

Dear Canterbury City Council

I have the following comments and observations on the above Draft Local Plan using your headings which have been shown in bold.

Policy W7 - Bodkin Farm (page 130)

1. As you will know, this strategic development site was previously the subject of planning application No CA/14/01319/OUT which proposed broadly similar developments to those proposed in the Draft Local Plan 2042/43. However this application was subsequently refused following a public inquiry in 2015. I understand that the former Bodkin farmhouse, built in the 18th Century was later delisted from the National Heritage List for England in September 2018.

2. Currently, the Bodkin Farm site is the subject of planning application No CA/24/00224 and I emailed my comments to Canterbury City Council in two emails on the 22/03/2024. The applicant subsequently submitted additional information relating to access, open space and ecology, my email reply being sent on the 26/08/2025.

3. The above application CA/24/00224 was more recently considered at a Canterbury City Council Planning Committee meeting on the 28/04/2026, with an Officers' recommendation that it should be approved. Reasons include at:

Paragraph 38 "...The Council cannot demonstrate a 5-year supply of housing..."

"...The Council is in a position where the presumption in favour of sustainable development applies."

Paragraph 165 "...the proposed development complies with the relevant policies of the adopted Local Plan (ie 2017)."..."Having regard to the relevant policies in the draft Local Plan and the weight of the draft Local Plan, it does not indicate that a decision should be made other than to approve the application on the basis of the assessment above,"

4. I understand that the Planning Committee did not decide this application at their meeting on the 28/04/2026 but deferred a decision for a later date.

5. The Draft Plan Policy W7 proposals include the construction of about 250 new homes: in addition, a new 6FE secondary school with a 6th form is included in the development. The proposed development would sit wholly within the existing Herne Bay - Whitstable Green Gap (HB-WGGap) and is approximately wedged shaped. It is bounded on its northern side by the A2990, its eastern side by a solar farm bisected by Purchas Wood (a listed ancient woodland) and on its south-western side, partly by Maydowns Road and the HB-WGgap and solar farm.

However the extreme western end of the wedge shape has not been included in the Draft W7 proposals, I assume remaining as an isolated part of the HB-WGGap.

6. To conclude, the above proposals would seem to conflict not only with the adopted Canterbury District Local Plan 2017 Policy OS6 “Green Gaps” and Policy OS7 “Herne Bay and Whitstable Green Gap” but also with the Draft Canterbury District Local Plan 2042/43 “Policy DS22 - Habitats, landscapes and sites of local importance” (page 279) as discussed further in paragraphs 8 to 12 inclusive below.

Policy HB5 – Land to the West of Thornden Wood Road (page 149)

7. The Draft Plan proposals include the construction of about 150 new dwellings: a new 6FE secondary school plus 6th form is included in the development. The site is broadly anvil shaped, the northern boundary bordering the A2990, and its eastern boundary aligning with the existing Greenhill housing development. The south-western boundary has a distinctive dog-leg alignment and adjoins the existing HB-WGGap where there is an element of the solar farm associated with the Bodkin Farm proposal. At their closest point, I estimate that the two site boundaries (ie between W7 and HB5) would be about 100m apart. Like Policy W7 (Bodkin Farm), this site also sits wholly within the HB-WGGap and falls to be considered in the same manner as discussed in paragraphs 8 to 12 inclusive below.

Green Gap Policy Background : Land at Bodkin Farm

Planning Inquiry into Application Ref: CA/14/01319/OUT

Land at Bodkin Farm

Appeal Ref : APP/J2210/A/14/2227624

8. Following the Public Inquiry in August 2015, the Inspector issued their dismissal decision letter on the 16th October 2015.

9. The Inspector’s policy assessment of the Herne Bay and Whitstable Green Gap is set out in paragraphs 13 to 34 of their decision letter together with their conclusions at paragraph 50 are, I suggest, relevant to the DCDLP 2042/43. I appreciate that the PI took place before the adoption of the CDLP 2017, however there are long standing commitments to the Green Gap stemming from the Local Plan Inquiry of 1997 (para 15) and the importance of the Green Gap lies in its separating function (para 26).

10. For reasons of space I have not reproduced the above paragraphs from the Inspector’s decision letter or included a copy of the Inspector’s letter in this submission on the basis that

you will no doubt already have a copy of their letter as the City Council were represented at the PI. The Planning Inspectorate's Appeal Ref is: APP/J2210/A/14/2227624.

