

From: Adrian Garner [REDACTED]
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To: Consultations
Subject: SaveBrooklands draft Response to the Draft Local Plan consultation

Importance: High

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Where applicable references to “NPPF” refers to the December 2024 version of the National Planning Policy Framework

1. I refer to NPPF paragraphs 16(b) and 36(c) state that Plans should be deliverable. CCC require the developers of Brooklands Farm (Policy W4) to construct a new intersection between the A299 New Thanet Way and the Chestfield – Canterbury Road (Radfall Hill), to be delivered prior to occupation of 50% of the total new homes. The new junction is required to relieve congestion on the local road network, especially the A2990 Old Thanet Way.

The proposed off slip from the A299 onto South Street and hence onto the Chestfield Road will lead to extensive through traffic. The South Street/Chestfield Road/Radfall Hill into Radfall Road access/egress and interchange will become a bottleneck for local traffic. It remains a significant 3-way access road to Whitstable, Chestfield, Swalecliffe & Canterbury, via Chestfield Road passing through the designated Chestfield conservation area village onto the roundabout system on the Old Thanet Way at the northern end of Chestfield Road leading to further overloading, notably in the summer months/weekends. This is already an issue along the Old Thanet Way with queues backing up to the Long Reach roundabout and beyond onto the A299 and weekends and weekday evenings.

2. In reference to the draft Local Plan (Policies W4 Brooklands and W7 Bodkin) fail to comply with NPPF Policy 39 which requires Local planning to “to secure developments that will improve the “..... *environmental....conditions of the area.*”

- a. *Wastewater Treatment*** - Southern Water has previously provided a response that largely points out the inadequacies and risks of the current water management systems and fails to adequately advise on how this can be addressed, nor commits to the future planning and construction to

support the future development, let alone those already in existence in the area. It is unacceptable that planning can be granted for such a scheme on a known flood risk area that causes flooding down into Whitstable/Swalecliffe without first having a clear strategy and funded plan to develop the wastewater network and confirm the treatment capacity for wastewater in line with the increase in homes. The development will lock in the stream and its surroundings like a concrete collar and flooding will become the norm with the water having nowhere to go. It is inevitable there will be significant flooding and damage to the properties nearest the stream running through the estate, and for the residents downstream, where the water will inevitably flow. Southern Water has reflected in their response that the current foul drainage in the area will be inadequate for the extended population and water treatment capacity could be exceeded at peak times.

b. *Environmental and Landscape Impact* - Brooklands Farm lies within an area which has long been regarded as an Area of High Landscape Value. It was identified once more as an AHLV in the currently adopted Canterbury District Local Plan 2017 and remains the case. The farmland itself lies within, and provides a wide panoramic view of, the valley of the Swalecliffe Brook with the Blean Hill ancient forests on its' southern side. Whitstable and the surrounding Chestfield area to Herne Bay is significantly built on London Clay, known for its non-water absorbing and water barrier properties. This development will only exacerbate flooding with the addition of more concrete and water restricting man-made barriers that come with any significant housing development. The Brook itself runs down through its' valley to Chestfield and Swalecliffe and onto the sea exit at Swalecliffe. It is already well known in the area to be a regular source of flooding in the low-lying London clay areas, including housing and other areas, through which it runs to the sea.

The plans and proposals do not adequately provide and evidence as to the substructure composition and engineering approach / methods that will be deployed differently at Brooklands Farm to any other recent developments and how these are accommodating the climate change impacts whereby heavy and persistent rain downfalls, flooding and storms will become an increasing feature of our climate. They do not exist because it is not a clear consideration, and it should be!

3. I refer to Policies W3 (Whitstable Urban Area), W4 (Brooklands Farm) and W7 (Bodkin Farm) do not comply with NPPF Paragraph 32, which states that all policies should be underpinned by relevant and up to-date evidence. CCC's draft Local Plan is, in fact, lacking key evidence in several areas.

a. Traffic Modelling - Firstly, for journeys to Canterbury, there are only two realistic options:: (A) South Street to the Radfall Road on through the Thornden Wood Road, through Blean Woods, and Hackington Road through Tyler Hill and on down St Stephens Hill into Canterbury via either St Stephens or Beaconsfield Road; or (B) South Street the other way onto the Old Thanet Way (A2990) up Clapham Hill onto the A290 through Honey Hill, Blean Hill and down into Canterbury via the Whitstable Road. South Street is prominent in both these options and will be a major access road during and post the development of the Brooklands Fram.

South Street is a "bottleneck" today with double parking given it is a narrow road all the way to the junction with Chestfield Road/Radfall Hill. The suggested access proposed to the Brooklands Farm off South Street is not viable access and will only snarl-up traffic attempting to access Chestfield Road to cut the corner off Old Thanet Way into Chestfield/Swalecliffe or Radfall Hill into Radfall Road en-route to Tyler Hill or Canterbury. This will affect residents living in the South Street/Millstrood Road area significantly and makes no credible sense - with this becoming one of the main roads into the new estate when completed only makes a mockery of whatever planning/modelling has been undertaken to date.

Both these routes to Canterbury are going to experience major problems with large increases in off-peak/peak traffic in the future, particularly the Thornden Wood/Hackington Road option which is narrow, and width restricted for most of its length. This is also increasingly used by cyclists causing delays on the narrow roadway. It is only a matter of time before the levels of traffic loading become unsustainable to the existing road network from the already numerous planned developments, let alone another one at Brooklands Fram. This loading will only result in increased

risk to accidents and fatalities for which there is minimal mitigation given the existing road network in place.

Chestfield Road is by far the widest to accommodate heavy vehicular site traffic, and will significantly impact the local area and residents, given that it is already a major trunking between from the Old Thanet Way running adjacent to Whitstable/Chestfield/Swalecliffe, provides one of the major flows to Canterbury and this will only add to an already busy commuter feeder road.

b. Pedestrian movements - As referenced above in part (a), Policy W4 (Brooklands Farm) would naturally add traffic from the proposed new development along the A2990 westbound and A290 Clapham Hill to the A299 Thanet Way. At present there is no means for pedestrians to cross over the A290 at Clapham Hill, although many (including school children) need access to cross the road here especially to reach the local bus-stops. Nowhere have we seen evidence that looks specifically at the pedestrian safety for “11-year-old schoolchildren”, let alone older members of the public, specifically the elderly, to cross the road here in the rush-hour with all the added road traffic from the developments at W4, W5 and W7 mentioned above. I understand that previous attempts to instigate and put in place a pedestrian/cycle crossing at this location found that there was no safe location to set one up. What is different now? I do not see the evidence.

Policy W7 Bodkin Farm would likely see many school-children to commute to the school by train, using Chestfield & Swalecliffe station. The only link between the two station platforms is the narrow pedestrian pavement alongside the busy road under the railway bridge. Where is there any safety audit evidence quantifying the likely number of children using this pavement and assessing the risk of accidents? It should be noted that the British Transport Police have already expressed concern about the safety of pupils using the station and the risk of possible trespassing incidents (see planning application CA/24/00224).

c. Surgeries, Pharmacies, Schools, Hospital Facilities - These are already stretched and will be further stretched by already existing developments having been completed, before even adding Brooklands Farm Estate.

Local NHS services are already under severe strain, with long waits for GP appointments. The application makes vague references to a possible new healthcare facility but offers no firm commitments or timelines. Meet the existing growth before planning for future growth and consult the surgeries, hospitals and local education facilities and ask them what they need today to support the community.

Yours sincerely,
Adrian Garner

