration of Alternative Designs

4.5 The Proposed Development is in outline at this stage with all matters, except the means off access, being reserved. As such, the scheme design and layout are

provided by a series of parameter plans, together with an illustrative masterplan. However, the scope for alternative approaches to be taken is limited, due to the following:

- The planning policy requirements of the draft allocation under Policy W4 of the emerging Canterbury Local Plan;
- The vision and overarching principles set out in the South Whitstable SDA;
- The Site-specific constraints and opportunities e.g. topography, heritage; woodland, trees and hedgerows, hydrology and drainage catchment, and existing footpaths and bridleways.

4.6 The illustrative masterplan for the Proposed Development is described in detail within the Design and Access Statement which accompanies the outline planning application submission.

5. THE PROPOSED DEVELOPMENT

5.1 The Proposed Development seeks:

“Outline application with all matters reserved apart from principal means of access from South Street and Chestfield Road for a proposed mixed use development of up to 1350 dwellings, including a mix of market housing, affordable housing, older persons housing (Class C2 / C3); a mixed use Local Centre to include homes alongside retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a two-form entry primary school (Use Class F) and a SEND school (Use Class F); business/employment space (Use Classes B2, B8 and E(g)); open space and the laying out of green infrastructure including habitat creation, drainage infrastructure, earthworks, pedestrian and cycle route; and new A299 east off / east on slip roads to the south of Chestfield.”

5.2 The Proposed Development as set out on the submitted parameter plans and shown on the illustrative masterplan comprises:

- up to 1350 residential dwellings including a mix of market housing, affordable housing (30%), older persons housing (Class C2 / C3);
- a mixed use Local Centre to include homes alongside retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F);
- a two-form entry primary school (Use Class F);
- a SEND school (Use Class F) covering both primary and secondary education;
- 3000m2 (footprint) of flexible business/employment space (Use Classes B2, B8 and E(g));

- open space and the laying out of green infrastructure including habitat creation, drainage infrastructure, earthworks, pedestrian and cycle route; and
- new A299 east off / east on slip roads to the south of Chestfield.

5.3 More detail of the Proposed Development is contained within the Design and Access Statement and across the application submission as a whole.



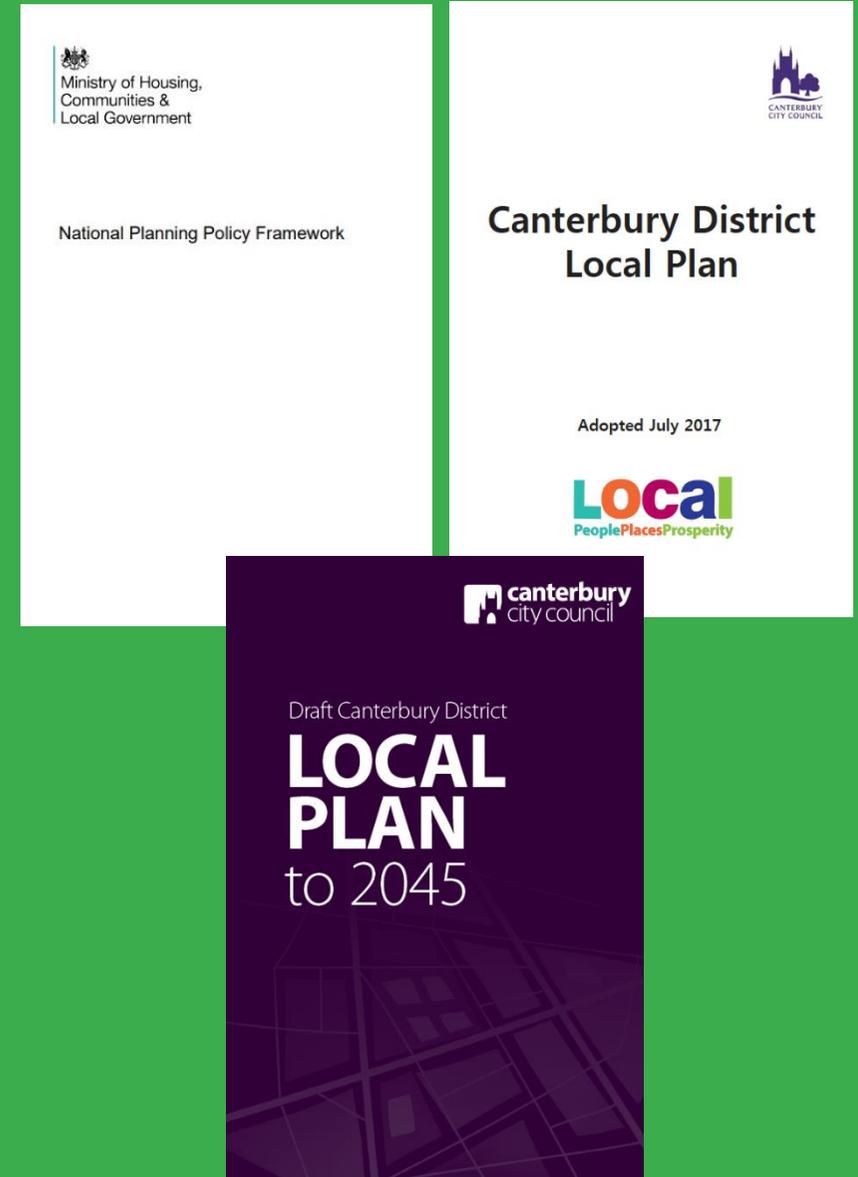
Illustrative visual - housing overlooking Central Park

Illustrative Masterplan



6. PLANNING POLICY FRAMEWORK

- 6.1 The Planning Policy Framework Chapter sets out the relevant planning policy documents at national and local levels. It summarises the National Planning Policy Framework (“NPPF”) which was published in December 2024, drawing on salient parts in the context of the Proposed Development.
- 6.2 The Chapter goes on to set out the local policy context relating to Canterbury City Council, comprising the Canterbury District Local Plan 2011-2031 (Adopted 2017). A key material consideration for the Proposed Development is the Regulation 18 emerging Local Plan (to 2045) where the Site was allocated for development.



7. SOCIO ECONOMIC AND HUMAN HEALTH

Introduction

7.1 This section provides a summary of the socioeconomic impacts of the Proposed Development which have been referenced within the ES chapter. Chapter 7 of the ES has considered an Immediate Zone of Influence comprising of four Middle Layer Super Output Areas (MSOAs) surrounding the Site, and a Wider Zone of Influence (composed of the local authority area of Canterbury District).

Impacts of the Proposed Development

Construction Phase

- 7.2 On the majority of receptors included in the assessment, the Proposed Development is considered to have a negligible impact during the construction phase.
- 7.3 The Proposed Development is expected to have a moderate beneficial impact on the receptor of employment, earnings and the labour market. The construction phase of the Proposed Development will offer a number of economic benefits in terms of jobs created and construction GVA. The construction phase is anticipated to directly create 1,559 person years of employment, equivalent to 142 jobs per annum over the anticipated 11-year build period. After accounting for indirect and induced job creation, it is projected that the Proposed Development will support 2,339 net additional person years of employment, equivalent to 213 jobs per annum. Furthermore, the construction expenditure is forecast to generate a total of £90m GVA across the build period.

7.4 As a result of the scale of job creation associated with the Proposed Development, we consider that there will be a minor beneficial impact on the receptor of unemployment. There is the potential for the construction process to include training schemes for local residents, and as such we expect there will be a minor beneficial impact on the receptor of qualifications and skills.

Operational Phase

- 7.5 Under the receptors of qualifications and skills and travel to work the Proposed Development is expected to have a negligible impact during the operational phase.
- 7.6 The Proposed Development is expected to accommodate approximately 3,038 people once operational, including younger residents, working age residents and older residents. Consequently, we expect there to be a moderate beneficial impact on the receptor of population.
- 7.7 Similarly, we expect there to be a moderate beneficial impact on the receptor of housing. Proposals are for 1,350 dwellings, including a proportion of affordable housing and older person's accommodation. This will contribute to Canterbury's annual housing requirement, and improve housing affordability in the area.
- 7.8 The impact on the receptor of employment, earnings and the labour market is also expected to be moderate beneficial. The Proposed Development includes flexible business space and a new local centre. This is projected to generate approximately 400 direct jobs on-site, and another 200 indirect and induced jobs. Increased retail and leisure spend as a result of new residents is expected to generate another 80 jobs. These jobs are expected to generate an operational GVA of £207m.
- 7.9 The Proposed Development includes a new 2FE primary school, land for a SEND school, as well as potential provision in the local centre for a nursery and a

medical/health centre. As a result, we consider that the Proposed Development will have a moderate beneficial impact on the receptor of healthcare and social infrastructure.

- 7.10 The Proposed Development has the potential to improve the local area's performance across multiple domains of deprivation, and as such we consider it to have a minor beneficial impact on the receptor of deprivation.
- 7.11 Due to the scale of jobs supported both directly and indirectly, the Proposed Development is likely to decrease unemployment in the local area, and will have a minor beneficial impact on this receptor.
- 7.12 The Proposed Development is expected to have a minor beneficial impact on the receptor of accessibility and active travel, as proposals include a new mobility hub, and improvements to existing walking and cycling networks.
- 7.13 The Proposed Development includes a wide range of formal and informal open spaces which will be accessible both to residents of the Proposed Development but also to the wider community. These include sports pitches, playing fields, parks, play areas for children and allotments. Consequently, we expect there to be a minor beneficial impact on the receptor of open space.

Mitigation

Construction Phase

- 7.14 During the construction phase, a Construction Partnership agreement will be established to assist in ensuring that local residents can take advantage of employment opportunities in construction of the Proposed Development. A Construction Environmental Plan and a Construction Transport Management Plan will also be established to protect the environment, amenity and safety of the area local to the Proposed Development.

Operational Phase

- 7.15 During the operational phase, a Residential Travel Plan will be established and implemented to encourage sustainable modes of travel.

