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From: Robert Jackson [REDACTED]
Sent: 21 October 2025 20:25
To: Consultations
Subject: Fwd: COMMENT ON DRAFT CANTERBURY DISTRICT LOCAL PLAN 2045

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I now understand that I must be clear about my address as well as my name. It is Dr Robert Jackson,

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Sent from my iPad

Begin forwarded message:

From: Robert Jackson [REDACTED]
Date: 21 October 2025 at 17:23:08 BST
To: consultations@canterbury.gov.uk
Subject: COMMENT ON DRAFT CANTERBURY DISTRICT LOCAL PLAN 2045

COMMENTS ON DRAFT CANTERBURY DISTRICT LOCAL PLAN 2045 SUBMITTED BY DR ROBERT JACKSON, SECRETARY, GRASMERE VILLAGE RESIDENTS' ASSOCIATION (GVRA)

1. INTRODUCTION

1.1 This document sets out objections to the latest draft Canterbury District Local Plan 2045. In particular, we comment on the unacceptable proposals for Chestfield, Whitstable and their environs. Notably, this includes: traffic generation and impacts, the effects of future climate change and its impacts, including water supply and foul water management, and adequate road provision

1.2 First, we should like to point out that all major new housing developments are required to be included and fully justified in a current Local Plan. The current existing Canterbury District Local Plan adopted in 2017 covers the period to 2031. *This remains the last Local Plan that has gone through the full legislative procedures required, including review by Planning Inspector at Public Inquiry.*

1.3 A draft Local Plan 2045 exists but, to reiterate, this has not gone through the full process required by legislation, including review by Planning Inspector appointed by the Secretary of State, at open Public Inquiry which allows for public comment and objections. It cannot therefore be considered legally viable in the consideration of any large new sites additional to the Local Plan 2017.

1.4 Any proposal for development of the large, proposed Brooklands Farm and Bodkin Farm sites, therefore has no lawful standing until this full Local Plan 2045 process has been completed, and indeed any detailed consideration of them at this stage must be considered prejudicial to proper and legitimate Local Plan considerations in respect of them.

1.5 Also planning for large new housing estates requires assessment the potential future impacts of climate change over the expected lifetime of the proposed housing development. We see little or no evidence of this in the current draft Local Plan 2045.

1.6 However, we know for certain that several Chestfield and Whitstable areas and roads already suffer from severe flooding at times, not least from the effects of the Swalecliffe Brook and poor historic drainage, and that potentially large areas of new housing estates and their concreting over of land associated with these developments which will add to these problems.

1.7 In the next few sections we comment specifically on the proposed Brooklands Farm, Bodkin Farm and Land East of Chestfield Road draft Local Plan proposals

2. THE FLAWS IN THE PROPOSED BROOKLANDS FARM DEVELOPMENT PROPOSAL

2.1. Overview

2.1.1 Brooklands Farm lies within an area which has long been regarded as an Area of High Landscape Value (AHLV). It was identified once more as an AHLV in the currently adopted Canterbury District Local Plan 2017(see page 10). The farmland provides a wide panoramic view of the Swalecliffe Brook valley with the Blean Hill ancient forests on its' southern side.

2.1.2 The Brook runs down to Chestfield and Swalecliffe to the sea at Swalecliffe. Historically it has repeatedly been a source of flooding in some of the low-lying London clay areas, including housing and other development, through which it runs. This before any additional widespread concreting over of the Brooklands Farm site.

2.1.3 Long-established popular registered footpaths cross the site provide opportunities for open rural walking and enjoying the countryside and its wildlife, with no overbearing roads or buildings spoiling the view.

2.1.4 It is an area of high biodiversity value with rare butterflies and breeding birds. Its ecological, biodiversity and landscape value would be seriously and adversely impacted by a major housing development.

2.1.5 The National Planning Policy Framework (NPPF) requires LPAs to use areas of poorer quality land for future developments in preference to that of a higher quality and, if agricultural land is to be proposed for development, the economic and other benefits of that land should visibly be fully considered and taken into account. There is no evidence that this has been done.

2.2 Loss of Best and Most Viable Farmland

2.2.1 It is Government policy to prevent the loss of best and most viable farmland. Historic maps (see The History of Chestfield published by the Chestfield History Society) show clearly that the Brooklands farmland has been farmed for many centuries up to the present day and thereby remains demonstrably long existing and viable farmland. It is clear that it would never have been farmed this length of time if it was not viable.

