



Regulation 19 Draft CCC Local Plan consultation

Response from The Whitstable Society

The Whitstable Society was set up in 1960. Our overall objective is to improve the amenity and utility value of the town and district for local people, preserving the character and features of our inheritance and improving the area to meet the needs of the future.

The Society has approximately 1,400 followers on Facebook. This representation was released after consideration by the Whitstable Society Committee.

1. Document Summary

- a. The CCC's Regulation 19 draft Local Plan fails to comply with numerous aspects of Government policy, in particular the National Planning Policy Framework (NPPF), as set out below.*
- b. Draft Local Plan policy W4 Brooklands Farm is examined in detail as most Whitstable residents regard it as totally unacceptable. It clearly fails to comply with numerous requirements of the National Planning Policy Framework, and it should be replaced by a more sustainably-located alternative, possibly one of the sites dropped from a previous version of the draft Local Plan.*
- c. Further work is required to demonstrate whether Policies W7 Bodkin Farm and R24 Broadoak Reservoir would be safe to implement, and we ask for alternatives to be considered.*
- d. Questions about the capacity of the M2/A2/A299 junction and about coastal realignment require further work before the Plan can be considered for adoption.*
- e. Lack of infrastructure, uncertainty over funding, and poor rates of selling new homes (and therefore slow construction rates) suggest this Local Plan is over-ambitious and not deliverable. A more realistic housing target should be agreed with the Government.*

Please note NPPF refers to the December 2024 version of the National Planning Policy.

2. **Policy W4 Brooklands Farm.** This policy conflicts with NPPF paragraphs 7, 8, 16, 20, 32, 36, 39, 44, 96, 103, 104, 106, 116, 135, 161, 164, 187, 193, 198, 208 and 213 as explained below.

- 2.1 **NPPF policies 7 and 8.** Policy W4 does not comply with NPPF paragraphs 7 and 8, because it would not achieve “sustainable development” in a sustainable manner. Brooklands Farm does not score highly as a “sustainable location” for such a large development. Census data shows that the vast majority of working people in Chestfield commute by car or van, very few travel by train, as shown in figure 1. Census data also shows that most commuters drive to Canterbury.

1	QS701EW - Method of travel to work				
2	ONS Crown Copyright Reserved [from Nomis on 5 February 2025]				
3					
4	population	All usual residents aged 16 to 74			
5	units	Persons			
6	date	2011			
7	rural urban	Total			
8		S. Chestfield	N. Chestfield	Tesco area	SW Whitstable
9	Method of Travel to Work	E01024056 : Canterbury 005A	E01024057 : Canterbury 005B	E01024062 : Canterbury 009A	E01024107 : Canterbury 009C
10	Work mainly at or from home	86	45	49	42
11	Underground, metro, light rail	3	1	2	1
12	Train	53	51	39	34
13	Bus, minibus or coach	18	14	12	30
14	Taxi	1	1	1	0
15	Motorcycle, scooter or moped	3	4	9	6
16	Driving a car or van	550	538	514	526
17	Passenger in a car or van	31	36	39	22
18	Bicycle	10	9	13	14
19	On foot	22	45	59	41
20	Other method of travel to work	5	7	4	3
21	Not in employment	601	521	401	355

Figure 1. Data from 2011 National census showing method of travel to work of residents in south Chestfield, north Chestfield, south Whitstable (area around Tesco's), southwest Whitstable, and the area around the University of Kent campus. Each of these areas was a “Lower layer super output area” in the 2011 National census. The very high proportion of people commuting to work by car in Chestfield and the Whitstable area can be seen clearly.

- 2.1.1 It is evident from traffic flows that considerably more people drive from the Whitstable and Chestfield areas to Canterbury in the morning peak hour than vice versa. This is illustrated in figure 2, which shows traffic flows in the “base model” (representing the year 2019) used in traffic modelling for the draft CCC Local Plan.

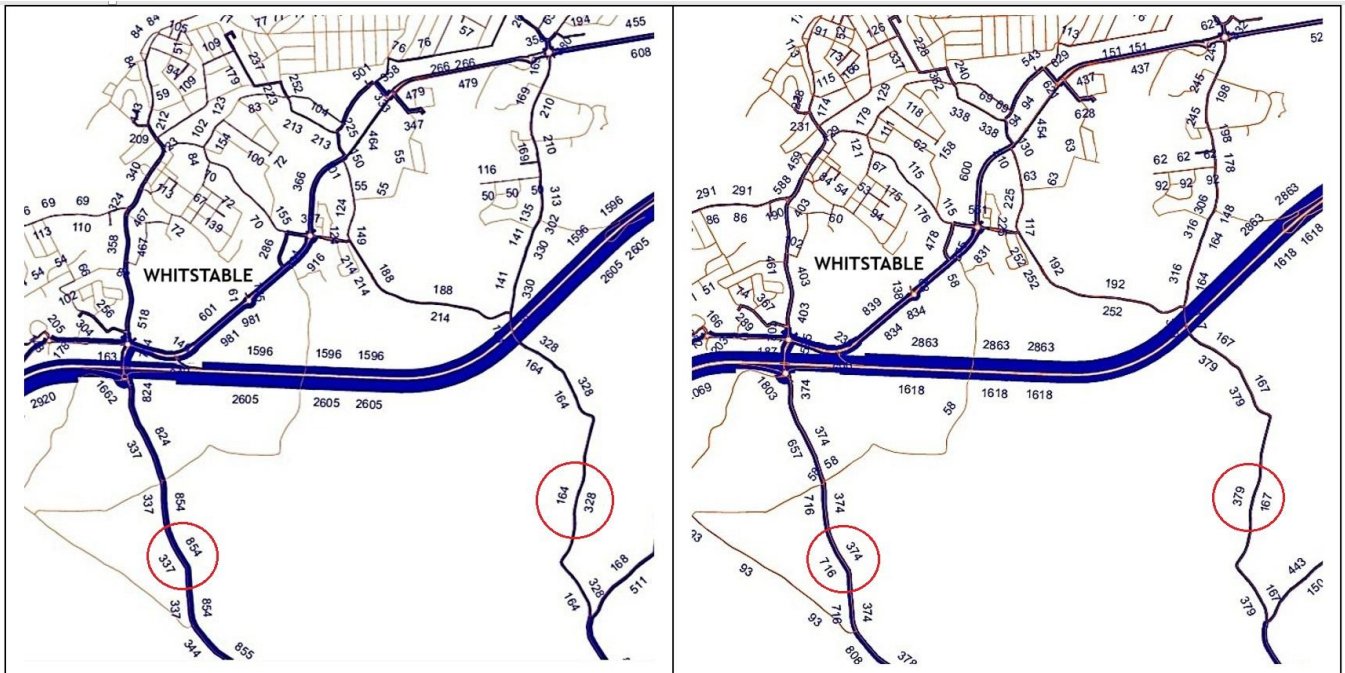


Figure 2: Modelled traffic flows in AM (left) and PM (right) peak hours for the year 2019. This shows that the AM traffic flows from Whitstable to Canterbury are at least twice the flows in the direction of Whitstable. In the evening, the peak flow is reversed.

Source: Kent Countywide Model Forecast Report, Jacobs, 14 May 2021

2.1.2 Canterbury has considerably more employment opportunities than Whitstable, including the District's largest employer - the University of Kent. The housing proposed for Brooklands Farm would be more sustainably located if built closer to Canterbury, somewhere like the proposed site for 2,000 new homes immediately north of the University of Kent campus. Not only is this in close proximity to the University, it also benefits from a frequent shuttle-bus service to and from the City.

2.1.3 Canterbury also has considerable advantages over Whitstable for sustainable transport connectivity. Canterbury has quicker train services to London. Whitstable has no direct services to Maidstone, Ashford, Dover and other important destinations. This problem was highlighted recently by plans to transfer acute stroke services in East Kent from Kent & Canterbury Hospital to a new unit at the William Harvey Hospital in Ashford.

2.1.4 NPPF paragraph 8b states that a key objective of the planning system is to "to support strong, vibrant and healthy communities, by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being". Implementing the planned Brooklands farm development would deliver the opposite outcomes.

2.1.5 If we look at the subject of "beautiful places", Brooklands Farm currently forms part of the Blean Woods Area of High Landscape Value (AHLV) [1]. The AHLV was previously known as the Blean Woods Special Landscape Area (SLA), and the whole of Brooklands Farm

was included in it at the time of the Canterbury District Local Plan of 1998. The southernmost part of the farm (part of the proposed W4 housing estate) was part of the Special Landscape Area even earlier. [2]

2.1.6 Reasons why Brooklands Farm was added to the Blean Woods SLA are set out in the Canterbury District Local Plan Technical Paper 3 of 1994. In the document, CCC's Director of Planning explains "... Parts of this area form the setting to the Blean Woods SLA complex. It is an attractive landscape and has a rural character worthy of conservation. It is vital to the setting of south Whitstable and Chestfield...." (CCC 1994, p22). The SLA was extended to include Brooklands Farm "to include the setting to the main woodland and pieces of outlier woodland – Convicts and Longtye Woods." (CCC, 1994, p22).

2.1.7 A separate landscape assessment reinforces the above arguments. "The countryside on the lower areas of London clay often provides a setting and foreground for the woodland edges of the core area. These views of the woodland edge, and of the woodland in its broader landscape setting, are also important to the distinctive character of the SLA and are of countywide importance. Thus the distinctive and unique core woodland landscape is not only experienced from within the woodland itself, but from adjoining countryside. This was recognised when the original designation was awarded on the basis of the original definition: ' Both the woodland blocks and more open countryside which surrounds and intersperses them, acting as foreground ' (Kent Countryside Plan)." (CCC 2001, p69)

2.1.8 Not only does the Brooklands Farm landscape provide a valuable visual setting for the Blean Woods, and a buffer area helping to keep away recreational pressure, but the wooded farmland is also a highly attractive and varied landscape in its own right. This can be seen in public comments received by CCC in the public consultation on the Draft Local Plan (see Appendix 1).

2.1.9 As part of the new draft Local Plan, CCC redesignates Blean Woods AHLV as the Blean Woods Local Landscape Designation (LLD), and redraws its northern boundary along the A299 New Thanet Way, presumably to facilitate the development of Brooklands Farm. The redrawn boundary follows a recommendation in a report (LUC 2021) commissioned by CCC, which gives no objective reason apart from an incorrect statement that the road effectively follows the floor of the valley. In fact, the road crosses valleys on bridges and passes through cuttings between them. This report was unusually published with the authors' and approvers' names all redacted – clearly the authors did not want to be associated with it!

2.1.10 Appendix 3 shows that the Brooklands Farm landscape in fact does meet the necessary criteria required for it to be included in the planned Blean Woods LLD.

2.1.11 Policy W4 of the draft Local Plan would fail to meet **NPPF paragraph 8b**'s objective of "fostering beautiful places", because it would take an Area of High Landscape Value, acknowledged for its beauty, and replace it with nondescript urban sprawl.



Figure 3: The view south from Whitstable, currently designated as an Area of High Landscape Value. This is site W4 Brooklands Farm in the draft Local Plan, allocated for 1400 new houses and flats up to 4 storeys high.

2.2 **NPPF paragraph 8b** also states that one objective of the planning system is “fostering....open spaces that reflect current and future needs and support communities’ health, social and cultural well-being....”.

2.2.1 Brooklands Farm currently provides two rural public footpaths for local residents to enjoy as recreational routes, for relaxation, and for enjoyment of nature and the rural views. These footpaths and peaceful rural landscapes mean a lot to local people, and have irreplaceable health benefits. Please see appendix 1 part b for details.



Figure 4: Footpath CW27 at Brooklands Farm – very popular with local residents.

