

From: Emily Firmin [REDACTED]
Sent: 18 May 2026 14:22
To: Consultations
Subject: Regulation 19 draft Local Plan consultation (2026)

--Email From External Account--

I am emailing you to object to the above development proposal.

The draft Local Plan raises significant concerns regarding compliance with the National Planning Policy Framework (“NPPF”), particularly in relation to deliverability, infrastructure provision, environmental sustainability, public health, and evidential robustness.

1. Deliverability – Policy W4 Brooklands Farm

NPPF paragraphs 16(b) and 36(c) require Local Plans to be deliverable. Policy W4 is dependent upon the construction of a new junction between the A299 New Thanet Way and Chestfield Road (Radfall Hill), which Canterbury City Council (“CCC”) requires to be delivered before occupation of 50% of the proposed dwellings. The junction is intended to mitigate congestion on the surrounding highway network, particularly the A2990 Old Thanet Way.

However, there is a substantial risk that the developers may ultimately claim that the required infrastructure is financially unviable, resulting in the junction not being delivered and the development remaining permanently incomplete. There is precedent for mitigation infrastructure not being delivered within the district, including the absence of the promised bus service associated with the Whitstable Heights development (planning application CA/15/01296), despite almost ten years having elapsed since planning permission was granted.

In addition, reports concerning subsidence affecting the A299 New Thanet Way raise concerns regarding the long-term reliability of the surrounding highway network. If such reports are accurate, there is a risk of future closures or restrictions affecting the route. Taken together, these issues create significant doubt as to whether Policy W4 can realistically be regarded as deliverable in accordance with the NPPF.

2. Water Supply Infrastructure – Policy R24 Broad Oak Reservoir

The draft Local Plan also appears inconsistent with NPPF paragraph 20, which requires strategic policies to make sufficient provision for infrastructure, including water supply.

Southeast Water informed Canterbury City Council's Scrutiny Committee on 4 March 2026 that it would struggle to provide sufficient water resources to support the scale of housing growth proposed in the draft Plan. Policy R24 seeks to address this issue through the proposed Broad Oak Reservoir. However, the reservoir would rely upon water abstraction from the Rivers Great Stour and Little Stour, including watercourses known to receive treated effluent from upstream wastewater treatment works.

Concerns therefore arise regarding the potential presence of PFAS and other chemical contaminants within the source water. Despite repeated requests, Southeast Water has not provided clear evidence explaining how such pollutants would be removed or reduced to levels safe for long-term human consumption. This absence of evidence raises legitimate concerns regarding both the operational safety and overall deliverability of the proposal.

Further uncertainty arises from statements reportedly made by Southeast Water indicating that funding for the reservoir has not yet been secured. In these circumstances, it cannot reasonably be assumed that the reservoir is either financially deliverable or technically viable.

3. Lack of Robust and Up-to-Date Evidence

Policies W3, W4 and W7 appear inconsistent with NPPF paragraph 32, which requires planning policies to be supported by relevant and up-to-date evidence.

a. Traffic Modelling and Highway Capacity

The strategic traffic modelling underpinning the draft Local Plan does not appear to adequately assess the cumulative effects arising from the proposed secondary schools between Chestfield and Greenhill. Existing congestion around the A2990/Chestfield Road roundabouts is already severe, particularly due to signalised pedestrian crossings that regularly result in queueing traffic affecting surrounding junctions.

The proposed schools are likely to generate substantial additional pedestrian and vehicular movements, yet the resulting impacts on congestion and highway operation have not been comprehensively modelled, including within the outline applications for Brooklands Farm and Bodkin Farm. Consequently, the true impacts on the local highway network remain uncertain.

Moreover, physical constraints around the northern side of the Chestfield Road roundabout may significantly limit opportunities for meaningful highway improvements, calling into question whether the proposed developments can be accommodated without severe and potentially irresolvable congestion.

b. Pedestrian Safety

The draft Local Plan also appears deficient in relation to pedestrian safety assessment.

At Clapham Hill, Policy W4 would generate substantial additional traffic movements along the A2990 and A290 corridor, yet there remains no safe pedestrian crossing facility despite regular use by schoolchildren, elderly residents, and bus passengers. Previous investigations reportedly concluded that no suitably safe crossing location could be identified. The Plan contains no convincing evidence demonstrating that pedestrian safety would remain acceptable under the increased traffic conditions arising from Policies W4, W5 and W7.