Cumulative Impacts

- 7.16 A number of developments have been identified in terms of relevance to assessing cumulative impact, as determined through the scoping report and discussions with the Council. Including the Proposed Development, the cumulative sites are expected to provide a total of 5,880 new dwellings in the local area, and are expected to generate 932 new direct jobs.

Residual Impacts

Construction Phase

- 7.17 During the construction phase, the Proposed Development is considered to have a minor beneficial impact on the receptors of employment and the labour market, unemployment, and qualifications and skills. On all other receptors the Proposed Development is expected to have a negligible impact.

Operational Phase

- 7.18 During the operational phase, the Proposed Development is considered to have a moderate beneficial impact on the receptors of population, housing, employment, earnings and the labour market, and healthcare and social infrastructure, and a negligible impact on the receptor of qualifications and skills. On all other receptors the Proposed Development is considered to have a minor beneficial impact.

8. TRANSPORT, ACCESSIBILITY AND MOVEMENT

8.1 This Chapter of the Environmental Statement (‘ES’) has been prepared to assess the direct and indirect impacts from highways and transportation.

Impacts of the Proposed Development

Construction Phase – Construction Traffic Noise

8.2 The initial construction phase that will occur at commencement will deliver the infrastructure (road and drainage). The temporary increase in traffic due to construction is unlikely to result in a perceivable difference. Therefore, the temporary direct effect from construction traffic is likely to be Negligible.

Operational Phase

8.3 The assessment undertaken for the operational phase is based on the future year 2040 as identified in the TA. Comparing the Full Development with and without the proposed East bound A299 Slip Roads. The results of the impact of the development at operation phase is considered to be negligible.

Mitigation

Construction Phase

8.4 A Construction Environmental Management Plan (CEMP) will be produced in order to protect the existing local sensitive receptors. This will include the identification of point of connection for construction vehicles together with the permissible roads within the local network.

Operational Phase

Walking and Cycling

8.5 Walking and cycling trips will be encouraged throughout the development through the introduction of high-quality strategic routes. The on-site network will deliver strong connections to the wider walking and cycling provision in the area.

Public Transport

8.6 A new hopper style bus route accessing the site will be introduced and proposed to be Monday to Saturday with a 30min frequency between the hours of 6am and 8pm, after which the frequency will be hourly.

Travel Plan

8.7 A Residential Framework Travel Plan and Employment Framework Travel Plan have been produced as stand-alone documents in support of the application. The overarching principles and targets for the management and coordination of travel planning goals is to promote travel by sustainable modes such as walking, cycling and public transport.

Junction Mitigation

8.8 The proposed development includes mitigation to the following junctions:

- South Street/Chestfield Road/Radfall Hill T Junction
- South Street/Millstrood Road T Junction
- Millstrood Road/Thanet Way Roundabout

Cumulative Impacts

Construction Phase

- 8.9 The potential for cumulative impacts from construction is considered negligible due to the distance between the proposed site and any other potential construction site.
- 8.10 The assessment (including the cumulative impact of other developments) identifies that the construction phase of the development will give rise to effects that are significant in EIA terms.

Operation Phase

- 8.11 This chapter has used traffic data provided by the transport consultant who has agreed with the Local Planning Authority that the EIA would consider the cumulative effects of committed developments in the locality of the development site. The increase in traffic due to committed developments had been included within the traffic projections.
- 8.12 The assessment (including the cumulative impact of other developments) identifies the development will not give rise to effects that are significant in EIA terms.

Residual Impacts

Construction Phase

- 8.13 With the proposed mitigation (i.e. implementation of a CEMP) the residual effect is assessed to be of negligible significance.

Operational Phase

- 8.14 After the introduction of mitigation there will not be a residual effect.



Figure 79 Walking & Cycling Plan through and beyond the Site

9. AIR QUALITY

Introduction

- 9.1 An assessment has been undertaken to determine the potential effect on local air quality of the construction and operation of the Proposed Development. The assessment has been undertaken in accordance with relevant national/ local policies and technical guidance relating to air quality.

Impacts of the Proposed Development

Construction Phase

- 9.2 During site enabling and construction, the Site has the potential to generate dust nuisance beyond the application boundary. A construction dust risk assessment has been undertaken in accordance with Institute of Air Quality Management Guidance to identify the level of mitigation required to minimise dust soiling, human health and ecological impacts. Following the implementation of best practice dust control measures via the Construction Environmental Management Plan, the impacts will be effectively minimised and not significant.
- 9.3 Due to the phased nature of the Proposed Development, emissions from construction traffic are unlikely to significantly affect local air quality.

Operational Phase

- 9.4 Detailed dispersion modelling has been undertaken to assess the impact of emissions from operational traffic associated with the Proposed Development on air quality at sensitive receptor locations. The impact on air quality is assessed as not significant.

- 9.5 Pollutant concentrations at the Site are predicted to be well below the relevant air quality standards for the protection of health. The proposed development will not, therefore, introduce new exposure to poor air quality.

Mitigation

Construction Phase

- 9.6 A range of construction phase mitigation measures have been recommended for incorporation into the CEMP for the Proposed Development to ensure that off site impacts are not significant.

Operational Phase

- 9.7 A Framework Travel Plan has been developed for the site which includes a range of measures to encourage sustainable travel and minimise the number of vehicle trips associated with the Proposed Development.

Cumulative Impacts

Construction Phase

- 9.8 Following the implementation of the CEMP, construction phase impacts associated with the Proposed Development will be minimised and not significant. Other construction sites in the area will also be subject to best practice dust control, therefore the cumulative impact is expected to be negligible/ not significant.

Operational Phase

- 9.9 The future baseline traffic flows used in the modelling include traffic associated with other proposed and committed developments in the area, therefore cumulative impacts are intrinsic to the assessment and are not significant.

Residual Impacts

Construction Phase

- 9.10 The residual impact of the Proposed Development on local air quality during the construction phase is not significant.

Operational Phase

- 9.11 The residual impact of the Proposed Development on local air quality during the operational phase is not significant.

10. NOISE & VIBRATION

Introduction

- 10.1 This Chapter of the Environmental Statement ('ES') has been prepared to assess the direct and indirect impacts from noise and vibration. The baseline situation is considered before the likely environmental effects of the Proposed Development are identified.

Impacts of the Proposed Development

Construction Phase

Construction Traffic Noise

- 10.2 The initial construction phase that will occur at commencement will deliver the infrastructure (road and drainage). The temporary increase in traffic due to construction is unlikely to result in a perceivable difference. Therefore, the temporary direct effect from construction traffic is likely to be Negligible.

Construction Vibration

- 10.3 General construction activities are unlikely to result in vibration effects being perceived.

Construction Phase - Construction Noise

- 10.4 It is likely that the main construction activities which may affect existing or proposed residential dwellings would include site mobilisation, site clearance, road construction and building construction. The temporary direct effect from construction noise is likely to be moderate.

Operational Phase

Operational Traffic Induced Noise

- 10.5 The Traffic noise predictions have been made using the forecast traffic levels. The significance of such impacts on the most sensitive receptors – residential uses – is assessed as being negligible.

External Noise Levels

- 10.6 A review of the noise environment across the Proposed Development has indicated that the external noise levels has the potential to exceed 55 dB immediately adjacent to the A299, South Street and Chestfield Road. The final site layout will be subject to additional reserved matters applications to be submitted at a later date. For the purpose of this assessment, it has been assumed that the site layout will follow good practice guidelines, which identifies that amenity space associated with the proposed dwellings will be protected from noise levels associated with traffic by locating gardens behind the housing which will provide noise screening. Noise modelling has identified that the properties along A299 will benefit from formal noise screening which could take the form of a 3 m high noise barrier.

Internal noise levels daytime

- 10.7 BS8233 indicates that a daytime internal noise level of 35 dB LAeq represents the desirable noise standard. The required mitigation is based on the façade noise level minus the acceptable internal noise level (35db during daytime). This indicates that the maximum attenuation required is 29 .9 dB. However, opening windows for ventilation purposes will increase noise levels. Therefore, alternative means of ventilation will be required for properties fronting the A299. The alternative means of ventilation can take the form of acoustic trickle vents within the window frames of habitable rooms.

Internal noise levels night-time

- 10.8 The required mitigation is based on the façade noise level minus the acceptable internal noise level (30 dB during night-time). Non-Statutory Nature Conservation Sites
- 10.9 This indicates that the highest level of attenuation necessary is 31.3 dB. However, opening windows for ventilation purposes will increase noise levels. Therefore, alternative means of ventilation will be required, which can take the form of acoustic trickle vents.

Mitigation

Construction Phase

- 10.10 To minimise the impact on receptors during the construction process, a Construction Environment Management Plan (CEMP) is anticipated to be provided for the development and secured by way of planning condition.

Operational Phase

- 10.11 For the basis of this assessment, it has been assumed that all the future homes will be provided with double glazing together with alternative means of ventilation for those properties that overlook the A299.
- 10.12 In order to achieve external limits identified within BS8233 a 3 m noise barrier will be necessary on part of the southern extremity adjacent to the A299.

Cumulative Impacts

Construction Phase

- 10.13 The potential for cumulative impacts from construction is considered negligible due to the distance between the proposed site and any other potential construction sites. The assessment (including the cumulative impact of other developments) identifies that the construction phase of the development will not give rise to effects that are significant in EIA terms.

Operational Phase

- 10.14 This chapter has used traffic data provided by the transport consultant who has agreed with the Local Planning Authority that the EIA would consider the cumulative effects of committed developments in the locality of the development site. The increase in traffic due to committed developments has been included within the traffic projections.
- 10.15 The assessment (including the cumulative impact of other developments) demonstrates that the development will not give rise to effects that are significant in EIA terms.

Residual Impacts

Construction Phase

- 10.16 With the proposed mitigation (i.e. implementation of a CEMP), noise from construction plant, equipment and machinery is assessed to have a negligible significance.