- 2.3 NPPF Paragraph 8b: The NPPF's social objective aims *"to support strong, vibrant and healthy communities by fostering places with accessible services that reflect current and future needs and support communities' health"*.
- 2.3.1 The health service in East Kent is failing under the strain of relentless housebuilding and population growth. Everyone in Whitstable knows a family where a member has had a traumatic long wait at the nearest A&E service – QEQM hospital, 18 miles away by road in Margate.
- 2.3.2 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. Please see [East Kent to receive help as one of England's 'worst' NHS trusts - BBC News](#)
- 2.3.3 The local GP service is underfunded and could not cope with the large increase in patients that would come from the Brooklands Farm development. This is clear from a GP's response to planning application 25/00779 Brooklands Farm: "As a local GP myself I know the current woefully underfunded general practice service cannot support a huge increase in patients with minimal s106 funding and no support for ongoing care funding" – M Davies.
- 2.3.4 The Government-imposed housing targets for East Kent do not provide any new hospitals or significant increase in hospital capacity in this area. Consequently, in respect of health services, social conditions are worsening.
- 2.4 The NPPF's Environmental Objective (**NPPF Paragraph 8c**) is to *"protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently"*
- 2.4.1 It simply not possible to replace this traditional mixed farm (including traditional hedgerows, brooks and ancient woodland) with high-density urban housing and **genuinely** "enhance our natural environment" and improve biodiversity. In the present outline planning application CA/25/00779, the applicants' consultants appear to be using "creative accounting" to claim their biodiversity increase. In particular, existing wildlife is ignored, and claimed future improvements are unrealistically optimistic (judging by other recent housing developments in Whitstable). For example, the applicants' biodiversity survey made no mention of a rare native plant (Mousetail) that grows on the farm, so rare that it had been considered "probably extinct" in Kent (Philp, 2010.) This plant is shown in figure 5 below. Its special habitat on the farm would be completely eliminated by policy W4 Brooklands Farm development.

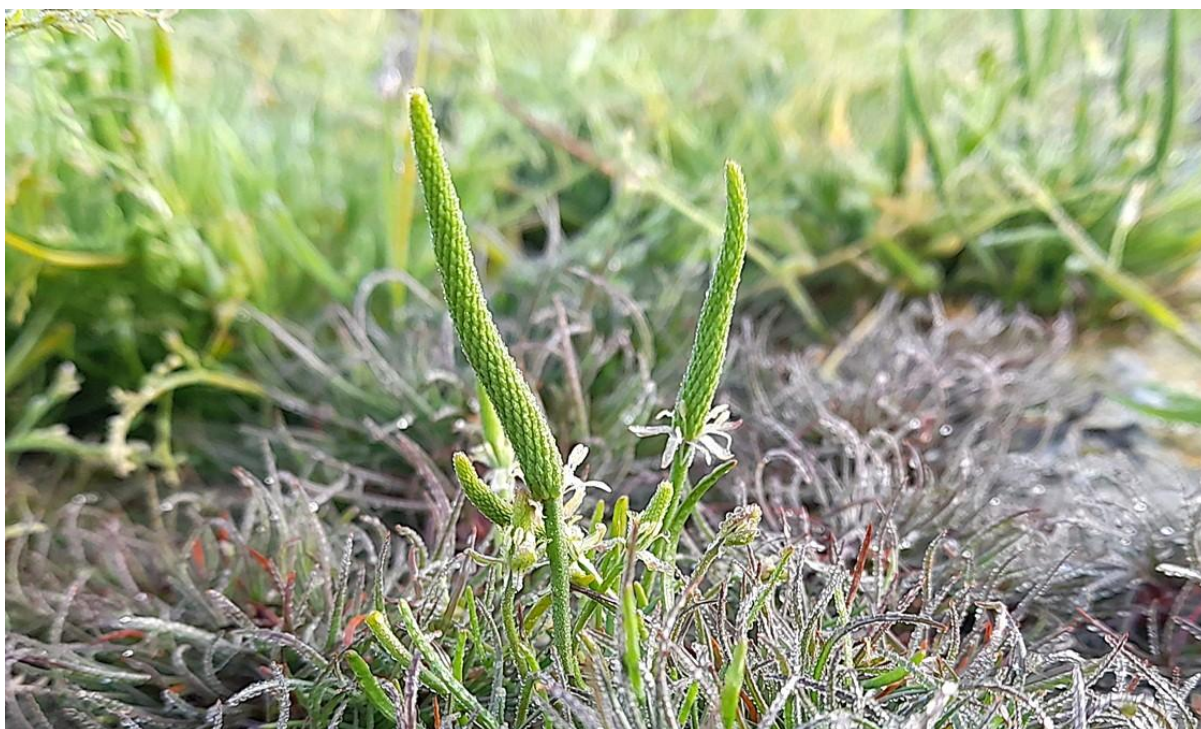


Figure 5: Mousetail (Myosurus minimis) growing on Brooklands Farm. Until a few years ago this native species was considered “probably extinct” in Kent.

2.4.2 The natural environment at Brooklands Farm provides the public with an unusually rich experience of nature, not found anywhere else within easy reach for local residents (Figure 6). This includes natural brooks, ancient woodland, traditional cattle meadows and open arable farmland with distant views of wooded hills. In the summer, skylarks sing overhead, and whitethroats, blackcaps and wrens sing from the hedgerows. In winter, large flocks of seabirds feed on the fields.

2.4.3 At least 66 species of birds have been seen on the farm, and at least 14 species of butterflies. A simple “citizen science” wildlife survey counted over 280 species of wildlife visible more-or-less from the two public footpaths that cross the farm – only a small proportion of the site and not including Longtye Wood ancient woodland where public access is not permitted.

2.4.4 Protected species living on the farm include hazel dormice, slow-worms and bats. The hazel dormice are unlikely to survive if this development is authorised, and the slow-worms and dormice are also likely to be adversely affected. Another species seen on the farm is brown hare (figure 7), a Priority Species for nature conservation in the Kent & Medway Local Nature Recovery Strategy (KCC 2025), however the planned development would destroy its habitat.



Figure 6 above: A unique landscape. Nowhere else locally can residents walk along a footpath beside a brook flowing through trees and open farmland. The Swalecliffe Brook, footpath CW27, trees and open farmland at Brooklands Farm.

2.4.5 The W4 Brooklands Farm development would also have adverse consequences on the Ancient Woodland of the Blean, Convicts Wood and Longtye Wood. The primary cause would be disturbance to wildlife from recreational pressure, peoples' pets, litter and garden waste.

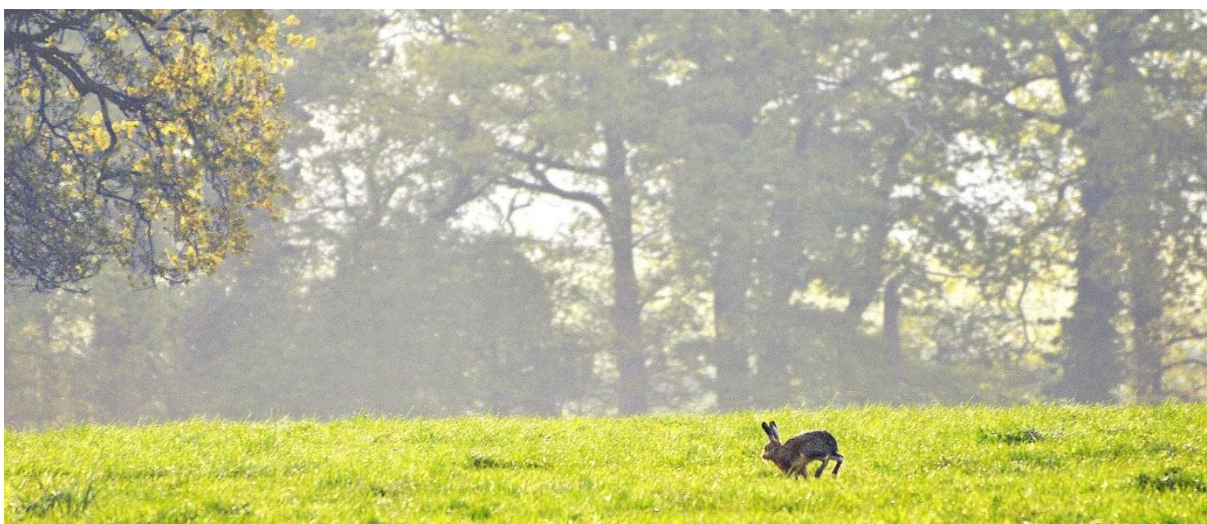


Figure 7: Brown hare on Brooklands Farm – This is a priority species for nature conservation.



Figure 8: The W4 Brooklands site (in the field on the left) and the Swalecliffe Brook. Convicts' Wood Ancient Woodland and Local Wildlife Site is to the right.

2.4.6 The Ancient Woodland and Local Wildlife Sites at Convicts' Wood (figure 8) and Longtye Wood are outliers of the Blean Woods, and are linked to them via the Swalecliffe Brook and its tributaries, as well as by underpasses under the A299 New Thanet Way, originally built for the farmer to use.

2.4.7 Among the wildlife that could be threatened by policy W4 Brooklands Farm is the Heath Fritillary butterfly, which can be seen every summer in Clowes Wood, approximately 700m south of the farm (figure 9). This is one of the UK's rarest species and is classified as endangered and fully protected.



Figure 9: Heath Fritillary butterfly in Clowes Wood, approx. 700 m south of Policy W4 Brooklands Farm development.

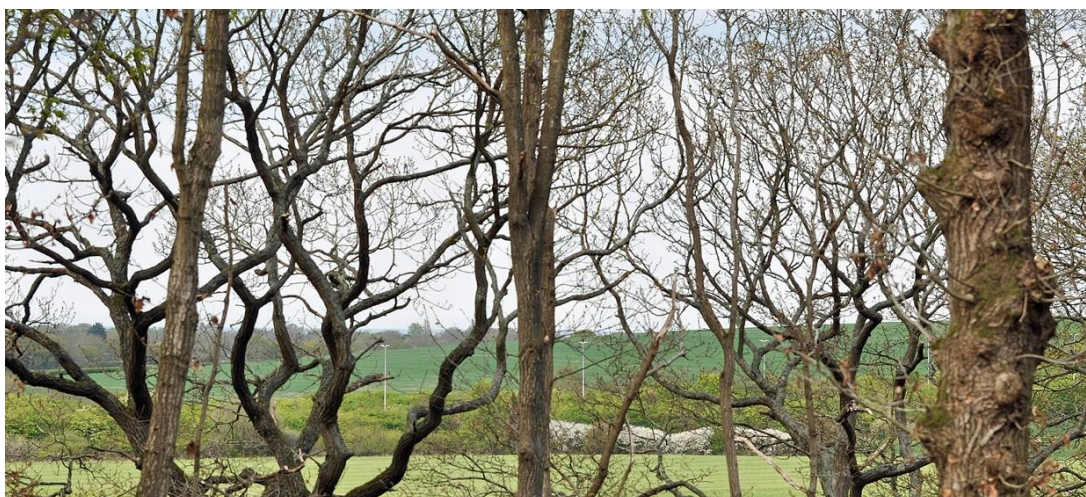


Figure 10: Brooklands Farm (the darker field) as seen from Ancient Woodland at Clowes Wood.

2.4.8 Not only would the W4 Brooklands Farm development be an “eyesore” in the AHLV between Whitstable and the Blean Woods, it would also be clearly visible from the Ancient Woodland on the northern slopes of Clowes Wood (figure 10). These slopes are the location of the Clowes Wood Barrows, a funerary monument most likely to date from the early Bronze Age (figure 11).

2.4.9 The W4 Brooklands Farm development would be visible to anyone visiting the monument, and would intrude into the unique experience of this site. When standing near the barrows, it is possible to see the sea on the horizon, however the new development would henceforth be in the foreground. This is quite the opposite of enhancing our historic environment (**NPPF paragraph 8c**).



Figure 11: Clearing in Clowes Wood, containing the Clowes Wood Barrows – a scheduled ancient monument probably dating from the early Bronze Age.

- 2.5 **NPPF Paragraphs 16b and 36c** require Plans to be deliverable. The following points demonstrate a definite risk that the W4 Brooklands Farm development and associated new road junction may not be fully deliverable.
- 2.5.1 CCC have asked the developers of W4 Brooklands Farm to construct a new junction linking the A299 New Thanet Way to the Chestfield – Canterbury Road at Radfall. The draft Local Plan requires the junction to be delivered before the occupation of 50% of the total new homes. CCC’s Sustainability Appraisal Report 2026 (paragraph 5.9.10) explains that the new junction is required to relieve congestion on local roads, especially the A299/Old Thanet Way junctions.
- 2.5.2 The proposed arrangement by which the developers are supposed to build the new junction provides no guarantee when it would be constructed, or whether it would be constructed at all. It is conceivable that the developer may build half the proposed houses, then abandon the project. It is worth noting that the Grasmere Gardens development (planning application CA/17/00469 for 300 homes) is still far from complete more than six years after it secured planning permission. This demonstrates how developers build houses when they judge the market conditions to be right.
- 2.5.3 According to a recent press report, there is a risk that subsidence problems on the A299 New Thanet Way could cause its closure, unless central government provides £63 million funding for improvements to the road and bridges:
[Stretches of A299 and four overbridges could close in ‘worst-case scenarios’ if £63m funding bid fails](#) If the A299 is closed, the A2990 would be gridlocked.
- 2.5.4 **NPPF paragraph 16c** states that *“Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, etc.”* However, in respect of the community of Whitstable, this has not happened.
- 2.5.5 There has always been substantial opposition to Policy W4 Brooklands Farm ever since the start of the Local Plan process in 2022. This is due to the extensive negative consequences that would result, both from the 1,400 new houses and flats and from the new A299 road junction which would attract additional development along the A299 corridor.
- 2.5.6 In the 2024 consultation for the Canterbury Local Plan 2040, by a wide margin the most unpopular policy was W4 Brooklands Farm. More than 2,040 people commented about policy W4, the vast majority objecting, whereas the second most unpopular policy was the C12 University of Kent site, which attracted 1,244 comments. See Appendix 2 for evidence and further details.

