

Response to Section 19 Consultation on the Draft Local Plan

The following is not an exhaustive list of the problems with the soundness of the proposed W4 development but outlines areas where the decision to include W4 development in the Local Plan is clearly unsound.

NPPF paragraphs 16(b) and 36(b)

The NPPF Paragraphs 16(b) and 36(c) state that Plans should be deliverable. CCC require the developers of Brooklands Farm (Policy W4) to construct a new intersection between the A299 New Thanet Way and the Chestfield to Canterbury Road (Radfall Hill), to be delivered prior to occupation of 50% of the total 1400 new homes. The new junction is required to relieve congestion on the local road network, especially the A2990 Old Thanet Way.

It is possible the developers will never construct the new junction, citing lack of money, (or more truthfully diminished profits), so they may build half and then withdraw with a partially completed project not fit for purpose. This failure to deliver is currently a major issue in the Thannington development where an unfunded school was proposed but is now unlikely to be built. I see the same issue at Bodkin Farm as well as Brooklands Farm. Transport links are poor and new bus routes have not been forthcoming for the bus service for the 400 new homes at the Whitstable Heights Development (planning application CA/15/01296) after 10 years since planning permission was granted.

The subsidence problems on the A299 New Thanet Way and 4 over bridges are likely to cause its closure, possibly long-term as £63m of external and “matched funding” funding is required and may not be met. Transport links will be worse than at present in the short to medium term for the W4 plan.

NPPF paragraph 20

The draft Local Plan does not comply with NPPF paragraph 20, which states that Strategic policies should set out an overall strategy ... and make sufficient provision for infrastructure for ... water supply....

Southeast Water told Canterbury City Council Scrutiny Committee on 4th March 2026 that it would struggle to provide water for the increased number of new homes in the draft Canterbury Local Plan. See Kent Online 14th March:

<https://www.kentonline.co.uk/canterbury/news/now-water-firm-warns-it-will-struggle-to-supply-new-homes-in-337698/>

NPPF paragraph 161

The draft Local Plan does not comply with NPPF paragraph 161 which states that The planning system should take full account of all climate impacts including, water scarcity.... storm and flood risks and coastal change.

NPPF Paragraph 32

Water shortages

Climate change has caused water shortages leading to bottled water distribution as the only remedy and months of water use restriction due to the semi-arid climate of East Kent. The failure of Southeast Water to make adequate provision for current demand will be exacerbated by increased demand with a significant population increase. Population growth is from migration rather than an increased local need.

Policy R24 - Broad Oak Reservoir

Support for local water resources is planned by the building of a reservoir at Broad Oak in Policy R24 of the draft Local Plan. Broad Oak reservoir is proposed to be supplied by pumping water from the river Great Stour as well as some from the Little Stour which is too small on its own. The Great Stour is heavily contaminated by effluent from Wastewater Treatment upstream, for example at Canterbury. As shown in the recent BBC Panorama programme The Truth about Forever Chemicals, Wastewater Treatment Works are major sources of Forever Chemicals, with evidence of associated serious health concerns. Southeast Water failed to say how or whether they will remove chemical pollutants (hazardous PFAS chemicals) to make it safe to drink.

Policy R24 needs evidence to show levels of PFAS chemicals how it could operate safely. What are the levels of PFAS chemicals in the Great Stour at the proposed extraction point? and how Southeast Water would reduce or remove them to make the water safe to drink? There appear to be no proposals on the table currently, and it may not be possible, rendering the plan undeliverable or unsound.

Indeed, Southeast Water have said to the meeting of Canterbury Society on 22nd January 2026 that they do not have sufficient funds to build the reservoir. It is unlikely the reservoir will be delivered in time for the new developments, despite being needed for current demand.

