

Mrs A Tappenden

15th May 2026

Ref: Regulation 19 Canterbury District's Draft Local Plan

Dear Sir / Madam

This document is an objection in respect of Regulation 19 of the Town and Country Planning Regulations 2012 regarding the Draft Local Plan to 2042/3 prepared by Canterbury City Council.

Planning application CA/25/00779 is a planning application submitted by Hallam Land Management and proposes 'Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons' housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.'

The site in question is 'Land at Brooklands Farm' and it is included in the Draft Local Plan at Policy W4.

I am using this planning application to evidence my comments regarding the Draft Local Plan which I believe to be unjustified, flawed and therefore unsound. I attach the documents to which I refer, and trust that they will all be read fully as they contain more detailed information than I have included in my letter. I understand that Canterbury City Council (CCC) are likely to view individual planning applications as separate from the Draft Local Plan. It is my view that they are a vital source of evidence to prove that there has been no consideration by CCC to realistically take an overview of the multiple sites and how they have an impact on one another and to the district as a whole. The major concerns voiced by many residents include fresh water supply, sewage processing and disposal, the local road network (and the effect on the larger national road network), healthcare, education, the huge impact on the biodiversity of the area and the loss of food producing farmland.

The planning application was validated on Friday 2nd May 2025 and the public and consultees were then able to make comments. There are 2011 documents associated with this application (at the time of writing). A substantial number of responses refer to elements of unsoundness within the proposals, thus demonstrating that, when taken as part of the whole plan, there are numerous problems with soundness throughout. In principle, to those unfamiliar with the area, the plan may appear well constructed, but it is widely felt that the Local Authority and Central

Government are (despite regulations offering public consultation) not considering the justified concerns of the communities in the Canterbury District.

Paragraph 20b of the NPPF refers to the infrastructure including water supply and waste water. Paragraph 162 of the NPPF refers to water supply with specific resilience in the face of climate change.

Paragraph 187e of the NPPF refers to the prevention of pollution.

The letter from Southern Water dated 10th June 2025 is entitled 'Inadequate capacity in the foul network' and explains the problems that Southern Water anticipate from 'uncontrolled' development. Bearing in mind that Swalecliffe Waste Water Treatment Works will be expected to process (eventually) the human waste generated by an additional 23,000 households, care homes, schools and businesses (not including the current unfinished houses from the previous Local Plan) it appears that to add such numbers to an already struggling sewage infrastructure is unjustifiable and unsound.

The letter from SOS Whitstable (added to the planning application on the 10th July 2025) details the environmental damage, danger to public health caused by water pollution and economic downfall to Whitstable's businesses that could ensue if development proceeds without adequate infrastructure in place. It also makes reference to the fact that at the time of writing, over 7,000 homes and businesses were without water due to an outage. This lasted for six days and affected people in Whitstable, Blean, Seasalter and Dargate. Canterbury City Council and our MP have blamed South East Water for the problems, yet still the Council pursue the Local Plan and the proposed 23,000 additional houses! South East Water have stated in March 2026 that they 'will struggle to supply any housing growth above what's included in our water management plan'. If fresh water cannot be sustainably supplied to the district, the entire plan becomes unsound. Lack of water threatens people's health and welfare (including the requirement for water in a hospital environment), businesses of all types - food producers, farmers, hospitality and retailers to name but a few.

Paragraphs 115 - 118 of the NPPF refer to travel and transport.

There are numerous issues concerning road safety for all users. Whilst it is admirable that the underlying policy aspires to sustainable transport - walking, wheeling, cycling and public transport, the existing road network in the Whitstable area is prohibitive in this regard.

A memorandum from Ruth Goudie (ironically involved in the creation of the Draft Local Plan) dated 12/06/25 in response to the planning application lists specific issues that she has observed within the outline plans. It is all very well to create a Draft Local Plan on paper, but the realities of what is proposed, does not work - another example of how the plan is ineffective, unsound and flawed.

The junctions and crossing points to which Ms Goudie refers, are already hazardous to users. There has been no overall observations by Canterbury City Council regarding the increased

cumulative traffic and human activity which will be generated by the total developments in the Whitstable area.

Houses which are currently in the building stages and partly occupied or as yet unoccupied are: Grasmere Gardens 300 houses, Whitstable Heights 400 houses, Seasalter Meadows 220 houses, Montpelier Avenue 28 houses and Pearson Heights 51 houses. This totals 999 dwellings. Planning permission has been granted for a three storey care home North of the Thanet Way, which although will be unlikely to have residents' cars, will have staff, visitors and medical professionals attending. Harrier Lodge (care home South of the Thanet Way) always appears to have a full (if not overflowing) car park. The proposed number of dwellings for Whitstable as part of the Draft Local Plan is 1,990. The two housing figures total 2,989 dwellings and with a (national statistics) average of 2.36 persons per household, increases the population of the town by 7,054 individuals. Even using an unlikely estimate of only one car per household, it still adds 2,989 cars to the district. Ms Goudie rightly points out that there is a site requirement (for Brooklands Farm) to complete the Crab & Winkle Way as a route to the harbour 'because all other routes are less than ideal for walking, wheeling and cycling and are unlikely to persuade new residents to switch to sustainable transport'.

Ms Goudie also notes the current lack of bus service provision, although she suggests an improvement in the service, but this will rely on a private company who will not be prepared to invest if it is not profitable.

