

Save Brooklands Response to the Draft Local Plan Consultation

Note: All references to the NPPF refer to the December 2024 version of the National Planning Policy Framework.

(W3 Whitstable Urban Area, W4 Brooklands Farm, W7 Bodkin Farm)

1. Deliverability Concerns (NPPF Paragraphs 16(b) & 36(c))

Canterbury City Council (CCC) requires developers of Brooklands Farm (**Policy W4**) to construct a new junction between the A299 New Thanet Way and Chestfield - Canterbury Road (Radfall Hill) before 50% of the homes are occupied. This junction is intended to reduce congestion on the local road network, particularly the A2990 Old Thanet Way.

However, there is a serious risk the developers **will fail** to deliver this junction, citing financial constraints. As a result, fewer than half of the proposed 1,400 homes may ever be completed. Developers have a history of failing to deliver mitigation works; for example, nearly ten years after planning approval, the 400 homes at Whitstable Heights (CA/15/01296) still have no new bus service.

There is also concern about structural issues on the A299 New Thanet Way. Press reports suggest stretches of the road and several overbridges could close if funding for repairs fails, further jeopardising the feasibility of Brooklands Farm. Taken together, these risks cast serious doubt on whether **Policy W4** is deliverable.

2. Water Infrastructure (NPPF Paragraph 20)

Southeast Water has warned CCC that it would struggle to provide enough water for the additional homes proposed in the draft Local Plan (KentOnLine, 14 March 2026).

Policy R24 proposes a new reservoir at Broad Oak, which would draw water from the Great and Little Stour rivers. The Great Stour is heavily contaminated by effluent from upstream sewage works, and Southeast Water has not provided evidence showing how chemical pollutants, particularly hazardous PFAS, would be removed to make the water safe to drink.

Additionally, Southeast Water has admitted it does not have the funds to build the reservoir (22 January 2026). These uncertainties mean that **Policy R24** may not be deliverable, leaving the Local Plan without sufficient water infrastructure.

NPPF paragraph 20 states 'Strategic policies should set out an overall strategy... and make sufficient provision for ... infrastructure for ... water supply...'

The Draft Plan does NOT comply

3. Lack of Supporting Evidence (NPPF Paragraph 32)

a. Traffic Modelling – Chestfield

Traffic modelling for **Policies W3, W4, and W7** is simplistic and does not account for new secondary schools proposed near Chestfield and Greenhill. Existing signalised pedestrian crossings already create queues that block both Chestfield roundabouts and the Swalecliffe roundabout. Additional traffic from new schools and housing would worsen congestion, yet no modelling has been undertaken to assess this. The physical constraints around the north side of the A2990/Chestfield Road roundabout may prevent any realistic increase in capacity, making the proposed Bodkin school potentially undeliverable without significant investment.

b. Pedestrian Safety

The Plan does not assess pedestrian safety for the new developments. **Policy W4** would increase traffic along the A2990 and A290 Clapham Hill to the A299 Thanet Way where no safe pedestrian crossing over the A290 currently exists. This is particularly concerning for schoolchildren and the elderly, who need to cross to reach bus stops. Previous attempts to introduce pedestrian or cycle crossings concluded no safe location was possible. **Policy W7** could force many children to commute via Chestfield & Swalecliffe station. The only connection between platforms is a narrow pavement under a busy railway bridge. There is no evidence assessing the risk to children, yet the British Transport Police have already raised concerns about safety and trespassing incidents (CA/24/00224).

c. Broad Oak Reservoir

Policy R24 relies on water from the Great Stour, which contains pollutants from upstream sewage treatment. PFAS chemicals, which have serious health risks, are present, yet Southeast Water has not provided evidence on how these would be removed. It remains unclear whether the reservoir could operate safely for public consumption.

d. Decision-making Transparency

Policy W4 is included while the University of Kent's site (Policy C12 in the draft Local Plan 2024) is excluded, despite being closer to the largest employment site in Canterbury District and offering excellent public transport links. The Sustainability Appraisal notes C12 was removed "based on representations," but it is unclear who these representations were from. Public consultation in 2024 showed stronger opposition to Brooklands than to C12. Concerns have been raised that site allocations may be influenced by political expediency.

*NPPF Paragraph 32 states that all policies should be underpinned by **relevant and up-to- date evidence**.* The Local Plan is **lacking key evidence** in several areas

4. Social Impacts (NPPF Policy 39)

a. Health Services

East Kent Hospitals are under intense pressure due to ongoing housing growth. QEQM Hospital declared a Critical Incident in January 2026, and the Trust is now on an Intensive Recovery Programme. The Local Plan does not provide for new hospitals or significant increases in capacity, so social conditions in the area will worsen.

b. Sewage and Water Quality

Additional housing will increase sewage effluent into local beaches, bathing waters, and seafood. While Southern Water is upgrading Swalecliffe Waste Water Treatment Works, pollution is likely to increase, with treated effluent still containing potentially harmful chemicals.

c. Mental Health and Wellbeing

Policies W4 and W7 would remove much-loved open countryside with rural footpaths used for recreation, relaxation, and mental health. Urban replacements would not compensate for the loss of natural spaces, thus reducing social conditions and wellbeing for local residents.

