
Consultation on Draft Local Plan - Regulation 19

From Jacqui Hutton [REDACTED]
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To Consultations <Consultations@canterbury.gov.uk>

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Dear Sirs

Please find below my concerns about the proposed draft local plan and why i believe it to be unsound and therefore not legally compliant.

1. 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 under infrastructure for water supply.

Southeast Water told Canterbury City Council Scrutiny Committee on 4th March 2026 that it would struggle to provide water for the increased number of new homes in the draft Canterbury Local Plan. See KentOnLine 14th March:

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

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

Also South East Water told a meeting of Canterbury Society on 22nd January 2026 that they do not have money to actually build the reservoir. Therefore there is considerable doubt as to whether the reservoir is actually deliverable. Without the reservoir, there is insufficient water supply to accommodate the proposed new housing as we are already experiencing water shortages for existinf homes in the Whitstable area.

2. Policies W3 (Whitstable Urban Area), W4 (Brooklands Farm) and W7 (Bodkin Farm) do not comply with NPPF Paragraph 32, which states that all policies should be underpinned by relevant and up to-date evidence. CCC's draft Local Plan is, in fact, lacking key evidence in several areas.

a. Traffic modelling – Chestfield

The Policies W3, W4 and W7 are based on relatively simplistic traffic modelling that does not take account of the likely vehicular and pedestrian traffic to/from the two secondary schools the draft Local Plan proposes to build between Chestfield and Greenhill. Note that the Introduction of the Local Plan traffic modelling report states "It is important to note that

strategic modelling is not intended to determine... the acceptability of individual development proposals.”

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

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

b. Pedestrian safety

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

Policy W4 Brooklands Farm would create considerable additional traffic from the new development along the A2990 westbound and A290 Clapham Hill to the A299 Thanet Way. There is no pedestrian crossing over the A290 at Clapham Hill, although many people (including school children) need to cross the road here especially to reach the bus-stops. Where is the evidence that it would still be acceptably safe for 11-year old school-children and the elderly to cross the road here in the rush-hour with all the additional traffic from the developments at W4, W5 and W7? Previous attempts to implement a pedestrian/cycle crossing here concluded that there was no suitably safe location for it.

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

c. Policy R24 - Broad Oak Reservoir

The proposed Broad Oak reservoir is proposed to work by pumping water from the river Great Stour as well as from the Little Stour (the latter would not be able to supply enough water on its own). However, the Great Stour is well known to be heavily contaminated by effluent from Wastewater Treatment Works / sewage works upstream, for example at Canterbury. As shown in the recent BBC Panorama programme The Truth about Forever Chemicals, Wastewater Treatment Works are major sources of Forever Chemicals, and “there is growing body of evidence linking them to serious health concerns”.

Policy R24 therefore needs evidence to show how it could operate safely. What are the levels of PFAS chemicals in the great Stour at the proposed extraction point, which chemicals are they specifically, and how would Southeast Water remove them or sufficiently reduce them to make the water safe for residents to drink? Southeast Water have been resisting requests to

answer such questions, suggesting they may not know the answers and do not have processes that would make the water safe to drink.

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

3. The draft Local Plan does not comply with NPPF Policy 39 which requires Local planning authorities to work “to secure developments that will improve the social....conditions of the area.”

a. Health service.

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

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

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

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

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

c. Other issues affecting health

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

4. The draft Local Plan (and in particular Policies W4 Brooklands and W7 Bodkin) fail to comply with NPPF Policy 39 which requires Local planning to “to secure developments that will improve the environmental....conditions of the area.”

a. Sewage.

W4 Brooklands and W7 Bodkin (including the new school) would both generate considerable additional sewage to be processed by Swalecliffe Wastewater Treatment Works (WWTW),

which already struggles to cope with the ever-growing demand from new housing developments. The WWTW is already notorious for numerous outpourings of not-fully-treated effluent after heavy rainfall, and these can result in people and their pets becoming badly ill from infections such as E Coli. (Victims can include swimmers and others enjoying local beaches). This is potentially very damaging for a community that is trying to nurture its tourism potential and enjoys a reputation for its oysters.

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

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

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

5. Policy W4 Brooklands Farm does not really comply with NPPF Policy 110 which states Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

National census data for Chestfield shows that most working residents commute by car, many of them to Canterbury. So, the Brooklands site is much less sustainably-located than, for example, an equivalent development on fields close to the University of Kent (This was site C12 in the draft Local Plan of 2024). The University of Kent is the largest employer in Canterbury District, and the site benefits from relatively good proximity to a good range of schools. There are frequent shuttle buses to/from the centre of Canterbury, and there is also a cycle-route to the City centre.