2.5.7 CCC's stubborn insistence of pursuing the most unpopular plan it can think of leads residents to conclude the whole consultation process is a sham, especially when developers in Whitstable already have so much difficulty selling their new homes. This local plan may have been developed in consultation with landowners, but it certainly has not been developed with *effective* consultation with the community of Whitstable.

2.6 **NPPF paragraph 20** states that "*Strategic policies should make sufficient provision for conservation and enhancement of the natural environment, including landscapes ..*". This has not been carried out for the Whitstable area, and Policy W4 does not comply with it.

2.6.1 The recently published draft CCC Biodiversity Strategy treats Whitstable as an urban area (including the existing agricultural Area of High Landscape Value). CCC appear to envisage most of Whitstable's last remaining green fields to be building-sites, irrespective of the environmental consequences.

2.6.2 Similarly, CCC's *Canterbury District Local Landscape Designations Review* (LUC 2021) proposes to remove Area of High Landscape Value status from the Ancient Woodland (figure 12) and farmland at Brooklands Farm, rather than "make provision for enhancement and conservation" as required by NPPF 20. Again, this demonstrates CCC's unilateral vision for urbanising Whitstable's natural environment,



Figure 12. Wheatfield and (to the right) Convicts' Wood Ancient Woodland and Local Wildlife Site, both to be stripped of their Area of High Landscape Value status in the draft Local Plan. The Blean Woods can be seen in the background.

2.7 NPPF **paragraph 32** states that “*the preparation and review of all policies should be underpinned by **relevant and up to-date evidence***”. Likewise, **NPPF paragraph 44** states that “*The **right information** is crucial to good decision-making, particularly where formal assessments are required*”. These policies have not been adequately applied to Policy W4 Brooklands Farm.

2.7.1 **The traffic modelling underpinning the Local Plan has insufficient detail to determine accurately the cumulative impact of policies W4 (Brooklands Farm), W7 Bodkin Farm and HB5 Land West of Thornden Wood Road.** It is based on a customised version of KCC’s strategic Kent Transport Model.

2.7.2 As stated by the consultants who carried-out the modelling: “The strategic modelling has been undertaken to provide evidence to support Local Plan testing, helping to understand the broad network implications of different growth scenarios and policy assumptions across Canterbury. It is important to note that strategic modelling is **not intended to determine detailed junction performance, or the acceptability of individual development proposals.**” (Jacobs, 2026).

2.7.3 The principal question to answer for policies W4 Brooklands Farm, W7 Bodkin Farm and HB5 Land west of Thornden Wood Road is what their cumulative effect would be on the main A2990 / Chestfield Road roundabout. It appears almost certain that several existing causes of congestion on the roundabout are not included in the Local Plan strategic modelling, namely:

- The effect of extensive school traffic to and from Swalecliffe Primary School;
 - Junction blockage due to traffic queues from nearby signalised crossings (figure 13);
- Of particular concern is the anticipated traffic associated with the two proposed secondary schools in policies W7 and HB5, and the consequences of the multiple associated pedestrian crossings planned on the A2990 Old Thanet Way.



Figure 13: Queue from signalised crossing on A2990 blocking the main A2990 / Chestfield Road roundabout at 8:24am on 24th March 2026

2.7.4 It appears almost certain that there would be congestion problems at the A2990 / Chestfield Road roundabout in the implementation of policies W4 and W7. In the current planning applications for these developments the developers are strongly resisting requests to model the queues from the A2990 signalised crossing, and also resisting requests to model the queues from the A2990 / Chestfield round junction onto the St John Road roundabout and vice versa.

2.7.5 The Bodkin Farm applicants are misleadingly arguing that NOT modelling the A2990 signalised crossing is justified by a statement in the User Guide for the modelling software. The Brooklands Farm applicants have made a similar argument: “The Chestfield Road/ Thanet Way junction includes for the signalised crossing on Herne Bay Road only as the guidance is that crossings only need to be included if they are within 20m of the give-way line...” However, these arguments have been contradicted by the suppliers of the software in a recent email (figure 14).

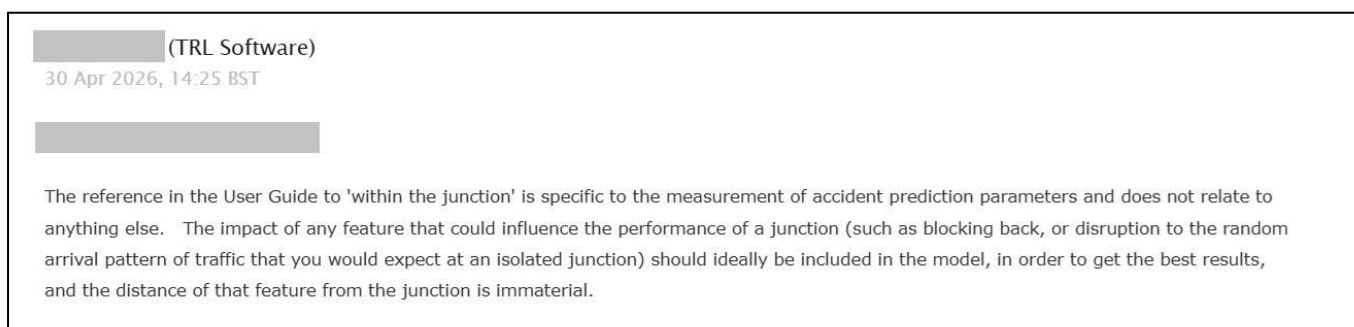


Figure 14: Statement from TRL Software clarifying that for best results, the modelling of a junction should include assessment of ALL blockages of the junction, for example by traffic queues from pedestrian crossings.

2.7.6 If more-accurate modelling of the A2990 / Chestfield Road roundabout reveals severe problems, then a solution could in principle be provided by a Chestfield by-pass, briefly investigated earlier in the development of the draft Local Plan, as shown as scheme 2 in figure 15. However, this scheme would require changes to policy W7 or HB5, so it would be important to examine at this stage whether it would be required.

2.7.7 Another issue that requires more detailed modelling, is the impact on traffic delays of the growing number of pedestrian crossings and signalised road junctions on the A2990, especially those planned as a result of developments proposed in the draft Local Plan.

2.7.8 Whereas drivers currently drive from the A299 at Yorkletts to Chestfield station via the A2990 Old Thanet Way, after construction of the proposed A299 junction at Radfall, it will be quicker in peak periods to drive via the A299 and Chestfield Road (figure 16).

This would increase the traffic on Chestfield Road, a residential road. The number of drivers re-routing will depend on how much traffic delay is caused by the signalised junctions and crossings on the A2990, so this needs to be modelled to show the true impact on Chestfield Road and the Chestfield roundabouts.



Figure 15: Proposed Chestfield By-pass labelled "2" in the Kent Countywide Model Forecast Report (Jacobs 2021)

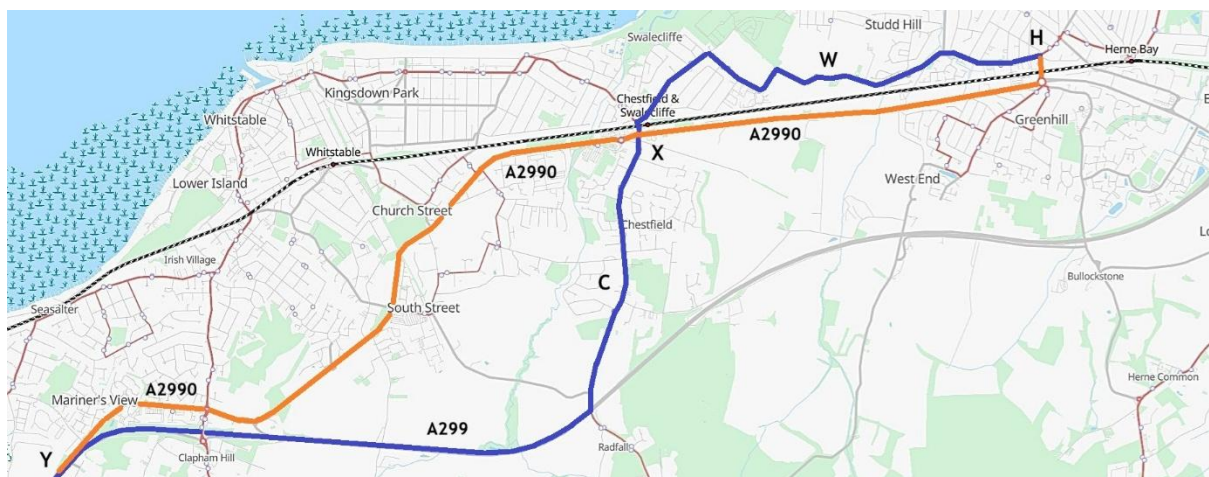


Figure 16: Alternative routes shown in blue and orange for drivers from the A299 at Yorkletts (Y) to the A2990 / Chestfield Road roundabout (X), after construction of the proposed A299 junction at Radfall. Also, alternative routes from Chestfield (X) to Herne Bay (H). Chestfield Road is marked as C. (Map from OpenStreetMap, Open Database License)

- 2.7.9 Similarly, policies W7 and HB5 would result in multiple additional signalised junctions and crossings on the A2990 between Herne Bay and Chestfield. These are likely to cause considerable delays at the start and end of the school day, thereby being likely to cause some drivers to reroute via Whitstable Road, shown as W on figure 16. This needs to be modelled to show the impact on Whitstable Road, and the Swalecliffe and Chestfield roundabouts.
- 2.7.10 KCC's role in the planning process has led to public questions and criticism, for example a complaint by the Whitstable Society in respect of planning application 23/00379 *Land South of Thanet Way* (Policy W5), and councillors' concerns about KCC Highways advice in application 24/00224 Bodkin Farm (expressed at the Planning Committee on 18th April 2026). KCC is the Highway Authority and therefore provides advice for CCC on highways matters. However, KCC is also the Education Authority, and stands to gain land for a school and associated funding if the Bodkin Farm development is included in the Local Plan and if the planning application is approved. So, can the public and CCC fully trust that its highways advice is truly independent and unbiassed?
- 2.7.11 Policy W4 Brooklands Farm would almost certainly lead to a considerable volume of sewage effluent pumped out to sea every day from Swalecliffe sewage works. Nobody knows exactly what the environmental impact would be in the shallow waters at Swalecliffe, and the sea-swimming area at Tankerton, and on our beaches (figure 17).
- 2.7.12 Whereas the environmental impact of Canterbury sewage effluent is relatively well-known, due to environmental monitoring at Stodmarsh nature reserve, nothing is known about the impact on the international Ramsar site at Swalecliffe.
- 2.7.13 People and their pets have become severely ill from sewage-related E Coli infections picked-up at Tankerton and Swalecliffe (from both the sea and the beaches), but the extent of the problem is unknown because nobody keeps any records. This is completely unacceptable for a seaside town that benefits so much from tourism.
- 2.7.14 Whereas volunteers have recently been testing seawater for E Coli, so far as we know nobody has tested for the chemical pollutants commonly found in sewage effluents, such as PFAS "forever chemicals". Exposure to PFAS chemicals has been associated with a range of adverse health effects, including liver damage, thyroid disease, immunotoxicity, reproductive issues, and various cancers in both humans and animals (Ferretti 2026).

2.7.15 Although Southern Water have constructed a slightly longer (and larger) “short sea outfall” in 2024, this does not solve the problem that on-shore winds blow the effluent back onto the beaches.



Figure 17: Scum on Swalecliffe beach after an on-shore breeze, April 2025.