Operational Phase

- 10.17 After the introduction of mitigation there will be a negligible residual effect.

11. HYDROLOGY & FLOOD RISK

Introduction

11.1 This non-technical summary has been prepared by Brookbanks to present the findings of an assessment of the environmental effects of the Proposed Development on hydrology, flood risk, foul and surface water drainage and water resources.

Impacts of the Proposed Development

11.2 The potential environmental effects of the development proposals relate to both construction and operation (following completion) stages of the development.

Construction Phase

- Short term volume increase of run off due to removing topsoil and increasing the impermeable area on site.
- Direct and indirect contamination of surface water and groundwater due to mobilisation of soils, existing contamination and spillage of oils, fuels etc from construction plant.
- Direct and indirect flooding and changes to baseline drainage hydrology due to disturbance of the ground during construction works.
- The operation of construction vehicles and general construction activities can potentially give rise to the contamination of surface water runoff from the site by pollutants.

11.3 It is assessed that the proposals with any mitigation measures may result in a Minor Adverse (non-significant) effect on contamination of surface water and groundwater and flood risk to local watercourses and water resources.

Operational Phase

- Direct and indirect flooding of surrounding watercourses, the wider catchment area, adjacent land and property due to increases in surface water runoff from positively drained hard areas.
- Direct flooding of the Proposed Scheme due to inadequate flooding resilience and management of residual flood risk.
- Direct contamination or deterioration of water quality due to contaminants from within the development and the associated collection of surface water runoff from hard standing areas.
- Direct and indirect contamination of surface water and groundwater due to surcharging of the foul water network or the discharge of untreated foul flows.

11.4 It is assessed that the proposals with any mitigation measures may result in either a Minor Adverse or Positive (non-significant) effect on off-site flooding, flood resilience and water quality.

Mitigation

Construction Phase

11.5 The Proposed Development has been designed to avoid significant adverse effects resulting during post construction phase operation.

11.6 The Construction Environmental Management Plan (CEMP) will detail the procedures and methods that must be followed to minimise the potential environmental effects of construction activities at the site.

11.7 To prevent localised flooding associated with extreme rainfall events during the construction phase a temporary localised run-off management system will be employed by the contractor.

11.8 Specific requirements for protecting the unnamed watercourse and on site ground water will be required and worked into the CEMP.

Operational Phase

11.9 A surface water strategy has been prepared as part of the FRA based on the principles of sustainable drainage (SuDS). It is assessed that the Proposed Development will be of minor beneficial significance following the implementation of the appropriate mitigation measures that are described within the FRA.

11.10 The prime water receptor at risk is Swalecliffe Brook that flows through the centre of the site.

11.11 A SuDS based storm water management system is proposed providing source control, conveyance and attenuation features in compliance with current guidance to provide appropriate sustainable drainage features that passively treat storm water from the Site.

11.12 When assessing potential effects of the foul drainage, it is important that the proposed system is designed to convey foul waters safely from the site to a suitable treatment facility, without overloading the existing sewerage systems.

11.13 Discussions with Southern Water are ongoing to discuss the best option to discharge foul water from the development.

Cumulative Impacts

11.14 It is anticipated that no cumulative effects are present on site or within the adjacent surrounding areas. This is due to the mitigation proposed on site ensuring the storage of storm water and that discharge rates remain constant with existing Greenfield runoff rates.

Residual Impacts

11.15 The potential significance of the effects assumes that the mitigation measures outlined above have been implemented and are fully in accordance with current guidance and the requirements of the regulating authorities.

11.16 Standard good practice mitigation measures will be employed during the development which will ensure that there will be no significant effects arising as a result of the changes made to the unnamed watercourse and the surrounding area.

11.17 In summary, no significant adverse environmental effects will result.

12. HERITAGE & ARCHAEOLOGY

Introduction

12.1 The cultural heritage chapter assesses the findings of the assessment of likely significant effects of the Proposed Development on the historic environment, including below-ground archaeological features and built heritage. It incorporates the results of a historic environment desk-based assessment and a geophysical survey.

Impacts of the Proposed Development

Construction Phase

12.2 The potential effects of the Proposed Development on built heritage assets have been assessed in accordance with the methodology and criteria described in the ES chapter.

12.3 The construction phase of the Proposed Development is anticipated to have indirect impacts upon the Grade II listed Brooklands Cottage Brooklands Farmhouse (NHLE 1120914), Rayham Farm (NHLE 133690) and Barn to northeast of Rayham Farm (NHLE 1084912) through both temporary and permanent changes to their setting. These changes within the asset's settings are considered to have a minor adverse magnitude of change. If no mitigation strategy was adopted, the Development would result in an adverse effect of minor significance. This is not significant in EIA terms.

12.4 There are no direct or indirect impacts to Canterbury and Whitstable Railway, Whitstable Station Conservation Area (High Significance) or Chestfield Conservation Area (High Significance) arising from the Proposed Development. Therefore, no magnitude of change has been identified. If no mitigation strategy

was adopted, the Development would result in a neutral effect of negligible significance. This is not significant in EIA terms.

12.5 The construction phase of the Proposed Development has the potential to impact on the archaeological assets identified in the ES chapter; these impacts include visual intrusion and disruption to access during construction; creation of increased noise/ dust during construction; temporary structures, including signage, hoarding, and fencing associated with construction; temporary works including compounds; use of increased artificial lighting; vibrations; changes in hydrology; diversion or alteration of existing services and installation of new services; and landscaping and planting.

12.6 These activities could lead to the following effects on archaeological assets: total or partial loss/damage of the above- and/or below-ground archaeological remains; long-term burial of archaeological remains; opportunity to investigate and record archaeological remains; severance or loss of features such that the physical or visual integrity of a Site is compromised and the ability to understand and appreciate the remaining elements is diminished; and temporary alteration and/or visual intrusion into the setting of a designated Site or undesignated Site of national or regional significance. Proposed groundworks associated with development have the potential to result in a moderate to major magnitude of impact should deposits of archaeological interest be present on Site. If no mitigation strategy was adopted the Development would result in an adverse effect of moderate-major significance. This is significant in EIA terms.

Operational Phase

12.7 No significant effects have been identified in relation to built heritage following completion and during use of the Development.

12.8 No significant adverse effects have been identified in relation to archaeology following completion and during use of the Development.

Mitigation

Construction Phase

- 12.9 There are no proposed mitigation measures in relation to built heritage sensitive receptors during the construction phase, these impacts are considered to be indirect and temporary and cannot be mitigated.
- 12.10 It is recommended that development of the Site is preceded by a programme of archaeological works in the form of an archaeological trial trenching evaluation to characterise the sub-surface archaeological resource and inform a final mitigation scheme, if required.
- 12.11 The First World War military trenches and circular redoubt will largely be preserved in situ in an area proposed for public open space. Those parts of the military trenches which are located within the Proposed Development area will be subject to archaeological evaluation and subsequent mitigation, if required. This equates to a minor adverse magnitude of impact on this asset of local significance, resulting in an adverse effect of minor to negligible significance. This is not significant in EIA terms.
- 12.12 The inclusion of further areas of public open space and the implementation of the programme of archaeological work will result in the preservation in situ as well as by record of other archaeological deposits which may be present within the site, which may be of local to regional significance and which may be impacted by the Development. This will result in an adverse effect of moderate to minor significance. This is significant in EIA terms.

Operational Phase

- 12.13 The Proposed Development has incorporated a green buffer to the Grade II listed Brooklands Cottage Brooklands Farmhouse (NHLE 1120914), Rayham Farm

(NHLE 133690) and Barn to northeast of Rayham Farm (NHLE 1084912) alongside new planting and hedgerows to screen the Development from view. Whilst the mitigation has a positive effect on these sensitive receptors, there is still considered to be a permanent change to the receptors setting which results in a minor adverse magnitude of change. With mitigation in place the operational Development would result in an adverse effect of minor significance. This is not significant in EIA terms.

- 12.14 Canterbury and Whitstable Railway, Whitstable Station Conservation Area (High Significance) and Chestfield Conservation Area (High Significance) did not require any mitigation during the operational phase and Development would result in a neutral effect of negligible significance. This is not significant in EIA terms.
- 12.15 No significant effects have been identified in relation to archaeology and therefore no further mitigation or enhancement is proposed.

Cumulative Impacts

Construction Phase

- 12.16 In terms of direct cumulative effects, due to the physical localised character of sub-surface archaeological remains, construction of identified cumulative schemes will generally not result in cumulative direct impacts on designated or non-designated archaeological assets. The exception to this is archaeological deposits which extend beyond the Site which would be impacted by removal of contemporary deposits by cumulative development in the immediate vicinity. The potential for archaeological deposits to extend substantially beyond the limit of the Site and be impacted by identified cumulative schemes is considered low.
- 12.17 This assessment is based upon the results of a historic environment desk-based assessment and a geophysical survey. Cumulative effects are assessed as

therefore being not significant in relation to archaeology and all cumulative schemes have been scoped out for further assessment.

12.18 Of the built heritage assets identified the cumulative schemes will have negligible/no impact on the setting and significance of the built heritage assets identified.

Operational Phase

12.19 Of the built heritage assets identified the cumulative schemes will have negligible/no impact on the setting and significance of the built heritage assets identified.

Residual Impacts

Construction Phase

12.20 Following mitigation there will be a moderate-minor adverse residual impact in the long term at the local-regional level. This is due to the complete or near complete removal of the archaeological resource within the Site. It is acknowledged that the recording of any features within the Site would present an opportunity to enhance knowledge of the local area. This is significant in EIA terms.

12.21 There is no proposed mitigation for built heritage receptors during the construction phase. The residual impacts during the construction phase for the Grade II listed Brooklands Cottage Brooklands Farmhouse (NHLE 1120914), Rayham Farm (NHLE 133690) and Barn to northeast of Rayham Farm (NHLE 1084912) relate to temporary and permanent changes to their settings. These changes within the asset's settings are considered to have a minor adverse magnitude of change. If no mitigation strategy was adopted, the Development

would result in an indirect adverse effect of minor significance. This is not significant in EIA terms.