The road and travel networks for Whitstable are unsuitable for the level of development proposed, thus rendering the Draft Local Plan unsound, with particular reference to compliance with paragraph 15 a and b. Paragraph 15 d is relevant and appears to require scrutiny in regard to the Plan as the costs which may be involved to make the highways and byways safe for all users may be prohibitive to justify the number of dwellings proposed. Paragraph 117 a cannot be complied with in the existing Plan. Paragraph 116 should be considered relevant with regard to Whitstable sites within the Plan as there is likely to be an unacceptable impact on highway safety.

Ms Goudie also makes reference to approximately 180m of South Street, part of the National Cycle Route, where cyclists will contend with a 'length of route which will be more heavily trafficked than at present because of the development traffic'. There is insufficient space to create a cycle lane for this stretch thus rendering cyclists at great risk of harm.

Kent County Council Growth, Environment & Transport department, in a letter dated September 2025, raise a holding objection to the planning application. The first ten pages cite numerous concerns from the Local Highway Authority. The County Council refer to the stretch of South Street to which Ms Goudie refers. They ask that more consideration be given to cycling improvements along that section. If this is not achievable, the Plan is not complying with paragraph 117 c of the NPPF.

Kent County Council discuss bus provision. They state that private bus companies are not obliged to use private streets, thus the roads must be adopted by CCC. They also state that a

bus service will need to be procured by the developer of the site and run for a minimum of 10 years from the occupation of the 200th dwelling. If this is not achievable, then the Plan does not comply with paragraph 117 a of the NPPF.

Kent County Council comment on Impact Assessment - this of course only concerns the Brooklands Farm Planning Application - and have requested their own review of all junction models. They believe that the existing models appear to overestimate capacity and they ask for the models to be corrected before they comment. With regard to the soundness of the Draft Local Plan for the Whitstable district, there have not been any combined impact assessments combining the impacts from all proposed developments ie the potential for an additional 2,989 or more cars using the local road network. The figure of 2,989 cars does not include other vehicles such as vans, lorries and delivery vehicles. There is also a proposal for two schools on the Brooklands Farm site, along with a care home, shops etc within a 'community hub' and an industrial area - which can only be an estimated number of vehicles and traffic movements on a daily basis. The inevitable increase in traffic movements in the district will not comply with paragraph 117 c of the NPPF. Paragraph 116 of the NPPF should be considered relevant as the combined impact of additional traffic to the Canterbury district over the duration of the Plan with 23,000 dwellings and inevitable cars will create an unacceptable impact on highway safety.

Kent County Council make reference to the South Street / Millstrood Road junction and state that a mini roundabout at this location is unacceptable. This junction is where the off road section of the Crab & Winkle Way cycle path meets South Street and cyclists negotiate the 180m of the road (as per the comments by Ms Goudie), thus making the route even more hazardous to users. This does not comply with paragraph 115 b and 117 a and c of the NPPF.

The County Council continues to question the modelling conducted on the majority of junctions along the A2990 (Old Thanet Way). I will reiterate my earlier comments regarding viewing the overall usage of the road network taking into consideration, all of the proposed developments included in the local plan, all of which will use the A2990 as the primary access route. A further increase in vehicular traffic will be the proposed Park & Bus at 'Land South of the Thanet Way' which allows for 300 parking spaces. It appears that this facility is primarily for the use of visitors to the town (tourism is a major part of Whitstable's economy) to try and prevent them from driving into the town to try and access the limited parking available. This adds to the anticipated number of additional cars on the local roads - a new figure of 3,289 cars. Paragraph 116 of the NPPF must be considered, and the developments should be prevented based on the likelihood of an unacceptable impact on highway safety.

National Highways, in a document dated 23 February 2026, also recommend that planning permission should not be granted for a specified period (until 23rd May 2026) when it can be further reviewed. The first point raised is the impact that could affect Junction 7 (Brenley) of the M2. The M2 joins the A2 and the A299, which becomes the A2990 at the Whitstable slip road. There are numerous developments proposed (including 2,000 houses at Brenley on Duchy of Cornwall land), the access to all of which utilise the M2/A2/A299 corridors. The 23,000 dwellings proposed for the Canterbury District will all use junction 7 of the M2 whether they are

positioned North or South of the city. All the new developments in North Kent and Thanet should be questioned under paragraph 116 of the NPPF. National Highways have commented that they require further detailed traffic counts for the Brenley junction - solely based on the Brooklands Farm planning application. They appear aware of other development proposals in the area but have not (it seems) combined all proposals and the traffic increases that will ensue. Whilst there is focus on sustainable transport, there will be inevitable increases in car journeys throughout the area, thus raising whether paragraph 116 of the NPPF should be brought into effect.

Active Travel England (ATE) have responded to the planning application in several letters. In a letter dated 10 June 2025, they state that they are not in a position to support the application. They state a number of unanswered questions from their review of the planning application. In a letter dated 23 June 2025, they are still unable to support the application. One reason stated is that the obvious routes likely to be used by those who are walking, wheeling or cycling are not overlooked and are unlit, thus leading people using those routes to feel unsafe during the hours of darkness which does not comply with paragraph 117 c of the NPPF. ATE suggest that the alternative routes that people may take are not assessed by the applicant. ATE also identify that certain routes present a 'significant barrier' to safe travel - the Thanet Way A2990 as a major issue, due to no safe crossing places and traffic travelling at speed.

