

Draft Canterbury District Local Plan: Regulation 19 consultation

Representation from the SaveBrooklands residents' group

17th May 2026



Photo above: Proposed site for 1400 new homes in Policy W4 Brooklands Farm. The Blean Woods are on the horizon. Copyright: Tony Barrett

The **Save Brooklands** group was formed more than two years ago in response to residents' concerns about Canterbury City Council's draft Local Plan, in particular the plans for 1,400 new homes to be built in the Area of High Landscape Value at Brooklands Farm, and the associated new junction between the A299 New Thanet Way and the Chestfield – Canterbury road. The group has c.1,400 members on its Save Brooklands Farmland Facebook site.

A draft version of this representation has been posted on the [SaveBrooklands.org](https://www.savebrooklands.org) website for discussion and comments since March 2026

1. **Paragraphs 16(b) and 36(c)** of the National Planning Policy Framework (NPPF) state that Plans should be **deliverable**.

1.1 Possible failure to construct new A299 junction.

CCC require the developers of Brooklands Farm (Policy W4) to construct a new intersection between the A299 New Thanet Way and the Chestfield – Canterbury Road (Radfall Hill), to be delivered prior to occupation of 50% of the total new homes. The new junction is required to relieve congestion on the local road network, especially the A2990 Old Thanet Way.

There is a real risk that the developers will not construct the new junction, citing lack of money, and consequently they may never complete more than half the proposed 1,400 new homes. Developers have a reputation of failing to deliver mitigation works, for example there is still no new bus service for the 400 new homes at the Whitstable Heights Development (planning application CA/15/01296) even 10 years after planning permission was granted, and after all the houses have been built. **Consequently, there is a real risk that Policy W4 Brooklands Farm may never be more than half-delivered.**

1.2 Possible closure of A299 due to subsidence

There is also a risk that subsidence problems on the A299 New Thanet Way could cause its closure, if press reports are to be believed. Please see:-

[Stretches of A299 and four overbridges could close in ‘worst-case scenarios’ if £63m funding bid fails](#)

When closure of the A299 has happened in the past, even briefly, the A2990 Old Thanet Way is unable to cope with the resultant traffic demand. When there is closure, there is no residual capacity to serve developments set out in the Draft Local Plan, so these would be undeliverable.

1.3 Failure to meet delivery timescales due to poor demand

Press reports frequently warn that the Governments’ target for constructing 1.5 million new homes by the end of the decade will not be met. See for example BBC News:

<https://www.bbc.co.uk/news/articles/cr5er1dpmn8o>

In Whitstable, the rate of housing sales and construction have been far too slow to deliver its share of CCC’s target of 25,407 new homes in just 16 years. For example, it took more than 10 years for 400 new homes to be built and sold at “Whitstable Heights” (planning application CA/15/01296), and the 300 new homes authorised in 2019 at Grasmere Gardens are still far from complete. This suggests that the Government’s target for the number of new homes to be built in the District would be **undeliverable within the required timescale**.

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

2.1 Proposed new reservoir.

Policy R24 of the draft Local Plan proposes to build a new reservoir at Broad Oak in order to try to provide water for as much as possible of the proposed growth. However, the new reservoir would use polluted water pumped from the rivers Great Stour and Little Stour. Southeast Water have declined to answer questions about how they propose to remove chemical pollutants (in particular hazardous PFAS “Forever Chemicals”) from the river water to make it safe to drink.

There are therefore significant concerns about the safety and deliverability of the proposals.

It should be noted also that Southeast Water told a meeting of Canterbury Society on 22nd January 2026 that they do not have money to actually build the reservoir.

There is therefore additional doubt whether the reservoir is actually deliverable, thereby failing to meet the requirements of NPPF paragraphs 16b, 20 and 36c.