12.22 There are no direct or indirect impacts to Canterbury and Whitstable Railway, Whitstable Station Conservation Area (High Significance) and Chestfield Conservation Area (High Significance) arising from the Proposed Development. Therefore, a no magnitude of change has been identified. If no mitigation strategy was adopted, the Development would result in a neutral effect of negligible significance. This is not significant in EIA terms.

Operational Phase

12.23 There are no residual effects anticipated for archaeology receptors during the operational phase of development.

12.24 The Development would result in an indirect adverse effect of minor significance to the Grade II listed Brooklands Cottage Brooklands Farmhouse (NHLE 1120914), Rayham Farm (NHLE 133690) and Barn to northeast of Rayham Farm (NHLE 1084912). This is not significant in EIA terms.

12.25 The Development would result in a neutral effect of negligible significance to Canterbury and Whitstable Railway, Whitstable Station Conservation Area and Chestfield Conservation Area. This is not significant in EIA terms.

13. ECOLOGY

Introduction

- 13.1 The Ecology Chapter provides an assessment of the likely significant effects of the Proposed Development on ecology and nature conservation in the context of the Site and surrounding area. It considers the likely significant effects of the Proposed Development on statutory and non-statutory designated sites, and the flora and fauna within the Site and the immediate surroundings and has been informed by a range of ecological surveys undertaken on the Site between October 2020 and March 2025..

Impacts of the Proposed Development

- 13.2 An assessment of the likely construction and operational impacts upon Important Ecological Features has been made in line with the methodology provided within Chapter 13. This assessment will consider the proposed landscaping and habitat creation that is part of the proposed development, to highlight where additional mitigation is required.

Construction Phase

Designated Sites

- 13.3 A shadow Habitats Regulations Assessment has been undertaken to assess whether the proposals will result in any likely significant effects on nearby internationally designated sites (Appendix 13.8). Seven internationally designated sites are located within proximity of the Proposed Development: Tankerton Slopes and Swalecliffe SAC, Thanet Coast & Sandwich Bay SPA and Ramsar, Outer Thames Estuary SPA, The Swale SPA and Ramsar, Blean Complex

SAC, Margate & Long Sands SAC, Stodmarsh SPA, SAC and Ramsar and Thanet Coast SAC. Due to the location of these sites at least 1.62km from the development boundary, it is considered unlikely that they would be affected by noise, lighting or dust deposition during the construction phase of development. An assessment of the winter bird assemblages onsite has concluded that the Site is unlikely to provide Functionally Linked Land (land which is outside of a European site, that is critical to or important for the ecological or behavioural functions of a site's qualifying features, in this case wading bird species) for any of the bird species that the surrounding Special Protection Areas (SPA's) are designated for.

- 13.4 Two nationally designated sites of nature conservation importance are located within 2km of the Site: West Blean and Thorndon Woods SSSI, and Tankerton Slopes SSSI. Due to the location of these sites at least 260m from the proposed development and the habitats present in between, a significant effect due to dust deposition has been ruled out with only negligible effects anticipated. The effects on nationally important statutory designated sites during the construction phase are therefore Negligible.
- 13.5 Seven locally designated sites are present within 1km of the Proposed Development: Convicts Wood Chestfield; Pasture at Chestfield and Greenhill, Thanet Way; Clowes Wood and Marley Wood; St Josephs Church, Chestfield; RNR Thanet Way; Duncan Down, Seasalter; and Thorndon Pasture & Crow Park. Convicts Wood Chestfield is located within the Proposed Development Site. Convict's Wood is located within the Proposed Development Site and comprises a strip of ancient woodland known as Longtye Wood and a stream known as Swalecliff Brook. In the absence of mitigation, a minor adverse effect at a County level is anticipated upon Convict's Wood in the short-medium term due to dust deposition. This is not considered to be significant due to the degradation of the ground flora within the woodland since its designation in 2002. An assessment of the impacts of the reconstruction/improvement of two pedestrian bridges that

cross Convict's Wood has concluded no significant effects on the woodland, due to the sensitive design of these bridges. The remaining six sites are located at least

440m from the proposed development, there will therefore be no direct or indirect impacts during the construction phase upon these sites.

Habitats

- 13.6 The majority of habitat loss required to facilitate the Proposed Development will be limited to the arable cropland and species-poor improved grassland which are of low ecological value and are abundant within the wider landscape. The loss of these habitats is therefore considered to have a negligible, non-significant effect.
- 13.7 Minor losses of hedgerows will be required to facilitate the development, such losses will be compensated for through extensive hedgerow planting across the development Site and retained hedgerows and their root protection areas will be suitably protected during construction. Hedgerow losses will therefore result in a not significant, short-term, minor adverse effect at the local level.
- 13.8 The majority of ditches will be retained, and where losses are required, these will be redirected to maintain the ditch network across the Site. A non-significant, short-term minor adverse effect at the local level is anticipated while new proposed ditches establish.

Fauna

- 13.9 A common and widespread assemblage of bats was recorded onsite. Construction lighting operations have the potential to lead to a short- to mid-term minor adverse effect at a local scale on the bat population recorded. Negligible impacts are anticipated due to habitat losses due to the retention of the majority of valuable features (woodland and hedgerows).

- 13.10 Bird surveys identified a range of common and widespread generalist and farmland bird species onsite. The loss of arable cropland is anticipated to result in a non-significant, minor adverse effect on breeding farmland birds at a local level. The loss of farmland habitat is considered to have a **not significant, minor adverse effect** on skylark, meadow pipit and wintering thrushes **at a local scale**, due to the abundance of further suitable arable habitats in the wider landscape. A not significant, minor adverse effect at a local scale is also anticipated for the three wading bird species recorded onsite: curlew, snipe and golden plover, due to the relatively limited suitability of the Site for wading species, and the relatively sporadic use of the Site by wading species in largely small numbers. A **negligible effect** upon the generalist bird assemblage is anticipated due to the retention of the majority of hedgerows and ancient woodland which will continue to provide suitable foraging habitat. The loss of grassland habitat will not have a significant impact on any of the species recorded utilising the Site as it was generally poor foraging habitat for the birds recorded. A not significant, **short term minor adverse effect significant at a local scale** is foreseen for the wintering bird assemblage due to disturbance during the construction phase. Noise during construction is anticipated to result in a **not significant, minor adverse effect** on the breeding generalist and woodland edge assemblages recorded, due to the retention of the majority of hedgerows and woodland, with suitable buffers.

- 13.11 Records indicated that great crested newts are present within the locality of the Site. The loss of sections of hedgerow, field margins, ditches and scrub have the potential to impact great crested newts during the terrestrial phase of their life cycle (if present). This would result in a **minor adverse effect significant at a local scale**.

- 13.12 Dormice have been recorded breeding at the southern Site boundary. During the construction phase, in the absence of mitigation, a **minor adverse effect significant at a local scale** is anticipated due to the fragmentation of hedgerows

and scrub and potential for injuring or killing of dormice during vegetation removal.

13.13 The Site supports a good population of slow worms. Vegetation removal is unlikely to impact the favourable conservation of this species due to the limited amount of suitable habitat that the Site supports, with the slow worms likely reliant on off-site garden habitats. The works do however have the potential to injure or kill individual reptiles which would result in a not significant, minor adverse effect at a local scale.

13.14 There are records of hedgehogs at the eastern tip of the Site, this species is likely to use the habitats within the wider Site area. Retention of the majority of hedgerows and woodland reduces the risk of killing or injuring hedgehogs, however, construction operations have the potential to trap hedgehogs within excavations which would result in a not significant, minor adverse effect at a local scale.

13.15 Three cornered leek *Allium triquetrum* has been recorded at the western Site boundary and vegetation clearance and earth works in the area have the potential to cause the spread of this Schedule 9 invasive species during cut and fill operations onsite. This would result in a not significant, minor adverse effect at a local scale and has the potential to breach wildlife legislation.

Operational Phase

Designated Sites

13.16 The shadow Habitat Regulations Assessment (Appendix 13.8) included an assessment of the likely effects on Air Quality upon The Swale Ramsar/SPA/SSSI/MCZ and Blean Complex SAC, due to nearby main roads falling within 200m of these sites. Traffic data provided by Brookbanks (Environmental Statement 2025: Chapter 9) concluded that the increase in Annual Average Daily

Traffic (AADT) will not lead to a significant increase in air pollution on these designated sites. Effects due to Air Quality upon internationally designated sites is therefore considered to be negligible adverse for the development alone.

13.17 The proposed development will result in an increase in the local population located within the Zone of Influence for both The Swale (6km ZOI) and Thanet Coast and Sandwich Bay SPA (7.2km ZOI), there is likely to be increased recreational disturbance from new development on the overwintering bird populations for which these sites are designated. Alone, the Site has the potential to result in a not significant minor adverse effect at an International level.

13.18 The proposed development is likely to result in increased visitors to West Blean and Thorndon Woods SSSI. This site is well managed by Kent Wildlife Trust, and provides surfaced paths, dog bins and required that dogs are kept on leads. It is therefore considered that the impact of increased visitors will be negligible. The effect of increased visitors upon Tankerton Slopes SSSI is also considered to be negligible due to the sloping nature and dense vegetation supported by the site that is unlikely to be accessed by visitors, with paths and benches more likely to be utilised. The effects on nationally important statutory designated sites during the operational phase are therefore negligible and will not result in any significant effects on the Integrity of West Blean and Thorndon Woods SSSI and Tankerton Slopes SSSI.