Similarly, the proposed school associated with Policy W7 is likely to increase use of Chestfield & Swalecliffe railway station by pupils travelling by train. The constrained pedestrian route beneath the railway bridge raises obvious safety concerns, particularly given previous concerns reportedly expressed by British Transport Police regarding pupil safety and trespass risks. No detailed safety audit evidence appears to have been produced addressing these matters.

4. Public Health and Environmental Concerns

The draft Local Plan also raises substantial concerns regarding public health, environmental quality, and compliance with NPPF policy objectives requiring developments to improve social and environmental conditions.

The continued expansion of housing development in East Kent is placing increasing pressure upon healthcare infrastructure, with East Kent Hospitals Trust already experiencing severe operational difficulties, including the declaration of a critical incident at QEQM Hospital in January 2026. The draft Local Plan proposes significant additional population growth without corresponding provision for major healthcare expansion.

In addition, the proposed developments would inevitably increase sewage flows to Swalecliffe Wastewater Treatment Works, which already experiences regular storm overflow events and discharges into the local marine environment. Increased discharges would likely worsen pollution affecting bathing waters, beaches, marine habitats, and seafood quality. Concerns also arise regarding the potential accumulation of PFAS and other chemical contaminants within the marine ecosystem.

The Plan further proposes the loss of accessible countryside currently valued by residents for recreation, tranquillity, and mental wellbeing. The countryside surrounding Brooklands Farm and Bodkin Farm forms an important part of the local landscape character and provides significant environmental and social benefits that would not be adequately replaced through urbanised open space provision.

5. Sustainability and Alternative Sites

Policy W4 also raises concerns in relation to NPPF paragraph 110, which seeks to focus development in sustainable locations capable of reducing reliance upon private car travel. Census data indicates that a substantial proportion of residents in the Chestfield area commute by car, including journeys towards Canterbury.

By contrast, the previously proposed University of Kent site (Policy C12 in the 2024 draft Local Plan) appears significantly more sustainable, given its proximity to major employment opportunities, schools, public transport infrastructure, shuttle bus services, and established cycle connections to Canterbury city centre. The rationale for excluding that site while retaining Brooklands Farm has not been clearly justified by the Council.

6. Landscape, Biodiversity and Ancient Woodland

Policies W4 and W7 also appear inconsistent with NPPF paragraphs 135, 187 and 193. Brooklands Farm forms part of the wider setting of the Blean landscape and remains identified within the existing Area of High Landscape Value designation. The landscape possesses a distinctive and historic rural character, comprising ancient woodland, pasture, hedgerows, watercourses and open agricultural land that contribute significantly to local character and visual amenity.

The proposed development would fundamentally urbanise this landscape and result in irreversible harm to biodiversity, including impacts upon habitats supporting species such as skylark and brown hare.

Particular concern also arises regarding the proximity of development to Longtye Wood and Convicts Wood, both ancient woodland habitats and Local Wildlife Sites. Increased recreational pressure, domestic pets, artificial lighting, noise, and fly-tipping associated with large-scale residential development would likely result in long-term ecological deterioration.

In addition, the proposed development lies close to the West Blean and Thornden Wood Site of Special Scientific Interest (“SSSI”), which could experience increased recreational disturbance and associated impacts upon protected habitats and wildlife species.

7. Flood Risk and Climate Change

Finally, the draft Local Plan does not appear to fully address the requirements of NPPF paragraph 161 concerning climate impacts, including flood risk and water scarcity.

The Level 1 Strategic Flood Risk Assessment appears to contain factual inaccuracies regarding the Swalecliffe Brook and does not adequately assess the potential impacts of sea level rise, tidal blocking, or increased rainfall intensity associated with climate change. There is a foreseeable risk of worsening flood conditions affecting Swalecliffe, yet the Plan

does not contain a sufficiently detailed assessment of mitigation measures or long-term resilience.

Taken together, these matters raise substantial doubt as to whether the draft Local Plan, and in particular Policies W4 and W7, can properly be regarded as sound, deliverable, sustainable, or compliant with the requirements and objectives of the NPPF.

Sincerely

Emily Firmin