

15/05/2026

Dear Planning Inspectorate,

Re: Regulation 19 Consultation Canterbury City Council Draft Local Plan - Commenting specifically on inclusion of Site W4 chapter 3 Land at Brooklands Farm

I am writing to register my comments as I believe the inclusion of Brooklands Farm in ccc draft local plan contravenes tests of soundness and legality and should therefore be omitted .

The inclusion of Brooklands Farmland is fundamentally flawed, non compliant with National and local planning policies, and if included would result in irreversible harm to the environment, heritage, infrastructure, and the rural character of the surrounding area.

The whole process of repeatedly having to comment on the local plan (and additional planning application by Hallam Land) seems overly complex and an attempt to wear down the voices of the local residents (many of whom think that they have already objected and don't realise that have to do so again and again) More people objected to the inclusion of Brooklands farm than any other site but they feel their voices are being ignored.

I have no legal training and unable to format my comments in the correct manner to satisfy the extremely long winded and complicated guidelines but nonetheless hope you will seriously take on board the concerns of a lifelong Whitstable resident.

I think there are some good ambitions in the new draft local plan, found in its sustainability appraisal, to protect bio diversity, conserve the landscapes of the district for people and wildlife, to avoid inappropriate development in areas at risk of flooding , to avoid the unnecessary loss of best and most versatile agricultural land, to avoid adverse impacts to bathing waters, support the reduction in the need to travel and so on, **none** of which are fulfilled by the proposed inclusion for development of W4 Brooklands Farmland, Whitstable with CCC own chart showing the most



5-12 - Summary SA of proposed housing allocations – Whitstable area

	Site Address:	Proposed allocation reference	SAO 1: Air Quality	SAO 3: Biodiversity	SAO 4: Geology	SAO 5: Landscape	SAO 6: Water	SAO 7: Flood risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land Use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
LP	Whitstable Harbour	W2	0	--	--	+	--	--	-	+/?	++	++/- -/?	++	++/- /?
U141	Oyster Indoor Bowling Centre and Whitstable Harbour Garage (identified as part of Whitstable Harbour broad location for development)	W2	0	--	--	+	0	--	0	+	+	++/-	++	++/- -
U104	Brooklands Farm, Whitstable	W4	0	--	--	--	--	--	--	++	--	++/?	++/- -	++/-

negative impact on the land at Brooklands Farm (W4) see below.

I write to strongly object to the proposed inclusion of Brooklands Farm, Site/ policy W4, chapter 3 as I believe that it is unsound and breaches NPPF and for the following reasons:

1.

Ecological and Biodiversity Harm – Non-Compliant with National and Local Policy

The inclusion of Brooklands Farmland poses significant and irreversible risks to biodiversity and protected habitats, in direct contravention of:

- NPPF 2023 Paragraphs 179-182, which mandate that planning authorities must protect and enhance biodiversity and prevent the loss of irreplaceable habitats.
- Canterbury District Local Plan (CDLP) 2017 Policies LB5, LB6, and LB7, which protect Local Wildlife Sites (LWS), ancient woodlands, and hedgerows.
- Likely harm to priority habitats.
- Potential presence of European Protected Species (bats, great crested newts).

Under the Conservation of Habitats and Species Regulations 2017 (Reg. 62), permission for development should not be granted unless:

- No satisfactory alternative exists;
- The proposal is of overriding public interest (not demonstrated here);
- Compensatory measures are secured (not clearly evidenced).

This site is ecologically sensitive and wholly unsuitable for major development.

2.

Landscape and Visual Intrusion – Contrary to Strategic Countryside Protections

This proposal for inclusion in the local plan would urbanise an open and rural landscape, introducing built form on a scale entirely incompatible with its setting.

This is in direct conflict with:

- CDLP Policy LB10, which protects mature tree lines, historic landscape structure, and rural character.
- NPPF Paragraph 174, which requires development to contribute to and enhance the natural and local environment.
- Policy OS6, which restricts development in open countryside except in cases of exceptional justification — none of which has been demonstrated.

The site is highly visible from:

- Public Rights of Way;
- Key ridgelines;
- The immediate setting of Grade II listed assets (Brooklands Farmhouse, Rayham Farm and Barn).

The harm to the landscape character is neither temporary nor mitigatable and is therefore unacceptable in planning terms.

3.

Unacceptable Heritage and Archaeological Harm

The development site lies within the setting of multiple designated heritage assets, including:

- Brooklands Farmhouse (Grade II);
- Rayham Farm and The Barn House (Grade II).

Additionally, the site is in an area of high archaeological potential. Yet the proposed inclusion fails to adequately assess the likely impact, contrary to:

- NPPF Paragraphs 199-202, which require great weight to be given to the conservation of heritage assets.
- CDLP Policy HE1, which requires the protection and enhancement of heritage assets and their settings.

4.

Flood Risk and Drainage – Inadequate and Potentially Hazardous

There are acknowledged areas at risk from surface water flooding. Proposed attenuation basins and drainage solutions are:

- Unproven in viability over the long term;
- Rely on assumptions about capacity and maintenance that may not be enforceable or deliverable.