Active Travel England also make reference to the fact that people are likely to walk when their destination is 800m or 10 minutes away. They note that the secondary school (The Whitstable School) is 1km away. There is a grammar school system in Kent, and the nearest grammar schools are either in Canterbury or Faversham. The former sees pupils using a bus service (at a cost to parents - where if there is more than one child travelling, it may be more economically viable to take them in a car) and the latter, a train ride. If the Crab & Winkle Way remains unlit and generates a safety concern for children walking to the train station, the likely outcome is that parents will drive their children instead of letting them walk! The proposed secondary school at Bodkin Farm (another site within the Draft Local Plan) is more than walking distance, and will undoubtedly lead to children being driven to school. Paragraph 118 of the NPPF requires a travel plan - this must include all current and 'in progress' sites, and the proposed new sites within the Draft Local Plan.

Active Travel England state in a letter dated 15 December 2025 that they are still unable to support the planning application. The organisation had received no further answers to their questions pertaining to the site. They have however seen correspondence from both Kent County Council and Canterbury City Council regarding the completion of the Crab & Winkle Way from Milstrood Road to Whitstable Harbour. If the developer of the Brooklands Farm site does not comply with the condition to extend and complete the Crab & Winkle Way, the site lacks safe and usable routes for new residents to move about. The Thanet Way A2990 and the railway line present fixed and hazardous boundaries to the site. These circumstances do not comply with paragraph 115 a and b, or paragraph 117 c.

The letter dated 15 December 2025 also makes reference to primary schools. A primary school and a SEND school are proposed on the Brooklands Farm site, but there are no time frames as to when a school might be built. This leaves the closest primary school at a distance of over 2.5km away. School start and end times would see large amounts of car journeys when children are delivered and collected from local primary schools. Those times of the day are the most congested times currently, and the local roads can become almost gridlocked.

It should be noted that Canterbury is 6 miles South of Whitstable. The Crab & Winkle Way is a shared pathway allowing cycling and walking. With regard to the distances that people are prepared to walk or cycle, it will only be committed cyclists who would use the route to get to Canterbury. The path is unlit and the same rationale regarding safety will apply during hours of darkness and the winter months. I imagine that a proposal to light the path would result in opposition from wildlife groups, and artificial lighting will have a detrimental effect on the wild creatures who live in the woodland. The Crab & Winkle Way can realistically only be viewed as a sustainable transport link between Millstrood Road and Whitstable, and not as a realistic route to Canterbury. ATE also agree with KCC and CCC that the 180m stretch of South Street between Millstrood Road and the site requires safety improvements.

A further letter from Active Travel England dated 26 February 2026 again states that they are unable to support the application. They summarise their concerns which have not been addressed by the applicant. They state that the scope of the infrastructure must extend beyond the boundary of the site in order to comply with paragraph 117 a of the NPPF and that a 'viable alternative to the private car' is unlikely to materialise while the following matters remain outstanding'. Those matters are the Crab & Winkle Way, the severance resulting from the A2990 and the railway line, South Street and Millstrood Road connectivity and improvements to The Ridgeway and Chestfield Road.

A further letter from Kent County Council dated 10 February 2026 continues to place a holding objection to the planning application. A number of comments are made further to the earlier letter from KCC. The upgrade and completion of the Crab & Winkle Way and refers to Policy W4 in the Draft Local Plan where strategic cycling upgrades are an explicit requirement. If this work is not undertaken, paragraph 115 a and paragraph 117 a and c of the NPPF are not complied with. The 180m section of South Street (referred to in earlier documents) is acknowledged to have been addressed by the proposal to place cycle symbols on the road to increase driver awareness - this action does very little to reassure cyclists that they are safe to use that section of road. The junction at Millstrood Road and South Street is noted (even with alteration to plans) not to 'show any lateral shift on the South Street Northern arm' - the very section where the 180m stretch is located!

This letter also refers to 'Committed Developments', noting that Land South of the Thanet Way and Bodkin Farm (referenced earlier) are in a position where 'both developments need to be included in updated junction modelling for all junctions so that the impact along the Thanet Way corridor can be properly assessed'. I note that not all current and prospective developments are mentioned and reiterate that they all need to be included in junction assessments. Again,

Section 116 of the NPPF should come into play when considering the cumulative impact of all the development in the Whitstable district. When the Draft Local Plan proposes to add 23,000 houses (and all the supporting developments including industrial areas, shops and schools etc) the entire district risks gridlock. Despite the 'vision led' transport plan, the reality is that residents will not walk, wheel or cycle or use public transport to move around the district, but will continue to use private cars to go about their daily business, whatever that may be!

The applicant, with regard to the Outline Planning Application for Brooklands Farm has been offered the opportunity to resolve the issues regarding roads and transport, and from the ongoing responses from KCC in particular, are unable to provide satisfactory solutions. If the reality of a planning application raises these issues, it shows that the practicalities of the Draft Local Plan cannot comply with many parts of the NPPF, thus leading me to conclude that the Draft Local Plan is unsound, as it is impossible to meet development needs without adversely affecting the quality of life for current residents and unrealistic for the Local Council to pass plans for sites within their Local Plan (although the current Labour led council at Canterbury have made unlawful suggestions regarding voting at planning to their Liberal Democrat colleagues, causing the Liberal Democrats to leave the coalition of the two groups. There have been suspicions recently that the labour group and Council officers have used somewhat underhanded means to convince members of the planning committee to vote applications through despite legitimate reasons to defer or vote against the application, because they have been told that developers will appeal, and CCC cannot afford to lose the case and subsequent legal costs).

Kent County Council Public Rights of Way & Access Service have responded to the planning application in a letter dated 19th March 2026. They discuss a variety of issues and place a holding objection until mitigation proposals are provided. They have made such comments with reference to paragraph 105 of the NPPF.

SPOKES, East Kent Cycle Campaign, in a letter dated 6 July 2025 have praised the concepts of providing cycling routes. Their observations however and their suggested solutions appear to be unrealistic and potentially prohibitively expensive.