13.19 The proposed development includes measures such as thorny planting and strategically placed ditches that will deter future residents from entering Convict's Wood LWS. Furthermore, the provision of ample recreational greenspace including multiple sports pitches, three parks and numerous play areas (NEAP/LEAP/LAP/Youth play), will provide both semi-natural habitats suitable for walking and formal areas for amenity and play that will attract future residents. A sensitive lighting strategy will avoid light spill on the ancient woodland and stream due to illumination of the pedestrian bridges (Cow Bridge

and Red Bridge). Long-term improvements to the LWS are foreseen due to the proposed buffer planting and implementation of a Woodland Management Plan, which are considered to amount to a mid- to long-term minor beneficial effect on the Convict's Wood LWS significant at a County level (not significant).

13.20 Clowes Wood & Marley Wood LWS and Duncan Down, Seasalter LWS may be attractive to future residents for walking and recreation. The provision of a range of recreational greenspace facilities onsite, included within the inherent mitigation is considered to reduce the potential effect to a not significant, negligible adverse on these nearby LWS's. These sites are well managed by Forestry England and Canterbury City Council and are both welcoming towards dogs. It is therefore unlikely that an increase in visitors will result in an effect on the integrity of these sites, and the provision of a range of recreational greenspace facilities onsite is considered to reduce the predicted effect to a not significant, negligible adverse on these nearby LWS's.

13.21 The remaining local wildlife sites are very small areas that are unlikely to attract future residents from the proposed development to visit. No effect is therefore anticipated for Pasture at Chestfield and Greenhill, Thanet Way; St Josephs Church, Chestfield; RNR Thanet Way; or Thordon Pasture and Crow park.

Habitats

13.22 The existing ancient woodland onsite is likely to be significantly enhanced by the proposed development as a result of the removal of intensive agricultural management on either side, proposed habitat creation within a 30m buffer on either side and implementation of a Woodland Management Plan. It is therefore considered that the existing woodland will receive a not significant, moderate beneficial mid- to long-term effect at a county level. This effect is considered to be adequate compensation for the potential very minor tree and shrub losses anticipated to construct the two bridges that will cross the Ancient Woodland.

13.23 Planting of native species-rich hedgerows will take place across the Site, in excess of the losses required to facilitate access. As part of the BNG proposals for the Site, these will be managed for a minimum 30-year period to create bushy, outgrown hedgerows to promote their ecological value and resource as connective habitat. This overall increase in species-rich hedgerow abundance onsite will result in a not significant, minor beneficial mid- to long-term effect at a local scale.

13.24 The removal of intensively managed arable and grassland habitats and creation of higher value habitats will have an overall minor beneficial long-term effect significant at a local level.

Fauna

13.25 Proposals will increase light levels through the introduction of buildings and street lighting, which would reduce the suitability of retained/created hedgerows and habitats for bats. The assemblage recorded comprised mainly common and widespread species typical of the habitats present, this effect is therefore not considered to be significant. Lighting therefore has the potential to result in a not significant, minor adverse, long-term effect at a local level on foraging and commuting bats. The range of new habitats proposed will result in a minor beneficial long-term effect at local level on the local bat populations.

13.26 The retention of the majority of hedgerows, woodland features and the introduction of green infrastructure planting will continue to provide suitable foraging habitats for the generalist breeding bird species recorded. A number of notable bird species are likely to benefit from the proposals, including house sparrow with the inclusion of built environment and wetland features providing more potential breeding and foraging sites for this urban species. It is therefore considered that development of the Site will result in minor beneficial or negligible impact at a local level for the majority of the generalist bird populations recorded. The proposed development is likely to increase the number of domestic

cats onsite. The retention, enhancement and creation of hedgerows and mixed scrub will continue to provide cover and screening from potential predators. It is therefore considered that the impact of cats will result in a not significant, negligible effect which will be offset by the increase in the availability of good quality breeding habitat that the scheme will provide for birds.

13.27 As discussed above the proposals will result in a not significant, minor adverse, long-term impact at local level on the local farmland bird assemblages. The impact on wading species is expected to be a minor, adverse effect on a local scale which is not significant.

13.28 The range of habitat creation measures onsite including species rich grassland, SuDS, mixed scrub, hedgerows and woodland are anticipated to provide an overall betterment for amphibian species including great crested newts when compared with the poor suitability of the majority of baseline habitats (species-poor grassland and arable land). Therefore, it is expected that the proposals will lead to not significant, minor beneficial effect significant at a local scale for amphibians including great crested newts.

13.29 The removal of scrub habitats to facilitate creation of the new slip roads to the A299 will result in the fragmentation of suitable habitats for hazel dormice. This is likely to have a not significant, minor adverse effect in the short-term on hazel dormice at a Local scale. The proposals include a new network of species rich hedgerows, providing increased connectivity between suitable habitats. The hedgerows will be planted with native fruit, berry and nut bearing species, as well as thorny species which will deter cat predation during the operational phase. Further creation of mixed scrub and woodland will provide greater abundance of suitable habitats and connectivity with the existing the habitats onsite. The retention and buffering of the majority of suitable habitats alongside the new habitat creation will result in an overall not significant, long-term beneficial effect at a Local scale for hazel dormice.

13.30 The creation of a network of SuDS and ditches with connectivity to Swalecliff Brook will provide an overall enhancement for riparian mammals, should such species colonise the Site in the future. This effect is considered to be non-significant, negligible.

13.31 The proposed species-rich grassland and SuDS will offer additional foraging opportunities for common species of reptile, while the mixed scrub, hedgerows, and woodland will provide essential areas for commuting, refuge, and hibernation. Overall, this is anticipated to significantly increase the availability of suitable habitats compared to the current arable and species-poor grassland. As a result, the proposals are expected to have a beneficial effect on reptiles at a local scale which is not significant.

13.32 The creation of new species-rich hedgerows, woodland, scrub, and grassland will enhance foraging and commuting opportunities for hedgehogs, leading to a minor, beneficial effect at a local scale. While new roads may increase the risk of traffic collisions for hedgehogs, the low-density, slow-moving traffic is expected to result in a negligible effect. This risk is likely to be outweighed by the overall increase in high-quality habitat provided by the development.

13.33 A removal program for three-cornered leek will be carried out during the construction phase of the development, and ongoing monitoring throughout the operational phase will ensure that invasive species do not re-establish on the site, with an eradication program implemented if necessary. This is expected to have a minor, beneficial, long-term effect at the site scale, which is not significant.

Mitigation

Construction Phase

13.34 During the construction phase, a Construction Environmental Management Plan (CEMP) will be implemented to protect the natural environment from

potential harm. This plan will regulate construction activities and include measures to prevent damage to important ecological features such as designated sites, woodlands, hedgerows, and watercourses.

13.35 To minimise disruption, site workers will follow best practices, such as using protective barriers and fencing to safeguard sensitive areas, managing dust and noise, and implementing strict pollution control measures. Where necessary, an Ecological Clerk of Works (ECoW) will be present to oversee activities, deliver training to construction workers, and ensure all protective measures are followed.

13.36 Particular attention will be given to legally protected species that may be present on-site. Measures will be taken to avoid harming bats, nesting birds, dormice, reptiles, hedgehogs, and other notable species. For example, any tree or vegetation removal will take place outside of the bird nesting season, and lighting will be carefully managed to avoid disturbing nocturnal animals. The plan will also include specific methods to passively displace reptiles from the Site prior to construction works.

13.37 Great crested newts could be at risk if present on-site, but they will be safeguarded through District Level Licensing (DLL), a conservation approach that ensures their protection by funding habitat creation and enhancement in strategic locations. Similarly, hazel dormice will be protected through a careful vegetation removal strategy, which includes phased clearance. The process will be carried out under ecological supervision to ensure that any dormice found can be safely relocated. These works will be conducted under a European Protected Species (EPS) mitigation licence, ensuring that legal requirements are met and that best-practice measures are followed to minimise harm.

13.38 Construction near Convict's Wood, an area of ancient woodland, will be carried out with extreme care. Work will be confined to designated areas to prevent accidental damage, and special construction methods will be used within

a 30-meter buffer zone around the woodland to protect tree roots and soil quality. Invasive plant species, such as three-cornered leek, will be removed by specialists to prevent them from spreading into the surrounding natural environment.

13.39 To ensure compliance, the preparation and approval of the CEMP can be secured by an appropriately worded condition of the planning permission. This approach will help to reduce the environmental impact of the construction process while protecting important habitats and species.

Operational Phase

13.40 Once construction is complete and the development is in use, a long-term environmental management plan will be put in place to enhance and protect biodiversity. A Habitat Management and Monitoring Plan (HMMP) will guide the care of the newly created and retained green spaces for at least 30 years. This will include the ongoing maintenance of woodlands, hedgerows, and other natural areas to support a wide range of wildlife.

13.41 A Woodland Management Plan will be developed to ensure the ancient woodland on-site remains healthy and biodiverse. This will involve selective thinning to allow more sunlight to reach the ground, removing diseased trees, and controlling invasive species. The area will be managed as a vital wildlife corridor, helping species to move through the landscape without disturbance.

13.42 To support biodiversity, wildlife-friendly features will be installed throughout the development. Bat boxes will be placed on trees and buildings to provide roosting sites, while bird boxes will offer nesting opportunities for different species. Reptile refuges, log piles, and insect hotels will be added to create additional habitat for a variety of creatures. Special gaps in fences, known as hedgehog highways, will be included to allow hedgehogs to move freely between gardens and green spaces.

- 13.43 A sensitive lighting strategy will be followed to prevent unnecessary light pollution, particularly near woodlands and hedgerows where bats and other nocturnal species are active. This will include using low-level, directional lighting and motion-activated security lights to minimise disturbance.
- 13.44 Residents will be provided with homeowner information packs, which will educate them on the importance of the surrounding habitats and how they can help protect local wildlife. These packs will also include guidance on responsible pet ownership, such as encouraging cat owners to keep their pets indoors at night or use collars with bells to reduce the risk to birds and small mammals.
- 13.45 Since the new development is expected to bring more people to the area, there will likely be increased recreational use of nearby protected sites, such as The Swale Special Protection Area (SPA). To mitigate this impact, the developers will make a financial contribution to conservation efforts through the North Kent Strategic Access Management and Monitoring Strategy (SAMMS).
- 13.46 Additional biodiversity enhancements will include planting native trees and shrubs to improve habitat connectivity, as well as maintaining hedgerows with minimal gaps to support wildlife movement. In areas where gaps in hedgerows must be created for roads or footpaths, new trees will be planted to form bat and dormouse "hop-overs," allowing these species to cross safely.
- 13.47 By implementing these measures, the development will not only minimise its impact on the environment but also create a sustainable and wildlife-friendly space for the future.

