

From: Gabe Mitchell [REDACTED]
Sent: 17 May 2026 20:35
To: Consultations
Subject: Section 19 Objection – Brooklands Farm Allocation

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Gabe Mitchell
[REDACTED]

To: Local Plan Consultation Team

Subject: Section 19 Objection – Brooklands Farm Allocation

Dear Sir/Madam,

I am writing to object to the proposed allocation of Brooklands Farm in the emerging Local Plan as part of the Section 19 consultation process.

I strongly believe this development is too large for the area and would place huge pressure on infrastructure and public services that are already struggling to cope. I do not think the proposal is sustainable or properly supported by the infrastructure needed to make it work safely and effectively.

One of my main concerns is water supply and wastewater infrastructure, including the issues raised in representation R24. The Local Plan does not clearly show that there is enough capacity to support development on this scale.

South East Water's own information states that the proposed Broad Oak Reservoir, which is being relied on for future water resilience, is still only at consultation and design stage. A planning application is not expected until 2028 and it is not expected to be operational until around 2035. This means that a major piece of infrastructure needed to support growth is neither approved nor guaranteed within the timeframe of the development.

It does not seem reasonable or sound for the Local Plan to rely on infrastructure that does not yet exist and may not be available for many years after development begins. This is especially concerning given the existing pressure on water resources in the South East, increasing drought risks, and recent water supply problems experienced across Kent and

Sussex.

There are also serious concerns regarding sewage and wastewater infrastructure. Existing sewer systems already struggle during periods of heavy rainfall, and the Plan does not provide enough evidence that these systems can cope with the additional demand without causing environmental harm.

I also believe the proposal conflicts with policies W3, W4 and W7 regarding sustainable growth and infrastructure delivery.

Transport is another major issue. Roads in and around Whitstable already experience congestion and delays, particularly at busy times of the day. A development of this size at Brooklands Farm would create a significant increase in traffic and make the area even more dependent on private cars.

The Local Plan does not provide convincing evidence that the road network could cope with this level of additional traffic without serious impacts on congestion, road safety, air quality, emergency access, school traffic and everyday life for local residents.

Public transport in the area is also limited and does not currently support development on this scale in a genuinely sustainable way. Because of this, I do not believe the proposal aligns with the sustainability aims of the National Planning Policy Framework (NPPF).

In particular, the proposal appears inconsistent with NPPF paragraph 20, which requires strategic policies to provide sufficient infrastructure, including transport, utilities and community facilities.

The allocation also appears to conflict with NPPF Policy 39 and paragraph 110, which aim to ensure developments are supported by appropriate infrastructure and safe access for all users.

In addition, the proposal does not appear to comply with NPPF paragraph 161, as the Local Plan does not adequately assess infrastructure constraints or the cumulative impacts of the level of growth proposed.

There are also concerns regarding compliance with NPPF paragraphs 193 and 198 in relation to protecting the natural environment, encouraging sustainable patterns of development and avoiding unacceptable pressure on environmental infrastructure and local character.

Overall, the combined issues around water supply, sewage infrastructure, transport pressures and the overall scale of development clearly show that the Brooklands Farm allocation is not sustainable or infrastructure-led.

The proposal would significantly change the character and scale of the town in a way that feels disproportionate and unsupported by the infrastructure required.

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

Yours faithfully,

Gabe Mitchell