In policy SS4 of the Draft Local Plan, there is minimal reference to Whitstable. The main focus concerning Whitstable is the extension of the Crab & Winkle Way from South Street to the harbour and the creation of a new slip road from the New Thanet Way A299 at a junction with Chestfield Road. The concept appears to be that this new junction will be used by residents of the dwellings and businesses created at Brooklands Farm. In reality, it is more likely that it will generate all manner of traffic and that Chestfield Road itself and the main road through the proposed development will become a 'rat run' for those who are trying to avoid the congestion at the Whitstable off slip (junction where the A299 becomes the A2990). The rationale behind the proposal does not take this into account, and merely endeavours to justify the inclusion of large developments at Whitstable and tries to 'pull the wool over the eyes' of the existing residents in that traffic movement will be away from residences. The proposal of an additional junction at this point will only serve to add vehicular traffic to Chestfield, through the development at Brooklands

Farm itself and onto South Street. Brooklands Farm is not a suitable site for such a large development and the decision to include it is a major flaw within the Draft Local Plan. Fast roads, local roads and a railway line prevent development in accordance with the NPPF with particular regard to the furtherance of sustainable transport.

At the initial public consultation meeting concerning the Draft Local Plan, held on the 24th April 2024, Dr Ribchester (local GP) stated that in order to meet the basic medical needs of the increased population due to development, Whitstable would require an additional 31 GPs (there is of course a national shortage of trained GPs) and that the current three medical centres are at capacity ie all usable consulting rooms are utilised fully. Nowhere in the Draft Local Plan is there any mention of a new medical centre! This is a major flaw in the proposals when Canterbury City Council intends to add 23,000 dwellings to the district, which (using the national average again) will add 54,280 people to the population.

Our hospitals in this part of Kent are Kent & Canterbury, Canterbury (there is no A&E), The Queen Elizabeth, the Queen Mother (QEQM) hospital, Margate, and the William Harvey at Ashford. Emergency patients are taken to or attend either the QEQM or William Harvey. On the 12th January 2026, QEQM declared a critical incident due to high demand and insufficient beds. This situation lasted until the 20th January. On February 3rd 2026, a critical incident was declared at the William Harvey due to 'exceptional demand and full beds'. This situation lasted until the 6th February. To add (as a minimum) 54,280 people (not including the residents of the one existing and two proposed care homes in Whitstable) to the Canterbury district alone (bearing in mind that Thanet and Ashford both have huge numbers of people to accommodate within their local plans) is reckless and will lead to preventable deaths in the county. This is a major flaw in the Draft Local Plan and is a highly unsound decision without a guarantee that a new hospital in the district is built, equipped and fully staffed (staff base ready to work as the population increases) prior to any developments proceeding.

Kent and Medway NHS have responded to the planning application in a letter dated 3 July 2025. They make reference to costs that would be required to be provided by the developer in CIL and Section 106 funding to cover Primary and Community Care and Acute Care based on the anticipated population (they state 3079 solely based on the Brooklands Farm proposal). The total costs are £6,287,708 and they stipulate that the funding should be linked to the commencement or the early stage of development, with the funding being available in full and not provided in phases. They state that 'the need from this development, along with other new developments, will need to be met through the creation of additional capacity in primary and community care facilities'. It should be remembered that this is one of many sites to be developed as part of the Draft Local Plan, and that the costs above only refer to Brooklands Farm. There is no request in the above figure for capital expense for mental health services as they form part of community based services, but that an increased population will impact the NHS.

The final paragraph of the letter from the NHS states 'It is, however, important to note that large housing developments impact on the provision of acute, community and mental health services.

New housing should not negatively impact on the existing population's access to healthcare services'. Paragraph 27 a of the NPPF is not complied with unless tangible plans for healthcare are included within the Draft Local Plan.

The press have widely reported that the current government do not prioritise wildlife when it comes to development. The NPPF in paragraphs 187 a, b and e, 192 a, b and 193 a, b and c all refer to the requirement to preserving the existing flora and fauna of a site. Paragraph 195 states that development is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects) without appropriate assessment. Kent Wildlife Trust in a letter dated 16th June 2025 make comments regarding the importance of the Brooklands Farm site as a wildlife habitat, including its proximity to the Blean Woodland Complex and associated habitats. KWT also comment on the ancient woodland and the presence of priority and red-list species eg hazel dormouse. They provide detail about the predation statistics of the domestic cat and estimate that 430 - 445 cats may live on the development and are likely to (on average) kill 3.5 prey items per month, that is 1,505 - 1,558 prey creatures per month. They also point out that Convict's Wood (ancient woodland) is protected under policies in Canterbury Council's existing Local Plan adopted in 2017. KWT raise that the developer has not conducted sufficient surveys of the site to ascertain more detailed information in regard to the wildlife that inhabits or visits the area. This is also the opinion of the Ecological Advice Service from KCC in a letter dated 10 November 2025.

Natural England, in an email (ref 541124) do not comment on the planning application, but offer advice on environmental decision making.

The letter referred to above from KCC Ecological Advice Service makes reference to the ancient woodland. They raise paragraph 193 c of the NPPF which along with Canterbury Local Plan (2017) Policy LB7, which both state that suitable mitigation should be in place in order to develop near the site. There is insufficient and unsatisfactory mitigation provided by the developer for the proposal to comply with these regulations.

