



The Whitstable Society

Response to Consultation on draft Local Plan 2025

Thank you for the opportunity to respond. We have the following comments.

Scope of Consultation

The Council's consultation web-pages state they are inviting feedback on:

- Changes to existing strategic site allocations
- New draft site allocation policies
- Gypsy and Traveller draft policies and allocations
- Impact of the December 2024 NPPF changes

However, we note that, this is a consultation under Regulation 18 of The Town and Country Planning Regulations 2012, which specifies how the Council must consult on their Local Plan, and "must take into account any representation made to them...". **There does not appear to be any basis under Regulation 18 for restricting consultation to any particular part of a Local Plan, or for not taking account of representations about any particular subject.**

Changes to existing strategic site allocations

We note that the "Focused Regulation 18 Topic Paper (Aug 2025)" states that it "explains the justification for the spatial growth strategy selected for the draft Local Plan". It reviews the various sites and mentions how many people / organisations commented on them in the 2024 Reg 18 consultation.

A notable exception is site W4 (SLAA104) Brooklands Farm. The topic paper mentions this site only briefly, and makes no mention of the fact that **Brooklands received far more OBJECTIONS than any other site in the 2024 Regulation 18 consultations.**

We request CCC to provide evidence to show how it complied with the legal requirement in Regulation 18 to "take into account any representation made to them" about site W4.

The draft Local Plan in its present form, with its proposed strategic site allocations, appears to be unsound. It is based on inadequate and out-of-date evidence, and therefore overlooks material issues such as known highway constraints and safety hazards

Whitstable fundamentals – highways issues

Before commenting on new sites proposed for the Whitstable area, we should point out some fundamental highway problems. The evolution of the draft Local Plan suggests the Council may not be aware of the extent of these difficulties.

Problem 1: A299 queues and risk of high-speed collisions

A significant constraint to housing growth in Whitstable is the existing congestion between the start of the A2990 Old Thanet Way (west of Whitstable) and the Long Reach roundabout. Traffic entering Whitstable on this route is subject to delay at (1) the Prospect Retail Park traffic signals and (2) the Long Reach roundabout. The queue from the roundabout can stretch back through the traffic signals to at least the next roundabout (Mariners View / Speedwell Road). It is not unusual to see longer queues stretching back onto the A299 dual carriageway, with risk of high-speed rear shunt type collisions.

Considering a new site (e.g.N20) in isolation from any other development, the addition of a few hundred new homes could perhaps be argued to be unlikely to cause significant increase in hazard on the A299. However, as part of this draft Local Plan, traffic from site N20 would add to traffic from at least seven other sites, namely:

- HB4 (150 homes + new secondary school west of Thornden Wood Road),
- W5 (220 homes at Land South of Thanet Way)
- W6 (250 homes and new secondary school at Bodkin Farm)
- SLAA243 (220 homes at Land east of Seasalter Lane Whitstable) – under construction
- Whitstable Heights – houses still being completed
- Grasmere Gardens – houses under construction
- W4 (up to 1400 homes at Brooklands Farm).

The aggregate impact would be too massive and dangerous to ignore.

CCC's strategy is that the developer at Brooklands Farm would construct a new A299 junction at Radfall, thereby transferring some of the traffic from the A2990 to Chestfield Road.

CCC's Focused Regulation 18 Topic Paper (Aug 2025) states the new A299 junction should "be delivered prior to occupation of 50% dwellings" in about 2031 or 2032. So CCC's strategy is that the existing high-speed collision hazard on the A299 should be allowed to become progressively more severe for another six or seven years before the Brooklands developer provides a solution. As we all know, many developers would be likely to avoid, delay, or water-down such planning obligations, so the provision of the new junction remains uncertain.

A solution to eliminate queuing on the A299 needs to be **implemented** immediately, before any more significant new developments are planned or authorised.

Problem 2: Unplanned development triggered by new A299 junction.

The proposed new A299 junction would be very likely to encourage developers to submit planning applications for housing developments on other fields along the A299 corridor. This would be particularly probable if the new junction included a westbound on-slip, a suggestion that has been raised by some councillors, including two CCC Cabinet members and Chestfield Parish Council.