This directly contravenes:

- CDLP Policy CC5, requiring sustainable urban drainage and no net increase in flood risk;
- NPPF Paragraph 159, which requires that development should be directed away from areas at highest flood risk.

5.

Unsustainable Transport Strategy – Car Dependency and Infrastructure Strain

Despite promises of a “mobility hub,” the site remains poorly connected and car-dependent:

- There is no adequate public transport connectivity to key local services;
- Pedestrian and cycle infrastructure is insufficient or entirely lacking;
- The proposal would exacerbate traffic pressures on already constrained local roads including South Street, Molehill Road, and Chestfield Road.

This is contrary to:

- CDLP Policies T1 and T2, which seek to reduce car reliance and promote sustainable transport modes;
- NPPF Paragraph 110, which demands safe and suitable access for all users;

- NPPF Paragraph 112, which requires that significant development should be supported by sustainable

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Loss of Productive Farmland – Impact on Food Security

The site comprises productive agricultural land, and its permanent loss for speculative development is:

- Contrary to the principle of safeguarding agricultural land under NPPF Paragraph 174(b);
- In conflict with national concerns about resilience and food security, particularly post-Brexit and amid increasing climate pressures.

Conclusion:

This proposed inclusion of site W4 in the draft local plan is :

- Non-compliant with multiple national planning policy frameworks;
- Damaging to the local environment, heritage, landscape and community;
- Strategically incoherent and unjustified.

The rural nature and agricultural value of Site W4 Brooklands Farm should be being preserved for amenity use and mental well-being of future generations and preserved vitally for our long term food security It should be taken into account the long term danger/ impact of concreting over this green space (the green lungs of the area (and threat to it's bio diversity and wildlife) and the increased flood risk, when the land cannot absorb rainfall and additional run off from this vast tarred and concrete area , given the huge impact that global warming & the climate emergency is having on our lives and land.

It is overwhelmingly opposed by local residents and offers no overriding public benefit to justify the scale of harm proposed. It fails the fundamental planning tests of sustainability, deliverability, and public interest.

I urge the planning inspectorate to remove Brooklands Farm site from the Canterbury City Council draft local plan in full, and to uphold its commitment to lawful, plan-led and sustainable development in the interests of both current and future generations.

I strongly object to including Brooklands Farm. Chapter 3 policy W4 in the ccc local plan.

Yours faithfully,

Wendy J Croft

W J Croft

Additional thoughts from my previous objections :

1. Loss of best and most versatile agricultural land

The National Planning Policy Framework requires that local planning authorities should use areas of poorer quality land in preference to that of a higher quality, and if agricultural land is to be proposed for development the economic and other benefits of that land should be taken into account. The housing evidence base which supports the draft local plan does not address this requirement.

The land is currently farmed for cereal crops and is therefore likely that it is Grade 3a rather than 3b, Grade 3A is best and most versatile agricultural land and its development for housing would be contrary to policy EMP 12 of the current local plan and policy DS12 of the draft local plan.

Given that shortages of wheat and other cereal crops that have been highlighted by our dependence on imports from the war in Ukraine, surely agriculture land should be protected for the growing of crops rather than being concreted over /destroyed and used for development. We need our own food security in this country. The government have just highlighted the importance to protect food security by not using agricultural land for solar farms, surely permanently building on this land must be contrary to this policy . Once lost, our farmland and countryside are lost forever.

2. Development outside urban area

The land at Brooklands Farm is outside the settlement boundary of Whitstable and it has not been adequately demonstrated that its development is necessary to meet local needs. The central south and western end of Whitstable has made substantial contributions in previous local plans in taking on new commuter residents working in Canterbury or in London without the appropriate investment needed in infrastructure of many and possibly all types. Sites W4, may be being put forward to generate S106 contributions for new slips on the New Thanet Way at Radfall designed to relieve pressure on the old Thanet Way.

3. Landscape Impact

The 2017 Canterbury Local Plan shows Brooklands Farm within an **area of high landscape value**" (see page 10 of the 2017 Plan). The Canterbury Landscape Character and Bio diversity Appraisal dated as recently as October 2020 designates this site as being within LCA 10 Chestfield wooded farmland. It is in an area of high biodiversity value with rare butterflies and breeding birds, golden plover, nightingales, and the Brook (of Brooklands Farm) and it s banks are home to water voles, stickleback and newts as well as a plethora of other wildlife.

It provides a wide panoramic view of the valley of the Swalecliffe Brook with the forested Blean hills in the distance. Footpath CW27 crosses the site and is popular with local residents for rural dog-walking and simply enjoying the countryside and its wildlife. The A299 Thanet Way is not visible, being screened by trees and landscape.

A major part of the attractiveness of the view over the green valley of the Swalecliffe Brook is its rural tranquillity.

The development would totally change the nature of the valley and just being able to see the Blean over the rooftops wouldn t be the same.