2.7.16 The 1,400 new homes proposed for Policy W4 Brooklands Farm will inevitably increase demand for water supply in the Whitstable area, which already suffers from summer water shortages (figure 18) . Although the draft Local Plan proposes an additional reservoir at Broadoak (Policy R24), this would be supplied by water pumped from the Great Stour. This river is already notorious for polluting Stodmarsh Nature Reserve, because it receives sewage effluent from numerous sewage works all the way up the Stour Valley.



Figure 18: Southeast Water bottled water deliveries in Whitstable, July 2025

2.7.17 According to an Environment Agency report (EA 2021, page 6), wastewater treatment works are among the sites regarded as having the highest potential risk as a source of environmental pollution from PFAS “forever chemicals”. According to the same report (page 9) “Standard wastewater treatment processes that rely on biodegradation or sorption of sewage sludge are often not able to remove PFAS from wastewater. This means that PFAS can readily enter the environment and remain there almost indefinitely, leading to long-term continuous exposure of people and wildlife.”

2.7.18 There is growing concern surrounding PFAS substances due to the mounting body of evidence that they can harm wildlife and humans (De Silva et al., 2021).

2.7.19 We note that CCC’s *Level 1 Flood Risk Assessment January 2026*, as shown in the Local Plan Evidence Library, is inaccurate and out-of-date regarding the Swalecliffe Brook. On page 42 it states that the Brook “rises close to the A290 midway between Blean and the Thanet Way”. In fact it is longer, rising near Dunkirk and following a sinuous course through Bossenden Woods, as shown in figure 19.

2.7.20 Also, the Assessment’s description of the mouth of the Brook and its need for clearance is more than ten years out-of-date. On going erosion has, since early 2016, moved the mouth of the Brook *eastwards* to its present position, which can be seen in the aerial photograph in Google Streetmap. The Assessment should also have mentioned that the Brook has numerous tributaries, has a catchment of approximately 20 square kilometers, and has been known to block South Street when it floods.



Figure 19: The sinuous course of the Swalecliffe Brook near Bossenden Woods, upstream from the location claimed to be its source in CCC's Level 1 Flood Risk Assessment January 2026

- 2.8 Policy W4 Brooklands Farm does not comply with **NPPF Policy 39** which requires Local planning authorities *"to secure developments that will improve the **social conditions** of the area."*
- 2.8.1 We have already outlined (paragraphs 2.3 – 2.3.4) the current health service problems in this area, which would be exacerbated by W4, and there are no proposals for significant improvements on the horizon.

- 2.8.2 Likewise we have already outlined above the sewage effluent problems on the coast at Swalecliffe and Tankerton. These would be exacerbated by W4, and there are no proposals for significant improvements on the horizon.
- 2.8.3 We have already outlined that policy W4 would remove much-loved open countryside and rural footpaths where local people find peace, tranquillity and an escape from the worries of everyday life. These areas and their wildlife are beneficial for mental health. No open-landscape rural footpaths would remain for local residents within easy walking distance. Hence, reduced and worsened social conditions for local people.
- 2.8.4 No **social impact** study appears to have been attempted to understand the impact of such a large development as W4 on the neighbouring communities. What will be the **cumulative result of losing unspoilt green space and rural footpaths** CW21 and CW27 at Brooklands Farm, so soon after losing the “ruralness” of footpaths CW88 and CW89 due to planning application 17-00469 (“Grasmere Gardens”), and footpath CW20 due to application 15/01296 (“Whitstable Heights”)? At the same time, Church Street Playing Field is to be redeveloped as a school, and application 23/00379 is to urbanise footpath CW20 where it currently enjoys far-ranging scenic views at “Land south of Thanet Way”, and Policy W7 is to remove the “ruralness” of footpaths CW8 and CW68 at Bodkin Farm. Will residents have enough access to unspoilt green space? They are certain they will not. Busy urban parks with tarmac paths, mown grass and street lighting are no substitute, and anyone thinking the difference is immaterial clearly doesn’t understand the issue here.
- 2.8.5 **NPPF Policy 39** also requires Local planning to secure developments that will improve the **environmental conditions** of the area. Clearly policy W4 Brooklands Farm fails to comply with this in respect of **sewage** effluent (paragraphs 2.7.11 – 2.7.15 above)
- 2.8.6 Policy W4 also fails to comply with **NPPF 39** in respect of **biodiversity** (as explained in paragraphs 2.4.1 – 2.4.7 above), and would considerably reduce open-landscape corridors and connectivity across the north edge of the Blean Woods.
- 2.9 Policy W4 would not comply with **NPPF policy 96** which requires Planning policies to achieve healthy, inclusive places which “enable and support healthy lives”, because (as explained in 2.8.4 above) it is one of several policies removing the locally accessible green open countryside and public footpaths that makes local residents want to go out, get fresh air and take exercise.
- 2.10 Policy W4 would not comply with **NPPF policies 103 and 104**, which state that “Access to a network of high-quality open spaces and opportunities forphysical activity is important for the health and well-being of communities”, and “Existing open space...should not be built on unless...(c) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location”. The public footpaths and their margins (which

include brooks and woodland) provide high-quality open space where residents can exercise in healthy natural surroundings with wildlife (skylarks, hares, wildflowers etc) ; all this would be lost and replaced by lower quality urban park flanked by urban development.

2.11 **NPPF policy 106** has proved impossible to apply to policy W4. During the evolution of the Chestfield Neighbourhood Plan in 2025, a request for a small Local Green Space beside the Swalecliffe Brook was made to the landowner and applicant in associated planning application 25/00779 (Brooklands Farm). Both rejected the request. Clearly the views of local people are irrelevant in this development.

2.12 Policy W4, as currently planned, would not comply with **NPPF Policy 115**, which states that *“it should be ensured that....any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree....”*.

2.12.1 **Policy W4 Brooklands Farm** would cause considerable traffic along the A2990 westbound and A290 Clapham Hill to the A299 Thanet Way. Many people (including school children) need to cross the A290 at the bus stops on Clapham Hill, however there was a serious accident here in December 2017 involving a pedestrian crossing the road at the bus stops, after 4pm and probably in the dark or in poor light. An attempt under application CA/20/00925 to create a safer formal crossing point was abandoned after a safety auditor expressed concerns.

2.12.2 There is a serious risk of similar accidents occurring in the future, especially after dark, and most likely affecting an elderly or other less quick-footed person trying to cross the road. One issue to note is the length of time it takes the Highway Authority to repair failed street lighting here. **Where is the evidence that it would be adequately safe for 11-year old school-children and the elderly to cross the road in the rush-hour with all the additional traffic from developments at W4, W5 and W7?**

2.12.3 Policy W4 Brooklands Farm would, prior to construction of any new A299 junction at Radfall, add considerably to eastbound traffic queues at the A2990/Prospect Retail Park traffic signals (just west of the A2990/A290 “Long Reach” roundabout). However, these queues already regularly exceed 1km length, extending back onto the A2990 dual carriageway, raising the risk of high-speed rear-shunt type collisions (figure 20). Queue times of 6 minutes are not uncommon. Increasing the length of the queues by policy W4 and thereby increasing the risk of collisions would surely be an **unacceptable highway safety risk**, likewise queue times of 6 minutes and more surely constitute **severe congestion**.



Figure 20. Top photo: eastbound queue on the A2990 at the A290 “Long Reach” roundabout during the evening peak period. Middle photo: same queue stretching back almost to the Prospect Retail Park traffic signals. Bottom photo: the eastbound A299 showing the tail of the evening traffic queue from the Prospect Retail Park traffic signals more than 1km ahead.

2.13 Policy **W4 Brooklands Farm**, an urban development in the rural Blean Woods Area of High Landscape Value, would be totally contrary to **NPPF paragraph 135**. This states that “Planning policies should ensure that developments: a) add to the overall quality of the area b) are visually attractive and c) are sympathetic to local character and history including the surrounding landscape setting.”

2.13.1 Reasons why W4 would be contrary to NPPF 135 are explained above in Paragraphs 2.1.5, 2.1.7, 2.1.10, 2.2.1, 2.3.1 – 2.3.4, 2.4.1 - 2.4.5, 2.4.7 - 2.4.9, 2.7.4, 2.7.11, 2.7.16, 2.8, 2.8.1 - 2.8.6, 2.9, 2.10, 2.12.3.

2.13.2 As regards the local history, it will be noted that probably Early Bronze Age Barrows overlook the application site from their elevated position 700 metres to the south application site. Erosion on the foreshore approximately 2km north-northeast of the site has uncovered the bones of farm animals (goats) also dating to the Early Bronze age (Slaughter, 2022). It seems likely therefore that the valley of the Swalecliffe Brook has been farmland for at least the last 4,000 years, and the Barrows can still be seen in the pastoral environment in which they were probably constructed. If the W4 Brooklands Farm development is authorised, this historic connection will be lost forever and the educational value of the historic monument would be diminished.

2.14 Policy W4 Brooklands Farm does not really comply with **NPPF Policy 161** which states *“The planning system should ... take full account of all climate impacts including ... flood risks”*. Nor does it really comply with **NPPF Policy 164** which states *“New development should be planned for in ways that ... avoid increased vulnerability to the range of impacts arising from climate change...”*

2.14.1 Policy W4 appears to have been added to the Local Plan without fully understanding how the site would be impacted by flooding from the heavier rainfall likely to result from climate change over the lifetime of this development. We understand, from making enquiries to the Environment Agency, that their modelling for Flood Zones extends only up to about the year 2070, so does not take full account of future climate change scenarios over the future lifetime of the Brooklands housing development. It needs to be borne in mind that the approx. 20sq km catchment area of the Brook is mostly clay upland and absorbs very little rainfall, so flash flooding results. How wide would the flood zones be after 100 years? Nobody knows.

2.14.2 We are concerned that, although it is intended that rainfall run-off from the future development would be moderated using “SUDS”, these would only be effective if properly maintained, so they would not be fail-safe. We are also concerned that no account has been taken of the extensive role that evaporation takes in drying out waterlogged fields at Brooklands Farm (figure 21), something that would not be replaced on the hard surfaces of the built development at Brooklands. Water that would today be evaporated would in future be directed into SUDS for onward discharge to the Brook. We can see no consideration of how the draft Local Plan plans for increased flows down the Swalecliffe Brook at the same time that rising sea levels are likely to increase “tidal blocking” of its outlet to the sea, raising the risk of increased flooding in Swalecliffe.



Figure 21: Brooklands Farm after 16mm rain in February 2026. Evaporation has an important role drying waterlogged fields – something that would not happen in the built development.

2.15 Policy W4 Brooklands Farm does not comply with **NPPF policy 187** which states that *“Planning policies ... should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs....”*

2.15.1 As mentioned in 2.1.10, policy W4 Brooklands Farm replaces a highly attractive, ecologically useful and agriculturally productive **Area of High Landscape Value** and replaces it with standard urban development. The Farm is part of the Blean Woods AHLV because of its value in providing the setting of those Woods and the outlying Ancient Woodland at Convicts and Longtye Woods, and its role in buffering them from recreational pressures from the urban area to the north. Policy W4’s urbanisation could provide no useful “enhancement” of this natural environment.



Figure 22: Harvesting the wheat in the north field at Brooklands Farm in 2024.

2.15.2 Policy W4 does not recognise “*the intrinsic character and beauty of the countryside*”, as required by **NPPF 187b**, it would eliminate them and replace them with urban development.

2.15.3 We are not aware of any genuinely independent assessment to determine how much of the Farm counts as “best and most versatile”, however we note that the arable fields reliably grow good harvests of wheat and barley (and sometimes beans) year after year, so they are effectively functioning as BMV fields (figures 22 and 23).