Flood Risk

Despite Southern Water's inadequate storage facilities to utilise rainfall locally, there is the risk of increased flooding. The draft Local Plan fails to look at the issue of how tidal blocking of the exit of the Swalecliffe Brook may be affected by rising sea levels and increases in rainfall due to climate change. There is likely to be increased flooding in Swalecliffe, so the Local Plan should examine what should be done to prevent such problems occurring. Extremely worrying is the flawed Level 1 Strategic Flood Risk Assessment (January 2026). The source of the Swalecliffe Brook is near Dunkirk, so the

Assessment is incorrect to say that it rises close to the A290 Blean-Whitstable road (several miles away). The description of the geography of the mouth of the Swalecliffe Brook is a decade out-of-date, as coastal erosion has resulted in considerable change.

Policies W3 (Whitstable Urban Area), W4 (Brooklands Farm) and W7 (Bodkin Farm) do not comply with NPPF Paragraph 32, which states that all policies should be underpinned by relevant and up to-date evidence.

Traffic modelling and pedestrians in Chestfield

CCC's draft Local Plan lacks evidence in several areas.

The Policies W3, W4 and W7 use simple traffic models that do not take account of the major increase in pedestrian and car traffic generated by the 2 new secondary schools in the Draft Plan adjacent to the A2990 between Chestfield and Greenhill. Note that the Introduction of the Local Plan traffic modelling report states "It is important to note that strategic modelling is not intended to determine... the acceptability of individual development proposals."

The current pedestrian crossings at the Chestfield Road roundabout cause traffic queues that can block both Chestfield roundabouts and the Swalecliffe roundabout. The proposed new schools will exacerbate this causing morning rush hour chaos. This has not yet been modelled, even in the submitted outline planning applications for the Bodkin and Brooklands developments. There is not much available space for any mitigation with new or widened roads and nothing is said about how this might be financed.

Pedestrian (especially schoolchildren) safety has not been addressed.

Policy W4 Brooklands Farm would create much more traffic along the A2990 westbound and A290 Clapham Hill to the A299 Thanet Way. There is no pedestrian crossing over the A290 at Clapham Hill, although many people (including school children) need to cross the road there to reach the bus-stops. Previous analysis of options for a pedestrian/cycle crossing found no suitably safe location for it.

Policy W7 Bodkin Farm would be likely to cause large numbers of schoolchildren to commute to the school by train, using Chestfield & Swalecliffe station. The only link between the two platforms is the narrow pavement outside the station along the very busy road under the bridge. This requires a full safety review before the plan can possibly be accepted. British Transport Police are worried for the safety children at the station and the risk of line trespassing incidents (see planning application CA/24/00224).

NPPF paragraph 198

Policy W4 Brooklands Farm does not comply with NPPF paragraph 198, which states that Planning policies and decisions should ... ensure that new development is appropriate for its location taking into account ... the potential sensitivity of.... the wider area to impacts that could arise from the development.

One of the constraints preventing large new developments in south Whitstable is the lack of highway capacity between the A299 eastbound offslip and the Long Reach / Borstal Hill roundabout. If a new A299 junction is built under Policy W4, this check on development would be largely removed. So, a likely effect of approving the Local Plan including Policy W4 is that there would be speculative applications for new development along the A299 corridor (capitalising on the improved accessibility provided by the new junction), which the Council would feel it had no alternative but to authorise because they consider they cannot afford to pay the costs of any Appeal. The likely consequences of such developments should be investigated now, before it is too late to stop them occurring.

It cannot be assumed that any consequences can be investigated at the submission of such applications, because the Planning Committee have demonstrated an inability to object to any substantial application where they think the Applicant is likely to appeal against a refusal of planning permission (see for example, CA/23/00379).

NPPF Policy 39

The draft Local Plan does not comply with NPPF Policy 39 which requires Local planning authorities to work “to secure developments that will improve the social....conditions of the area.”

Health Service Capacity

The existing provision of GP and A&E and East Kent Hospitals elective services is already overloaded. Existing developments have not been accompanied by additional facilities, and the current provision is inadequate. A Critical incident was declared at the QEQM Hospital in Margate in January 2026 due to high demand, and from April the East Kent Hospitals Trust has been placed on an Intensive Recovery Programme to attempt to tackle the ongoing financial and operational challenges.