Possible scenarios might, for example, include a new link road from South Street to the A2990 Whitstable Heights roundabout, via site SLAA208 (Land at Golden Hill). Given the pro-development bias of current planning legislation, it is unlikely CCC would be able to prevent such developments being authorised, despite their negative impact on local services, highway safety, highway congestion, landscape, wildlife and the local community.

Problem 3: Impact of A299 junction on residential roads and conservation area.

Consequences of the proposed new junction would include increased traffic on Chestfield Road, South Street, Molehill Road and the Radfall Hill / Tyler Hill route to Canterbury, which all include stretches of residential roads.

The volume of traffic that diverts through Chestfield Road would increase as delays increase on the A2990 Old Thanet Way between the A299 eastbound offslip and Chestfield station. This diverted traffic is likely to be considerably more than forecast in CCC's 2022 traffic modelling, due to delays from:-

- New signalised crossing east of Long Reach roundabout (this is well-used)
- New signalised crossing required for "Land South of Thanet Way" development
- Increased use of Golden Hill signalised crossing, due to Whitstable Heights (400 new homes, causing numerous pedestrian trips to Tescos across the road)
- Increased use of Chestfield signalised crossing due to new homes at Grasmere Gardens (crossing well-used as route to nearby station and supermarket).

The current journey from the A299 to the A2990/Chestfield Road roundabout has been timed to about 12 minutes in the evening peak period (17:00-18:00) and almost 10 minutes 16:00-17:00. In contrast the equivalent drive-time via the A299 and Chestfield Road would be about 7 minutes if the new junction is built.

It should be noted that Chestfield Road passes through the heart of the Chestfield Conservation Area. The Chestfield Conservation Area Appraisal (2007) mentions that one of the Area's weaknesses is that even the existing modest "traffic flow from Thanet Way leads to noise and safety issues". (This refers to the A2990). Traffic and its noise are also considered to be a *threat*.

It should also be recognised that the new junction would be likely to lead to considerable increased through-traffic on Chestfield Road during weekends and bank holidays, as holiday makers travel to the seaside at Tankerton and Swalecliffe.

It also needs to be borne in mind that, from time to time, the A299 is closed occasionally either in full or in part. For example (according to recent experience), to change the lighting in Chestfield tunnel. In such circumstances, it is likely that Chestfield Road would take almost ALL the traffic from the A299, at least in one direction.

An assessment would be required of the impact of the above matters on pedestrians, especially the elderly, who find it difficult to cross busy roads quickly enough. Signalised crossings may be required, especially where there is strong pedestrian demand, e.g. close to the A2990 roundabout.

Problem 4: Traffic modelling

CCC's assessment of traffic impact of the Local Plan proposals appears not to benefit from up-to-date traffic modelling. The latest modelling in CCCs "Evidence Library" dates from 2022, and therefore lacks material information, for example:-

- 220 new homes at site SLAA243 "Land east of Seasalter Lane", approved 2023
- New / planned signalised pedestrian crossings on A2990 (1: East of Long Reach roundabout and 2: Land South of Thanet Way)
- Increased use of existing signalised crossings due to nearby recent developments (1: Golden Hill, 2: crossing west of A2990/Chestfield Road roundabout)
- Traffic from the proposed new developments N20, N21 etc

The consultants' traffic model used for Local Plan modelling appears to contain at least one error, which may have led to an unrealistically optimistic assessment of the Tesco roundabout. The excerpts of AM and PM traffic flows in Figure 1 below appear to show through-traffic flowing along Golden Hill west of the Tesco roundabout, as indicated by the red arrows. However, this road is a cul-de-sac.