2.2.2 It is still farmed for cereal crops and cattle grazing and must therefore be regarded as Grade 3a rather than Grade 3b land. Grade 3a is Best and Most Versatile (BMV) agricultural land and its development for housing would be contrary to both policy EMP 12 (Agricultural Land) and policy DS12 (Rural Economy) of the current draft Local Plan.

2.2.3 For these reasons, the Brooklands Farm Site should be nominated as a Green Gap space in any new Local Plan. No legitimate reasons have been given and set out as to why this

centuries old farmland which has been protected in previous Local Plans should now be designated for housing development other than, perhaps, the current owner wishes to retire from farming.

2.3. Impact on Traffic and Transportation

2.3.1 Sub-section 4 of the draft Local Plan 2045 entitled “Access and Transportation” provides no legitimate detail how additional off-site traffic from the extensive Brooklands Farm site, and other ongoing and proposed Whitstable area development, locally or to and from Canterbury will be adequately catered for in future.

2.3.2 There is mention of the A299 and A2990 but these run east to west not north to south so are essentially irrelevant for Canterbury journeys.

2.3.3 The A2990, the existing Old Thanet Way, is facing essentially insuperable traffic problems in future due to three things which will lead to ever increasing car traffic levels on it:

1. greatly increased already committed and other proposed development along or alongside or off the Old Thanet Way;
2. the fact that it runs alongside the Whitstable to Herne Bay railway line and thus has two unavoidable and essentially impossible to rectify pinch points situated along it, namely the Chestfield Road and Greenhills roundabout complexes. These railway line crossing points serve to back up queues as does ever-increasing development on or off the Old Thanet Way. In particular, the capacities of the roundabout arms and bridge respectively needed to allow traffic to cross the railway line to access coastal areas cannot be increased; and
3. from Spring to Autumn the Old Thanet Way also needs to carry increasingly high levels of additional holiday traffic.

2.3.4 We do not believe that the traffic analyses submitted and the assumptions behind them have been adequately explained for public information and sound future decision-making, including the extent of traffic impact of other future developments and the traffic impacts of them eg the ongoing Grasmere Gardens development. We believe the extent of these traffic impacts have been severely underestimated and understated by the prospective developer.

2.3.5 For developments on or off the Old Thanet Way there will be only two realistic options for journeys inland, most notably to or from Canterbury. These are:

1. Use of South Street to the Radfall Road on through the Thornden Wood Road, through Blean Woods, and Hackington Road through Tyler Hill and on down St Stephens Hill into Canterbury via either St Stephens or Beaconsfield Road;
2. Use of South Street the other way onto the Old Thanet Way (A2990) up Clapham Hill onto the A290 through Honey Hill, Blean Hill and down into Canterbury via the Whitstable Road.

2.3.6 These alternative routes will face major problems with large increases in peak traffic in future from other ongoing development, particularly the Thornden Wood and Hackington Road option. This is narrow and width restricted for most of its length. It is increasingly used by cyclists causing traffic delays on the narrow roadway. There is no indication that this issue has been properly considered.

2.3.7 Unavoidable roadside parking throughout the day in Tyler Hill village leaves only half road passing down its length. This will be worsened by more car and cycle trips to and from Canterbury.

2.3.8 There will also be additional traffic loading on these routes in future from a range of other already committed ongoing or new developments.

2.3.9 The Brooklands Farm site's proposed 1300 dwellings, a 3FE primary school, a SEND school, and other buildings will be a day long major traffic generator to and from Canterbury along with other ongoing proposed Whitstable area development.

2.3.10 The proposed off-slip from the A299 onto South Street and hence onto the Chestfield Road would lead to extensive additional traffic passing through the designated Chestfield conservation area village onto the overloaded complex multi-roundabout system at the northern end of Chestfield Road leading to further unacceptable overloading of it.

2.3.11 These movement and transportation issues and impacts have not been fully and properly addressed in the latest existing draft Local Plan 2045 for the proposed Brooklands Farm development application. Indeed, in the latest version nothing substantive is said of these potentially highly damaging effects of this site.

2.4. Flooding Likely to be Caused by the Proposed Brooklands Farm Site

2.4.1 Part of the proposed Brooklands Farm development site is in Flood Zone 3. There is therefore a high probability of flooding which will be exacerbated by future climate change not least due to run off from extensive concreted over areas.

