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## Response To The Draft Local Plan

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From Matthew Rigden [REDACTED]  
Date Thu 5/14/2026 3:04 PM  
To Consultations <Consultations@canterbury.gov.uk>

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Dear Sir/Madam,

I wish to raise the following observations in regard to the soundness of the draft local plan;

1. The draft Local Plan does not comply with the **National Planning Policy Framework (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, and 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.

2. 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**.

3. 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” and deliverable.

## d. Decision-making.

There is a lack of clear evidence why the Council has decided to include **Policy W4 Brooklands Farm** in the draft Local Plan, but excluded an alternative site for 2000 houses that the University of Kent wants to build on its land immediately to the north of the university. (This was Policy C12 in draft Local Plan 2024). That location would score very highly as a sustainable location, given its proximity to the District’s largest employment site and excellent public transport links.

In the Sustainability Appraisal Report for the Regulation 19 draft Local Plan (2026), site C12 was taken out of the Plan “based on representations and further information....”. Representations by whom? In the draft Local Plan consultation of 2024, a far greater number of residents objected to the

Brooklands proposal than objected to the University of Kent site C12. In a recent article in *Kent On Line*, the leader of the conservative councillors at the Council accused the CCC leadership of allocating sites “anywhere that’s politically expedient for this cabinet.”

I trust my views will be considered as part of this consultation.

Regards

Matthew Ian Rigden