The high Government-imposed housing targets for East Kent do not come with new funding for health or social care. Social conditions are getting worse.

The award-winning GP service in Whitstable was represented by their Executive Director at an initial public meeting in Whitstable in 2023, who stated that it was impossible to recruit additional GPs and staff to provide medical services for the envisaged population expansion.

Sewage effluent on beaches, in bathing waters, in seafood

W4 Brooklands and W7 Bodkin (including the new school) would both generate considerable additional sewage at Swalecliffe Wastewater Treatment Works (WWTW). This already is demonstrable unable to cope with the current demand from new housing developments. The WWTW is notorious for numerous overflows of effluent after heavy rainfall, which can result in beachgoers and their pets becoming ill from infections e.g. E Coli.

Any further housing development in Whitstable will inevitably increase sewage effluent pollution on local beaches, contaminating the marine SSI and local seafood – Whitstable oysters were found to be the cause of a food poisoning outbreak in Hong Kong a couple of years ago demonstrating our impaired biosecurity in our current marine environment. Southern Water may increase treatment capacity at Swalecliffe Wastewater Treatment Works eventually but is currently inadequate with very frequent sewage overflows directly into our streams and coastal waters and will continue to do so for many years even without further wastewater from the proposals. Even though properly treated effluent may have E Coli and biological hazards removed, it still contains other waste products and chemicals such as PFAS pollutants which could be accumulating in the local seafood and the wildlife in the local marine SSSI and Ramsar sites as no testing for PFAS is known to be carried out at this site.

In 2024 Southern Water installed a longer storm outfall at Swalecliffe, but it does not overcome the problem that the sea is shallow and incoming tides and onshore winds can bring the effluent back onto the beaches.

This does not enhance social conditions or access to recreational use of the shoreline. This is very damaging for town trying to increase tourism and preserve the reputation of its oysters.

The draft Local Plan (and in particular Policies W4 Brooklands and W7 Bodkin) fail to comply with NPPF Policy 39 which requires Local planning to “to secure developments that will improve the environmental....conditions of the area.” It will clearly fail to do this – the draft Local Plan would bring worse environmental conditions.

NPPF paragraph 135 and 187

Policy W4 Brooklands Farm does not comply with NPPF paragraph 135 which states that: Planning policies should ensure that developments: a) will add to the overall quality of the area b) are visually attractive and c) are sympathetic to local character

Policy W4 does not comply with paragraph 187 which states Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes.... (in a manner commensurate with their

statutory status or identified quality in the development plan) and b) recognising the intrinsic character and beauty of the countryside

In the Canterbury Local Plan (2017), Brooklands Farm, Longtye Wood and Convicts Wood are all part of the Blean Woods Area of High Landscape Value (AHLV). This followed extensive evaluation in the 1990s of their roles as the setting of the Blean Woods, i.e. providing a viewpoint where people can see the wooded upland of The Blean framed by lower lying fields and pasture. These fields have been farmed for thousands of years, ever since the days of the prehistoric people who built the Barrows in Clowes Wood, overlooking Brooklands Farm. Canterbury City Council propose to remove the AHLV protection based on misleading comments in a report they commissioned when they decided they wanted to build a housing estate on Brooklands Farm (Canterbury District Local Landscape Designations Review and Recommendations 2021). This was an initial rapid desk study evaluation of all the 42 LCAs against the agreed landscape value criteria. The purpose was to reach a rapid conclusion rather than a focus on field evidence. The study acknowledged it was to find a starting point for assessment, not be the definitive assessment.

The landscape of Brooklands Farm is irreplaceable and unique combining ancient woodland, traditional hedgerows, traditional cattle-pasture, open wheatfields and a characterful brook, almost all of which can be enjoyed from the two public footpaths that crisscross the farm.