2.2 Implications of recently increased housing target:

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 latest draft Canterbury Local Plan. See *KentOnLine* 14th March:

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

This provides more evidence of **strong likelihood of inadequate water supply infrastructure, and the draft Local Plan failing to comply with NPPF paragraphs 16b, 20 and 36c.**

2.3 Highways – M2 and junction 7

National Highways clearly have concerns about the potential of the Brooklands Farm development to adversely impact M2 Junction 7 (Brenley Corner) – as shown by their letter of 23rd Feb 2026 for planning application CA/25/00779. This junction is also shown to be congested in the modelling carried out for CCC’s Regulation 19 draft Local Plan. The junction is already congested in peak periods, but will be under increased pressure from the developments proposed in the CCC draft Local Plan, and further developments in Faversham, “Winterbourne Fields” (Dunkirk), and Thanet. However, the Government’s recent Road Investment Strategy 3 provides no funding to improve this junction. See:-

<https://www.kentonline.co.uk/faversham/news/there-s-no-way-it-will-cope-shock-as-busy-junction-upgrad-338311/>

This suggests **the draft Local Plan does not comply with NPPF paragraphs 11a, 20b and 27a** in regard to inadequate infrastructure at M2 Junction 7.

3. 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**. CCC's draft Local Plan is, in fact, lacking key evidence in several areas.

3.1 Traffic modelling – Chestfield

Policies W3, W4 and W7 are based on relatively simplistic traffic modelling that is not sufficiently detailed to model the existing interaction of the Chestfield and Swalecliffe roundabouts with the very busy nearby pedestrian crossings. Local Plan policy W7 (Bodkin Farm) would add additional pedestrian crossings to the A2990, causing additional as-yet unmodelled delays, as well as adding more pedestrians and associated delays to the existing crossings west and north of the A2990 / Chestfield Road roundabout. 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 impacts of the Bodkin and Brooklands developments on the Chestfield and Swalecliffe roundabouts therefore remain unknown, contrary to the requirements of **NPPF paragraph 32**.

It is important to understand that the tight physical constraints on the north side of the A2990 / Chestfield Road roundabout may prevent any effective increases in highway capacity. **It remains unproven therefore whether the proposed Bodkin school is even deliverable without causing traffic congestion that would be unsolvable unless unrealistic amounts of money are spent.**

3.2 Pedestrian safety at Clapham Hill

The draft Local Plan proposals do not contain any assessment of the impact of the various policies on pedestrian safety.

Policy W4 Brooklands Farm would create considerable additional traffic from the new development 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 here especially to reach the bus-stops. Previous attempts to implement a pedestrian/cycle crossing here concluded that there was no suitably safe location for it.

Where is the evidence that CCC has evaluated the higher risks the increased traffic from policies W4, W5, W6 and W7 would have **on pedestrians** (especially school children and the elderly) **crossing the increased traffic flows on the A290 near the Clapham Hill bus stops?** How has it been concluded that these proposals would be acceptably safe?

3.3 Pedestrian safety at Chestfield Railway bridge

Policy W7 Bodkin Farm would be likely cause a large number of school-children to commute to the school by train, using Chestfield & Swalecliffe station. The only link between the two station platforms is the narrow pedestrian pavement alongside the busy road under the railway bridge. **Where is the safety audit evidence quantifying the likely number of children using this narrow pavement and assessing the risk of accidents?** This pavement is already used by young children walking to and from Swalecliffe Primary School, as well as other numerous other commuters and local pedestrians. It should also be noted that British Transport Police have already expressed concern about the safety of pupils using the station and the risk of possible trespassing incidents (see planning application CA/24/00224).

3.4 Policy **R24 - Broad Oak Reservoir**

The proposed Broad Oak reservoir is planned to work by pumping water from the river Great Stour as well as from the Little Stour (the latter would not be able to supply enough water on its own). However, the Great Stour is well known to be heavily contaminated by effluent from Wastewater Treatment Works / sewage works 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 PFAS 'Forever Chemicals', and "there is growing body of evidence linking them to serious health concerns".