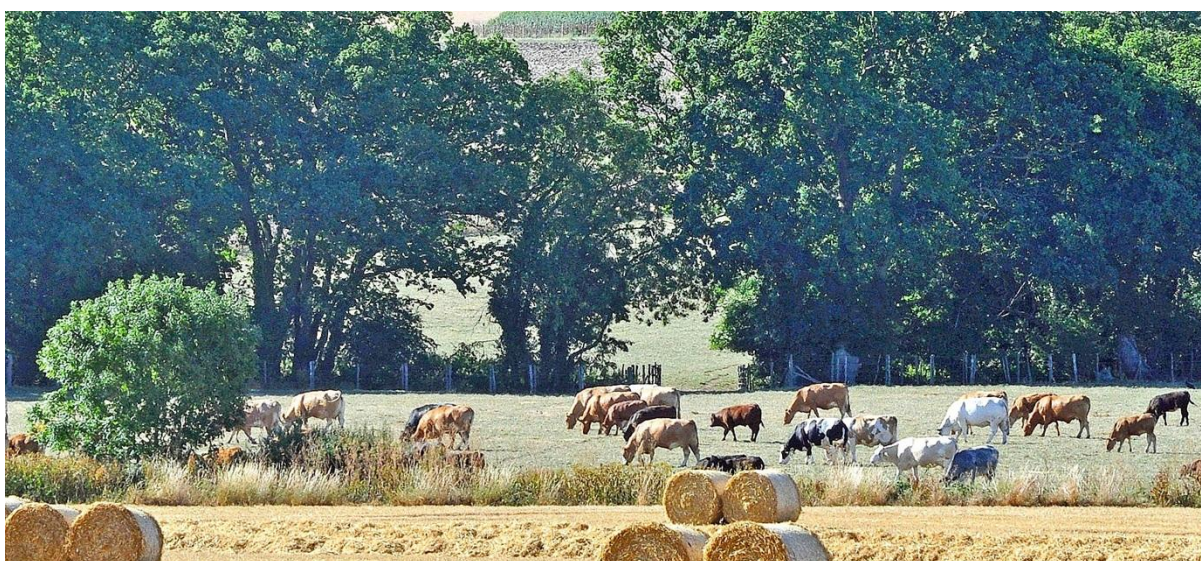


Figure 23: Brooklands Farm 2025 – cattle meadow and north field after the barley harvest.

2.15.4 Policy W4 Brooklands Farm does not comply with **NPPF 187d**, as regards biodiversity, because it would eliminate much of the wildlife associated with the farm, including the hazel dormice (protected species), the rare Mousetail plants, open landscape species such as skylarks and brown hare, the wildlife associated with the cattle meadows, including the dung beetles, the rove beetles that predate them, the associated flies and the swallows that predate them, the wildlife that eats the grain left over from the harvests, and the buzzards and other birds of prey that predate them, and all the other wildlife that depend on the peace and tranquillity of the farm (such as the whitethroats) and would never tolerate an urban environment. There could be no *genuine* gains of real biodiversity from building an urban landscape here, and it should be noted that the Government's "Standard Biodiversity Metric" in fact models habitat categories and not biodiversity.

2.15.5 Policy W4 Brooklands Farm would not comply with **NPPF paragraph 187d** and the requirement to establish "*coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs*". On the contrary, it would destroy long established ecological networks such as the small brook and its riparian wildlife corridor that runs between the north field and the large cattle meadow. The development would also severely constrict the open landscape wildlife corridor that crosses the north edge of the Blean Woods (figures 24 and 29). Brooklands Farm already has hedgehogs and numerous bats, and it has swallows rather than swifts, which is noteworthy because swifts are found even in urban Whitstable whereas swallows are not.



Figure 24: Brooklands Farm with the Blean Woods on the horizon. The farm is currently a key part of a broad, open-landscape wildlife corridor across the north edge of the Blean Woods.

2.16. Policy **W4 Brooklands Farm** would be incompatible with **NPPF paragraph 193 a** which aims to minimise "*significant harm to biodiversity resulting from development*".

2.16.1 The Farm has very varied habitats, including several brooks with riparian margins, Ancient Woodland, cattle pasture, traditional hedgerows, and arable fields with uncultivated borders. The associated wildlife is equally varied. The proposed development would destroy many of these habitats, including that required by the rare plant Mousetail, and that required by open-landscape species such as skylark and brown hare. There is no practical possibility of recreating these types of landscape elsewhere.

2.17 Policy **W4 Brooklands Farm** would be incompatible with **NPPF paragraph 193 b** which requires 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.”*

2.17.1 The W4 development would be approximately 300m from the West Blean and Thornden Wood SSSI at Woodside Wood, and accessible using the agricultural underpasses under the A299 New Thanet Way. The SSSI is likely to be adversely impacted through increased recreational use by residents, and it is likely that wildlife could be killed or disturbed by dogs and cats from the new development.

2.18 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.”*

2.18.1 The W4 development plans numerous houses and flats close to Longtye Wood and Convicts Wood, which are both Ancient Woodlands and Local Wildlife Sites. At present they have no public access, but in future they would be open and subject to recreational pressure from residents. Wildlife in these woods would be heavily impacted by the presence of so many people and their dogs and cats. Garden waste, litter and discarded refuse are also likely to create problems. Street lighting would also impact wildlife, and background urban noise would impair the ability of any surviving bats and owls to hunt and feed.

2.19 Policy **W4 Brooklands Farm** would not comply with **NPPF paragraph 198**, which states *“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.”*

2.19.1 The Plan’s proposals for Whitstable would cause increased flows of sewage effluent into the shallow sea at Swalecliffe, increasing pollution of bathing water, and on beaches, in seafood and in the Long Rock Ramsar site, Special Protection Area and marine SSSI.

2.19.2 Policy W4’s proposal for a new A299 junction at Radfall would circumvent one of the constraints that currently inhibits development along the “A299 / A2990 corridor” – namely

poor accessibility due to congestion between the A299 offslip and the A2990 / A290 Long Reach roundabout. So, development on the remaining green fields of the A299 corridor would be become likely, however the wider implications of such developments have not been investigated. These issues need to be assessed at this stage, because current planning legislation makes it very difficult to refuse applications for unsuitable small developments whose promoters are able to argue that their impact are very small, even though the cumulative impact of many such developments may be unacceptable.

2.20 There is no evidence that CCC have complied with **NPPF paragraphs 208 and 213** in regard to the Clowes Wood Barrows scheduled monument.

2.20.1 Paragraph 208 states *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal **(including by development affecting the setting of a heritage asset)** taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal”*.

2.20.2 **NPPF paragraph 213** states that *“Any harm to, or loss of, the **significance** of a designated heritage asset (from its alteration or destruction, or from **development within its setting**), should require clear and convincing justification”*.

2.20.3 At present, the open fields of Brooklands Farm can be seen by visitors to these historic barrows. When standing adjacent the barrows, visitors can see the sea above the fields. In future, the houses, flats and offices of the development would dominate the foreground. The barrows were built by the local farming community most probably in the Early Bronze Age, and **the monument would lose a significant part of its impact and educational value** if the associated farmland was no longer visible and part of its “setting”, as would happen under policy W4.

2.20.4 It is noteworthy that Historic England’s description of these monuments states “the pair of bowl barrows in Clowes Wood **survive comparatively well** and will contain archaeological remains and environmental evidence relating to the monument and the landscape in which it was constructed. **This type of funerary monument rarely survives in the clay areas of south eastern England.**”

2.21 Policy W4 clearly fails to comply with numerous requirements of the National Planning Policy Framework. It should be replaced by a more suitable and sustainably-located alternative development, possibly one of the sites dropped from a previous version of the draft Local Plan.

3. Policy W7 Bodkin Farm

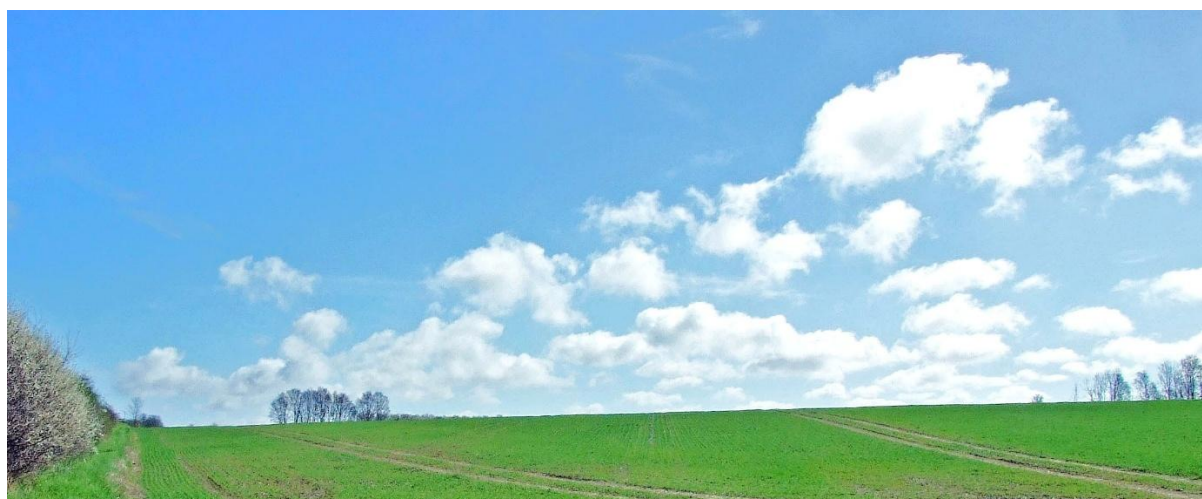


Figure 25: The Green Gap. The skyline of Bodkin Farm as seen from A2990 Old Thanet Way.

3.1 Policy W7 Bodkin Farm does not comply with **NPPF paragraphs 32 and 44**. The former states *“the preparation and review of all policies should be underpinned by **relevant and up to-date evidence**”*. Similarly, NPPF paragraph 44 states that *“The **right information** is crucial to good decision-making, particularly where formal assessments are required”*.

3.1.1 The Whitstable Society is concerned that, although Policy W7 includes a new 6-form-entry secondary school, there has been no serious attempt to assess whether Chestfield and Swalecliffe highways (very constrained at the railway bridge) could cope with the additional vehicular and pedestrian traffic. In particular, traffic modelling undertaken does not assess the effect of busy pedestrian crossings on local junctions – in practice traffic queues form at the crossings and block nearby roundabouts, a problem that would worsen with policy W7.

3.1.2 The non-compliance of W7 with **NPPF 32 and 44** is described in paragraphs 2.7.1 – 2.7.10 above. In addition, the need to model the impact of signalised crossings on nearby roundabouts also applies to the Greenhill roundabout, at the junction of the A2990 and Greenhill Bridge Road.



Figure 26: Traffic congestion at Chestfield railway bridge at 8.30am on a typical morning

3.1.3 There is also uncertainty whether the existing narrow pedestrian pavement under the railway bridge would be adequate for large numbers of school pupils walking to the new school, at the same time that primary school children would be walking in the opposite direction to Swalecliffe primary school. The footway under the bridge, only 1.42m wide, also serves to provide access between the two platforms at Chestfield and Swalecliffe station. No safety assessment has been published, and this is a serious concern because there is no practical possibility of widening the path or making it safer by another other means.



Figure 27: The narrow pavement under Chestfield railway bridge – suitable for children to walk both northwards and southwards to different schools at the same time?

3.1.4 Highways advice is provided to CCC by Kent County Council, but there is concern that, in this proposal, KCC is not an independent party because it would gain land for a school and associated funding if policy W7 is built.

3.2 **NPPF paragraph 135** states that *“Planning policies should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; are visually attractive are sympathetic to local character and history, including the surrounding built environment and landscape setting..... (and)....maintain a strong sense of place.... ”*. Policy W7 Bodkin Farm will fail all of these objectives, because it would destroy the farmland that has been carefully preserved as **Green Gap** to break the monotony of the suburban sprawl that has spread for mile after mile across Whitstable and Herne Bay.

3.3 W7 Bodkin Farm would not comply with **NPPF paragraph 187a**, which states *“Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and **enhancing valued landscapes ... (in a manner commensurate with their statutory status or identified quality in the development plan).**”*

3.3.1 As mention in paragraph 3.2 above, Bodkin Farm lies in the **Green Gap** separating Whitstable and Herne Bay. This is Policy OS7 in the adopted CCC Local Plan 2017. Planning applications in the Gap have twice been refused and with Appeals successfully dismissed, these were applications CA/14/01319 (which included a school) and CA/24/01560.

3.3.2 As a councillor mentioned at a recent CCC planning committee, nobody seriously expects KCC to build both the secondary schools proposed in policies W7 and HB5, less than one kilometre apart. One of these two school sites will almost certainly be sold for more housing.

3.4 Policy W7 does not comply with **NPPF paragraph 187b** which states: *“Planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the **best and most versatile agricultural land (BMV)**...”*

3.4.1 We are not aware of any independent assessment of whether Bodkin Farm has BMV soils, however it successfully and reliably grows cereal crops year after year, and in practice is as useful as BMV land (figure 28).



Figure 28: Harvesting at Bodkin Farm, 2024

3.5 Policy W7 does not comply with **NPPF paragraph 187d** which states *“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** that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs...*

3.5.1 Far from providing any coherent ecological network, policy W7 would destroy the existing ecological networks. In particular, W7 together with Policy HB5 would urbanise and severely reduce the effectiveness of the Green Gap wildlife corridor between the Blean Woods and the coastal wildlife sites / SSSI (Figure 29). It should be noted that the existing farm landscape (including extensive hedgerows), link the Ancient Woodland at Purchas Wood with the wider ecological networks and landscape including the Blean Woods.