11. In summary, the protection of the Green Gap between Herne Bay – Whitstable has been established for many years being confirmed in the adopted 2006 Canterbury District Local Plan (CDLP). The Inquiry Inspector at the Bodkin Farm planning appeal of 2015 confirmed that development at this site would be contrary to Green Gap Policies TC26 and R8 which were current at that time. Subsequently Green Gap policy was maintained in the adopted July 2017 CDLP under “Policy OS6 Green Gaps and Policy OS7 Herne Bay and Whitstable Green Gap”.

12. Accordingly, it is suggested that Draft Local Plan 2042/43 Policies W7 (Bodkin Farm) and HB5 (Land to the West of Thornden Wood Road) should be revisited since the City Council would appear to be disregarding its own long established Green Gap policies of permitting only very limited development in such areas. As drafted, Policies W7 and HB5 would, in my view, create an unwelcome precedent.

Policies W7 and HB5 – Travel / Local A2990 Traffic Implications

(Planning Application CA/24/00224 re Policy W7 also refers)

Proposed Vehicular Access to Proposed Development Sites and Toucan Crossings.

13. Both Policies, W7 and HB5, require the provision of primary vehicle access to the A2990 plus Toucan crossings. However only indicative details of the proposed junction locations are given, with no information on the Toucan locations. However, the W7 planning application does provide more information on these points.

14. The current speed limit on the section of the A2990 where the proposed accesses are indicated is 60mph however I understand that the applicant for the W7 Bodkin Farm site proposes to introduce a 50mph speed limit in the vicinity of their proposed accesses, I assume through a Traffic Regulation Order promoted by Kent CCC as Highway Authority for the A2990. However, I am not aware if the proposed speed reduction from 60mph to 50mph would also apply to the proposed HB5 development site which also proposes at grade junctions in order to access the site. There are very few accesses onto the A2990 60mph section and all are private apart from the access to the Herne Bay Recycling Centre (commercial access only) and “Garden X” formerly “Johnsons” garden centre. In general, vehicular use of these accesses is low.

15. The proposed accesses under Policies W7 and HB5 would, if implemented, introduce two at-grade junctions on the A2990 with potentially high volumes of turning traffic during school term times, especially during the morning traffic peak flow of 8am to 9am. The afternoon traffic flow peak of 5pm to 6pm is likely to be less affected, however both junctions would be sited on a currently high speed section of road and, depending on their configuration, could have road

safety implications. The proposed introduction of the Toucan crossings on this section of the A2990 is also, I suggest, a matter that needs careful consideration for road safety reasons.

16. Both Policies W7 and HB5 propose 6FE secondary schools with 6th forms some of whose students are likely to make use of the existing nearby Chestfield and Swalecliffe (C&S) railway station. However I understand that the station is not DDA access compliant and would also mention that unfortunately the connecting highway beneath the railway tracks is narrow, as is the single footway located on the eastern side which makes two-way pedestrian passing movements potentially hazardous. This raises safety concerns for its greater use by school students especially during term times. I suggest that NPPF paragraph 109(b) “ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;” and NPPF paragraph 109(c) “understanding and addressing the potential impacts of development on transport networks;” are relevant in this case. A potential cause of concern for high sided vehicles relates to the railway bridge which has a height restriction of 4.0 meters. In short, this railway underbridge has very limited height and width, with minimal provision for the safe movement of pedestrians. The proposed W7 and HB5 developments are therefore likely to make what is already an unsatisfactory traffic movement situation, even worse. The letter from Kent CC dated 10/02/2026 to Canterbury City Council under the heading “Comments from The Whitstable Society and Active Travel England” includes information on the footway on the eastern side of the road under the railway line at paragraph 9.

17. While accepting the need for the greater provision of secondary education in the District, the need for two such schools in Greenhill Ward (ie Herne Bay), in close proximity to each other on the A2990 under Policies W7 and HB5 is not at first sight clear to me for the following reasons;

(a) There is already a secondary school with a 6th form in Greenhill ie Herne Bay High School in Bullockstone Road which is approximately 2km from the mid point between proposed school sites W7 and HB5;

(b) If it is decided that the proposed A2990 site is the most appropriate location, then it is not clear why two schools are being proposed in such close proximity, when one school site of equivalent student capacity would seem to be more economic to construct, maintain and operate or is there a countervailing factor that I have missed?

