

To:
Planning Policy Team
Canterbury City Council
Council Offices, Military Road
Canterbury, Kent CT1 1YW

Subject: Formal Objection to Draft Local Plan 2025 – Policies N20, N21, N22, N23 and Policy W4 (Brooklands Farm), and Proposed A299 Junction at Radfall

Date: 21st October 2025

Dear Sir or Madam,

I am writing to submit a formal objection to the Canterbury City Council Draft Local Plan 2025, specifically in relation to Policies N20, N21, N22, N23, and Policy W4 (Brooklands Farm), as well as the proposed new A299 junction at Radfall.

Grounds for Objection

1. Inadequate Infrastructure Provision

The proposed developments would place an unsustainable burden on local infrastructure that is already struggling to meet current demand. Local roads, utilities, and essential public services are under significant pressure, and the Draft Plan fails to provide sufficient or credible evidence of how these shortfalls will be addressed.

The water supply and sewage disposal systems in the area are already operating close to capacity. Southern Water has acknowledged that the wastewater network is often overloaded, leading to repeated pollution incidents. Similarly, local health services—GP practices, dental surgeries, and hospitals—are stretched to breaking point, and the Plan offers no clear mechanism for expanding provision to meet population growth.

2. Sewerage Capacity and Coastal Pollution

The foul drainage and wastewater infrastructure serving Whitstable and the surrounding area is already inadequate. Southern Water regularly discharges untreated or partially treated sewage into local watercourses and directly into the sea when the system is overwhelmed.

Whitstable's coastline has suffered repeated pollution incidents, resulting in beach closures, contamination warnings, and serious damage to the town's reputation as a coastal resort and shellfish harvesting area. These discharges present public health risks and cause environmental harm to marine life and coastal ecosystems.

Introducing large-scale developments under Policies N20–N23 and W4 (Brooklands Farm) would significantly increase wastewater output, placing even greater strain on already failing infrastructure. The Draft Plan contains no firm commitment to the delivery of required capacity upgrades before new housing is occupied.

Without fully funded and timed improvements to sewage treatment capacity and surface water management systems, the Plan risks worsening the frequency and severity of raw sewage releases. Such outcomes would be contrary to national and local environmental protection objectives and render these proposals environmentally unsound.

3. Loss of Amenity, Open Countryside, and Local Character

The Draft Local Plan, and particularly Policies N20–N23 and W4, represent an excessive concentration of development in and around existing settlements, leading to a substantial and irreversible loss of open countryside and green space.

The proposed housing sites would consume large tracts of productive farmland, valued landscape, and natural habitat, which currently provide a vital green buffer between Whitstable, Chestfield, and the surrounding villages. These open spaces form an essential part of the area's rural character, helping to define community identity, provide visual separation between settlements, and support biodiversity.

The scale and density of the proposed developments would result in urban sprawl, merging distinct communities into one continuous built-up area. This overdevelopment would fundamentally alter the rural setting, diminish the sense of place, and erode the tranquil, semi-rural character that residents deeply value.

These green areas also serve important recreational and amenity functions, providing accessible spaces for walking, cycling, and outdoor recreation that contribute to residents' physical and mental wellbeing. Their loss would deprive both current and future residents of these benefits.

The Draft Plan fails to recognise the cumulative impact of multiple large sites in close proximity. The combined effect would be a dramatic change in landscape character—from open, green countryside to dense housing estates—and a significant reduction in visual amenity. Such extensive loss of green infrastructure contradicts the Council's own sustainability objectives and local climate resilience goals.

In short, the Plan as drafted promotes overdevelopment at the expense of environmental quality, rural character, and community wellbeing, rather than achieving a balanced, infrastructure-led pattern of growth.

4. Traffic Impact on the A2990 and Whitstable Access

There is widespread concern about the additional traffic pressures these developments will create, particularly along the A2990. This route already experiences heavy congestion during commuting hours and weekends.

Of particular concern is the A299 slip road into Whitstable, leading to the retail park containing Aldi, Halfords, M&S, and Home Bargains. Tailbacks frequently extend from the retail park junction onto the A299 itself, creating a serious road safety hazard for vehicles travelling at high speed on the dual carriageway.

The Draft Plan provides no realistic assessment or mitigation strategy for this known issue, and the likely increase in traffic from multiple new housing sites will only intensify the problem.

5. The Proposed A299 Junction at Radfall

The proposed new A299 junction at Radfall is unnecessary, poorly justified, and likely to encourage further speculative development along the A299 corridor. Such a major new access point would increase noise, pollution, and traffic volumes, while eroding the rural separation between settlements.

The junction would set a dangerous precedent for incremental urbanisation along the A299, undermining the strategic planning principles that seek to protect rural landscapes and prevent coalescence between Whitstable, Herne Bay, and surrounding villages.

Conclusion

For the reasons outlined above — particularly the severe and unresolved issues with sewage capacity and coastal pollution, loss of countryside and amenity, inadequate infrastructure, and unsustainable traffic impacts — I believe that Policies N20, N21, N22, N23, and W4 (Brooklands Farm), together with the proposed A299 junction at Radfall, are unsound, unsustainable, and contrary to national planning policy.

I therefore urge Canterbury City Council to remove or substantially revise these policies before the Local Plan progresses further.

Yours faithfully,

Trevor Mills

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes or dates.