Figure 29: Whitstable, Herne Bay, major development sites (outlined red) in the draft Local Plan, and wildlife corridors (indicated by blue lines). Clearly, sites W4, W5, W7 and HB5 would all block wildlife corridors. The “Green Gap” between Whitstable and Herne Bay can clearly be seen to link the Blean Woods SSSI with coastal wildlife sites. Aerial photo: Google

3.5.2 It is highly unlikely that developing site W7 could generate a *genuine* increase in **biodiversity**. The farmland benefits from extensive hedgerows and uncultivated borders to the arable fields. The resident **hazel dormice** (supposedly a protected species) would not survive the presence of so many people and predation by their pets. Other **protected species** found here include bats, common lizards and slow worms, all of which are likely to be adversely affected. Wildlife seen on the farm include swallows, buzzards and other birds of prey. Numerous seabirds visit the fields in winter to feed (figure 30), especially at high tide when the entire foreshore is under water. It is very likely, therefore, that this site is ecologically linked with the international Ramsar wildlife site at Long Rock.



Figure 30: Seabirds feeding in a wheatfield at Bodkin Farm in November 2023

3.5.3 For similar reasons regarding biodiversity, policy W7 would not comply with **NPPF paragraph 8c** which states that the Planning System’s environmental objective is “to protect and enhance our natural environment; including making effective use of land, improving biodiversity...”.

1. Policy R24 Broad Oak Reservoir

4.1 The Whitstable Society is concerned that the water planned to be pumped to the reservoir is well-known for its pollution, and consequently Policy R24 would not be compatible with **NPPF paragraph 96**. This states “ *Planning policies ... should aim to achieve healthy and safe places which: enable and support healthy lives, through both promoting good health and preventing ill-health....* ”

4.1.1 The R24 proposals include abstraction of water from the Little Stour near West Stourmouth, and from the Great Stour either at Plucks Gutter or upstream near West Stourmouth.

4.1.2 The abstraction points would be downstream of the sewage works at Canterbury, Westbere, Preston, Chartham, Chilham, Wye, Ashford, Charing, Lenham and others. The abstracted water would therefore potentially be affected by pollutants from these works. It is conceivable that any abstraction from Plucks Gutter might also be affected by pollutants from Minster sewage works brought upstream by an incoming tide.

4.1.3 We understand that Southeast Water have been discussing with the Environment Agency how chemical pollutants should be removed from the water supplied from the reservoir for public consumption.

4.1.4 According to an Environment Agency report (EA 2021, page 6), wastewater treatment works are among the sites regarded as having the highest potential risk as a source of pollution from PFAS “forever chemicals”.

4.1.5 There is growing concern surrounding PFAS chemicals due to the mounting body of evidence that they can harm wildlife and humans, for example De Silva et al., 2021, and Plunk et al, 2025. Furthermore, there is currently considerable attention on sewage discharges in the UK following the reports of substantial quantities of untreated wastewater released to rivers and coasts, raising concerns about human health.

4.1.6 According to the Environment Agency report (page 9) “Standard wastewater treatment processes that rely on biodegradation or sorption to sewage sludge are often not able to remove PFAS from wastewater. This means that PFAS can readily enter the environment and remain there almost indefinitely, leading to long-term continuous exposure of people and wildlife.”

4.1.7 The report also states (page 21) “The most-difficult fluorinated organic compound to decompose is tetrafluoromethane (CF₄), requiring temperatures over 1,400°C Incineration must therefore be at very high temperatures to destroy PFAS.”

4.1.8 It would surely make more sense, and be potentially safer, to site the abstraction points further upstream, and possibly move the reservoir too. If that is regarded as not practicable, it should not be assumed that the existing proposal is therefore acceptable.

4.2 We note also that earlier this year, Southeast Water stated (at a presentation to the Canterbury Society) that they did not at present have funding to actually construct the reservoir, and that funding may have to be raised from non-government third parties. This raises a question about whether policy R24 would actually be deliverable, i.e. does it comply with **NPPF Paragraphs 16b and 36c** which require Plans to be deliverable.

2. Other matters – not site specific

5.1 Lack of plan to adapt for climate change: coastal realignment

5.1.1 Faversham Road, the coastal road between Whitstable and Faversham (via Seasalter and Graveney) serves as an alternative route when problems occur on the A299, although it is not really suitable for large vehicles. However, the road is not protected by “hard” sea defences, despite being seaward of the Environment Agency’s sea-defence bund. It is apparently believed by councillors that, due to the ongoing coastal erosion, “part of Faversham Road will be gone in a matter of years” (Express, 2025). The Environment Agency plans that their sea-defences will need to be re-aligned, although no position for the proposed defences has yet been finalised (DEFRA, 2026).

5.1.2 The draft Local Plan does not comply with **NPPF paragraph 184b**, which states “Plans should reduce risk from coastal change by not exacerbating the impacts of physical changes to the coast...**They should make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas**”.

5.1.3 The Local Plan process needs to examine the consequences of the permanent closure of the coast road, particularly in the context of the proposed population growth of Canterbury District, the increase traffic on the A299 and growing congestion at Brenley Corner (junction of the M2, A2 and the A299). The likely closure of Faversham Road has not been incorporated in the Canterbury Local Plan traffic model. The lack of information on this subject is an example of how the draft Local Plan fails **NPPF policies 32 and 44** (i.e. fails to have the right information and up-to-date evidence). Faversham Road will be increasingly needed because it serves as a “safety valve” by which traffic can avoid the congestion problems at Brenley Corner.

5.1.3 Government and Local Authorities including CCC need to plan the “managed” realignment of the coastal defences, and make financial provision for this and a replacement for Faversham Road. Otherwise, after a particularly heavy storm, the sea will break through the clay sea defences and flood the A299 and the Faversham – Whitstable railway line (as happened in 1953). The alternative routes via Canterbury will be severely overloaded.

5.2 **Lack of highway capacity on M2 and M2 Junction 7.**

5.2.1 Appendix J of the Canterbury Forecasting Report (Jacobs, 2026) shows the roundabout junctions of the M2, A2, and A299 (Brenley Corner) as congested even in the future baseline scenario (i.e. zero new development in the draft Local Plan).

5.2.2 Modelling undertaken for the Bodkin Farm planning application shows that the eastbound A299 would have over 4,000 vehicles per hour (close to capacity) in the PM peak hour between Brenley Corner and Seasalter after completion of all the developments in the draft Local Plan (figure 31). This flow would surely be impossible with the existing geometry of the Brenley Corner junction, which has only one eastbound lane (capacity little more than 2,000 vehicles per hour) from the M2, plus a slip road where traffic must pass through either a “give-way” or traffic signals.

5.2.3 We can only conclude that the Brenley Corner junction would have severely inadequate capacity before the end of the Local Plan period. Nevertheless, the Department for Transport's Road Investment Strategy has no funding for improvements (Kent-Online, 2026). So, what is the strategy to make the M2, the A2, and the A299 adequate to provide sufficient capacity to serve the needs of the Draft Local Plan, and make it deliverable? This needs to be addressed and answered by the draft Local Plan. This is another example where the Plan fails **NPPF paragraphs 32 and 44**.



Figure 31: Traffic flows in the PM peak period in 2045 after delivery of all development in the CCC draft Local Plan. Flow over 4000 veh /hr highlighted for this report. Source: RPS 2024.

3. Conclusion

6.1 Canterbury District clearly lacks sufficient infrastructure for this draft Local Plan (especially health services, drinking water, safe sewage disposal, and highways), and there is clearly insufficient Government money to provide required improvements, such as increased capacity at the M2/A2/A299 junction at Brenley Corner. There is also uncertainty about how essential infrastructure improvements would be funded, such as essential repairs to keep the A299 open and funding to construct the Broad Oak reservoir.

6.2 The current delivery rate of housing in the District is low, even a development of c.**300** homes remains substantially incomplete after **six-and-a-half** years (Grasmere Gardens, planning application CA/17/00469). Developers build houses “when the market conditions are right”, and only at the rate that they expect to sell them. It is therefore extremely unlikely that developers could sell **25.407** new homes over the next **16** years, and also unlikely that they would build them to stand empty.

6.3 The lack of infrastructure suggests this draft Local Plan would not deliver viable development, and the poor rate of sales suggests that builders would not build the houses at the required rate even if they secured planning permissions. This draft Local Plan therefore is over-ambitious and is unlikely to be deliverable as required under **NPPF Paragraphs 16b and 36c**. CCC should therefore present the hard evidence to the Government and try to secure a more realistic housing target.

6.4 CCC should also review sites removed from the 2022 and 2024 versions of the draft Local Plan, and work with site promoters to develop suitable alternatives to the W4 Brooklands Farm and W7 Bodkin Farm sites.

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Appendix 1.

Some public consultation responses to Brooklands Farm planning application 25/00779 and its inclusion in the draft CCC Local Plan:

- a) Regarding beauty of Brooklands Farm landscape:
- “...The area that we all love for its natural beauty and resources” – B. Edmonds
 - “The land belonging to Brooklands Farm is incredibly beautiful farmland.” – H. Hills
 - “the amazing uninterrupted views that we still enjoy.” - L Robertson
 - “...natural beauty, wildlife, farmland ... are all under threat...” – S. Andrews
 - “...trying to turn our once beautiful area into one big ugly housing estate...” E. Lee
 - “Having this beautiful area built on will crucify this area” – L Bennett
 - “...beautiful, unobstructed views...This area is cherished for its natural beauty” T. Maybin
 - “This is an area of great beauty...” K. Mesquita
 - “...wonderful wide views across the valley of the Swalecliffe Brook” P. Orlov
 - “...beautiful vistas will be ruined” C. Stokes
 - “Brooklands Farm ... provides a beautiful recreational area for the public” B. Hadler
 - “...exceptionally attractive countryside”. P Welch
 - “...outstandingly beautiful farmland” E. Padgham
 - “...beautiful landscape and scenery ... one of the last gorgeous spaces we have” R Batcheldor
 - “Without doubt the best view in Whitstable facing south ...completely uninterrupted views of the countryside. Showing England at its best” R Preece
- b) Health and recreational value of the farmland:
- “.... Areas like Brooklands Farm, with established footpaths, provide invaluable recreational and psychological benefits to the community. Access to open, natural spaces for exercise and mental respite is crucial for public health, particularly when other local options The erosion of these green spaces through development leads to an undeniable diminishment in the quality of life for the existing population.” - L. Coult
 - “Whitstable lacks significant areas of countryside.... And Brooklands Farm represents one of the few remaining rural spaces. This land ...serves as a recreational area for local residents. The loss of this green space will diminish the quality of life for Whitstable residents who use it for walking... and connecting with nature. The importance of such spaces for mental and physical health cannot be overstated....” N. Padgham
 - “Local people will no longer be able to walk to quiet open green spaces because even if some 'pockets' or 'wedges' of land are retained they won't be quiet and will be surrounded by development.” M. Mullaney
 - “...loss of beautiful outdoor space for residents to walk and enjoy, often for medical and mental health reasons”. J. Williams

- “What little farmland that remains within easy walking distance of Whitstable is needed for residents’ recreation and well-being as well as to preserve the last vestiges of the natural setting of this tourist destination town. Therefore, the farmland between the Blean woodland and the existing urban edge of Whitstable should be given statutory protection.” M. Saunders
- “Whitstable is losing green spaces at an alarming rate, which has a significant impact on the entire community. We are losing places to walk and connect with nature, exercise our dogs, and enjoy recreational activities as families. ... think of the impact on the overall wellbeing of the local population”. G. Pettman
- “This area provides vital recreational space and mental health benefits to the community - Its loss would be deeply felt”. L. Szeto
- “This development destroys the very qualities that make this community desirable. Mental health benefits of green space and rural views will be eliminated.” P. Elfick
- “There are very few green spaces left in Whitstable. This farmland has beautiful footpaths that run alongside it and allow for local residents to exercise and enjoy the nearby countryside” M. Nelson
- “The area is a much-loved and greatly required space of green in the area. ... The communities in the area will lose peace, nature and green spaces” J. Howard
- “The site lies within a cherished open landscape bordering the ancient Blean Woodlands It is widely used for walking, recreation, and mental wellbeing ... The proposed development would destroy this green space, severing a vital link between local communities and the natural environment.” C. Morland
- “Losing trees and green space doesn't just harm wildlife it will make people more ill, physically and mentally. Especially older people who rely on those natural spaces for a sense of well-being” M. McVickers.
- “The loss of green space, along with more noise, pollution, and traffic, will impact the overall wellbeing of local people. Open, natural environments are vital for both mental health and quality of life.” P. Keeley-Denning
- “the feeling of peace and calm that one feels when walking the footpaths across the farm. ... This area provides a very welcome and needed place for mental health.”
- “My family, as well as a lot of others - use this space for dog walking and mental well being.”