18. The C&S railway station does not have any dedicated car parking unlike that provided at Herne Bay and Whitstable railway stations. Also the “Javelin” high speed service does not stop at the C&S station.

19. In traffic terms, both Policies W7 and HB5, if implemented, would increase both traffic flows on the A2990 and introduce junction turning movements at the proposed schools particularly during term times. In consequence, adverse traffic movement effects and congestion are likely to be experienced on the existing closely spaced A2990 roundabouts at Chestfield Road and Reeves Way, the former road connecting with the highway under the railway tracks at C&S station as discussed above under paragraph 16. The presence of the existing Toucan crossing

between the two roundabouts and the existing Toucan crossing between the Chestfield roundabout and the C&S railway underbridge are considered to be complicating factors, disrupting traffic flows when the signals are called.

Whitstable Urban Area (page 116)

20. Para 3.9 advises that “The strategy for Whitstable is to focus development where it can unlock opportunities for significant infrastructure investment; namely a new secondary school to the north of Chestfield, new A299 junction to include east facing slip roads located south of Chestfield to relieve congestion and a new Park and Bus facility to the south of Duncan Down to serve the Town Centre.”

Policy W3 – Whitstable Urban Area Strategy (page 117)

21. Paragraph 2 advises that “A new A299 junction to include east-facing slip roads, together with a new Park and Bus facility at Land to the South of Thanet Way (Policy W5), with a fast link bus to the town centre, will be provided, with the aim to reduce traffic in and around the Town Centre.....”

22. What is being proposed under policy W3, is that eastbound A299 traffic destined for Whitstable town centre will be provided with advance direction signing on the A299 that will encourage motorists not to leave at the existing Whitstable grade-separated junction (g/s) between the A299 - A290 at Clapham Hill, but to continue eastbound on the A299 until they reach the proposed A299 east facing slip road g/s junction which connects with Radfall Road, a classified Class C road.

23. However, traffic having left the A299 at the proposed g/s junction connecting with Radfall Road and turning northwards will then have another route decision to make at the proposed three-way roundabout between South Street, Radfall Road and Chestfield Road. South Street would take motorists through the Brooklands Farm site (Policy W4), connecting with the A2990 near the Tesco superstore via residential roads. The Chestfield Road option would take them northwards through Chestfield village, eventually connecting with the A2990 at the Chestfield roundabout near the Chestfield & Swalecliffe railway station. Both route options connect with the A2990 but it is not clear to me how motorists would find their way on the local road network to get to Whitstable high street and the harbour areas. Both route options would cause adverse environmental and traffic effects on existing communities. Given that only east facing slips are being proposed at this time, returning London bound traffic to the A299 would need to use the existing A299 / A290 g/s junction at Clapham Hill. Clearly, appropriate traffic signing will be needed within Whitstable for motorists to give them safe routes to their desired destinations and later for their return journey's to the A299.

24. My general point in pursuing the above signing issues is to highlight that consideration of the wayfinding and traffic management issues should I suggest be dealt with, at least in principle, at

this stage in order to support the assumptions used in the traffic modelling of the redistribution of traffic on the local road network resulting from the proposed A299 / Radfall Road g/s junction. In addition sensitivity testing should be undertaken to demonstrate the robustness of the signing and traffic redistribution assumptions.

South Whitstable – Strategic Development Area (page 118)

25. Paragraphs 3.13 to 3.16 set out in more detail the strategic development proposals with a Indicative Concept Masterplan at page 119. In my view it is unfortunate that the masterplan does not show the A299 / A290 g/s junction at Clapham Hill, Whitstable which is an important element of the existing local highway network.

Policy W4 – Land at Brooklands Farm (page 121)

26. Currently the Brooklands Farm site is the subject of planning application No CA/25/00779 and I emailed my comments to Canterbury City Council on the 04/07/25 and 21/01/2026.