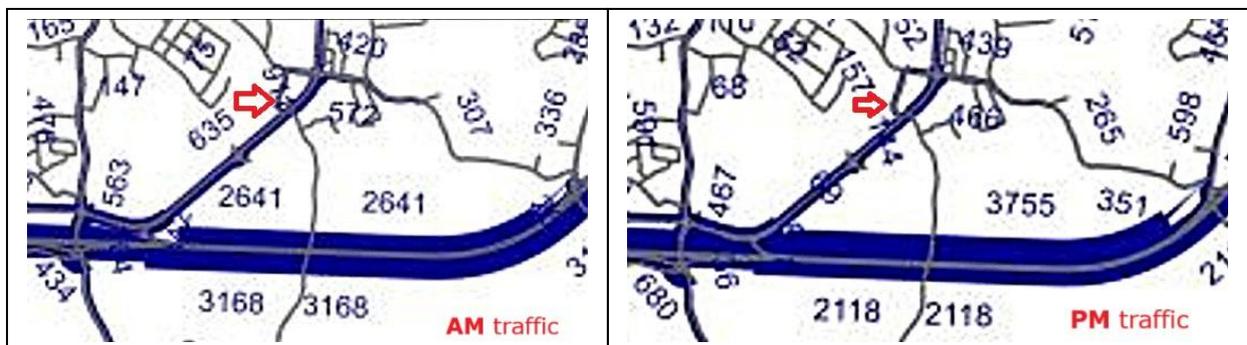


Figure 1: Excerpts of Local Plan traffic model with vehicle flows in AM and PM peak hours.

The consultants' traffic model predictions for vehicle flows in the PM peak hour (1700-1800) show exceptionally high flows eastbound on A299 Thanet Way between Faversham and Whitstable. Figure 2 shows an excerpt, showing flows of more than 4000 vehicles per hour coastbound. A similar effect is shown in the Applicants' modelling for Bodkin Farm.

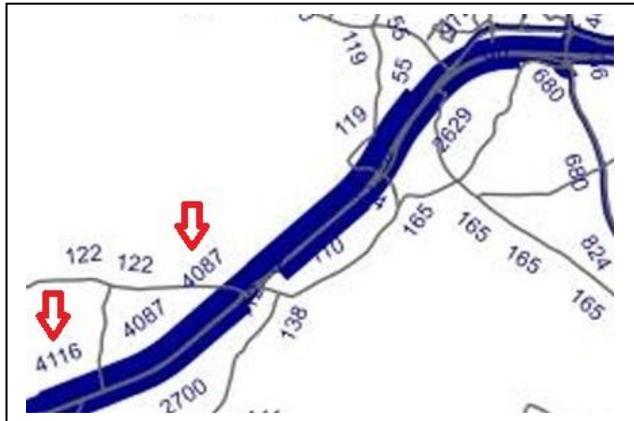


Figure 2: Excerpt of Local Plan traffic model estimates of traffic flows in PM peak hour. The red arrows highlight traffic flows over 4000 vehicles per hour coastbound on the A299 between Faversham and Whitstable

We note from several sources that 4000 vehicles per hour is a rule-of-thumb estimate for the maximum traffic flow in each direction for a road like the A299, with two lanes in each direction. This suggests that if the Local Plan is implemented, the A299 would be close to (if not in excess of) capacity, even on an average weekday.

It will be recalled that when driving to Whitstable from the M2, at Junction 7 (Brenley Corner), far more traffic leaves the M2 for Canterbury than joins the A299 eastbound. This suggests that it can be deduced from the flows in Figure 2 that predicted traffic flow eastbound on the M2 would be greatly in excess of 4000 vehicles per hour, indicating that demand would far exceed the capacity of the M2. **To summarise, Local Plan traffic modelling suggests there is insufficient capacity on the M2 and A299 to support it.**

Finally, we understand that the Local Plan modelling does not explicitly model pedestrian flows. At some locations, such as outside schools and railway stations, pedestrian crossings can cause significant delays. We query whether the modelling adequately takes into account the increased pedestrian flows (e.g. at pedestrian crossings) resulting from Policy W6 Bodkin Farm and its proposed secondary school.