Cumulative Impacts

Construction Phase

Impacts on Skylark

- 13.48 Skylarks, a farmland bird species, were recorded at both Brooklands Farm and Bodkin Farm. The proposed developments will result in some habitat loss for this species. Nationally, skylark populations have declined mainly due to changes in farming methods rather than construction or development. However, since skylarks require open farmland to breed, the loss of habitat from these projects may contribute to a minor decline at a local level.
- 13.49 At Bodkin Farm, no specific mitigation has been proposed for skylarks, meaning there could be a minor adverse effect on their local population. At Brooklands Farm, the impact is expected to be minor because the land is already intensively farmed and offers limited nesting opportunities. Since both sites only support small skylark populations, the overall effect of these developments is not expected to be significant when considered together.
- 13.50 It is considered highly unlikely that anticipated effects on this species on Site would lead to an effect greater than minor adverse when considered in combination with nearby sites, particularly Land at Bodkin Farm where a minor adverse effect is also anticipated. Both sites provide somewhat limited suitability for skylark, being intensively managed farmland and pasture

Impact on Other Species

- 13.51 Surveys of the various development sites found that they support a range of protected and notable species, including:

- **Bats** – Common species of bats were found using hedgerows and woodland edges for foraging and commuting, but no significant roosting sites were recorded.
- **Wintering and breeding birds** – Some sites recorded notable bird species such as golden plover, snipe, and linnet. However, no sites were considered essential for these species.
- **Reptiles** – Small populations of slow worms, common lizards, and grass snakes were recorded on some sites.
- **Great crested newts and dormice** – These species were found in certain locations, but mitigation measures have been proposed to protect them.

13.52 All developments have included measures to reduce harm to protected species during construction, such as habitat creation, relocation programs, and protective buffer zones. As a result, no significant negative effects are expected during the construction phase.

Operational Phase

Recreational Disturbance to Protected Species

13.53 The developments will bring a significant increase in local residents, which means more people using nearby green spaces for recreation. This could lead to increased disturbance to important bird populations in nearby internationally protected areas, including:

- The Swale Special Protection Area (SPA)
- Thanet Coast & Sandwich Bay SPA

13.54 These areas provide essential habitats for overwintering birds such as golden plover and other species. Increased foot traffic, dog walking, and other activities could disturb these birds and impact their feeding and resting behaviours.

13.55 To address this issue, all developments within a certain distance of these protected areas are required to contribute financially to a Strategic Access Management and Monitoring Strategy (SAMMS). This strategy helps manage visitor access and minimise disturbances to important bird habitats. There is therefore not anticipated to be any significant adverse in-combination effects.

Residual Impacts

Construction Phase

13.56 During the construction phase, various mitigation measures will be in place to reduce negative environmental effects. However, some minor residual adverse effects will remain. The disturbance caused by construction activities, such as increased noise, lighting, and habitat removal, may affect local bat populations in the short-term. Bats could experience temporary disruption due to changes in lighting and vegetation loss resulting in a minor adverse not significant short-term effect. The inclusion of extensive habitat creation/enhancement measures proposed will however mitigate for these effects, resulting in not significant minor mid- long-term beneficial effects on bats.

13.57 Breeding birds, particularly skylarks and linnets, will face habitat loss due to the removal of arable land. While some mitigation is in place, such as avoiding vegetation clearance during the breeding season, this loss will have a minor, not significant, long-term adverse effect at the local level on skylark and linnet. Similarly, wintering bird species, including golden plover, curlew, and snipe, will experience the loss of sporadically used foraging/loafing habitat. This is expected to cause a minor, not significant adverse long-term effect at the local level.

13.58 In terms of habitats and vegetation, most of the valuable features, such as woodland and hedgerows, will be preserved. However, some temporary and minor impacts will occur, particularly where ditches are redirected or hedgerows

are removed. Measures like buffer zones, fencing, and sensitive lighting strategies will help protect these habitats during construction.

13.59 Several species will also be affected during this phase. Great crested newts could be at risk if present, but they will be safeguarded through District Level Licencing. Hazel dormice will be protected through a careful vegetation removal strategy, which includes phased clearance and ecological supervision. Works will be carried out under a European Protected Species (EPS) mitigation licence. Reptiles will be relocated from affected areas through passive displacement, and hedgehogs will benefit from designated wildlife corridors and underpasses to ensure their safe movement. Overall, while some short-term adverse effects will occur, mitigation measures will reduce them to negligible or minor not significant levels.

Operational Phase

13.60 Once the construction phase is complete and the site is operational, several long-term strategies will be implemented to enhance biodiversity and protect local wildlife. One of the key concerns is the potential impact of increased recreational use on nearby protected areas, such as The Swale Special Protection Area (SPA) and Thanet Coast & Sandwich Bay Ramsar site. To address this, financial contributions will be made to local conservation efforts, and homeowner information packs will educate residents on how to minimise their impact on these sensitive areas. Additionally, well-designed onsite open spaces will help reduce pressure on designated nature reserves by providing alternative recreational areas.

13.61 The creation of new habitats will be a significant ecological benefit. The project will introduce new woodlands, hedgerows, scrubland, and wetland areas, increasing habitat diversity and supporting a wider range of species. The success of these newly created habitats will depend on factors such as weather conditions

and long-term management. A dedicated Ecological Management Plan (EMP) will ensure these habitats are properly maintained and continue to provide value for wildlife in the future. This will result in a moderate positive effect at the local level.

13.62 Species will also benefit from targeted conservation measures. Bats will be supported through a sensitive lighting strategy, additional hedgerow planting to provide safe flight paths, and the installation of bat boxes. Birds will gain new nesting opportunities through the planting of berry-bearing trees, hedgerows, and artificial nest boxes. Great crested newts, dormice, reptiles, and hedgehogs will all benefit from improved habitat connectivity, ensuring they can move safely between different areas of the site. These enhancements will result in long-term minor to moderate beneficial effects for the majority of species recorded.

13.63 To further support biodiversity, careful lighting design will be implemented to reduce light pollution and prevent disruption to nocturnal species. Additionally, continuous monitoring and adaptive habitat management will ensure that conservation efforts remain effective in the long term. While some minor effects may persist, particularly for certain bird species, the overall impact of the operational phase is expected to be beneficial for local biodiversity.

13.64 In summary, the construction phase will have some short-term minor adverse effects, particularly on birds and bats. However, the operational phase will introduce long-term ecological improvements, with new habitats and conservation measures leading to an overall positive outcome for local biodiversity

14. GROUND CONDITIONS

Introduction

14.1 This non-technical summary has been prepared by Brookbanks (BCL) to present the findings of an assessment of the environmental effects of the Proposed Development on ground conditions and contamination.

Impacts of the Proposed Development

14.2 The potential Ground Conditions environmental effects of the development proposals relate to both construction and operation (following completion) stages of the development.

Construction Phase

14.3 Potential construction phase environmental effects have been identified relating to ground conditions and contamination. These mechanisms are as follows:

- Contamination affecting humans
- Contamination affecting fauna and flora
- Contamination to surface water conveyance
- Contamination of groundwater

14.4 It is assessed that the proposals may result in short term and/or long term moderate adverse effects on contamination, if control and mitigation measures are not employed.

Operational Phase

14.5 With development of the Proposed Scheme, three potential operational environmental effects are identified relating to ground conditions and contamination. The mechanisms are as follows:

- Risk to below ground structures from contaminated soil
- Risk to proposed soft landscaping.
- Stability

14.6 It is assessed that the proposals may result in short term moderate adverse effects on contamination, if control and mitigation measures are not employed and implemented.

Mitigation

Construction Phase

14.7 The potential environmental effects from the discharge of suspended solids to watercourses and ground waters will be mitigated by the adherence to site controls provided in the Construction and Environmental Management Plan (CEMP). The CEMP will be agreed with the regulatory authorities prior to the start of construction. All contractors working on-site will be required to adopt the procedures and proposed means of mitigation outlined in the document.

14.8 The following general mitigation measures will also be adopted as part of the site construction phase to minimise the potential impacts arising from the proposed development:

- Material Storage
- Silt and Earthworking
- accidental Spillage

Operational Phase

Exposure of Residential End-Users to Contamination

14.9 A cover system should be applied across all proposed areas of soft landscaping in accordance with the BRE document entitled Cover Systems for Land Regeneration,

Thickness Design of Cover Systems for Contaminated Land (2004). Such would be sufficient to protect contamination risks to human health. The minimum thickness of clean cover in landscaped areas is 600mm.

Risk to Below Ground Structures from Contaminated Soil

14.10 Concrete will be designed and placed in accordance with normal good practice taking account of pH and sulphate concentrations in the ground. Plastic pipes will not be used where the ground or groundwater contains significant levels of light hydrocarbons or phenol. Ground conditions will be confirmed following an intrusive geotechnical investigation which would allow the correct concrete classification to be recommended.

Risk of Residential and Other End-Users to Ground Gas

14.11 Gas monitoring wells should be sunk across the site prior to construction to allow levels of hazardous ground gas to be monitored in accordance with current best practice. Gas control measures should be implemented if any hazardous gas is encountered within the made ground. Mitigation measures may comprise the use of membranes under floor slabs.