27. Paragraph 4 (e) advises that “Provide primary vehicular access via a new junction to the A299 to include east-facing slip roads;”

28. As discussed above under Policy W3 above, the introduction of the east-facing slip roads would seem to me to create an unwelcome precedent and have very wide environmental, planning and traffic implications especially for Chestfield village. However, I note that the new grade-separated junction is being conditioned on a single development under Policy W4 – paragraph 4 (e), to connect with Radfall Road (C Classified). Interestingly, with respect to the planning application CA/25/00779 for development at Brooklands Farm, the applicant’s supporting documentation included “Chapter 8 Transport, Accessibility and Movement”. Paragraph 9.1.19 of Chapter 8 states that “The analysis also demonstrates that whilst there is a reduction in traffic flows on the Thanet Way with the new A299 junction, the need for this junction is not considered to be a requirement of the development proposal and that contributions towards improving accessibility in the local area would be a much more cost-effective proposal.”

29. If implemented it would appear that the proposed A299 eastbound off-slip road would be in close proximity (less than 2 km) to the existing grade-separated junction between the A299 – A290 at Clapham Hill, Whitstable which I assume will need to be approved by Kent CC as Highway Authority for the A299. However, as far as I am aware, the proposed slip road layout and its conformity with DMRB highway layout standards relating to junction spacing, has not been demonstrated by KCC. It is clearly important that the layout of the proposed A299 eastbound off-slip and its connection with Radfall Road is of sufficient capacity to guard against any tailbacks onto the A299 high speed eastbound carriageway, this being the situation, on occasion, at the existing Whitstable A299/A2990/A290 Clapham Hill g/s junction.

30. Should the proposed A299 eastbound slip roads be approved and constructed, thereby setting a precedent and potential catalyst for further development in the vicinity of the new A299 Radfall Road g/s junction plus the possibility of westbound facing slip roads.

Policies W4 Brooklands Farm, W7 Bodkin Farm, HB5 Land to the west of Thornden Wood Road : Traffic Modelling Implications

31. Both Policy W4 Brooklands Farm and Policy W7 Bodkin Farm are the subject of planning applications which I understand have yet to be determined. However, both applications have submitted Traffic Assessments which include the consideration of their development proposals on the closely spaced roundabouts on the A2990 at Chestfield Road and Reeves Way near to the Chestfield and Swalecliffe (C&S) railway station. In addition there is mini roundabout on the northern side of the railway overbridge. There are also two Toucan crossings associated within this highway network.

32. In short, the current traffic modelling does not appear to fully represent the existing network configuration of the two roundabouts plus the mini roundabout, and the effects of use of the Toucan crossings when called by pedestrians. This latter issue is important since both Policies W7 and HB5 include the provision of 6FE secondary schools. Given the nearby location of the schools to the C&S railway station it is likely that some students will increase use of the Toucan crossings and the station facility during term times.

Draft Canterbury District Local Plan 2040 (DCDLP 2040)

(Policies not brought forward to DCDLP 2042/43)

Kent and Canterbury Hospital (K&CH)

33. The above draft Local Plan 2040 included improvements to K&CH under the following draft policies:

Policy SS4 Movement and Transport Strategy for the district (page 20)

Paragraph 2(e) “new A2 access to Kent and Canterbury Hospital and links to the A28 at Thanington;”

Policy SS5 Infrastructure Strategy for the district (page 22)

Paragraph 2(d) “ a new or improved Kent and Canterbury Hospital;”

34. I note that the above policies set out in DCDLP 2040 have not been brought forward and included in the current DCDLP 2042/2043.

35. Given the ongoing and proposed housing developments within the district consequent population growth and likely increasing waiting lists, together with an ageing cohort, this omission seems a very unwelcome miss-step and would appear to be contrary to NPPF paragraph 39.

University of Kent

36. The above draft Local Plan 2040 included a development on land to the north of the University under the following policy:

Policy SS3 Development Strategy for the district (page 17)

Paragraph 2 “A new rural settlement is planned for land north of the University of Kent campus north of Canterbury, which will provide new homes, jobs, services and infrastructure.

37. I note that this proposed policy has not been brought forward.

Sewage Infrastructure Provision in the district

38. Given the ongoing and proposed housing developments within the District, this will increase demand on existing sewage systems. In the Chestfield / Swaleciffe area there are ongoing sewage capacity issues which on occasion have resulted in effluent pollution of local beaches. Given that Whitstable, along with Herne Bay, are tourist destinations, this does not present a very positive image for potential visitors adversely affecting footfall and long term economic viability. I suggest that such matters need to be comprehensively addressed in the draft DCDLP 2042/43.

Regards

C Brown