

Harry Butcher

From: [REDACTED]
Sent: 15 May 2026 16:18
To: Consultations
Subject: Regulation 19 Consultation

--Email From External Account--

I wish to make the following points about the proposed Brooklands Farm development (Policy W4):

- the proposed new junction between the A299 and Radfall Hill - there is a history of developers failing to deliver mitigation measures such as this - I am concerned that they simply may stop the development before this junction is delivered. There's also a risk that the subsidence problems on the A299 could cause its closure - meaning the developers would 'get away' without delivering the junction, leaving local residents with all the disadvantages and no benefits.

- NPPF Paragraph 20 mentions provision for water supply, but SE Water told Canterbury City Council on 4th March that it would struggle to provide water for the increased number of new homes in the draft Canterbury Local Plan. In theory an answer is the proposed Broad Oak reservoir, but SEW have said they have no money to build this new infrastructure, so is it actually deliverable? And at what point, no doubt well beyond the delivery of the homes? Plus it would use water that SEW acknowledge is polluted, but they have made no statement on how this would be dealt with.

- Policies W3, W4 and W7 do not comply with NPPF Paragraph 32, which requires all policies to be based on up-to-date evidence. However CCC's Local Plan lacks key evidence e.g. Chestfield traffic modelling takes no account of the vehicular and pedestrian traffic from the two secondary schools included in the Local Plan between Chestfield and Greenfield. How can it make sense to allow what is for Whitstable a huge new development before knowing what the impact of all the proposed development along the Old Thanet Way is?

- why has W4 been included, but what was Policy C12 in the draft Local Plan 2024 been excluded? The University site is far more sustainable in terms of its transport links and proximity to the largest local employer. What was the new information which ruled this site out?

- NPPF Policy 39 requires any development to 'improve the social conditions of the area'. How can this be fulfilled in terms of a) health (East Kent Hospitals Trust is clearly struggling to cope with demand and the local housing targets do not provide any significant increase in hospital capacity for this area) and b) much increased sewage outputs which will need to be treated by the Swalecliffe Wastewater Treatment Works - which is already notorious for outpourings of not-fully-treated effluent after heavy rain.

Thank you,

Suze Gomme

[REDACTED]

[Sent from the all-new AOL app for iOS](#)