
Regulation 19 consultation

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Date Tue 5/12/2026 8:00 PM
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1. Deliverability – Policy W4 Brooklands Farm

NPPF paragraphs 16(b) and 36(c) require plans to be deliverable. Policy W4 depends on a new A299/Radfall Hill junction being built before 50% occupation to reduce congestion. There is a risk developers may not fund or deliver the junction, meaning the 1,400-home scheme may never be completed. Concerns are reinforced by previous unmet mitigation promises, including the lack of a bus service at Whitstable Heights nearly 10 years after approval. There are also concerns over possible subsidence issues affecting the A299.

2. Water Supply and Broad Oak Reservoir

The draft Local Plan may conflict with NPPF paragraph 20, which requires sufficient infrastructure for water supply. Southeast Water has warned it may struggle to supply planned housing growth. Policy R24 relies on the proposed Broad Oak Reservoir, but there are concerns over funding, deliverability, and the safety of using river water potentially contaminated with PFAS chemicals. Evidence on treatment methods and long-term safety has not been provided.

3. Lack of Evidence Base (NPPF paragraph 32)

Policies W3, W4 and W7 are not supported by sufficient up-to-date evidence:

- **Traffic modelling:** Existing modelling does not properly assess school-related traffic and congestion impacts around Chestfield and Swalecliffe roundabouts. The impact of proposed developments remains unclear.
- **Pedestrian safety:** No proper assessment exists for increased risks to pedestrians and schoolchildren, particularly at Clapham Hill and Chestfield & Swalecliffe station.
- **Broad Oak Reservoir:** Evidence is lacking on PFAS contamination and whether water can be safely treated.
- **Decision-making:** The Council has not clearly explained why Brooklands Farm was chosen over the more sustainable University of Kent site (former Policy C12).

4. Social Impacts (NPPF paragraph 39)

The Local Plan may worsen social conditions rather than improve them:

- **Health services:** East Kent hospitals are already under severe pressure.
- **Sewage pollution:** More development is likely to increase sewage pollution on beaches and in seafood.
- **Loss of countryside:** Policies W4 and W7 would remove valued countryside and footpaths important for residents' wellbeing and mental health.

5. Environmental Impacts (NPPF paragraph 39)

W4 and W7 would increase sewage flows to the already overloaded Swalecliffe Wastewater Treatment Works, leading to more pollution risks, including untreated discharges and possible PFAS contamination affecting beaches, marine habitats, and seafood.

6. Unsustainable Location (NPPF paragraph 110)

Brooklands Farm is car-dependent, with many residents commuting by car. The alternative University of Kent site would have been more sustainable due to better access to jobs, schools, buses, and cycle routes.

7. Landscape Harm (NPPF paragraphs 135 & 187)

Brooklands Farm lies within the Blean Woods Area of High Landscape Value. Development would destroy a distinctive historic landscape of woodland, pasture, hedgerows and open countryside, harming local character, visual quality, and valued views.

8. Climate Change, Water Scarcity and Flood Risk (NPPF paragraph 161)

The Plan does not adequately address water scarcity or future flood risks linked to climate change, sea level rise, and tidal flooding at Swalecliffe Brook. Parts of the Strategic Flood Risk Assessment are also inaccurate or outdated.

9. Biodiversity Loss (NPPF paragraph 193a)

Brooklands Farm contains diverse habitats supporting species such as skylarks and brown hares. Development would permanently destroy important open-land habitats.

10. Impact on SSSI (NPPF paragraph 193b)

The development could harm the nearby West Blean and Thornden Wood SSSI through increased recreational pressure, disturbance, and predation from pets.

11. Ancient Woodland Harm (NPPF paragraph 193c)

Development near Longtye Wood and Convicts Wood would increase public pressure, lighting, noise, and disturbance, harming irreplaceable ancient woodland habitats and wildlife.

12. Wider Impacts and Future Development (NPPF paragraph 198)

The Plan fails to properly assess wider cumulative impacts, including increased sewage pollution and the likelihood that a new A299 junction would trigger further speculative development along the corridor.