Policy R24 therefore needs evidence to show how it could operate safely. What are the levels of PFAS chemicals in the great Stour at the proposed extraction point, which chemicals are they specifically, and how would Southeast Water remove them or sufficiently reduce them to make the water safe for residents to drink? Southeast Water have been declining to answer such questions, suggesting they may not know the answers and do not have processes that would make the water safe to drink.

Would it even be practicable for Southeast Water to remove / reduce PFAS chemicals to a level that would be safe for prolonged exposure? **We need evidence** before it can be assumed that Policy R24 is "sound" and deliverable.

3.5 Decision-making.

There is a lack of clear evidence why CCC has decided to include **Policy W4 Brooklands Farm** in the draft Local Plan, but excluded an alternative site for 2000 houses that the University of Kent still wants to build immediately to the north of the university. (This was Policy C12 in draft Local Plan 2024). That location would score very highly as a sustainable location, given its proximity to the District's largest employment site (the University itself) and excellent public transport links.

The Sustainability Appraisal Report for the Regulation 19 draft Local Plan (2026) states that site C12 was taken out of the Plan "based on representations and further information....". Representations by whom? In the draft Local Plan consultation of 2024, a far greater number of residents objected to the Brooklands proposal than objected to the University of Kent site C12. In a recent article in *Kent On Line*, the leader of the conservative councillors at the

Council accused the CCC leadership of allocating sites “anywhere that’s politically expedient for this cabinet.”

4. 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.”

4.1 Health services

The relentless pressure from new housing developments in East Kent is causing East Kent Hospitals Trust to struggle to cope with demand.

A Critical incident was declared at the QEQM Hospital in Margate in January 2026 due to the high demand, and from April the East Kent Hospitals Trust was placed on an Intensive Recovery Programme to attempt to tackle the ongoing challenges.

The high level of Government-imposed housing targets for East Kent do not provide any new hospitals or significant increase in hospital capacity in this area. **In this respect, social conditions are worsening.**

We should also point out that, in regard to health, the draft Local Plan also would also not comply with the objective set out in **NPPF paragraph 8b**, namely “to support strong, vibrant and healthy communities ... by fostering ... places ... that reflect current and future needs and support communities’ health”.

4.2 Sewage effluent pollution on beaches, in bathing waters and in seafood

All development proposals for Whitstable would inevitably increase sewage effluent pollution on local beaches, in bathing waters and in local seafood. Although Southern Water may be working to increase treatment capacity at Swalecliffe Wastewater Treatment Works, the overall volume of effluent deposited in the local environment (including the marine SSSI) is likely to increase. Treated effluent may have E. Coli and similar biological hazards removed, but it still contains other waste products and hazardous chemicals that will be washed back into the shore area by incoming tides and onshore winds. In this respect, social conditions would also be worsening, and the likely impacts have not been properly investigated or evaluated.

We should point out that, regarding sewage pollution, the draft Local Plan also would also not comply with the objectives set out in **NPPF paragraph 8b** (health).

4.3 Other issues affecting health

With regard to Policies **W4 Brooklands** and **W7 Bodkin**, the draft Local Plan would remove areas of much-loved open countryside with networks of rural footpaths where local residents can walk to find peace, tranquillity and an escape from the pressures of everyday life. Residents find these areas and their wildlife beneficial for their mental health. The draft Local Plan proposes to replace these amenities with urban development, with a few semi-urban parks and much reduced natural beauty and biodiversity. There would be no alternative rural footpaths for local residents within easy walking distance. **So, in this respect too, the draft Local Plan would bring reduced social conditions for local residents.**

5. 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.”

5.1 Sewage.

W4 Brooklands and **W7 Bodkin** (including the new school) would both generate considerable additional sewage to be processed by Swalecliffe Wastewater Treatment Works (WWTW), which already struggles to cope with the ever-growing demand from new housing developments. The WWTW is already notorious for numerous outpourings of not-fully-treated effluent after heavy rainfall, and (as mentioned above) these can result in people and their dogs becoming badly ill from infections such as E. Coli. Victims can include swimmers and others enjoying local beaches. This is potentially very damaging for a community that is trying to nurture its tourism potential and enjoys a reputation for its oysters.