The developer, it appears, conducted the minimal amount of surveys to ascertain the true figures for the flora and fauna which/who inhabit Brooklands Farm. Canterbury City Council, in their eagerness to fulfil completion of their Draft local plan have not challenged the developer to provide more information, thus making the decision making process flawed due to basing it on insufficient evidence and failing to comply with paragraph 187 a, b and d, paragraph 192 a and b and paragraph 193 b and c. Paragraphs 193 a and paragraph 195 should apply to the site at Brooklands Farm and it should not be included in the Draft Local Plan.

Paragraph 193 b applies to the SSSI at Long Rock, Swalecliffe through which Swalecliffe Brook flows to the estuary. Swalecliffe Brook runs through the Brooklands Farm site (through the ancient woodland) and could carry pollutants of many types eg water run off from construction and post construction, which could contaminate the SSSI endangering the flora and fauna which is protected there.

CPRE Kent have commented in a document added to the planning application on the 10th July 2025. They object to the application on nine points. The first point they make is that 'the site is outside the current urban area of Whitstable as identified on the Adopted Local Plan Proposal Map and does not fall within one of the "exceptions" criteria listed in policy HD4 of the Adopted Local Plan (2017)'. They express concern that a precedent will be set, in that developers are making planning applications before the Local Plan has been adopted and scrutinised (Bodkin Farm and Land South of the Thanet Way have both been subject to planning applications. CCC have passed the latter further to 'threatening' elected councillors on the planning committee that the district is in presumption, so they must vote in favour. The former has been deferred for the time being for further details to be ascertained). CPRE state that to pass planning before the adoption of a local plan undermines the planning process by predetermining decisions about the scale, location and phasing of new development. The advantage of having early speculative planning applications submitted is that documents from organisations commenting on the outline plan, allow us to thoroughly examine whether the Local Plan is justified and sound, and to compare it to the criteria within the NPPF.

CPRE reiterate the concerns expressed by the KWT regarding the ancient woodland on the site. They request a 50m buffer zone around both the woodland and waterway, rather than the 30m proposed by the developer. They also refer to the SSSI of the West Blean and Thornden Woods. They describe the area of high biodiversity value with rare flora and fauna and comment that the applicant has given 'little consideration' to these impacts. They agree with KCC that surveys for beavers should be conducted. They ask for a planning condition to ensure that there is no lighting near hedgerows or woodland and for bat friendly lighting - this does not comply with the lighting requests for walking and cycling routes!

CPRE raise the Canterbury Landscape Character Appraisal which designates the site as being within LCA C2 Chestfield farmland, and quote from the Canterbury Landscape Character Assessment and Biodiversity Appraisal October 2020, where the open rural setting of the A299 should be preserved.

CPRE challenge the conclusion that the land, according to the applicant is not Best and Most Versatile. They note that 52 out of 53 of the soil tests are graded 3a (BMV), and that development for housing would be contrary to policy EMP 12 (Agricultural Land) of the Adopted Local Plan (2017). CPRE's points raise the question of is it justifiable to put forward this site for development when it is valuable as productive farmland (part of the food chain) and provides a habitat for a diverse range of plants, mammals, insects and birds, many of whom are rare or endangered. The proposal to include Brooklands Farm in the Draft Local Plan in this respect does not comply with paragraph 187 a and b, paragraph 192 a and b of the NPPF. Paragraph 193 a, b and c and paragraph 195 of the NPPF should be considered and Brooklands Farm should not be part of the Draft Local Plan.

A number of local organisations have commented on the planning application for Brooklands Farm and the documents are attached as they contain information that undermines the soundness of Canterbury City Council's Draft Local Plan:

Save Brooklands Farmland Campaign Group (dated 2nd July 2025) comment on Highways & Transport, Sewage, Flood Risk & Surface Water, Water Supply, Health & Education, Area of High Landscape Value, Landscape & Visual Impact Assessment (LVIA) & Build Design, Best & Versatile Farmland, Biodiversity & Wildlife and Miscellaneous. The NPPF is not specifically referred to in all aspects of the document but the points within all apply to various parts of the NPPF. Grampian requirements are also included should the planning application be approved. This document contains numerous valid reasons to prove that the Draft Local Plan is flawed and therefore unsound.

The Save Brooklands Local Residents' Group (dated 20th Feb 2026) comment with regard to later additions to the planning application made by the developer. The subjects covered are Highways and Flooding. This document contains information that shows that attempts by the developer to remedy previously raised questions are still unable to provide convincing evidence that the plan is sound.

The Whitstable Society in a document dated July 2025 comment on Relationship of the Application to the Local Plan, Traffic Highways, Transport, Accessibility and movement, Area of High Landscape Value, Agricultural Land, Flooding, Biodiversity, Socio Economics (including Medical Facilities), Summary of Permissible Grounds for Refusal and Appendix 1. Landscape Assessment Criteria - how the Brooklands landscape measures up. This document provides details that have not been provided by the developer and factual information that appears to have been ignored by Canterbury City Council when they have included Brooklands Farm in the Draft Local Plan. All of this information supports the belief that the Draft Local Plan is flawed and fails to comply with numerous parts of the NPPF.

The Whitstable Society added a second document dated 10th Feb 2026 further to a technical note being added by the developer dated 17-12-2025 and only added to the planning application on the 19th January 2026. The document challenges the re-modelling of various junctions, and raises further questions as to the modelling of multiple junctions carried out by the developer. It is pointed out that it still does not appear to model all of the proposed developments and the impact that will have on the local road network. The traffic modelling for the Brooklands Farm site as a part of the Draft Local Plan is seriously flawed and the developer appears unable to resolve the issues raised. Number 6 refers to the junction of South Street and Millstrood Road and the fact that safety is a very serious issue. This junction is where the Crab & Winkle Way meets the roads and does not appear to have any safe and usable solution, thus it cannot comply with paragraph 115 b, and paragraph 117 a and c of the NPPF. This evidence further indicates that the proposal to develop Brooklands Farm as part of the Local Plan is impractical, flawed and unsound.