APPENDIX 2

Public consultation responses to draft Local Plan 2040 consultation

Draft Canterbury District Local Plan to 2040

Chapter 2: Canterbury

Policy	Number of written comments
Policy C1: Canterbury City Centre Strategy	154
Policy C2: 43 to 45 St George's Place	82
Policy C3: Land north of Canterbury West Station	93
Policy C4: Canterbury City Centre Regeneration Opportunity Areas	86
Policy C5: Canterbury Urban Area	112
Policy C6: Land at Merton Park	130
Policy C7: Land to the North of Hollow Lane	98
Policy C8: Nackington Police Station	55
Policy C9: Milton Manor House	69
Policy C10: Land to North of Cockering Road	62
Policy C11: South West Canterbury Link Road	71
Policy C12: Land north of University of Kent	1,244
Policy C13: Becket House	65
Policy C14: Land at Station Road East	62
Policy C15: Land at the Former Chaucer Technology School	68
Policy C16: Land at Folly Farm	55
Policy C17: Land at Canterbury Business Park	99
Policy C18: Land on the eastern side of Shelford Landfill	49
Policy C19: Wincheap Commercial Area	90
Policy C20: Land to the south of Sturry Road	70
Policy C21: Canterbury Urban Area Regeneration Opportunity Areas	57
Any other comments	89
Total comments	2,960

Chapter 3: Whitstable

Policy	Number of written comments
Policy W1: Whitstable Town Centre Strategy	131
Policy W2: Whitstable Harbour	80
Policy W3: Whitstable Urban Area	295
Policy W4: Land at Brooklands Farm	2,040
Policy W5: Land south of Thanet Way	220
Policy W6: Bodkin Farm	259
Policy W7: St Vincent's Centre	67
Any other comments	95
Total comments	3,187

Draft Canterbury District Local Plan to 2040

Chapter 4: Herne Bay

Policy	Number of written comments
Policy HB1: Herne Bay Town Centre strategy	30
Policy HB2: Herne Bay Town Centre regeneration and opportunity areas	16
Policy HB3: Herne Bay urban area	19
Policy HB4: Land to the west of Thornden Wood Road	44
Policy HB5: Land comprising nursery industrial units and former Kent Ambulance Station	19
Policy HB6: Hawthorn Corner	17
Policy HB7: Former gas holder site	14
Policy HB8: Altira	19
Policy HB9: Former metric site	16
Policy HB10: Eddington Business Park	18
Any other comments	13
Total comments	225

Chapter 5: Rural areas

Policy	Number of written comments
Policy R1: Rural Service Centres	91
Policy R2: Great Pett Farmyard	26
Policy R3: Land at Ashford Road (east)	22
Policy R4: Land at Ashford Road (west)	22
Policy R5: Bread and Cheese Field	78
Policy R6: Land at Hersden	29
Policy R7: The Hill, Littlebourne	166
Policy R8: Land north of Court Hill	114
Policy R9: Land north of Popes Lane	40
Policy R10: Land at The Paddocks, Shalloak Road	34
Policy R11: Local Service Centres	34
Policy R12: Land west of Cooting Lane and south of Station Road	84
Policy R13: Land adjacent to Valley Road	24
Policy R14: Land at Goose Farm, Shalloak Road	29
Policy R15: Land at Shalloak Road	25
Policy R16: Land fronting Mayton Lane	28
Policy R17: Broad Oak Reservoir and Country Park	64
Policy R18: Land at Church Farm	29
Policy R19: Countryside	72
Any other comments	46
Total comments	1,056

Appendix 3

Assessing the Brooklands Farm landscape against Local Landscape Designation criteria

In the draft Local Plan, CCC are replacing the term “Area of High Landscape Value” with “Local Landscape Designation (LLD)”. CCC’s 2021 *Local Landscape Designations Review* described the methods used by consultants LUC for assessing CCC’s Valued Landscapes, as part of research for draft Local Plan. This is summarised in Table 1 below.

This Appendix assesses the Brooklands Farm landscape against those criteria

Part A. Local distinctiveness and sense of place:

LUC’s guidance is shown in italics:

*A.1 A **coherent landscape character** conferring a recognisable sense of place. A landscape with a strong sense of place derived from its combination of elements.*

The Brooklands Landscape is cohesive with the Blean Woods for a number of reasons:

- Convicts Wood and Longtye Wood are Ancient Woodland, outliers of the Ancient Woodland of the Blean.
- Being on private land and remote from habitation, their inaccessibility has preserved the “wildness” that is such a valued quality of the Blean Woods. This factor is lacking in more accessible woodland such as Benacre Wood which will soon be surrounded by suburbia. “Wildness” and remoteness from habitation are not just human sentiments, these factors determine whether certain wildlife species are likely to survive there.
- The Brooklands Farm landscape is part of the supporting ecosystem of the Blean Woodland. For example, the buzzards that live in the Blean Woods hunt over the surrounding farmland.
- The Blean Woods, Convicts Wood and Longtye Wood and adjacent open fields appear relatively close together when seen from the surrounding landscape. Moreover, Convicts Wood / Longtye Wood can be seen from within the Blean Woods (specifically from Clowes Wood); and when people walk and drive past Convicts Wood they see the Blean Woods dominating the southern horizon.

Criterion	Definition	Potential Indicators	Evidence
Local distinctiveness and sense of place	A landscape which is rare/unique or special in the local Canterbury/Kent context A landscape with a strong sense of place derived from its combinations of elements. A landscape which contains character/features or elements which are considered to be important typical or rare examples.	- A coherent landscape character conferring a recognisable sense of place. - A distinct landform or topography forming a discrete or recognisable area. - A distinctive rare or representative land cover. - An area representative of a particular phase in landscape history/development.	Landscape Character Assessment Historic Landscape Characterisation (HLC) Field Survey
Landscape quality (Intactness/Condition)	The physical state of the landscape, intactness of the landscape and the condition of individual natural and cultural elements e.g. hedgerows.	- Functional aspects of the landscape e.g. ecological integrity, visually coherent. - Presence of characteristic and valued features (as listed in the Landscape Character Assessment). - Presence of well managed features in good condition. - Absence of incongruous features/detractors or not visually intrusive.	Landscape Character Assessment Site survey Presence of designations indicative of condition
Scenic qualities and perceptual aspects	A landscape that appeals to the senses – primarily visual Perceptual and aesthetic qualities such as sense of tranquillity, remoteness.	- Strong visual character e.g. patterns/composition of vegetation/ landform. - Memorable, important or distinctive views. - Strong visual relationship with the AONB (views to and from). - Qualities of expansiveness, openness, enclosure, seclusion. - Tranquillity or perceptions of tranquillity – peace, quietness, birdsong, dark skies, presence of water – streams, sea. - Uninterrupted tracts of land with few built features. - Relative lack of human influence/absence of incongruous features. - Special qualities or elements of landscape value relating to Kent Downs AONB demonstrating special qualities as outlined in the management plan. Note: that this factor is relevant to those landscapes in proximity to the AONB.	Landscape Character Assessment CPRE Night Blight/Dark Sky CPRE Tranquillity Field Survey Consultation comments AONB Management
Natural and cultural qualities <i>Note: Note that this criterion alone will not be enough in its own right for an LLD as likely to be covered under other designations in the Local Plan.</i>	Presence of natural and cultural attributes or particular associations that contribute to the value of the landscape.	- Visible expression of geology creating distinctive sense of place. - Presence of wildlife and/or habitats/species that make a particular contribution to sense of place or scenic quality. - Presence of settlements, buildings or other structures that make a particular contribution to sense of place or scenic quality. - Visible presence of historic landscape types or specific landscape elements or features that provide evidence of time depth or historic influence on the landscape.	Landscape Character Assessment Designations Conservation Areas
Recreation value	Evidence that the landscape is valued for recreational activity where the experience of the landscape is important.	Evidence of recreational activity based on experience of the landscape (e.g. walking routes, access opportunities, activities such as birdwatching). <i>Note: needs to be more than just 'popularity'</i>	Landscape Character Assessment Field Survey Consultation OS map data
Associations	Landscapes associated with particular people such as artists or writers or events in history that contribute to their character.	Associations with written descriptions, artistic representations, and associations of the landscape with people places or events.	Local research Landscape Character Assessment Consultation

Table 1: Method used by consultants LUC for assessing Valued Landscapes in research for draft Local Plan. (LUC 2021)

It also needs to be recognised that what happens in the landscape at Brooklands Farm can affect the Blean Woods. If Brooklands Farm becomes housing, then the pressure of the c.4000 new residents and their pets on the ecology of the northern Blean will be immense. Even though Clowes Wood is relatively remote from housing at present, it is already experiencing recreational damage, off-road biking for example. Rare Heath Fritillary butterflies currently thrive only about 700 m from the housing estates proposed on Brooklands Farm (Wheatley, 2020).

As stated in a previous landscape assessment (CCC 2001), the **views “of the woodland edge and of the woodland in its broader landscape setting are also important to the distinctive character of the Special Landscape Area and are of countywide importance.** Thus, the distinctive and unique core woodland landscape is not only experienced from within the woodland itself, but from adjoining countryside. This was recognised when the original designation was awarded.”

This analysis refers to the Blean Woodland in general, together with its surrounding farmland. However, a particularly vivid example is the panoramic view from the hill at Rayham Road towards the broad spread of Blean Woodland on the high land on the other side of the valley of the Swalecliffe Brook (Figure 32). In other words, the view across Brooklands Farm towards The Blean is one aspect of experiencing the Blean Woodland, albeit in the context of its wider landscape setting.



Figure 32: Part of the panoramic distant view of the Blean Woods, as seen from Rayham Road.

Brooklands Farm has a definite sense of place conferred by the broad valley landscape, comprising fields, hedgerows, trees, woodland and higher ground to north and south. The Swalecliffe Brook threads through the middle, not just providing a core feature but the very reason for the valleys' existence.

A.2 LUC guidance (continued): A landscape which is rare/unique or special in the local Canterbury/Kent context. A landscape which contains character/features or elements which are considered to be important typical or rare examples

Although there are other extensive areas of Ancient Woodland in Canterbury District, such as Denge Wood, one of the characteristics that makes the Blean Woodlands distinctive is their proximity to the sea (CBA 1997). From Clowes Wood the sea can be seen across the fields of Brooklands Farm. This is a view that has characterised the woods for at least 500 years and probably several thousand years. How do we know this? Clowes Farmhouse is 15th century, indicating that there was surrounding farmland in the 15th century. Moreover, archaeological work along the lower reaches of the Swalecliffe Brook, about 2.5 km (1.6 miles) north of Brooklands Farm, indicates that there has been riverside grazing in this area for about 4000 years or more (Slaughter 2022).

The Brooklands Farm meadows that flank the Swalecliffe Brook are long-established and include at least one plant species that, until recently, was considered probably extinct in Kent. This is Mousetail *Myosurus minimus*.

A.3 LUC guidance (continued): A landscape with a strong sense of place derived from its combinations of elements. A distinctive, rare or representative land cover. A distinct landform or topography forming a discrete or recognisable area.

The character of the northern Blean, and the outlying areas of woodland and fields, clearly combine three distinctive elements, namely woodland-edge, open farmland and small brooks. This is as true of the north edge of Clowes Wood as Convicts Wood and Longtye Wood.

There is intervisibility between the Brooklands farmland and the northern slopes of Clowes Wood, i.e. the fields of Brooklands Farm can be seen from within Clowes Wood (especially in winter), and the Blean Woodland forms part of the southern horizon from the Brooklands farmland.

The factors described above combine to form an inspiring character and sense of place. This is further enhanced by the visibility of the sea on the northern horizon, as seen from the northern slopes of Clowes Wood and from Brooklands farmland near the highest point on South Street.

Where else in Canterbury District are there any other surviving traditional landscapes of brook-side cattle pastures with Ancient Woodland, fields of arable crops and views of the sea?



Figure 33: A timeless scene. Traditional cattle pasture beside the Swalecliffe Brook at Brooklands Farm.

