

From: Leslie Mitchell [REDACTED]
Sent: 17 May 2026 21:34
To: Consultations
Subject: Section 19 Objection - Brooklands Farm Allocation

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Leslie Mitchell

[REDACTED]

[REDACTED]

17th May 2026

To: Local Plan Consultation Team

Subject: Formal Section 19 Representation and Objection – Proposed Brooklands Farm Allocation

Dear Sir/Madam,

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

Having carefully reviewed the proposed allocation, supporting evidence base, infrastructure assumptions, and relevant national and local planning policy, I do not consider the allocation to be sound, justified, effective, positively prepared, or consistent with the requirements of the National Planning Policy Framework (“NPPF”).

My objection is founded upon substantial and unresolved concerns relating to:

- Water supply and long-term water security;
- Wastewater and sewage infrastructure capacity;
- Highway capacity, congestion, and transport sustainability;
- Environmental impacts and pressure on local infrastructure;
- The cumulative impacts of growth;
- The disproportionate scale of development proposed; and
- The absence of credible evidence demonstrating that the necessary strategic infrastructure can be delivered in a timely or coordinated manner.

The proposed allocation would represent a major urban extension that would fundamentally alter the character, scale, and setting of the town. In my view, the development proposed is significantly disproportionate to the existing settlement pattern and would place severe and unacceptable strain upon infrastructure and public services that are already operating under considerable pressure.

A central concern relates to water supply infrastructure and long-term resilience. The Local Plan fails to demonstrate, through robust and deliverable evidence, that sufficient water resources exist to sustainably accommodate development on the scale proposed.

In particular, concerns raised through representation R24 remain unresolved and highly material to the soundness of the Plan.

South East Water's published infrastructure planning information confirms that the proposed Broad Oak Reservoir — frequently referenced in discussions regarding future water resilience across the region — remains at an early consultation and design stage only. Current indications suggest that a planning application is not anticipated until approximately 2028, with operational delivery potentially not occurring until around 2035.

Consequently, the strategic water infrastructure relied upon to support long-term growth has neither been approved nor secured and may not become operational until many years after development at Brooklands Farm would commence.

This creates a fundamental soundness issue.

The Local Plan appears to rely upon speculative or uncommitted future infrastructure in order to justify strategic growth allocations. Such an approach is inconsistent with the requirement for plans to be deliverable and supported by a credible infrastructure strategy. It is neither reasonable nor sustainable to allocate development of this scale without clear evidence that adequate water supply infrastructure can be delivered within the relevant plan period and prior to occupation.

These concerns are amplified by the well-documented pressures already affecting water resources across the South East, including increasing drought risk, climate change impacts, groundwater stress, population growth, and recent water supply interruptions experienced by customers across Kent and Sussex.

The proposed allocation therefore raises serious concerns regarding long-term sustainability, resilience, and compliance with national policy objectives relating to climate adaptation and environmental protection.

In addition, representation R24 identifies significant concerns regarding sewage and wastewater infrastructure capacity. Existing sewer networks and wastewater treatment systems within the area already experience operational pressure, particularly during

periods of heavy rainfall and peak demand. Incidents involving sewer surcharge, drainage limitations, and surface water management pressures are already matters of public concern.

The Local Plan does not provide sufficiently detailed or convincing evidence to demonstrate that existing wastewater infrastructure can accommodate substantial additional development without resulting in unacceptable environmental consequences, including increased flood risk, pollution incidents, pressure on treatment facilities, or deterioration of local watercourses and habitats.

The absence of a clear, funded, and deliverable infrastructure strategy for both water supply and wastewater management directly undermines confidence in the deliverability of the allocation and conflicts with the principles of sustainable development.

Furthermore, the proposal appears inconsistent with the objectives and requirements of policies W3, W4, and W7 concerning sustainable infrastructure provision, environmental capacity, and coordinated growth.

Transport and highway impacts represent an additional and highly significant concern.

Roads within and surrounding the town already experience substantial congestion, delays, queuing, and operational stress during peak periods. Existing junctions and local road networks frequently operate at or near capacity, particularly in relation to commuter traffic, school traffic, local service access, and emergency vehicle movement.

The proposed Brooklands Farm allocation would generate a substantial increase in vehicle movements and would inevitably intensify existing congestion and traffic pressures across the wider highway network.

The evidence presented within the Local Plan does not convincingly demonstrate that the highway network possesses sufficient capacity to accommodate this scale of growth without severe cumulative impacts.

There remains insufficient evidence regarding:

- Junction performance and cumulative network impacts;
- Emergency access resilience;
- School-related traffic impacts;
- Pedestrian and cyclist safety;
- Air quality implications;
- Rat-running through residential areas;
- The practical deliverability of mitigation measures; and
- The long-term effectiveness of proposed transport interventions.

Moreover, public transport infrastructure and connectivity remain inadequate to support development of this scale in a genuinely sustainable manner. Bus services, service frequency, rail accessibility, and integrated transport options remain limited, meaning future residents would likely remain heavily dependent upon private car usage.

As a consequence, the allocation appears fundamentally inconsistent with the sustainability objectives of the NPPF and broader national policy objectives relating to sustainable transport and climate resilience.

In particular, the proposed allocation appears inconsistent with NPPF paragraph 20, which requires strategic policies to make sufficient provision for infrastructure including transport, utilities, water supply, wastewater systems, and community facilities.

The proposal also conflicts with the requirements of NPPF paragraph 110 and associated policy principles, which seek to ensure that development achieves safe and suitable access for all users and that unacceptable impacts on highway safety and network capacity are avoided.

Furthermore, the Local Plan does not appear to satisfy the requirements of NPPF paragraph 161, as it fails to adequately identify, assess, and resolve infrastructure constraints or properly address the cumulative impacts arising from the scale of growth proposed.

There are also significant concerns regarding compliance with NPPF paragraphs 193 and 198 in relation to the protection and enhancement of the natural environment, the need to pursue sustainable patterns of development, and the obligation to avoid placing unacceptable pressure upon environmental infrastructure, landscape character, and local settlement identity.

The cumulative effect of unresolved water supply uncertainty, inadequate wastewater capacity evidence, transport pressures, infrastructure deficits, environmental concerns, and the sheer scale of development proposed demonstrates that the Brooklands Farm allocation is neither sustainable nor infrastructure-led.

Rather than representing coordinated and sustainable growth, the allocation appears premature, poorly evidenced, and dependent upon uncertain future infrastructure delivery.

The proposal would fundamentally urbanise and expand the settlement in a manner that is disproportionate to the character and capacity of the existing town and unsupported by the infrastructure necessary to mitigate its impacts.

Accordingly, I respectfully submit that the allocation fails the tests of soundness required under the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework.

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

I further request that this representation is fully considered, recorded, and reported as part of the Section 19 consultation process and subsequent examination proceedings.

Yours faithfully,

Leslie Mitchell