

I am writing in connection with Outline Planning Application CA/25/00779 relating to Brooklands Farm Whitstable to which I am strongly opposed.

As you know the council has not yet approved a new local plan and this site received a lot of opposition when included in the draft local plan. The developer's application now seeks to circumvent proper consideration of the site in relation to the Local Plan process by taking advantage of the council being in a "presumption in favour of development" position. This is a result of not being able to approve sufficient developments in the current plan period mainly on account of the Stodmarsh Nature Reserve nutrients status. The government did not make sufficient allowance in the council's housebuilding targets for Natural England's intervention and this has put the council in this vulnerable position as regards future development.

In my view, at best, the council should refuse the application or at worst delay consideration until after a new local plan has been approved. The developer should not be allowed to "game" the system.

My objections are:

Firstly, councils need to stop this approach of allowing sizeable developments to be tacked on to existing villages and settlements thereby overwhelming existing services and infrastructure and dramatically changing the character and appearance of the village/settlement area. At the 2011 census Chestfield parish had 1346 dwellings of which 1112 were detached properties so a development of 1350 dwellings would significantly change the character of the area, a settlement with open land or woodland on 3 sides.

Secondly and specifically my opposition to this site being developed is as follows:-

- Sustainability – the developer uses the word sustainable many times to describe what is planned when the reality is the development will be far from sustainable so far as Whitstable is concerned. Whilst the buildings themselves may be built to better environmental standards with rain water collection and the like the consequences of the development elsewhere will negate any such benefits. The development in this place and on this scale will not be sustainable in terms of Chestfield, Whitstable, infrastructure impact, traffic generation, flooding risks, loss of green space and food production. In addition, the cycling and walking routes will have little benefit as the fact is the developer will build homes comparable to those in Chestfield currently so as to maximise profits. The average house price in Chestfield in 2023 was £558,037 and in Kendal Meadow, the newest estate in Chestfield prices were upwards of £695,000. The last census showed that 83% of households in Chestfield had at least 2 cars. The majority of people this development would be targeted at would be busy people with cars and little time to be walking and cycling places.
- GP services – Dr Ribchester, the director at Whitstable medical practice, is publicly quoted as saying that the health centres at Chestfield, Whitstable Harbour and Estuary View are all full. The country already has a shortage of GP's with Kent

having the worst ratio of GP's to residents in the country and according to the Chair of the Royal College of GP's it takes ten years to train a GP so a development of this scale and with a submission for outline planning permission now would put an intolerable strain on this already creaking service.

- Hospital provision – this development offers nothing towards achieving full and proper hospital services in the Canterbury district but it would add to the demand for these overstretched services.
- Traffic Pressures - together with the sites currently under construction at Whitstable Heights, Grasmere Pastures, Benacre Wood, around the Harrier Lodge care home and potentially Bodkin Farm this development would lead to severe traffic congestion along the Old Thanet Way (traffic regularly queues from Chestfield Roundabout to Greenhill Roundabout already; on the C192 which again has long queues into Canterbury during the morning rush hour and on roads into Whitstable and Tankerton which we all know are incredibly congested during the summers. There could be an additional 4000 cars on the roads from these developments alone.
- Bus Services – the claim is that bus services would be diverted through the development to make the development more sustainable. The bus company has not seen the need to re route buses through the existing estates in Chestfield. The recent changes to Herne Bay's bus services demonstrates the council has no control over how stagecoach chooses to run its buses. As councillor Ricketts acknowledged in the Gazette on 2 May 2024 the council has no sway over Stagecoach's commercial operations and if routes are not commercially viable "they will not run them if they lose money". In the case of the Brooklands Farm development I show above that there is likely to be a majority of 2+ car households and their lifestyles will not lead them to put bus travel first.
- Surface Water Drainage – The proposal says the development will have rainwater capture and SUDs to manage this. Parts of Chestfield are already prone to flooding and a development of this scale would exacerbate that. Would the SUDs be sufficient to deal with flooding on the scale seen in September 2024 in parts of the country – a month's rain in 24 hours?

Paragraph 4.5 of the Flood Risk Report says "The EA have kept fluvial flood extent records since 1946, any events previous to that are not likely to have been recorded." The authors contend that there is a low risk of Flooding. Perhaps they should have researched KCC documents and KentOnline for reports relating to Chestfield flooding in 2000 and 2001, They would have found that in the winter of 2000 and 2001 Chestfield experienced significant flooding due to heavy rainfall and rising river (stream) levels rising. Homes were flooded on 9 separate occasions within a 14 month period. The flooding was particularly severe with water flowing through streets and houses with great speed and force. Additionally, it might have helped the authors to have visited Chestfield in recent times during periods of heavy rain when they would have found that the area under the A299 bridge floods.

- Water Supply – The Environment Agency classes South East England as "water stressed" and the Broad Oak Reservoir proposal will not alter this for this area until well into the life of the next Local Plan so this development proposal is inappropriate at the present time.

- Foul Sewage – At the end of 2022 Tankerton had recorded more sewage releases than anywhere else in the county. In all, over 170 events were recorded working out at 529 hours of wastewater being pumped into the sea. The longer outfall pipe that the water authority is putting in is not enough to manage the impact this proposed development would have on such releases.
- Electricity Supply - The Financial Times reported on 22 July 2022 that electricity networks are near capacity. Demand for EV charging, heat pumps and data centres will place additional demands on local networks. The impact of a development of this scale should be tested before any approval is given.
- Food Production – Clearly losing this sizeable farm will have an adverse impact on food production.
- Community facilities – the proposal includes a space for a primary school and for a SEND school. Kent County council rarely provide the new schools (can anyone identify the last brand new additional school that KCC has built in the Canterbury district?) and as far as a SEND school is concerned the county council has proposals for one on Church Street Playing Field for which it has funding.
- Noise pollution and levels – a development of this scale will have a significant adverse impact on the quality of life for residents in the vicinity of the proposed development. The Gazette has reported that work started on the Whitstable Heights development in 2019 and it continues today. That is 6 years for a 400 homes development. This proposal is for over 3 times that scale so it could take **18 years** to complete that will not be beneficial to the well being of the local community.
- Visual impact -The impact on all properties with a view of the site will be negative.
- Impact on the environment – many others have commented extensively on the impact on the environment and the destruction of habitats so I will not repeat those very well argued reasons for rejecting the application.

For the reasons above this proposed development should not be approved by councillors.

J McDonald