NPPF policy 39 requires Local planning authorities to work to ‘secure developments that will improve the ... social... conditions of the area’.

The Draft Plan does NOT comply

5. Environmental Impacts (NPPF Policy 39)

Sewage Pollution

W4 and W7 would place additional burden on Swalecliffe Waste Water Treatment Works, which already struggles with heavy rainfall events. Outflows from the works have caused E. coli infections and environmental harm. Additional development would exacerbate these problems and threaten the local marine environment, including tourism and oyster production. As reported by KentOnLine 16 April 2026, sewage linked to the Oxenden Park development in Greenhill has already caused issues for residents in Maydowns Road, Chestfield.

NPPF Policy 39 requires Local Planning to ‘secure developments that will improve the ... environmental ... conditions of the area’

The Draft Plan does NOT comply

6. Unsustainable Location (NPPF Policy 110)

Most Chestfield residents commute by car, whereas the University of Kent site (C12) is more sustainable. It is close to employment, schools, public transport, and cycling routes, meaning Brooklands Farm (**W4**) is poorly located in sustainability terms.

NPPF Policy 110 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'

The area of Brooklands Farm (W4) is definitely NOT linked to genuine transport links

7. Landscape and Character (NPPF Paragraphs 135 & 187)

Brooklands Farm (**W4**) lies within the Blean Woods Area of High Landscape Value. Its landscape includes ancient woodland, traditional hedgerows, pasture, and historic farmland. Development would significantly reduce visual quality, destroy the local character, and conflict with policies protecting valued landscapes.

NPPF Paragraph 135 states that 'Planning policies ... should ensure that developments: a) will ... add to the overall quality of the area ... b) are visibly attractive ... and c) are sympathetic to local character'

NPPF Paragraph 187 states that 'Planning policies and decisions should contribute to and enhance the natural and local environment by; a) protecting and enhancing valued landscapes ... and b) recognising the intrinsic character and beauty of the countryside'

A development of 1400 houses/flats in this area can NEVER satisfy those requirements

8. Climate and Flood Risks (NPPF Paragraph 161)

Water Scarcity: See section 2.

Flooding: The Plan fails to account for tidal blockage of Swalecliffe Brook or climate-change impacts. Rising sea levels and increased rainfall could worsen flooding. The Strategic Flood Risk Assessment (January 2026) is inaccurate regarding the Brook's source and mouth, making current mitigation planning unreliable.

NPPF Paragraph 161 states that 'The planning system should ... take full account of all the climate impacts including ... water scarcity... storm and flood risks and coastal change'

The Draft Plan does NOT comply

9. Biodiversity Impacts (NPPF Paragraphs 193 a-c)

Brooklands Farm (**W4**) contains diverse habitats, including ancient woodland, pasture, hedgerows, and arable fields. Development would destroy habitats for skylarks, brown hares, bats, owls, and other species. The site is near the West Blean and Thornden Wood Site of Special Scientific Interest. Increased recreational use, pets, garden waste and increased street lighting and noise could degrade the SSSI and threaten wildlife. These are irreplaceable habitats, making the development incompatible with NPPF biodiversity policies.

NPPF Paragraph 193a seeks to minimise 'significant harm to biodiversity resulting from development'

NPPF Paragraph 193b states that 'development on land or within or outside a Site of Significant Scientific Interest, and which is likely to have an adverse effect on it should not be permitted'

NPPF Paragraph 193c states that 'development resulting in the loss or deterioration of irreplaceable habitats should be refused'

The Draft Plan is TOTALLY INCOMPATIBLE on all three counts

10. Site Sensitivity (NPPF Paragraph 198)

Brooklands Farm (**W4**) is not suitable for large-scale development due to health risks from sewage pollution, traffic congestion, and potential speculative growth along the A299 corridor. Approving the site could trigger uncontrolled development before mitigation measures are confirmed.

NPPF Paragraph 198 states that 'Planning policies and decisions should ... ensure that a 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'

The development of Brooklands Farm would have a truly devastating effect on the local community and the surrounding area that should not be underestimated by those making such an important decision.

Conclusion

Policies **W4** and **W7**, and the draft Local Plan overall, fail to meet key NPPF requirements on deliverability, sustainability, social and environmental conditions, landscape protection, and biodiversity. **Without further evidence and mitigation, the Plan cannot and should not be considered sound.**