Problem 5: Tight constraints, busy crossings and congested roundabouts

This is in fact a group of problems affecting the road network around Chestfield station. Issues which would be exacerbated by the Local Plan's proposals include:-

1. The **narrow railway bridge** at Herne Bay Road has room for a pedestrian pavement only on the east side of the road. Lack of pavement on the west side frequently leads to pedestrians including children "chancing it" by walking in the road during brief breaks in the traffic flow. It should be noted that all the houses in Swalecliffe are

north of the railway line, whereas their local McDonalds and KFC restaurants are just south-west of the railway bridge.

2. The **narrow pavement** under the railway bridge is less than 1.5m wide. It is well-used by, for example, Swalecliffe residents walking to the Sainsbury's supermarket, passengers accessing the station platforms, and parents with children walking to Swalecliffe Primary School. Adding large numbers of teenagers from a proposed secondary school at site W6 Bodkin Farm would be likely to lead to safety hazards on the narrow pavement.
3. Parents with children walking to Swalecliffe Primary School must cross heavy traffic on Herne Bay Road immediately north of the railway bridge. There is **no signalised crossing** here, and no scope for providing one due to proximity of the St Johns Road roundabout and the signalised crossing south of the railway bridge.
4. The **signalised crossing over Herne Bay Road** south of the railway bridge is very intensively used. Pedestrian flows here exceed 60 people / hour and include (1) train passengers commuting to local businesses, e.g. John Wilson Business Park, (2) local residents catching the train to work or school, (3) Swalecliffe residents walking to Sainsbury's supermarket, or McDonalds or KFC restaurants. Traffic queues stretch back onto the A2990 / Chestfield Road roundabout (sometimes blocking it), queues can even reach the Reeves Way roundabout. Queues on the north side of the crossing can extend more than a third of a mile towards Swalecliffe Primary School.

There is no evidence that CCC have adequately assessed the effects of Policies N20, W4 and W6 on congestion and pedestrian safety on the roads, signalised crossings and pavements near Chestfield station. It appears that, in this respect, the Local Plan is unsound.



Figure 3: Queue from signalised crossing blocking St John Road roundabout, Swalecliffe.

Comments on individual sites

Site N20, Land east of Chestfield Road (150 new homes)

This would be largely a car-dependent development. The nearest primary school is in Swalecliffe, and not within walking distance. Likewise, the nearest supermarket is too far away for most people to walk. Most people in this area commute by car to work, for example to Canterbury.

It is possible that a new primary school and shops may be built at site W4 Brooklands Farm, but these plans could change.

This site, together with other recent additions to the Local Plan, bring the total number of new homes CCC wants to build in Whitstable to 2,106. This is more than can be adequately supported by the existing infrastructure, i.e. roads, sewage, drinking water supplies and health services. CCC has not provided evidence that it has assessed the impacts.

We conclude that we must object to Policy N20 on grounds of unsustainability. The location could become more integrated if Policy W4 were to be built, but that development (including the new A299 junction) would create more problems than it solves.

Policy N23: Land to the south west of Joseph Wilson Industrial Estate

We object to Policy N23 because it lies in the Area of High Landscape Value. The site would be visible from South Street as well as the Crab & Winkle path. The hoped-for screening by trees etc would be unlikely to happen, judging by the Industrial Estate's failure to screen its existing development.

Site W4 Brooklands Farm – new considerations regarding latest CCC assessment

In respect of site W4 **the Local Plan is unsound**, because it has not properly assessed the consequences of its proposals. For example, it does not take account of known highway safety hazards and severe traffic congestion (queuing time of c.6 minutes). Unfortunately, CCC appear to have been dependent on advice from consultees and consultants who may not be sufficiently familiar with Whitstable's roads to be aware of everyday problems.