The Grasmere Village Residents' Association (GVRA) commented in a document dated May 2025. The residents live in 42 properties on the unadopted section of Grasmere Road. They initially comment that Brooklands Farm is not in the Adopted Local Plan of 2017, therefore they oppose the planning application as the Draft Local Plan is still in process. They note that the Draft Local Plan must be reviewed by the Planning Inspectorate, but as previously mentioned,

the fact that there is a planning application and responses, shows that the proposal for development at Brooklands Farm has numerous barriers for the practical matters involved in building what is in reality a village on productive farmland.

The residents note that in the 2017 Local Plan, Brooklands Farm was identified as An Area of High Landscape Value (AHLV). Within their comments on the environment, they refer to the fact that Swalecliffe Brook has regularly flooded (the developer does not propose to build within the flood plain, but run off will naturally enter the Brook) and that residences along the Brook as it flows towards the estuary have suffered with flooding. The residents who do not live on the immediate boundaries of the site must have their quality of life considered under paragraph 170 of the NPPF.

Grasmere Village Residents' Association propose that the land at Brooklands Farm should be nominated as Green Gap between the existing building line of Whitstable/Chestfield and the edge of The Blean woodlands complex.

In section 5 of their document they explain in some detail the effect that the additional traffic will have on the routes to Canterbury. They observe that the Draft Local Plan does not address journeys between Whitstable and Canterbury. They are another group of residents who have identified yet another flaw in the Draft Local Plan.

Hackington Parish Council have submitted a comment, added to the planning application on the 3rd July 2025. They too raise concerns regarding traffic impact on Hackington Road which runs through the village of Tyler Hill. This is the road between Chestfield and Canterbury. The residents are rightly concerned that traffic can be problematic currently, but to add to the numbers of cars likely to be using the road should the Brooklands Farm (and all the Whitstable developments) go ahead, that the lives of residents of Tyler Hill residents will be put at risk and their quality of life will be severely adversely affected.

Chestfield Parish Council submitted a document dated 30 June 2025. There are 17 sections within the document. Section 8 refers to Brooklands Farm as being in an Area of High Landscape Value (Local Plan 2017). They also add that the farm was included in the Blean Woods Special Landscape Area (SLA) specified in the Canterbury Local Plan 1998. It remains as an AHLV. Throughout the document Chestfield Parish Council offer some solutions to the problems they foresee. They conclude however, that they urge Canterbury City Council to refuse the application.

Hernhill Parish Council in a document added to the planning application on the 4th August 2025, also opposed the proposal. They provide a concise list of their concerns and view that such a development will affect their community, despite Hernhill being some distance away. Their last point is that a development will put 'further pressure and demand on water supply. Parts of our parish was recently affected by severe water outages'.

Canterbury Reform UK wrote a letter which was added to the planning application on the 30th June 2025. They write on behalf of their 1000 members. They oppose the application due to a lack of infrastructure (traffic congestion, healthcare, sewage capacity and contamination, building design, biodiversity and food security), and ask that Canterbury City Council listen to the people it serves.

Our MP, Rosie Duffield has written a letter dated Friday 4th July 2025 in which she expresses concerns about the suitability of the site at Brooklands Farm. Ms Duffield writes primarily about the water supply and the disruption in 2025 where homes were left without water. She states that 'further housing developments at this location will add further pressure to the already crumbling water infrastructure systems'. Ms Duffield also states that she has heard from numerous constituents concerned about the detrimental impact on biodiversity, road safety and demand for local services - she shares these concerns, and asks that the need for new housing not be detrimental to existing residents.

The local Green Party Councillors Clare Turnbull and Stuart Heaver submitted a document, added to the planning application on the 3rd July 2025, in which they list the reasons they oppose the development at Brooklands Farm. They state that there are numerous material planning considerations which justify a refusal of this 'unpopular and environmentally catastrophic outline planning application'. They ask that it be viewed cumulatively with all the other developments in the area.

Ms Turnbull and Mr Heaver list paragraphs 7, 116, 187e, 193a/b and 198 of the NPPF as critical legal areas on which to base an objection. They justify their concerns with examples detailing specific circumstances with regard to negative impact on biodiversity, inadequate water and wastewater infrastructure and road safety.

Whitstable Labour Councillors submitted a document on the 20th June 2025. It opens by stating that it is a 'principled objection' on behalf of Cllrs Chris Cornell, Charlotte Cornell and Simon Warley. Naomi Smith is a member of the planning committee and does not comment.

The document lists numerous issues with the planning application's lack of compliance with the NPPF and describes all the issues raised by others about this planning application. The last paragraph reiterates this, but that they believe that this planning application should not have been submitted before the finalisation of the Local Plan.

It should be noted that both Mr and Mrs Cornell sit on the committee who have created the Draft Local Plan, so are therefore biased in their confidence in it (and voted, along with all Labour councillors to proceed to this Regulation 19 stage) despite the fact that they have raised so many issues to oppose the planning application - issues that appear to show that the site cannot be included in the Plan for so many reasons, and that the Draft Local Plan is flawed, unrealistic and is seemingly impossible to fulfil.

