

Tom Hawkes

From: Peter Slaughter [REDACTED]
Sent: 21 October 2025 16:46
To: Consultations
Subject: Response to Consultation on Draft Local Plan

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--Email From External Account--

Dear Consultation team

My comments regarding the Draft Local Plan consultation are set out below.

Thank you
Peter Slaughter

Habitats Regulations Assessment

WSP's Habitats Regulations Assessment report makes incorrect conclusions and is therefore misleading the Council.

In assessing **impacts of water quality**, the Thanet Coast and Sandwich Bay Ramsar site and the Thanet Coast and Sandwich Bay SPA are both screened out of the assessment, because the sites have "not been identified as a site that is in unfavourable condition due to excessive nutrients (such that 'nutrient neutrality' is being deployed or considered as mitigation) in recent NE advice to LPAs."

So far as I know, (and I have been a frequent visitor to the foreshore here for over 15 years), no-one has carried out a comprehensive assessment the impact of sewage effluent pollution on the Swalecliffe foreshore, for example looking for the type of chemical pollutants mentioned by Ford & Ginley (2024), *Insights into PFAS contaminants before and after sewage discharges into a marine protected harbour*, Chemosphere 366, 2024.

The effects of water quality (especially increased sewage effluent discharges from the additional housing) must therefore be considered to have UNKNOWN impact on the Ramsar and SPA sites.

In terms of Recreational Pressure, the report concludes (para 6.2.12) "it can be concluded that the **...additional site allocations will have no adverse effects on the integrity of the Thanet Coast and Sandwich Bay SPA, Thanet Coast and Sandwich Bay Ramsar, or Thanet Coast SAC due to recreational pressure** or urbanisation effects, alone or in combination." This is unlikely.

In regard to the Ramsar and SPA sites (intended to protect birds), an increased number of local residents will result in an increased number of people in the SSSI and on the foreshore, even in winter. Popular activities include dog-walking (some dogs absolutely love chasing birds), fishing, and beach-combing for all sorts of things including fossils, for which Swalecliffe is well-known.

Swalecliffe is the nearest coastline to the 1800 new homes proposed for Chestfield in the new draft Local Plan. It is an extremely popular amenity for residents, not only as it is the nearest accessible natural environment, but because it provides inspiring views across Whitstable Bay towards the Swale and Isle of

Sheppey, with sometimes spectacular sunset views. It will undoubtedly attract plenty of visitors from the new developments.

One concern is the impact of the proposed A299 junction at Radfall, because any motorist looking for the easiest route to the beach will choose Swalecliffe as their destination rather than struggling to access Whitstable town centre or Seasalter with their expensive car-parking charges.

It should be noted that recent attempts by CCC to regulate where visitors walk is clearly ignored by some people including dog-walkers.

Table C-1 – Functionally linked land assessment: In assessing whether site N20 is relevant in connection with birds from the Thanet Coast & Sandwich Bay Ramsar and SPA, e.g. Golden Plover, the report apparently follows the lead of the clearly biased developers at Brooklands Farm who dismissed observations of 52 Golden Plovers there as “populations did not represent a significant proportion of the designated site populations.” Not only was this questionable comment not questioned, but no consideration was given to the cumulative effect of loss of farmland around Swalecliffe. The draft Local Plan proposes to eliminate much of the remaining open farmland within 2.5 – 3 km of Swalecliffe.

In the above considerations and many other I don't have time to cover, it appears that the draft Local Plan is unsound.