CCC's **Strategic Land Availability Assessment** (Appendix B) contains several **errors** in respect of site W4:

- In answer to the question whether there are highway capacity constraints, the Assessment states access from the A299 "should be considered". This **advice fails to take account** of the existing queuing hazard on the A299 dual carriageway, which would become too severe to ignore well before the target of 50% of the Brooklands homes had been built in 2031 (as set out in the Regulation 18 Topic Paper).
- In answer to the question asking if the site is adjacent a Local Wildlife Site etc, the Assessment **fails to mention** the site is within 300 m of the West Blean & Thornden Woods SSSI, and would undoubtedly have an adverse impact on it.
- In answer to the question about impact on Heritage, the Assessment **fails to mention** that the site is within sight of Listed Scheduled Monument 1009017 Clowes Wood Barrows, approx 700m from the site boundary. The proposed development would

affect the way in which public experience this monument, and it would be at risk of recreational damage from its new neighbours.

- In answer to the question about protected species, the Assessment **fails to mention** that the site is home to several protected species, including hazel dormice, slow worms, bats and skylarks. These would be unlikely to survive in the new urban environment.
- In answer to the question asking whether the development would affect the amenity of neighbours, the Assessment states that any impact could be mitigated by carefully considered design. **This is totally false.** (a) The development would massively increase traffic past neighbouring properties on South Street, (b) adjacent properties that currently have AoNB-quality views across the farm to ancient woodland in the distance would instead look over a suburban housing estate; other properties in South Street which currently have views over meadow-land, would have these replaced by neighbouring houses; (c) the Brooklands Farm development would affect residents from a wider area than simply immediate neighbours. People come from a wide area to enjoy the scenic countryside and riverside footpath. No mitigation could compensate, the landscape is unique and irreplaceable. (d) the development and new junction would substantially increase traffic through the current peaceful Chestfield Conservation Area; (e) The impact on neighbours should also consider the increased amount of sewage effluent pollution at Swalecliffe, where there is already a problem with people falling ill after visiting the beach.
- In answer to the question asking whether the site is in an AHLV, the report states that it is within the Canterbury AHLV, whereas it is in the Blean Woods AHLV.
- In answer to the question about Ramsar sites, the Assessment simply says No. However, the development would adversely affect the Ramsar site at Swalecliffe, by creating additional burden of sewage effluent pollution. Factors to be considered include non-human waste, including “forever chemicals” and insecticides that can be found in waste water.
- In answer to the question whether the site is suitable in terms of existing policies, it states “yes”, whereas the site is an Area of High Landscape Value.
- The Assessment states that it is within 15 mins cycle ride of a hospital. It is not.

As a result of these errors, the assessment is misleading. It makes the site appear more much favourable for development than is appropriate.

In conclusion, **we object** to the highly destructive Policy **W4**, for reasons of highway safety, adverse impact on the SSSI at Thornden Wood, Ancient Woodland (Longtye Wood), and a Scheduled Ancient Monument, and likely adverse impact on the SSSI, Ramsar, SPA and SAC at Swalecliffe.



Figure 4: The Area of High Landscape Value at Brooklands Farm, with the Blean Woods on the horizon.

Site W6 Bodkin Farm – new considerations regarding latest CCC assessment

Since consultation on the previous draft Local Plan, significant information has been learned about this proposal as part of the ongoing planning application. It now appears that **Policy W6 is unsound**, because it has failed to properly assess the impact of this proposal on material issues such as highway safety.

As mentioned above, the pedestrian pavement of Herne Bay Road under the railway bridge is too narrow for use by large numbers of secondary-school pupils at the same time that younger children are walking to Swalecliffe Primary School. There is insufficient room to widen the pavement. It should be noted that this pavement also provides access to the station platforms, so many pupils would be likely to use it for travelling to and from school.

British Transport Police have already stated concern about large numbers of pupils using the unstaffed station and waiting for possibly long periods for trains.

Unless the issues can be solved, **site W6** would not be a suitable location for a large secondary school, and we therefore **object to Policy W6 on Highway Safety grounds**. If the site is not used for constructing a school, it should not be developed at all because it lies in a Green Gap.

Other problems with this Policy include:-

- a) Lack of evidence of up-to-date traffic modelling to provide information about whether the local highway network (including pedestrian crossings) could safely accommodate the traffic and pedestrian flows that would result from this proposal.
- b) Errors in the Strategic Land Availability Assessment. For example, the Assessment fails to mention that this site is home to several protected species, including hazel dormice, bats, skylarks, common lizards and slow-worms.