Quite the opposite of complying with Policies 135 and 187, the Local Plan's proposals would severely reduce the overall quality of the area, would be visually urban, and destroy the character of the landscape. Policies W4 Brooklands and W7 Bodkin of the draft Local Plan would remove areas of outstanding open countryside and networks of rural footpaths which give tranquillity and an escape from the pressures of urban life. These areas of nature and wildlife are beneficial for residents' mental health. The draft Local Plan proposes to replace these amenities with high density urban development, with high buildings not in keeping with the rural surroundings. There are small semi-urban parks in the W4 draft Local Plan with much reduced natural beauty and biodiversity. The draft Local Plan will restrict access to open farmland paths locally, thereby giving poorer social conditions for local residents.

NPPF paragraph 193 a

Policy W4 Brooklands Farm would be incompatible with NPPF paragraph 193 a. which seeks to minimise significant harm to biodiversity resulting from the development.

The farm has diverse habitats, including a brook and other watercourses, damp lowland, ancient woodland, cattle pastures, arable fields surrounded by traditional hedgerows with grassy margins. The proposed development would destroy extensive habitat required by open-landscape species such as skylark and brown hare. The urban

environment and light pollution would encroach on what habitat remains, altering the wildlife profile diminishing sensitive species. This habitat cannot be replicated elsewhere.

Policy W4 Brooklands Farm would be incompatible with NPPF paragraph 193 c which states that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland ...) should be refused.

NPPF paragraph 193 b

Policy W4 Brooklands Farm would be incompatible with NPPF paragraph 193 b. which states that development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.

The proposed development would be about 300m from the West Blean and Thornden Wood SSSI at Woodside Wood, and easily accessible by way of underpasses under the A299 dual carriageway. The SSSI is likely to be degraded by increased recreational use, and wildlife numbers are likely to be diminished by predation from dogs and cats and the problems of urbanisation mentioned above. The same problem would be created in the ancient woodlands of Longtye Wood and Convicts Wood. Wildlife would be severely impacted by the proximity of so many extra people, by predation from dogs and cats, and by the introduction of new and alien species through discarded refuse and garden waste. Nocturnal species such as bats and owls would also be adversely affected by widespread street lighting and noise.

NPPF Policy 110

Policy W4 Brooklands Farm does not comply with NPPF Policy 110 which states Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

National census data for Chestfield shows that most working residents commute by car, many of them to Canterbury. There are very limited bus connections to the W4 Brooklands site, and poor access to the rail network for such a large development. The road network will not be able to cope as KCC has already made clear in their recent assessment, even with the proposed new slip road. There is no local employment expansion planned – new flats at Longreach are advertised as “commuter flats”. W4 is much less sustainably located than, for example, an equivalent development on fields close to the University of Kent (This was site C12 in the draft Local Plan of 2024). The University of Kent is the largest employer in Canterbury District, and the site benefits from relatively good proximity to a good range of schools. There are frequent shuttle

buses to/from the centre of Canterbury, and there is also a cycle-route to the City centre.

It is unclear why the Council has decided to include Policy W4 Brooklands Farm in the draft Local Plan, but excluded C12 in the Draft plan in 2024, the alternative site for 2000 houses that the University of Kent proposes on land north of the university which would be far more sustainable. Being next to a major employer and excellent existing public transport.

In the Sustainability Appraisal Report for the Regulation 19 draft Local Plan (2026), C12 was removed from the draft Local Plan “based on representations and further information”. This is not an example of openness, transparency and candour given the better sustainability – other criteria than those made public must have been applied. In the draft Local Plan consultation of 2024, and far more residents objected to the W4 Brooklands proposal than objected to C12 University of Kent. In a recent article in Kent Online, the leader of the conservative councillors accused the CCC leadership of allocating sites “anywhere that’s politically expedient for this cabinet.” This decision needs examination for probity issues – all sites should be assessed by the same criteria.