Tom Hawkes

From: Andy Latham ████████████████████

Sent: 21 October 2025 14:39

To: Consultations

Subject: Brooklands Farm - Altered local plan consultation

Subject: Objection to Planning Application CA/25/00779 and Emerging Local Plan Policy W4

Site: Land at Brooklands Farm, South Street, Whitstable

Dear Sir/Madam,

I am writing to submit my formal and absolute objection to the proposed development at Brooklands Farm, referenced in planning application CA/25/00779, and its proposed allocation under Policy W4 of the emerging Local Plan 2040.

This development should be refused in full, on grounds of flood risk, policy conflict, environmental harm, landscape loss, infrastructure failure, and procedural prematurity.

1. Flood Risk – Sequential Test Failed

This site is partly within Flood Zones 2 and 3, and is highly vulnerable to surface water flooding, as confirmed by the developer's own Flooding and Drainage Technical Note. The topography channels rainfall toward homes and roads at the foot of South Street, where I have personally witnessed standing water and runoff during heavy weather.

Under NPPF Paragraphs 162–164, development must be directed to areas of lowest risk unless there are no reasonable alternatives. That Sequential Test has not been met. Other, less risky, less sensitive sites clearly exist. The Council is therefore legally bound to refuse the proposal.

Moreover, the Kent County Council Local Flood Risk Management Strategy (2024–2034) states that development must actively reduce flood risk — not simply avoid adding to it. There is no evidence this proposal will do either.

2. Loss of Best and Most Versatile Agricultural Land

Brooklands Farm is not derelict wasteland — it is working farmland, likely to be classified as Grade 3a ("Best and Most Versatile"). Its soils grow cereal crops and it has been farmed continuously for generations. Once built

over, this nationally valuable land is permanently lost. The NPPF requires that such land is protected unless there is no lower-quality alternative — which simply is not true in this case.

3. Destruction of a Vital Landscape and Ecological Buffer

This development would obliterate the last remaining rural buffer between Whitstable and the A299. The site borders Longtye Wood, Swalecliffe Brook, and dark sky zones vital for bats and other nocturnal wildlife. The Council's Landscape Character Assessment (2020) warned specifically against development here due to its importance for visual relief, tranquillity, and ecological connectivity.

The Environmental Statement even confirms lux levels as low as 0.08–0.18 across the site — meaning this is among the darkest rural areas in the borough, currently supporting protected species and biodiversity corridors.

Approving this would directly breach Policy DBE9, the NPPF Paragraph 180, and the Council's own duty to protect its natural heritage.

4. Prematurity and Local Plan Manipulation

Policy W4 is not adopted. The Local Plan remains under consultation. To permit this scheme now would predetermine the outcome of the Local Plan process, violating Paragraph 49 of the NPPF and rendering the Council vulnerable to judicial challenge.

This is a developer-driven land grab, not plan-led, evidence-based growth.

5. Infrastructure Fantasy and Long-Term Risk

The proposal promises:

1,350+ dwellings

A mobility hub

A new local centre

A primary and SEND school

Employment land

New A299 slip roads

Drainage attenuation

Biodiversity mitigation

6. There Are Better Sites

There is no justification for choosing this location — flood-prone, infrastructure-poor, ecologically rich, agriculturally valuable — when less harmful, brownfield or underused sites exist elsewhere across the district.

This proposal is:

Legally unsound (NPPF 162–164, 180, 181, 49)

Ecologically damaging

Economically risky

Strategically premature

Visibly destructive

I implore you to refuse this application and remove Policy W4 from the Local Plan before irreversible harm is done.

Yours sincerely,

Andy Latham

(Whitstable resident)