Habitats Regulation Assessment

The Habitats Regulation Assessment fails to properly assess the impact of sewage effluent from 2,106 new homes on wildlife in the Ramsar site at Swalecliffe.

The fact that no adverse effects have been noted is almost certainly because no surveys are being carried out to test for the toxic chemicals that are typically found in sewage effluent, for example insecticides and “forever chemicals”. Factors affecting pollution at Swalecliffe include the shallow profile of the intertidal zone, and on-shore winds washing the effluent ashore.

The authors of the report have noted that surveys for the Brooklands Farm planning application have discovered that Golden Plover use the fields there. This shows that the Farm is probably functionally linked to the Ramsar site at Swalecliffe, which cites Golden Plover as one of the key species it aims to safeguard. Nevertheless, the authors simply accept the Brooklands developer’s claim that the number of birds does “not represent a significant proportion of the designated site populations”. This is a highly questionable assumption which needs to be justified by comparing with recent population counts in the Ramsar site.



Figure 5: pollution on the foreshore at Swalecliffe, April 2025

Sustainability Appraisal of the Strategic Land Availability Assessment

There are some significant errors in the various documents on this subject.

We note that in Appendix G *Appraisal of Site Allocations*, for Bodkin Farm (**SLAA247**) the assessment states:

“The site was identified as unsuitable in the SLAA due to existing capacity issues on the local highway network... However.... The proposed allocation at SLAA104 Brooklands Farm facilitates the delivery of improved connectivity to the A299 through new on/off slips to the Thanet bound carriageway. The transport modelling has shown this to have positive benefits at the currently congested **Chestfield roundabouts**”

This statement cannot be correct. Do they mean the Long Reach roundabout? That might make sense. The new A299 junction would probably still result in a similar level of traffic at the Chestfield roundabouts, albeit on different arms of the roundabout.

However, this “focussed” Assessment, like the simple traffic model, does not take any account of the most likely consequence of the new junction, namely unstoppable additional development on new-accessible farmland, resulting in all available highway capacity quickly being re-filled.

Whereas the Council and its consultants regard the new junction as “improved connectivity to the A299”, local residents see it as the road to ruin. The related development would cause widespread destruction of their accessible rural amenity land, an Area of High Landscape Value, wildlife, fresh air, the peaceful place they escape to and the end of a stressful day. CCC’s draft Local Plan is impacting residents’ mental health! These issues are not considered in this over-simplistic Sustainability Appraisal.

For site **SLAA319** Land North of University of Kent, the assessment reports that Natural England objected to this proposal. If that correct, where is the evidence? The only evidence in the public domain records that Natural England did **not** object (NE response to consultation on the 2024 Local Plan).

Climate change

The Local Plan should make suitable preparation for the effects of climate change. The UK’s Climate Change Committee recently advised the Government to prepare for warming of “at least 2 degrees Celsius above pre-industrial levels by 2050”. This is a faster rate than previously expected. The effects on the flooding of the Swalecliffe Brook need to be evaluated to see whether they affect Policy W4 Brooklands Farm. This assessment needs to be made public to provide confidence in the Local Plan process.

Planning for new housing estates requires assessment of the likelihood of flooding over the expected lifetime of the housing – presumably 100 years or more. CCC needs to consider how the existing flash-flooding of the Swalecliffe Brook (and tributaries) would impact Chestfield and the flood-plain at Brooklands Farm under the new faster rate of climate change. Without such evidence the draft Local Plan is “unsound”.

The Local Plan should also assess how erosion and rising sea levels affect the future of Faversham Road (Seasalter) and the local housing. At what point will a new sea wall and alternative Faversham Road be required? When and how would it be funded? When will the Council need to start acquiring land and doing planning and design work? These questions need to be answered in this Local Plan.

In conclusion

The comments set out in this document supplement our comments submitted in response to the 2024 Local Plan consultation. We conclude that, at least in regard to the proposals for Whitstable, the Plan remains unsound.