2.4.2 It is long established that the Swalecliffe Brook and its tributaries cause flooding in Chestfield and parts of Swalecliffe (see Environment Agency latest future flood risk maps on the gov.uk website). More abnormally heavy rainfall that is forecast in future due to climate change will serve to substantially increase these incidences of future flooding.

2.4.3 Published knowledge of the flooding caused to central Chestfield and parts of Swalecliffe by the upper catchment of the Swalecliffe Brook indicate that any substantial development of the main valley origin and this catchment down through Chestfield and Swalecliffe will cause additional future flooding problems – see current Environment Agency risk of future flooding map for Swalecliffe Brook on the gov.uk.

2.5 The Developer's Pre-emptive Planning Application Submission

2.5.1 We note that the prospective Brooklands Farm's developer's pre-emptive planning application – ref. CA/25/00779 – has attracted approximately 1,750 objections. We believe that legitimately, lawfully and given the scale and content of these objections, the analyses of these responses need to be fully analysed and assessed by CCC and the assessments placed in the public domain before any final decision on the inclusion of this site in the proposed Local Plan 2045 is taken.

3 THE FLAWS IN THE PROPOSED BODKIN FARM PROPOSAL

3.1 Overview

3.1 The Bodkin Farm site abuts onto the northern end of the Chestfield Conservation Area. It has been the subject of previous planning applications. The last one, for a mixed-use development of up to 290 dwellings, primary school and various other facilities, was rejected by CCC and subsequently went to Planning Inspectorate appeal in 2015 where it was again rejected (Appeal Ref: APP/J2210/A/14/222764).

3.2 A primary reason for the Appeal Inspector's rejection of the developer's Bodkin Farm appeal in 2015 was that it conflicted with CCC's Whitstable-Herne Bay Green Gap policy which

has been in place since 1997. At a Local Plan inquiry that year, the then Planning Inspector held that the long-term retention of the Green Gap separating the coastal towns of Whitstable and Herne Bay to be “an objective worthy of very strong support”. The Whitstable-Herne Bay Green Gap policy has been included in every CCC Local Plan since.

3.3 There remain eight existing Green Gaps that have been considered and consulted upon in the recent CCC Local Plan 2045 consultation, one of which was again the Whitstable-Herne Bay Green Gap. In respect of their reiterated Green Gap policy, CCC note in their outcome of their Local Plan 2045 consultation summary document that:

“Concerns were raised about damage to the natural environment through developments, as well as urban sprawl, the merging of settlements and a desire to keep the separate identities of settlements.

3.4 The “loss of green space, open space and open countryside” were also commented upon.

3.5 Paragraph 29 of the 2015 application Appeal Inspector’s report stated:

“The proposed development of these paddocks and fields to the south of the road would completely remove the perception of openness currently experienced along this stretch of the A2990. The sense of being within a Green Gap between the two settlements would be replaced with a sense of being part of the urban area of Chestfield and Swalecliffe”. The Green Gap policy and the relevant Appeal Inspector perception and assessment of its implication must logically apply in respect of the latest development proposal.

3.6 It is further noted that, in the draft Canterbury District Local Plan 2045 issued by CCC, it is stated that the “preferred option” - reference NE5H - for the Herne Bay and Whitstable Green Gap is to, “keep the existing green gap without any changes to the boundary”.

3.7 In light of the above, what any proposed large-scale development of the Bodkin Farm site would mean is that CCC would clearly not only be overruling and ignoring the 2015 Appeal Inspector’s assessment and decision statement but also be in inappropriate contravention of their own preferred policy option statement, arrived at and stated in their first draft Local Plan 2045 consultation. This is notably flawed logic, and the development proposal should therefore be rejected as it has been on previous occasions unless overwhelming counter arguments can be produced and published for public understanding. There is no evidence of this.

3.8 Documents submitted for the latest Bodkin Farm planning application remind us that the pavement of Herne Bay Road under the railway bridge is too narrow for use by the large number of teenage pupils using the station at the same time as smaller children going to Swalecliffe Primary School. There is no room to widen the pavement. The same problem also affects adults, including the elderly and disabled. To reiterate, there is no room to widen the pavement. This pavement also provides access to the station platforms, so it is It follows that many pupils would use it for commuting to and from schools.