In 2024 Southern Water installed a larger storm outfall at Swalecliffe. Although it is longer than the previous one, it does not overcome the problem that the sea is shallow and incoming tides and on-shore winds can bring the effluent back onto the beaches.

A second problem is that sewage outfalls are well-known sources of chemical pollutants, such as PFAS chemicals. So far as the public are aware, there is no testing for PFAS chemicals at Swalecliffe and nobody knows how these pollutants could be accumulating in the local seafood and the wildlife in the local marine SSSI and Ramsar sites.

One thing is certain, more houses mean more sewage effluent and more pollution, so in this respect the **draft Local Plan would bring worse environmental conditions.**

It should also be noted that, regarding sewage pollution, the draft Local Plan also would also not comply with the objectives set out in **NPPF paragraph 8c**, namely “to protect and enhance our natural ... environment; including ... minimising ... pollution”.



Photo above: Pollution on the beach at Swalecliffe after gentle onshore wind

6. **NPPF paragraph 102** - Public Safety

NPPF paragraph 102 states “Planning policies ... should promote public safety ...”

6.1 Offslip from eastbound A299 at the A2990

Whitstable’s longest regular traffic queues are at the Prospect Retail Park traffic signals on the eastbound A2990. Peak hour queues often exceed 1km in length with queue times of 6 minutes. If the timing of the signals were to be changed to allow greater traffic flow, the traffic would be likely to severely affect the nearby A290 / A2990 roundabout.

Policy W4 Brooklands Farm would increase queues here, at least until a new A299 junction were to be built at Radfall Hill – if it is ever constructed. The lengthened queues would create increased risk of high-speed shunt-type collisions on the A299 dual carriageway, a safety hazard that would be contrary to **NPPF policy 102**.

6.2 M2 Junction 7.

The increased traffic queues at Brenley Corner (as mention in paragraph 2.3 above) also create increased risk of high-speed shunt-type collisions on the approach to the queues at junction 7. This is contrary to the requirement of NPPF paragraph 102 to promote public safety.

6.3 A290 Clapham Hill

As mentioned in paragraph 3.2 above, policies W4, W5, W6 and W7 of the draft Local Plan would all increase traffic on A290 Clapham Hill, increasing the existing difficulties and hazards experienced by pedestrians trying to cross the road here, including the elderly and school children using the nearby bus stops. This would be contrary to the requirement of NPPF paragraph 102 to promote public safety. Note that this clause states “The safety of children and other vulnerable users in proximity to ... potential hazards should be considered in planning and assessing proposals for development”.

6.4 Chestfield Railway bridge

As mentioned in paragraph 3.3 above, policy W7 Bodkin Farm would significantly increase the number of children using the narrow pavement under Chestfield Railway bridge, a route already used by primary school children walking to and from Swalecliffe Primary School. There does not appear to have been any appropriate safety audit, and noting the potential safety issues, this matter could be contrary to the requirement of NPPF paragraph 102 to promote public safety, including the need to consider “the safety of children and other vulnerable users in proximity to ... potential hazards”.

7. Policy **W4 Brooklands Farm** does not really 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. So, the Brooklands site 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.

8. Policy **W4 Brooklands Farm** would be contrary to **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”*

Nor does Policy **W4** comply with **paragraph 187a and 187b**, which state *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 not-yet-superseded 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 role 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 on the basis of erroneous 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).

The landscape of Brooklands Farm is unique and irreplaceable. It combines Ancient Woodland, traditional hedgerows, traditional cattle-pasture, open wheatfields and a characterful brook. Much of this 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 at best visually mediocre, and would obliterate the unique local character of the landscape.