Councillors James Flanagan and Dr Peter Old who represent Chestfield residents, submitted a document of objection which was added to the planning application on the 10th July 2025. They object regarding several topics - transport and traffic management, flooding and sewage, local environment, ecology and amenity, further considerations and cumulative impact of this and other developments. They compare the planning application to the Local Plan 2017, and where relevant the Draft Local Plan and the NPPF.

I would urge the Planning Inspectorate to reassess the housing need for the district to reduce the requirement placed upon Canterbury City Council. It is well known locally that our own housing list is approximately 3,000 and that a large percentage of the social and affordable homes being built in the district are being purchased by London boroughs to accommodate their residents requiring safe and secure housing. Canterbury City Council is under immense pressure to find sites in the area to satisfy the alleged housing need figure generated by Central Government, but the area (in fact the entire county) is restricted with regard to water supply and waste water treatment and disposal, a road network which is currently unfit for purpose and a health system that has had to announce 'critical incidents' at our two main hospitals. Canterbury, Whitstable and Herne Bay simply cannot accommodate nor sustain such a huge increase in population.

I believe that the current Draft Local Plan is unsound for the reasons above and evidenced by the documents from the planning application. I do not believe that Canterbury City Council have fully considered all the practical issues which will be generated in the attempt to fulfil this Local Plan should it be adopted. I urge the Planning Inspectorate to scrutinise the details and the evidence, and to instruct Canterbury City Council to reconsider all aspects of the plan in the interests of the residents (current and future) to not jeopardise their health, welfare and quality of life, and to put those people as a priority above Canterbury City Council's desire to satisfy Central Government dictats.

Yours Faithfully



Alison Tappenden



**WATER
for LIFE**

from

**Southern
Water** 

Canterbury City Council
Military Road
Canterbury
CT1 1YW

Your ref
CA/25/00779

Our ref
DSA000044209

Date
10th of June 2025

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield..

Site: Land At Brooklands Farm, Whitstable.

Thank you for your correspondence, please see our comments below regarding the above application.

Inadequate capacity in the foul network

Network Capacity refers to the available capacity in our underground assets that carry water and wastewater to WWTWs. This includes a range of pipe sizes and material types, Wastewater Pumping Stations (WPS) and supporting infrastructure. Some capacity issues may be addressed with operational changes, others may require physical works on our assets. We may identify where several developments would benefit from a larger network reinforcement programme to serve them all where significant growth is taking place in close proximity.

Part of our evaluation looks at the risk of flooding incidents arising from the additional flow of material in terms of 'hydraulic overload'. This means we consider whether there is enough room in the pipes for the likely maximum flow from the connection itself. This assessment does not include random events such as ingress of water from broken pipes, changes in flow arising from blockages or unidentified additional flows from misconnections, these are dealt with through other processes outside of our asset growth planning team as they are operational incidents.



We do not object to any development on the grounds of Network Capacity, every development has a right to be able to 'communicate with', or connect to, the sewer network under section 106 of the Water Industry Act 1990. We also have a statutory obligation to provide the sewer network and treatment facilities to enable connection, therefore we would only request that developments align occupation with our provision of services.

Where reinforcement projects cannot be completed within 24 months of the request to connect we will work with the developer to agree alternative solutions whilst the work is completed.

Network Capacity is independent of capacity at the WWTW and growth is planned in a different way though in some cases we may have parallel projects to both reinforce both the network and upgrade the treatment works but this is often not required.

For full details of our connection charging arrangement visit: Connection charging arrangements (southernwater.co.uk)

Southern Water has undertaken a capacity check to understand the impact that the additional foul sewerage flows from the proposed development will have on the existing public sewer network. This indicates that these additional flows may lead to an increased risk of foul flooding from the sewer network. Any network reinforcement that is deemed necessary to mitigate this will be provided by Southern Water.

Southern Water will liaise with the developer in order to review if the delivery of our network reinforcement aligns with the proposed occupation of the development, as it will take time to design and deliver any such reinforcement. It may be possible for some initial dwellings to connect, pending network reinforcement. Southern Water will review and advise on this following consideration of the development programme and the extent of network reinforcement required. Please provide your developments build out rates to buildoutdata@southernwater.co.uk

Southern Water will carry out detailed network modelling as part of this review which may require existing flows to be monitored. This will enable us to establish the extent of any works required.

Southern Water endeavour to provide reinforcement within 24 months of planning consent being granted (Full or Outline) however for more complex applications our assessment of the timescales needed will require an allowance for the following which may result in an extension of the 24 month period:

- Initial feasibility, detail modelling and preliminary estimates.
- Flow monitoring (If required)
- Detailed design, including land negotiations.
- Construction.

Proposed SUDS features

If it is the intention of the developer for Southern Water to adopt the proposed SuDS, the system shall be designed and constructed in line with the Design and Construction Guidance www.water.org.uk/sewerage-sector-guidance-approved-documents/

No Soakaways should be connected to the public surface water sewer.



The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS). Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption of SuDS will be considered if requested by the developer if they comply with: Design and Construction Guidance (Appendix C), CIRIA guidance and Southern Water SuDS Guidance available here:

<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>

<https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS>

<https://www.southernwater.co.uk/media/14ndl3db/suds-final-080824.pdf>

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991.

Tree planting

We have restrictions on the proposed tree planting adjacent to Southern Water sewers, rising mains or water mains. Reference should be made to Southern Water's publication "A Guide to Tree Planting near water Mains and Sewers" (https://www.southernwater.co.uk/media/pddob0vn/ds-tree-planting-guide-1_nwm.pdf) and the Sewerage Sector Guidance (<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>) with regards to any landscaping proposals and our restrictions and maintenance of tree planting adjacent to sewers, rising mains and water mains.