A.4 LUC guidance (continued): An area representative of a particular phase in landscape history/development

As mentioned above, it is likely that the open farmland around Brooklands Farm dates back more than 500 years, as evidenced by the 15th century date of Clowes farmhouse, 2.3 km (1.4 miles) to the south of Brooklands farmhouse. The long-term nature of Brooklands Farm cattle pastures is evidence by the name of the adjacent wood – Longtye. “Tye” meant common pasture in Kentish dialect, as used more than 500 years ago (Parish & Shaw, 1888).

There is also evidence for earlier human occupation of the Brooklands Farm site, as shown on the Kent Historic Environment Record, namely

- 1st/2nd century AD Roman remains immediately south of Joseph Wilson Industrial estate;
- Late Bronze Age / Earliest Iron age remains east of Convicts Wood.

Near the northern edge of Clowes Wood, a pair of Late Neolithic or Bronze Age “bowl barrows” are located at the top of the slope overlooking the fields of Brooklands Farm and neighbouring farmland. They are marked as “Tumuli” in Figure 34 below.

Brooklands Farm’s location between the Neolithic or early Bronze Age Barrows and the Early Bronze Age archaeological site at Swalecliffe (Slaughter 2022) suggests that the farm probably lies in an area of Early Bronze Age farming along the valley of the Swalecliffe Brook.

According to Historic England it is rare to find bowl barrows surviving in the clay areas of south eastern England. It is particularly inspiring to find such rare bowl barrows in a landscape with traditional river-side cattle-grazing that is likely to have been familiar to the peoples who built them. Hence Brooklands Farm is indeed a rare and historic landscape.

On a more prosaic note, Brooklands Farm and Bodkin Farm (also with a planning application for a housing estate) are the last working farms within easy walking distance for most Whitstable residents. If CCC grant planning permission for replacing these farms with

housing estates or other urban development, Whitstable residents would see yet another large swathe of the town's rural heritage and character lost forever.

Part B. Landscape quality:

Guidance: The physical state of the landscape, intactness of the landscape and the condition of individual natural and cultural elements e.g. hedgerows

Functional aspects of the landscape e.g. ecological integrity, visually coherent

Presence of characteristic and valued features;

Presence of well managed features in good condition

Absence of incongruous features/detractors or not visually intrusive

The Blean Woods, Convicts Wood and Longtye Wood are all Ancient Woodland, and would have been part of the same area of forest for many thousands of years before the arrival of Neolithic and Bronze Age peoples creating farmland. The surviving areas of woodland are therefore ecologically and historically "coherent". Convicts Wood can still be seen from Clowes Wood in the northern Blean, and the Blean Woods can be seen from the edge of Convicts Wood and Longtye Wood at South Street.

As Convicts Wood lies on private land, and because it is still at some distance from human habitation, it remains relatively undisturbed. Surveys recorded that the woodland flora retains "a surprisingly large number of ancient woodland indicator plant species" (KWT, 2007). In that assessment, "Convicts Wood" includes Longtye Wood.

Convicts Wood and Longtye Wood are directly linked to the Blean Woods (Woodside Wood SSSI and Clowes Wood) by a narrow wildlife corridor which follows the Swalecliffe Brook and an un-named tributary that rises in Clowes Wood. There are also two nearby underpasses under the A299 that can be used by agricultural vehicles and wildlife (Figure 34).

A network of wildlife-friendly hedges, ditches and field boundaries extends across Brooklands Farm providing wildlife connectivity. Consequently, surveys show a good variety of wildlife including at least 15 butterfly species and 66 bird species, including skylarks, swallows, buzzards and kestrels. Hazel dormice and a hare have also been observed.

Brooklands Farm is crossed by the A299 road, however this is relatively well integrated into the landscape. The most intrusive feature can be traffic noise, depending on the wind direction. Traffic noise from the A299 does not simply affect the area close to the road, it also blights parts of the northern Blean Woods, such as Clowes Wood. If loss of the AHLV results in Brooklands Farm being developed for housing, this is likely to result in an increase in traffic noise.

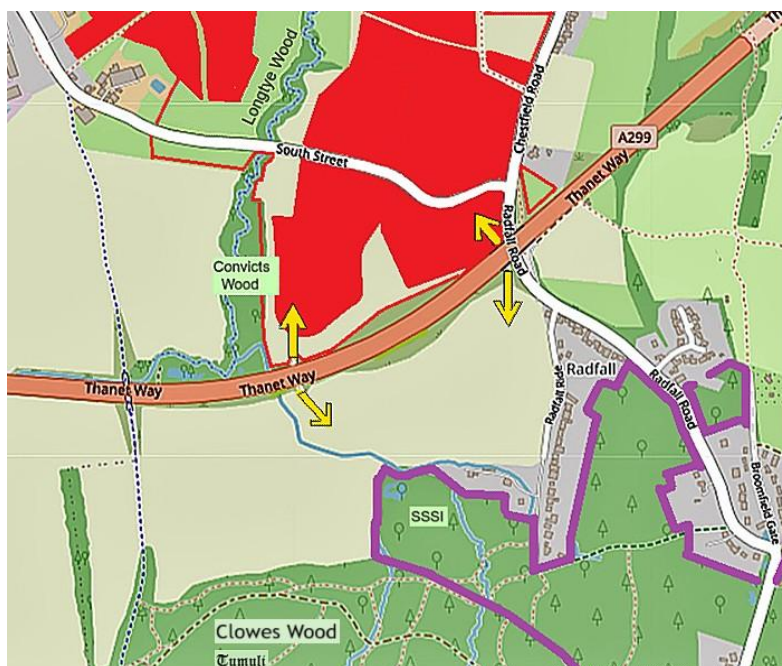


Figure 34: Proposed housing development (shown in red) at Brooklands Farm in relation to the nearby Sites of Special Scientific Interest (SSSI) of the Blean Woods (shown mauve).

The yellow arrows indicate underpasses for agricultural vehicles. These also provide wildlife connectivity, supplementing the wildlife corridors along the water course which is shown as a blue line.

Part C. Scenic quality and perceptual aspects:

*Guidance: A landscape that appeals to the senses – primarily visual; Perceptual and aesthetic qualities such as sense of tranquility, remoteness * Strong visual character e.g. patterns/composition of vegetation/ landform * Memorable, important or distinctive views * Qualities of expansiveness, openness, enclosure, seclusion * Tranquility or perceptions of tranquility – peace, quietness, birdsong, dark skies, presence of water – streams, sea * Uninterrupted tracts of land with few built features * Relative lack of human influence/absence of incongruous features*

Brooklands Farm is certainly a landscape that appeals to the senses. It includes open landscape, distant views, ancient woodland and the meandering Swalecliffe Brook (figure 6). There are numerous mature trees visible in all directions, including in hedgerows, in Longtye Wood, Convicts Woods, and in the Blean Woods on the horizon.

Arable fields at Brooklands Farm have uncultivated margins with wild flowers, and there are hedgerows rich with blossom in the spring and early summer. Plenty of butterflies can be seen, and on the flowers and blossoms are various types of bees, including Early bumblebees, White (or Buff) tailed bumblebees, common carder bees, and mining bees. Widespread bird-song in the spring includes whitethroat, blackcap, wren and dunnock.

There is definitely an air of tranquillity and freedom from suburbia. East of the Swalecliffe Brook, there are no buildings visible in the view southwards to the Blean Woods. People come here to enjoy the countryside and escape the overdevelopment of Whitstable. For example, two visitors interviewed recently said they walk their dog here now rather than in Grasmere Gardens, which they regard as no longer an attractive place for recreational use since the new housing estate was constructed.

The most memorable and distinctive views at Brooklands Farm are probably the rural panorama from Rayham Road (e.g. Figure 35 below), and various picturesque glimpses of the Swalecliffe Brook as it meanders through the fields and trees.



Figure 35: Part of the panoramic rural view from Rayham Road, with an anti-development protest rally by local residents in the foreground. The field in the middle distance is the northernmost field of Brooklands Farm, and Longtye Wood is behind it to the right.

Part D: Natural & Cultural qualities

*Presence of natural and cultural attributes or particular associations that contribute to the value of the landscape * Visible expression of geology creating distinctive sense of place * Presence of wildlife and/or habitats/species that make a particular contribution to sense of place or scenic quality * Presence of settlements, buildings or other structures that make a particular contribution to sense of place or scenic quality * Visible presence of historic landscape types or specific landscape elements or features that provide evidence of time depth or historic influence on the landscape*

The Brooklands historic landscape combines three key qualities, namely The Swalecliffe Brook that formed the valley where the farm is situated, the traditional farmland that has probably been grazed for 3000 – 4000 years, and the Ancient Wood at Longtye and Convicts Wood, with the Blean Woods forming the backdrop. This is a first-rate example of the traditional (but fast-disappearing) mixed farmland of the North Kent coastal plain.

There is an abundance of wildlife in the Brooklands Farm landscape. At any time of year there may be buzzards and kestrels hunting over the fields, in the spring there are whitethroats and blackcaps singing in the hedgerows, and skylarks displaying over the larger fields. There are numerous species of butterflies and bees on the flowers and blossoms. There are also various species of flies, dung beetles and rove beetles in the cattle meadows, forming the basis of an ecosystem supporting other species such as swallows, wagtails and bats.

Although wildlife is becoming rarer in the Whitstable area, as the town gradually expands into the surrounding countryside, there is still a pleasant variety of wild plants and flowers in the Brooklands landscape. The flora visible from the public footpaths includes species that are less well-known locally (such as Midland Hawthorn), and others regarded as indicative of ancient woodland, for example spindle-trees, wood anemones, bluebells, Goldilocks buttercups and moschatel. So, although the ancient woodland at Longtye and Convicts Wood are inaccessible to the public, the presence of ancient woodland indicator species near the public footpaths enables visitors to experience some of the delights of ancient woodland. The rarest plant that has been documented on the farm is Mousetail, *Myosurus minimus* (figure 5).

Part E: Recreational value:

*Guidance: Evidence that the landscape is valued for recreational activity where the experience of the landscape is important * Evidence of recreational activity based on experience of the landscape (e.g. walking routes, access opportunities, activities such as birdwatching) * Note: needs to be more than just 'popularity'*

Public footpath CW27 crosses the farm, linking Tankerton to Chestfield and the Blean Woods. It is very popular (figure 4), especially with dog-walkers. People use this path to experience the pleasures of its rural nature, for example the open countryside and trees, some to boost their mood and mental health (see Appendix 1 part "b" above). In the summer, sometimes people relax sitting on the grass beside the Swalecliffe Brook at the location shown in Figure 6.

Part F: Associations

*Guidance: Landscapes associated with particular people such as artists or writers or events in history that contribute to their character * Associations with written descriptions, artistic representations, and associations of the landscape with people places or events.*

Convicts Wood is associated with the smuggling of French prisoners of war to France at the time of the Napoleonic wars (Harvey, 1971).

As described above, the traditional grazing landscape of Brooklands Farm is almost certainly associated with the two Neolithic or Bronze Age burial mounds in Clowes Wood. The mounds are situated on the northern edge of the Blean upland, precisely where the ground drops steeply to the coastland plain. Parfitt (2020) notes that several burial mounds overlooking the Dour valley near Dover appear to have been designed to be both viewed and approached from the downhill side, and that the settlements associated with these monuments should be sought on the lower slopes and in the nearby valley. At Brooklands Farm, two prehistoric settlements have already been found in the specified area, one

thought to be from c 900 BC, the other from c 1000 – 600 BC (Parfitt et al, 2016). The first of these archaeological sites was within the boundaries of Brooklands Farm.

Further considerations

The proposal to remove most of Brooklands Farm from the Blean landscape designation (LUC 2021) is inconsistent with the same document's proposal to add the Amery Court farmland and The Sarre Penn valley to the same designation. The lack of any substantive reason for removing Brooklands leads the reader to conclude that the real reason is simply to facilitate the desire of the Council to build houses and a new A299 junction at Brooklands Farm.

Whitstable residents foresaw this eventuality more than 25 years ago, before the A299 New Thanet Way was built. Addressing these concerns, CCC added Brooklands Farm to the Blean Woods Special Landscape Area with effect from the CCC Local Plan 1998.

Appendix 3 Conclusion

The analysis in this paper shows that the Brooklands Farm landscape complies with the requirements of the Local Landscape Designation as specified by LUC, consultants for CCC's *Local Landscape Designations Review* (LUC 2021). The Brooklands Farm land area should therefore be retained as an Area of High landscape Value or assigned Local Landscape Designation status in the emerging CCC Local Plan.

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FOOTNOTES:

- [1] As shown in the map on page 10 of the not-yet superseded Canterbury Local Plan 2017.
- [2] As shown in Technical Paper 3 of the Canterbury District Local Plan 1994.