Those considerations, along with landscape and biodiversity impacts in the short and long term, should be requiring all of the gap between the existing building line of Whitstable/Chestfield and the edge of Blean Woods and Radfall settlement be proposed as Green Gap and should not be included in the draft local plan as a strategic site for a development of estates.

It is noted that when the A299 was approved by ccc in the 1990 s an agreement was made by the council that the area between the old Thanet way and the new Thanet Way (A299) would not be allowed to be infilled with housing development . The 2020 appraisal furthermore notes :- Strong rural character pervades despite proximity to the urban area and route of the A299. A crisp well defined urban edge abuts well managed agricultural farmland providing a rural farmed setting to the adjacent coastal settlement. All of this would be lost by these proposals.

Limited consideration is given to these impacts within the evidence base.

The ecological biodiversity and landscape value would be adversely impacted by a development on this site.

4. Flood risk

The evidence base states that the site is within Flood Zones 2 & 3. This is incorrect the site is within Flood Zone 3. There is therefore a high probability of flooding which will be exacerbated by climate change. It is long established that the Swalecliffe Brook and its (tidal) tributaries cause flooding in Chestfield and parts of Swalecliffe with high tides and heavy rainfall. Having grown up in a house overlooking this landscape I can confirm that the Fields turn into an extensive lake when the Brook overflows.

Greater rainfall intensity (climate change) is already causing historically novel flooding issues in and around Whitstable.

5. Environment/sewage effluent.

In combination with other housing developments (including those already under construction), the planned housing would add to the sewage effluent pollution problem on the beach at Swalecliffe. Southern Water's sewage works appear to be unable to safely process Whitstable's sewage after heavy rainfall, particularly if they use the Short Sea Outfall. The effect on people's health is not known because there is no reporting system for beach users who become infected. Southern Water's plans for replacing the Short Sea Outfall are unclear, but it appears the replacement longer 'pipe' currently being installed will only result in pumping effluent further out which will then be brought in with the tide. This does not comply with paragraph 109 or 170e of the NPPF to prevent pollution.

7. Water Supply

The draft local plan does not comply with NPPF paragraph 20 which states that Strategic policies should set out an overall strategy ...and make sufficient provision for infrastructure for... water supply

South East water told Canterbury City Council on 4 th March 2026 that it cannot supply increased housing demands .The director of operations stated' we will struggle to supply any housing growth above what's included in r water management plan (BBC News 14/3/26 , contrary to paragraphs 162 & 188 & Chapter 14 of NPPF

6. Traffic impacts.

NPPF paragraphs 16 (b) and 36(c) state that plans should be deliverable . CCC require developers of Brooklands Farm to construct a new intersection between the A299 & Chestfield Road to be delivered prior to 50% of total new homes , there is no guarantee that these houses will ever be built or in what time frame due to economic circumstances.

The proposed off-slip from the A299 onto Chestfield Road would lead to extensive through traffic using Chestfield Road and South Street, particularly on summer weekends (when Long Reach roundabout queues can stretch back onto the A299) and weekday evenings. This through-traffic is likely to include heavy vehicles. The summer weekend traffic has not been modelled and the effects are unquantified. There doesn't seem to be any modelling for school run traffic that would be exacerbated by a development of this scale with a potential 3000 + cars on the housing estate using local roads . There will be increased traffic, air and noise pollution, as well as light pollution. CCC proposal to use buses (there is no guarantee this would be delivered for example there is still no bus service for the 400 new homes at the Whitstable Heights Development (planning application CA/15/01296) even after 10 years after pp was granted.) and encourage walking and cycling are unrealistic in this location , being surrounded by steep hills. With an ageing population and anyone with mobility impairments (myself included) would not be able to travel in this way . This scheme seems a utopian dream completely unrelated to the location and how people live there lives.

In Conclusion

- 1. The proposed inclusion of Brooklands Farm in the local plan will result in the loss of best and most versatile and important agricultural land.*
- 2. There will be a negative affect on the countryside from the encroaching suburbanising impact on the countryside. This car dependant urban sprawl would merge Whitstable into Chestfield which presently has its own distinct identity. This seems to contradict the government directive to protect*

the character of local communities. There will be increased traffic, noise, light and air pollution destroying the rural nature of this setting.

3. The site allocation, if adopted, will create additional sewage effluent pollution at Swalecliffe beach.

4. I would support the recommendation made by Whitstable Society that the whole of the W4 Brooklands Farm site be defined as Green Gap.

5. There is a total lack of proposed (or existing) infrastructure to support the scheme , public transport, roads, already overwhelmed sewage and water, inadequate school provision & medical facilities which are already full to capacity in this area as highlighted by Dr Ribchester at the public consultation meeting in Whitstable , which others will have dealt with more knowledgeably and more fully than I have here.

6. Given the government current U turn on housing quotas and its directive to protect green spaces, and agricultural land for food security , actively look for brown fill sites and bring back into use unused housing stock this local plan seems to be now out of date in proposing a scheme which delivers far more units than are required for the predicted local population increase. (especially if this is sold to a London Borough Council thus not meeting the needs of local residents)