6. Policy W4 Brooklands Farm would be contrary to NPPF paragraph 135 which states that: Planning policies should ensure that developments: a) will add to the overall quality of the area b) are visually attractive and c) are sympathetic to local character

Nor does Policy W4 comply with paragraph 187 which states Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes.... (in a manner commensurate with their statutory status or identified quality in the development plan) and b) recognising the intrinsic character and beauty of the countryside

In the not-yet-superseded Canterbury Local Plan (2017), Brooklands Farm, Longtye Wood and Convicts Wood are all part of the Blean Woods Area of High Landscape Value (AHLV). This followed extensive evaluation in the 1990s of their role as the setting of the Blean Woods, i.e. providing a viewpoint where people can see the wooded upland of The Blean framed by lower lying fields and pasture. These fields have been farmed for thousands of years, ever since the days of the prehistoric people who built the Barrows in Clowes Wood, overlooking Brooklands Farm. Canterbury City Council propose to remove the AHLV protection on the basis of erroneous comments in a report they commissioned when they decided they wanted to build a housing estate on Brooklands Farm (Canterbury District Local Landscape Designations Review and Recommendations, 2021).

The landscape of Brooklands Farm is unique and irreplaceable. It combines Ancient Woodland, traditional hedgerows, traditional cattle-pasture, open wheatfields and a

characterful brook, almost all of which can be enjoyed from the two public footpaths that crisscross the farm.

Quite the opposite of complying with Policies 135 and 187, the Local Plan's proposals would severely reduce the overall quality of the area, would be at best visually mediocre, and would obliterate the unique local character of the landscape

7. The draft Local Plan does not comply with NPPF paragraph 161 which states that The planning system should take full account of all climate impacts including, water scarcity.... storm and flood risks and coastal change.

a. Water Scarcity. See our paragraph 1 above.

b. Flood risk.

The draft Local Plan fails to look at the issue of how tidal blocking of the exit of the Swalecliffe Brook may be affected by rising sea levels and increases in rainfall due to climate change. There is likely to be increased flooding in Swalecliffe, so the Plan should examine what should be done to prevent such problems occurring. The Level 1 Strategic Flood Risk Assessment (January 2026) is worryingly inaccurate. The source of the Swalecliffe Brook is near Dunkirk, so the Assessment is incorrect to say that it rises close to the A290 Blean-Whitstable road. Also, the description of the mouth of the Swalecliffe Brook is ten years out-of-date, because ongoing coastal erosion has caused considerable changes.

8. Policy W4 Brooklands Farm would incompatible with NPPF paragraph 193 a. which seeks to minimise significant harm to biodiversity resulting from development .

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

9. Policy W4 Brooklands Farm would be incompatible with NPPF paragraph 193 b. which states that development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.

The proposed development would be about 300m from the West Blean and Thornden Wood SSSI at Woodside Wood, and easily accessible by way of underpasses under the A299 dual carriageway. The SSSI is likely to be damaged by substantially increased recreational use by residents, and wildlife is likely to be adversely affected by predation from dogs and cats.

10. Policy W4 Brooklands Farm would be totally incompatible with NPPF paragraph 193 c which states that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland ...) should be refused.

The proposed development would create a large number of flats and houses close to the Ancient Woodlands of Longtye Wood and Convicts Wood, which are both Local Wildlife Sites. At present they are wildlife-friendly, being almost totally inaccessible to the public, but in future they would be exposed to extensive recreational pressure from residents. Wildlife would be severely impacted by the proximity of so many people, and by predation from dogs and cats, also by the introduction of new and alien species through discarded refuse and garden waste. Nocturnal species such as bats and owls would also be adversely affected by widespread street lighting and noise.

11. Policy W4 Brooklands Farm does not appear to comply with NPPF paragraph 198, which states that Planning policies and decisions should ... ensure that new development is appropriate for its location taking into account ... the potential sensitivity of.... the wider area to impacts that could arise from the development.

a. Health impacts

The Plan's proposals for Whitstable would inevitably lead to increased discharges of sewage effluent into the shallow waters at Swalecliffe, with increased pollution in bathing water, on beaches, in seafood and in the marine SSSI and Ramsar sites. Please see 4a above.

b. Other impacts

One of the constraints preventing large new developments in south Whitstable is the lack of highway capacity between the A299 eastbound offslip and the Long Reach / Borstal Hill roundabout. If a new A299 junction is built under Policy W4, this check on development would be largely removed. So, a likely effect of approving the Local Plan including Policy W4 is that there would be speculative applications for new development along the A299 corridor (capitalising on the improved accessibility provided by the new junction), which the Council would feel it had no alternative but to authorise because they consider they cannot afford to pay the costs of any Appeal. The likely consequences of such developments should be investigated now, before it is too late to stop them occurring.

It cannot be assumed that any consequences can be investigated at the submission of such applications, because the Planning Committee have demonstrated an inability to object to any substantial application where they think the Applicant is likely to appeal against a refusal of planning permission (see for example, CA/23/00379).

Kind regards

Jacqueline Hutton

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