3.9 British Transport Police have already expressed concern about large numbers of pupils using this unstaffed station and waiting a long time for trains. It follows therefore that the Bodkin Farm site would again not be suitable for locating a large secondary school. The station would also not be suitable for use by the elderly with very few facilities, including those for waiting.

4.1 This site is not in a sustainable location. It is not within walking distance of a primary school, and many people would not consider it within walking distance of the local supermarket or railway station. This may change if shops and a primary school were to be built at Brooklands Farm, but it is by no means certain that this would happen. People buying

a house here would probably drive to work in Canterbury, like so many others in the Chestfield area. More sustainably located sites closer to Canterbury have been listed in the last two CCC draft Local Plans, one of them in walking distance of a major employment site. We therefore object to site N20.

5. INADEQUATE FUTURE LOCAL DRAINAGE PROVISION

5.5.1 In combination with other ongoing and planned housing developments and given its' location and previous history, any large Brooklands Farm housing development would add to the sewage effluent pollution problem on the beaches at Swalecliffe and surrounding areas.

5.5.2 Southern Water's sewage works are unable to operate safely with even the current level of Whitstable housing and development. Their sewage disposal uses the Short Sea Outfall method. There have been many repeated problems, including the repeated release of untreated effluent and raw sewage, which been washed back onshore. Southern Water have been fined repeatedly for these events.

5.5.3 Plans for replacing the Short Sea Outfall are currently unclear and unapproved, but it appears that any replacement would be another "short" outfall but with somewhat higher capacity. It could therefore still be to result in sewage effluent being blown back onto the beach when winds are from the west or north.

5.5.4 It would also have to be shown that any increase in effluent treatment provision could deal with not only all the existing housing arisings, already causing severe problems, but also the new arisings from the large amounts of additional housing proposed by any future Local Plan 2045. This problem is not addressed in the developer's application material

6. THE FUTURE HOUSING WATER SUPPLY PROBLEM

6.1 The Problem

6.1.1 On 29 May 2025, Water Minister, Emma Hardy, announced to Parliament that England could face housing and drinking water shortages within a decade unless new reservoirs are built. In recent years, there have been repeated hosepipe bans in Canterbury district. At the time of preparing this objection document such a ban remains in place.

6.1.2 This household water problem will soon transform into a crisis in the Canterbury, Whitstable and Herne Bay areas with the amount of additional new development now ongoing and proposed.

6.1.3 A new reservoir for the Canterbury area at Broad Oak has been postulated for many decades by South East Water has now reached an initial feasibility investigation stage.

6.1.4 Further planning, assessment and approval stages would need to be undertaken before any construction begins. Even if commencement was approved, it would be highly controversial and would undoubtedly take a minimum of a number of decades more to implement. Realistically, it may never come to fruition due to legal considerations and objections.

7. THE CONCLUSION

7.2.1 The Brooklands Farm site should be removed from the draft Canterbury District Local Plan and the associated planning application - CA/25/00779 - should be rejected.

7.2.2 Given the number of flaws in the proposed development proposal it would be wrong for any development of this site to be authorised until it has been exposed to Planning Inspector decision at the necessary Local Plan inquiry.

7.2.3 The Bodkin Farm site also has many problems which have been exposed and site rejected for development in considered and exposed in previous development reviews and Planning Inspector inquiries. The latest planning application changes nothing against these previous reasons for rejection. Indeed, large increases in traffic on the Old Thanet Way serve to reinforce them.

7. OTHER SITES THAT MIGHT BE REVISITED/INCLUDED IN THE LOCAL PLAN 2045

7.1 We note that CCC were confident in their previous draft Local Plan 2040 that 2000 homes could be built at site C12 (University of Kent) and 800 at C7 (Hollow Lane), nevertheless we are now told (without clear evidence provided) that these plans are NOT deliverable largely on highways grounds. Surely it would be possible to build some homes on these sites, even if not in the quantity originally envisaged?

7.2 Similarly, draft Local Plan 2045 proposed building 3200 homes at Cooting Farm, Adisham, although this plan was soon discarded as other options were considered more easily achievable. But surely it would be possible to build a significant number of homes here, even if not the original number originally proposed. CCC needs to start the process of building a free-standing settlement gradually, because as a project it is too ambitious and risky to attempt to achieve in one Local Plan period. We raise these examples as possible alternatives to building 2106 homes in Whitstable when the necessary dated infrastructure is either inadequate, not suitable or unavailable.

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