

From: Rachael Mitchell [REDACTED]
Sent: 17 May 2026 20:17
To: Consultations
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Rachael Mitchell
[REDACTED]

To: Local Plan Consultation Team

Subject: Section 19 Objection – Brooklands Farm Allocation

Dear Sir/Madam,

I write to formally object to the proposed allocation of Brooklands Farm within the emerging Local Plan under the Section 19 consultation process.

My objection is based upon serious concerns regarding infrastructure capacity, sustainability, transport impacts, water supply, sewage provision, and the overall scale of development proposed. I do not believe the allocation is sound, justified, effective, or consistent with national planning policy.

The proposed development would represent a substantial expansion of the town, fundamentally altering its character and placing unacceptable strain upon infrastructure and public services that are already under significant pressure.

A key concern relates to water supply and wastewater infrastructure, including matters raised through representation R24. The Local Plan fails to demonstrate that there is sufficient existing capacity to support development of this scale.

South East Water's own published information confirms that the proposed Broad Oak Reservoir — relied upon as part of future water resilience planning — remains at consultation and design stage only, with a planning application not anticipated until 2028 and operational delivery expected around 2035. The critical infrastructure necessary to support strategic growth is therefore neither approved nor guaranteed within the anticipated delivery period of the proposed development.

It is unsound for the Local Plan to rely upon infrastructure that does not yet exist and may not be operational until many years after development commences. This concern is heightened by existing pressures on water resources across the South East, increasing drought risk, and recent well-publicised water supply failures affecting customers across Kent and Sussex.

In addition, representation R24 identifies concerns regarding sewage and wastewater infrastructure capacity. Existing sewer networks and treatment systems already experience pressure, particularly during periods of heavy rainfall, and the Plan does not provide clear evidence that these systems can accommodate substantial additional demand without unacceptable environmental consequences.

The proposal also conflicts with the objectives and requirements of policies W3, W4 and W7 in relation to sustainable growth and infrastructure delivery.

Transport impacts are another major concern. Roads within and surrounding the town already experience congestion, delays, and pressure at peak travel times. The proposed allocation at Brooklands Farm would generate substantial additional traffic movements and significantly increase reliance on private vehicle use.

The Local Plan does not provide convincing evidence that the highway network has sufficient capacity to accommodate this scale of development without severe cumulative impacts on congestion, road safety, air quality, emergency access, school traffic, and the daily functioning of the town.

Public transport provision remains limited and insufficient to support development of this scale in a genuinely sustainable way. As a result, the allocation appears inconsistent with the sustainability objectives set out within the National Planning Policy Framework.

In particular, the proposal fails to comply with NPPF paragraph 20, which requires strategic policies to make sufficient provision for infrastructure including transport, utilities, and community facilities.

The allocation is also inconsistent with NPPF Policy 39 and paragraph 110, which seek to ensure that development is supported by appropriate infrastructure and achieves safe and suitable access for all users.

Furthermore, the proposal does not appear to comply with NPPF paragraph 161, as the Local Plan fails to adequately assess and address infrastructure constraints and the cumulative impacts arising from the scale of growth proposed.

There are also concerns regarding compliance with NPPF paragraphs 193 and 198, particularly in relation to the need to protect and enhance the natural environment, ensure

sustainable patterns of development, and avoid placing unacceptable pressure on environmental infrastructure and local character.

The cumulative effect of unresolved water supply uncertainty, sewage infrastructure limitations, transport pressures, and the sheer scale of growth proposed demonstrates that the Brooklands Farm allocation is neither sustainable nor infrastructure-led.

The proposal would fundamentally urbanise and expand the settlement in a manner that is disproportionate to the existing town and unsupported by the necessary infrastructure.

For these reasons, I strongly object to the inclusion of Brooklands Farm within the Local Plan and respectfully request that the allocation is reconsidered and removed.

I request that this representation is fully considered and recorded as part of the Section 19 consultation process.

Yours faithfully,

Rachael Mitchell