

1. 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.

a. Traffic modelling in Chestfield

The Policies W3, W4 and W7 are based on relatively simplistic traffic modelling that does not take account of the likely vehicular and pedestrian traffic to/from the two secondary schools the draft Local Plan proposes to build 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."

As local Chestfield and Swalecliffe people know, the signalised pedestrian crossings to the west and north of the main A2990/Chestfield Road roundabout cause traffic queues that can block both Chestfield roundabouts and the Swalecliffe roundabout. The new schools will cause substantial increases in both pedestrian and vehicular traffic at the pedestrian crossings and substantially increase congestion. This has not yet been modelled, even in the submitted outline planning applications for the Bodkin and Brooklands developments. The impacts of the Bodkin and Brooklands developments on the Chestfield and Swalecliffe roundabouts therefore remain unknown.

It is important to note 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.**

b. Pedestrian safety

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. **Where is the evidence that it would still be acceptably safe for 11-year old school-children and the elderly to cross the road here in the rush-hour with all the additional traffic from the developments at W4, W5 and W7?** Previous attempts to implement a pedestrian/cycle crossing here concluded that there was no suitably safe location for it.

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 there any safety audit evidence quantifying the likely number of children using this pavement and assessing the risk of accidents?** It should be noted that the 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).

c. Policy R24 - Broad Oak Reservoir

The proposed Broad Oak reservoir is proposed 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 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 resisting requests 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.

d. Decision-making

There is a lack of clear evidence why the Council 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 wants to build on its land 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 and excellent public transport links.

In the Sustainability Appraisal Report for the Regulation 19 draft Local Plan (2026), 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."

2. 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."

a. 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 these can result in people and their pets 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**.

3. 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**....*

On 4th March 2026, Southeast Water told Canterbury City Council Scrutiny Committee that it would struggle to provide water for the increased number of new homes in the 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/>

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 chemicals) from the river water to make it safe to drink.

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.

This therefore brings into doubt whether the reservoir is actually deliverable.

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.”

a. Health service

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 is 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.

Personally, despite an estimate of 2 weeks, I waited 9 weeks before a medical professional was able to attend my home to secure a blood sample for a routine test which had been requested by my GP in February this year. I have also now given up on the emergency referral for a dental extraction made by the emergency dental service at Kent & Canterbury Hospital in October 2021, despite it being chased multiple times over the following 2 years. It has proven impossible to secure an NHS Dentist in the area since that time. The proposed increase in population as a result of the proposed developments will only increase the occurrence and frequency of such incidents on the local population as a whole. Many of which are elderly, on low income, disabled, or like myself housebound, and so do not have the option of going elsewhere to secure treatment, instead having to rely on the already vastly overstretched facilities currently in place.

b. Sewage effluent on beaches, in bathing waters, 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 probably 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.

c. 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 few remaining areas and their wildlife beneficial for their mental health. The draft Local Plan proposes to replace these amenities with urban development, containing a few semi-urban parks with much reduced biodiversity and natural beauty. This would leave be no alternative rural footpaths for local residents within easy walking distance. Therefore, in this respect too, the draft Local Plan would bring reduced social conditions for local residents.

5. 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 – 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.

However, 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, an example of this is that there still no new bus service for the 400 new homes at the Whitstable Heights Development (planning application CA/15/01296) even almost 10 years after planning permission was granted).

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

Consequently, there is a real possibility that Policy W4 Brooklands Farm may never be more than half-delivered.

6. 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.

7. 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 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 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, 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 at best visually mediocre, and would obliterate the unique local character of the landscape

8. 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.*

a. Water Scarcity. See our paragraph 3 above.

b. 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. There is likely to be increased flooding in Swalecliffe, 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 caused considerable changes.

The land to be developed under **Policy W4 Brooklands Farm** already has a considerable problem with flooding, water drainage problems and sewage, as do neighbouring areas and downstream in Chestfield and Swalecliffe with much of it consisting of London Clay. The increased strain on the existing system due to additional housing would lead to further overflows, pollution of water sources (also the Swalecliffe Brook) and a decline in water quality. At present heavy rainfall sits on the green fields at Brooklands Farm before is slowly evaporates or trickles into the Swalecliffe Brook, reducing the likelihood of severe flooding. Vast areas of storage would be required to accommodate rainwater run-off from any urban development, but this could not be located close to the Brook because that area already floods when the river level rises over the riverbanks as happened in February. There are historical incidents of existing waterways breaching their banks & flooding surrounding areas & properties particularly at these times of heavy rainfall. I have personally witnessed incidents of flooding, sufficient to support a rowing boat crossing the flood water on the higher elevated area of the land to be developed under **Policy W4 Brooklands Farm**. Although these are now considered historical events, they happened even before the effects of the current climate change we are experiencing and are due to the London Clay prolific in this area. London Clay is particularly vulnerable and so the land repeatedly gets flooded at times of heavy rainfall in the winter months & flash flooding from summer storm. Both these types of weather event are forecast to increase in future years due to climate change.

Government policy as set out in Sections 100–103 of the NPPF is to avoid development of areas at risk of flooding including any development which could increase the risk of flooding to surrounding areas. The replacement of these fields with impermeable surfaces such as buildings and roads would disrupt the natural drainage system and potentially exacerbate flooding issues, placing both existing and future residents at risk. Some examples of this have already been experienced by residents at the Whitstable Heights Development (planning application CA/15/01296), despite assurances that preventative measures would be put in place. Please see:

<https://metro.co.uk/2024/10/25/soiled-loo-roll-human-waste-flows-new-housing-21865987/>

Similar issues are reportedly still occurring at the Olympia Way development in Whitstable which was built in phases between 2007 and 2012 on similar land. Despite local residents, who are aware of & continue to experience the problems associated with flooding, raising concerns when new developments are proposed these are repeatedly overlooked and ignored.

c. Increased risk of subsidence and heave problems.

As previously stated much of the land locally is made up of London clay which is highly susceptible to volumetric changes depending upon its moisture content. During exceptionally dry periods or where the moisture is extracted by tree root activity, the clay can become desiccated and shrink in volume, and conversely swell again when the moisture content is restored. This can lead to many problems near the ground surface, including structural movement and fracturing of buildings, fractured sewers and service pipes/ducts and uneven and damaged road surfaces and pavings. Such that this type of damage is recognised to be covered by the interpretation of subsidence in buildings insurance policies, and the periods of dry weather in 1976/77 and 1988/92, in particular, led to a host of insurance claims. The more land claimed and replaced with the impermeable surfaces during developments only further disrupts the natural drainage system and increases the issues experienced as a result. Which not only affects home owners themselves, but the infrastructure of the area. Subsidence problems are already being experienced on the A299 New Thanet Way(see paragraph 6 for reference) with experts stating “the underlying issues are worsening. Sections of the road have been plagued by cracking, undulations and sinking caused by shifting clay beneath the surface.”

9. Policy **W4 Brooklands Farm** 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 species such as skylark and brown hare. There is no practical possibility of recreating this type of landscape elsewhere.

10. 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.

11. Policy **W4 Brooklands Farm** would be totally incompatible with **NPPF paragraph 193** 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 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.

12. Policy **W4 Brooklands Farm** does not appear to 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.*

a. 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 4a above.

b. Other impacts

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).