Photo above: Part of the W4 site, with Longtye Wood in the middle distance. Copyright Tony Barrett

9. 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.*

9.1 Likely increase in water scarcity.

Southeast Water is already doubtful that it could adequately supply water to the housing to be built in this draft Local Plan, even before climate change reduces summer rainfall.

9.2 Flood risk.

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 over the lifetime of the Brooklands development. This issue is likely to cause increased flooding in Swalecliffe, and could potentially be exacerbated by the Brooklands development. So, the Plan should examine what should be done to prevent such problems occurring. The Level 1 Strategic Flood Risk Assessment (January 2026) is worryingly inaccurate. 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. Also, the description of the mouth of the Swalecliffe Brook is ten years out-of-date, because ongoing coastal erosion has moved it eastwards.

10. Policy W4 (Brooklands Farm) would not comply with **NPPF paragraph 181d** which says “Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for **biodiversity**, including by establishing coherent ecological **networks** ...”

Similarly, Policy W4 would be incompatible with NPPF **paragraph 193 a.** which seeks to minimise *significant harm to biodiversity resulting from development*.

The farm has very diverse habitats, including a brook and other watercourses, damp lowland Ancient Woodland, cattle pastures, traditional hedgerows, and arable fields with grassy margins. The proposed development would destroy extensive habitat required by open-landscape wildlife such as skylarks and brown hares. There is no practical possibility of recreating this type of habitat anywhere else in the area.

The development would also destroy the habitat currently supporting the very rare plant Mousetail, and it would cause the loss of the hazel dormice (protected species) both by removal of habitat and by predation from residents’ cats and dogs.

In the current planning application for the Brooklands Farm development, it appears the applicants have only been able to claim they could make the required biodiversity increase by undervaluing the existing wildlife (e.g. no mention of mousetail or the profuse insect ecosystems) and by making extravagant claims about what habitats they could in principle build on the site.

11. 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 damaged by substantially increased recreational use by residents, and wildlife is likely to be adversely affected by predation from dogs and cats.

Additionally, traffic between the proposed W4 / W7 developments and Canterbury would use Radfall Road through the West Blean and Thornden Woods SSSI, posing increased disturbance and risks to wildlife.

12. Policy **W4 Brooklands Farm** would be totally 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.*

The proposed development would create a large number of flats and houses close to the Ancient Woodlands of Longtye Wood and Convicts Wood, which are both Local Wildlife Sites. At present they are wildlife-friendly, being almost totally inaccessible to the public, but in future they would be exposed to extensive disturbance and recreational pressure from residents. Wildlife would be severely impacted by the proximity of so many people, and by predation from dogs and cats, also 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.

13. 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.*

13.1 Health impacts

The Plan's proposals for Whitstable would inevitably lead to increased discharges of sewage effluent into the shallow waters at Swalecliffe, with increased pollution in bathing water, on beaches, in seafood and in the marine SSSI and Ramsar sites. Please see 4.2 above.

13.2 Other impacts

One of the constraints preventing large new developments in south Whitstable is the lack of capacity on the A2990 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 would be that there would be speculative applications for new development along the A299 corridor, capitalising on the improved accessibility provided by the new junction. CCC would consider it had no alternative but to authorise these applications, because they may not be able 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).

14. Conclusions

- The overstretched health services, lack of adequate infrastructure, low rate of sales for the new houses that developers are building, and lack of appropriate locations for housing developments, show that CCC should urgently try to secure a lower, less damaging, more achievable house-building target with Ministry of Housing, Communities & Local Government.
- Policy W4 Brooklands Farm should be removed from the draft Local Plan and, if necessary, replaced by a suitable site closer to the District's main area of employment.
- Brooklands Farm should be included in the proposed Blean Woods LLD (Local Landscape Designation), because it was included in the equivalent Area of High Landscape Value after comprehensive analysis of its contribution to the setting of the Blean Woods and outlying Ancient Woodland (Convicts Wood and Longtye Wood). No sound, objective reasons have been given for any removal of status.