Risk to Proposed Soft Landscaping

14.12 The use of a cover system, as described above, would not only protect human health but also any proposed planting in areas designated for soft landscaping / gardens / vegetation cover. Intrusive investigations would be needed to determine which areas on-site would require these cover systems.

Cumulative Impacts

Construction Phase

14.13 It is anticipated that each Cumulative Site will undertake its own assessment, and therefore no cumulative impacts are anticipated.

Operational Phase

14.14 It is anticipated that each Cumulative Site will undertake its own assessment, and therefore no cumulative impacts are anticipated.

Residual Impacts

Construction Phase

14.15 With the mitigation described above, no significant adverse residual effects are anticipated.

Operational Phase

14.16 Within the operational phase of development, with mitigation:

- The effects on human activity and health are assessed as being of short term, temporary and Negligible.
- The effects of contamination of surface water resources are assessed as being of short term, temporary and Negligible.
- The effects of contamination of ground water resources are assessed as being of short term, temporary and Negligible.
- The effects of construction on flora and fauna are assessed as being of short term, temporary and Negligible.
- The effects of below ground structures are assessed as being of short term, temporary and Negligible.

15. LANDSCAPE & VISUAL IMPACT

Introduction

15.1 This chapter of the Environmental Statement (ES) was prepared by Chartered Landscape Architects at Define Planning & Design and assesses the likely significant environmental effects of the Proposed Development on landscape and visual receptors, including:

- the elements that make up the landscape;
- the specific aesthetic or perceptual qualities of the landscape;
- the character of the landscape; and
- people who will be affected by changes in views or visual amenity.

15.2 The assessment has assumed a likely worst-case scenario whereby construction activities would take place across several parts of the Site, over an extended period of time, with mitigation planting delivered within the latter part of the works phase for each phase of development built out.

Inherent and Standard Mitigation

15.3 The Proposed Development has been designed to protect existing trees, hedgerows and woodland, and to work with existing levels to avoid the need for major land raising or excavation activities, where possible. It also retains the functional alignment of all rights of way that cross it and seeks to reflect best practice in its delivery of proposed green infrastructure measures. Its design has also included several inherent mitigation measures, which are intended to avoid or reduce harms and, upon their establishment, enhance and strengthen several elements of the landscape in the longer term; and would include good practice measures to protect

the landscape and people's visual amenity both during construction and establishment.

Impacts of the Proposed Development

Construction Phase

15.4 Construction of the Proposed Development could nonetheless introduce temporary activities and changes that may cause significant harm (a moderate-major adverse effect) to the character of the landscape within local landscape character area LCA C2 'C2: Chestfield Farmland' and several landscape elements of the site.

15.5 It is assessed additionally that - although changes would be screened in most more distant views by intervening landform, vegetation and/or built form - these construction phase changes may be visible to several groups of people moving through, living within or recreating in surrounding areas in close proximity to the site, and that these changes could temporarily cause harm of moderate-major adverse significance to several of these user groups visual amenity. It is assessed also that these changes may cause harm of major adverse significance to the visual amenity experienced by one user group in this period (users of public footpath CW21, which crosses the Site).

Operational Phase

Landscape Effects

15.6 Although delivery of the proposed development may temporarily result in significant harms to landscape receptors, both the LCA C2 'C2: Chestfield Farmland' landscape receptor and the landscape elements of the Site landscape receptor are judged to experience a not significant effect (moderate adverse) at completion. This is because some affected elements of the Site would have been restored by this stage and the

operational use of the Site should contrast less with the characteristics of its surroundings by this stage.

15.7 It is assessed furthermore that 15-years after completion (once inherent landscape measures have established), although effects on the LCA C2 'C2: Chestfield Farmland' landscape receptor would remain moderate adverse, the proposed changes could actually benefit the landscape elements of the Site receptor; changing this receptor's operational effect to moderate beneficial (not significant) at this stage.

Visual Effects

15.8 It is assessed that the adverse effects on most visual receptors would reduce to not significant (moderate adverse or less) once the proposed development is operational, with only the below six visual receptors assessed to potentially experience an effect of moderate-major adverse significance (significant) at completion; the majority of which are medium-high sensitivity users and/or users moving within very close proximity to the site, who presently experience views across agricultural farmland, but whose views may now be affected to a great degree by introduced built form:

- Users of South Street (motorists).
- Users of the Crab & Winkle Way (CW22).
- Users of public footpath CW21, which crosses the Site.
- Users of public footpath CW27/CW27A, within and at the perimeter to the Site.
- Users of public footpath CW28, north of the A299 (Thanet Way).
- Users of Radfall Recreation Ground.

15.9 It is assessed also that 15-years after completion (once inherent landscape measures have established) the effect on all but two of these visual receptors (users of the Crab & Winkle Way (CW22) and users of public footpath CW21, which crosses the

Site) would have reduced to not significant following the establishment of proposed planting that has been 'designed-in' to the proposed development.

15.10 And furthermore, were additional hedgerow and hedgerow mitigation planting delivered on land adjoining the Crab and Winkle Way within the control of the applicant, that the significant adverse harm to the users of the Crab & Winkle Way (CW22) visual receptor could be lessened to not significant by the operational phase.

Mitigation

15.11 It is considered that further mitigation measures to protect people's visual amenity during construction (i.e. additional to those described in the Inherent and Standard Mitigation section above, which it is assumed would be set out and explained in a CEMP) would not reduce the magnitude and so significance of the effect on these receptors in this phase beyond that recognised. This is because effects principally relate to earthworks and construction activities and the delivery of built form, either in close proximity to where the receptor passes or in views otherwise unaffected presently by activities of the type proposed.

15.12 It is also considered that effects on five of the six visual receptors that have been identified to experience significant and adverse effects at completion could not reasonably be further reduced without leading to other harms or risking greater levels of plant failure; and that effects on the users of public footpath CW21, which crosses the Site receptor could not be further mitigated 15-years after completion, because any meaningful mitigation that could reduce harms to this receptor is already 'designed-in' to the Proposed Development.

15.13 It is however considered that additional off-site hedgerow and tree planting on land that adjoins the Crab & Winkle Way, beyond the Site's boundary but within the applicant's control, could be delivered as advance planting and could reduce the significance of effect on the users of the Crab & Winkle Way (CW22) receptor at completion and after 15 years to moderate adverse, which is not significant.

15.14 It is separately considered that (although not significant for the purposes of this assessment), were the break in foreground vegetation that adjoins bridleway CW26 (which is on land beyond the Site's boundary but within the applicant's control) infilled with advance hedgerow and tree planting, this planting could establish to reduce the significance of effect on the users of bridleway CW26, to the west of Radfall receptor at completion and 15 years after completion to minor-negligible, which is not significant.

Cumulative Impacts

Construction Phase

15.15 The Proposed Development could be viewed in combination with the Grasmere Gardens, Land South of The Ridgeway, Chestfield cumulative scheme (CA/17/00469) and in succession with the Land south of Thanet Way, Whitstable cumulative scheme (CA/23/00379) in views experienced by the users of public footpath CW12, west of Clowes Wood receptor in the construction phase; and could be viewed in combination with these cumulative schemes and in succession with the Land at Bodkin Farm, Whitstable cumulative scheme (CA/24/00224) in views experienced by the golfers and users of PRoW over Shrub Hill (within Chestfield Golf Course) receptor in the construction phase.

15.16 Notwithstanding their visibility, these cumulative developments are assessed not to increase the 'total' magnitude of change or significance of effect for any of the cumulative landscape or visual receptors identified as being potentially sensitive to change from the Proposed Development during the construction phase.

Operational Phase

15.17 The Proposed Development could again be viewed in combination with the Grasmere Gardens, Land South of The Ridgeway, Chestfield cumulative scheme (CA/17/00469) and in succession with the Land south of Thanet Way, Whitstable

cumulative scheme (CA/23/00379) in views experienced by the users of public footpath CW12, west of Clowes Wood receptor at both completion and 15-years after completion; and could again be viewed in combination with these cumulative schemes and in succession with the Land at Bodkin Farm, Whitstable cumulative scheme (CA/24/00224) in views experienced by the golfers and users of PRoW over Shrub Hill (within Chestfield Golf Course) receptor at both completion and 15-years after completion.

15.18 These cumulative schemes are assessed to increase the 'total' magnitude of change experienced by the users of public footpath CW12, west of Clowes Wood receptor to low-medium at completion and 15-years after completion; and are assessed to increase the 'total' magnitude of change experienced by the golfers and users of PRoW over Shrub Hill (within Chestfield Golf Course) receptor to medium at completion and 15-years after completion.

15.19 These increases in magnitude are assessed to increase the 'total' significance of effect experienced by the golfers and users of PRoW over Shrub Hill (within Chestfield Golf Course) receptor at completion and 15-years after completion to moderate adverse, which is not significant; but is assessed not to increase the 'total' significance of effect experienced by the users of public footpath CW12, west of Clowes Wood receptor at either of the assessment stages.

15.20 The cumulative schemes are not however assessed to result in an increase in 'additional effects' to the golfers and users of PRoW over Shrub Hill (within Chestfield Golf Course) receptor at any of the operational phases.

Residual Impacts

Construction Phase

Landscape Effects

15.21 Both the LCA C2 'C2: Chestfield Farmland' landscape receptor and the landscape elements within the Site landscape receptor are assessed to experience a residual effect of moderate-major adverse significance during the construction phase, which is significant.

Visual Effects

15.22 The users of public footpath CW21, which crosses the Site visual receptor is assessed to experience a residual effect of major adverse significance during the construction phase; and the below visual receptors are assessed to experience a residual effect of moderate-major adverse significance during the construction phase, both of which are significant.

- Users of A299 Thanet Way (motorists).
- Users of Chestfield Road / Radfall Hill (motorists).
- Users of Lismore Road (motorists).
- Users of South Street (motorists).
- Users of the Crab & Winkle Way (CW22).
- Users of public footpath CW27/CW27A, within and at the perimeter to the Site.
- Users of public footpath CW28, north of the A299 (Thanet Way).
- Golfers and users of public footpath CW28, where crossing over Shrub Hill (within Chestfield Golf Course)
- Users of Chestfield Cricket Club.
- Users of Radfall Recreation Ground.
- Residents of Blackberry Way, immediately bordering the Site.

- Residents of Chestfield Road (near to Radfall Recreation Ground).
- Residents of Rayham Road.
- Residents of South Street.

15.23 All other visual receptors are assessed to experience a not significant residual effect during the construction phase.

Operational Phase

Landscape Effects

15.24 Both the LCA C2 'C2: Chestfield Farmland' landscape receptor and the landscape elements within the Site landscape receptor are assessed to experience a residual effect of moderate adverse significance at completion, which is not significant.

15.25 The residual effect to the LCA C2 'C2: Chestfield Farmland' landscape receptor is assessed to remain of moderate adverse significance 15-years after completion, but the residual effect to the landscape elements within the Site landscape receptor is assessed to change to be of moderate beneficial significance 15-years after completion. Both of these effects are however not significant.

Visual Effects

15.26 The below visual receptors are assessed to experience a residual effect of **moderate-major adverse** significance at completion, which is **significant**. All other visual receptors being assessed to experience a not significant effect at this stage.

- Users of South Street (motorists).
- Users of public footpath CW21, which crosses the Site.
- Users of public footpath CW27/CW27A, within and at the perimeter to the Site.
- Users of public footpath CW28, north of the A299 (Thanet Way).
- Users of Radfall Recreation Ground.

15.27 Only users of public footpath CW21, which crosses the Site is assessed to experience a residual effect of **moderate-major adverse** significance 15-years after completion, which is **significant**. All other visual receptors being assessed to experience a not significant effect at this stage.



Figure 66 Open Spaces Plan

16. CLIMATIC FACTORS

Introduction

- 16.1 The Climate Change assessment quantifies the Greenhouse Gas (GHG) emissions resulting from the Development and determines their significance in the context of local and national climate change policy and examines its resilience to future climate change.
- 16.2 The EIA chapter is supported by a Sustainability and Energy Statement (SES), which sets out a strategy for reducing carbon emissions and delivering a low carbon development and an Embodied Carbon Assessment Report to consider the carbon emissions of the buildings and associated construction processes. These are provided as appendices to the Climate Change ES Chapter.

Impacts of the Proposed Development

Construction Phase

- 16.3 The following are considered likely to give rise to significant effects during construction of the Proposed Development and are therefore considered within the Environmental Statement:
- Vehicular traffic associated with the construction process including earthmoving and supply vehicles on-site, and the import or export of soil of other materials from the Site.
 - Site preparation works, land clearance and construction activities will require the consumption of energy generated on-site from generators or obtained from the national grid.
 - Site preparation and site clearance work during the construction phases has the potential for substantial impacts upon the biodiversity of the Site and on the water environment.

Operational Phase

- 16.4 In the operational phases of the development the principal effects of the development are set out below, again based on an assessment of the development alone and in the absence of the mitigation:
- The emissions associated with heating in proposed buildings will result in one of the two primary climate change effects as a result of the completed development. In the context of the scale of the development relative to the number of dwellings in the locality as a whole, the impact is assessed (unmitigated) as minor.
 - The emissions associated with purchased electricity from the national grid during operation of the Proposed Development are likely to result in impacts as being small at the local scale and insignificant at the regional scale.
 - The emissions associated with vehicular movement and the use of petrol and diesel engines owned by occupiers of, and visitors to, the Proposed Development will result in the second of the two primary climate change effects as a result of the completed development.

Mitigation

Construction Phase

- 16.5 Any construction effects arising from the Proposed Development will be addressed through the preparation of a Construction Environmental Mitigation Plan (CEMP) which will provide a robust basis for managing and mitigating any climate change effects from the construction phase of the Proposed Development. Such a plan goes beyond a construction management plan which might hitherto, have been provided, and focuses upon the direct impact of a development (hours of operation, parking of vehicles etc) and includes the sustainability impacts of a development.

Operational Phase

- 16.6 A strategy for carbon reduction from the development has been provided in the Sustainability and Energy Statement and wider carbon emissions via the Embodied Carbon assessment. The whole site will be electric and with the decarbonisation of the grid, the operational carbon emissions will reduce to zero in line with the grid decarbonisation.

Cumulative Impacts

Construction Phase

- 16.7 There are 10 sites in the locality that have been considered for cumulative impacts. They have details and/or formal construction phase management plans and are in line with local planning policy with their own mitigation measures. Mitigation measures are embedded into the design philosophy of this development and a whole life carbon assessment is continuing alongside the design development. There is no need to monitor additional mitigation measures as there are no identified significant effects or cumulative effects.

Operational Phase

- 16.8 There are 10 sites in the locality that have been considered for cumulative impacts. They have details and/or formal energy statements and are in line with local planning policy with their own mitigation measures. Mitigation measures are embedded into the design philosophy of this development and a whole life carbon assessment is continuing alongside the design development. There is no need to monitor additional mitigation measures as there are no identified significant effects or cumulative effects.

Residual Impacts

Construction Phase

- 16.9 With the implementation of the CEMP throughout construction the residual impact from construction activities will be minor. The whole life carbon assessment will provide further analysis once completed and updated throughout the development.

Operational Phase

- 16.10 In terms of the heating and general operation of buildings within the development, the emissions will be highest at the outset and as the grid decarbonises emissions will reduce in line. Emissions are considered negligible in comparison to local and national figures. The whole life carbon assessment will provide further analysis once completed and updated throughout the development.

17. MITIGATION AND MONITORING

17.1 This section summarises the key mitigation and monitoring measures that will be implemented to minimise potential adverse effects during construction and operational phases of the Proposed Development.

Construction

17.2 The construction works will adhere to the measures set out in a framework Construction Environmental Management Plan (CEMP) which forms part of the ES (at **Chapter 5** and **Appendix 5.10**). This will be incorporated into a site-specific CEMP (secured via planning condition) and contain a range of protocols and procedures to minimise environmental effects such as dust, light and noise pollution. These include:

- Construction Traffic Management Plan;
- Erection of construction hoarding and controlled site lighting;
- Soil Management Plan;
- Hours of construction;
- Pre-demolition survey and removal (as necessary) of asbestos;
- Remediation Strategy;
- Installation of temporary drainage strategy, incorporating attenuation features;
- Pollution Control Plan;
- Construction Partnership Agreement;
- Avoidance of March to September bird breeding season in the stream corridor; and
- Restrictions on plant and machinery.

Operation

17.3 There are a range of primary (embedded), secondary and tertiary mitigation measures which have been identified in Chapter 19. In addition to the CEMP, the primary mitigation includes Sustainable Urban Drainage Systems. The table below sets out a summary of the additional, secondary mitigation measures which will need to be secured via planning conditions and/or Section 106 obligations:

Summary of Secondary Mitigation during the Operational Phase

ES Topic Chapter	Summary of Identified Mitigation
	Operational Phase
Air Quality	Travel Plan Improvements to Pedestrian and Cycle Networks, and Public Transport Networks
Climatic Factors	Building design and maintenance specifications including use of Air Source Heat Pumps Whole Life Carbon Assessment
Ecology	Landscape and Ecological Management Plan Habitat Management and Monitoring Plan Woodland Management Plan Contribution towards North Kent SAMMS Detailed landscaping scheme to incorporate ecological mitigation requirements Detailed lighting scheme
Noise and Vibration	3m noise barrier on part of the southern extremity of the site along A299 Scheme for alternative means of ventilation for properties fronting A299
Archaeology and Built Heritage	Retained and enhanced planting between the non-designated heritage asset and new development
Transport	Off-site junction improvements where necessary Improvements to public transport networks, and walking and cycling networks Travel Plan
Landscape and Visual Impact	Landscape and Ecological Management Plan Detailed landscaping scheme
Hydrology and Flood Risk	Drainage Operation and Maintenance Plan
Socioeconomic and Human Health	Travel Plan

18. CUMULATIVE IMPACTS

- 18.1 The purpose of this chapter is to draw together the findings from the individual topic chapters and to consider the inter-relationships between these assessments and any other developments in the area surrounding the site. It also establishes whether there are any other residual effects on the identified sensitive receptors which may require additional mitigation not previously identified.
- 18.2 Specifically, this chapter considers two types of effect in association with the Proposed Development:
- **Cumulative** – these arise from the combined effect of the Proposed Development with committed development schemes that, individually, may be insignificant, but when combined with other impacts, may be significant. This includes consideration of the impacts during the construction and operational phases; and
 - **Interactive** – the combined effect of different types of impacts arising from the Proposed Development on a particular receptor. An example of this could include the combined impact of noise and air quality effects on a residential dwelling. Again, this includes consideration of the impacts during the construction and operational phases.

Cumulative Effects

- 18.3 A list of potential cumulative sites was agreed with the Council through the EIA Scoping process.
- 18.4 Based on information available, the assessment shows that any potential cumulative effects arising from the identified sites, when considered with the

Proposed Development do not give rise to a need for additional mitigation measures that have not been previously identified.

Interactive Effects

- 18.5 This section considers the inter-relationship between the direct effects arising from the Proposed Development. It takes account of the main residual effects (following mitigation) as identified in Chapters 7-18 of this ES, which could be expected to arise during the construction and operational phases of the Proposed Development. The objective is to identify where the accumulation of effects on particular receptors, and the relationship between those effects, may give rise to a need for additional mitigation not identified previously.
- 18.6 Overall, the analysis above has identified that there is no requirement to identify additional mitigation measures to address effects arising from the interrelationship between impacts on identified receptors.

Further Information

- 18.7 This document is a Non-Technical Summary of the Environmental Statement in support of the outline planning application for the residential development on Land East of Culme House, Cullompton. The full ES is a more detailed study of the environmental effects of the detailed study of the environmental effects of the planning application.



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