Condition: In order to protect public apparatus, Southern Water requests that if consent is granted, the following pre commencement condition is attached to the planning permission; The developer must advise the local authority (in consultation with Southern Water) of the landscaping proposals in proximity of public apparatus in order to protect it in accordance with Southern Water's guidance, prior to the commencement of the development.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119)

Website: [southernwater.co.uk](https://www.southernwater.co.uk) or by email at: SouthernWaterPlanning@southernwater.co.uk



Yours faithfully,

Future Growth Planning Team

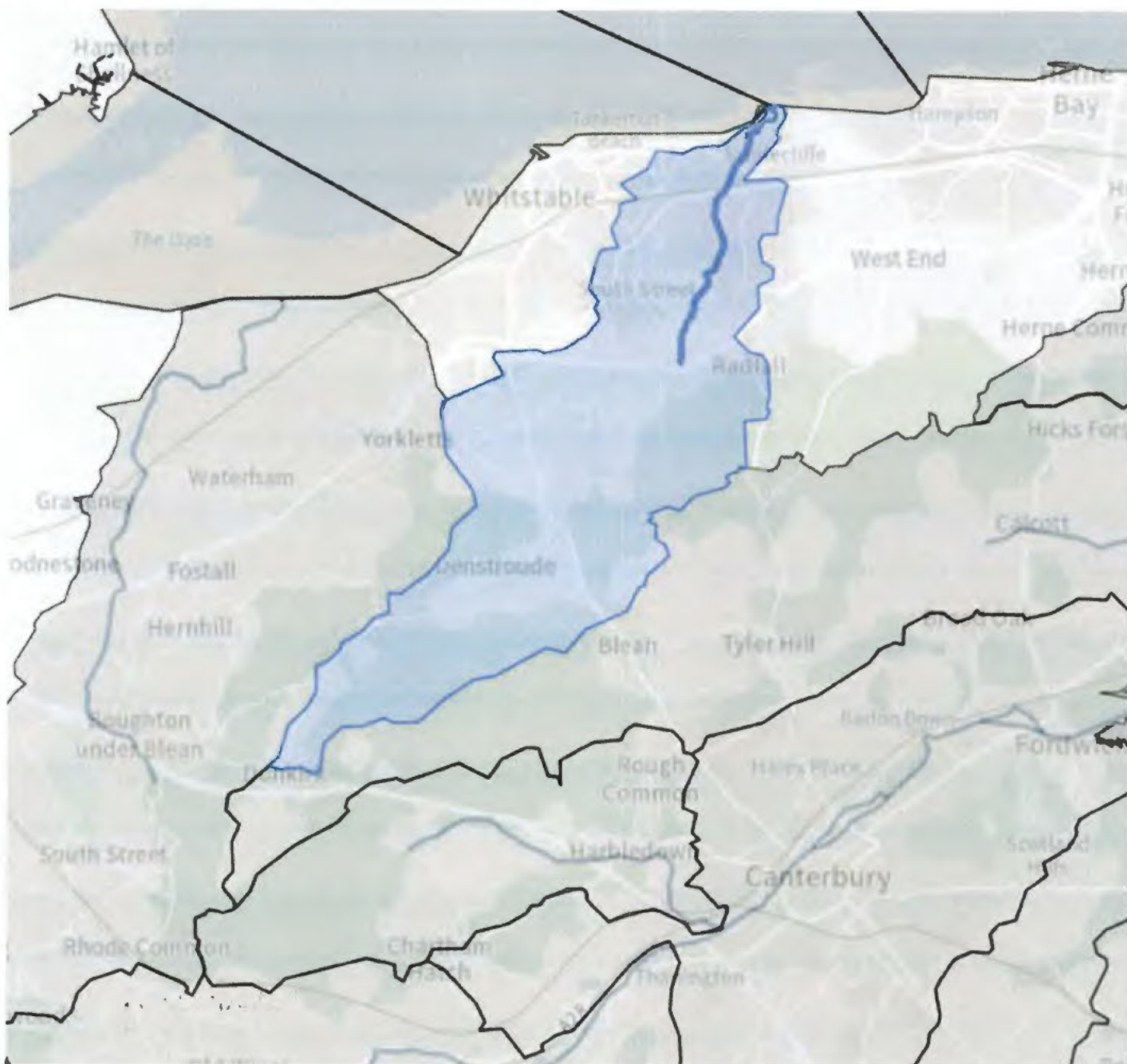
southernwater.co.uk/developing-building/planning-your-development

Our mission is to protect the sea and coastal communities in south east England by eliminating sewage pollution and promoting biodiversity. We are objecting to this planning application based on environmental impact.

Swalecliffe is protected under the Water Framework Directive (WFD)

Swalecliffe Brook discharges into the North Sea at Long Rock between Whitstable and Herne Bay. Right through the middle of this planning application map is the river basin that flows down to the brook. This is known as The Swalecliffe Brook Water Body.

There is a River Basin Plan (RBMP) in place for this area. These are put in place as a legal framework for protecting and improving water environment. River Basin Management Plans (RBMPs) aim to prevent deterioration of the water environment (groundwater, rivers, lakes, estuaries and transitional coastal waters) and improve water quality by managing water in natural river basin districts. Construction activities can introduce sediment, chemicals, and other pollutants into the watercourse, harming aquatic life and potentially impacting downstream water users



This (RBMP) has been classified with poor ecological status. Any building excavation or works will add to the deterioration which could lead to further pollution added to the Brook and the surrounding landscape.

This area is also protected under the Sites of Special Scientific Interest (England) (SSSI)



Southern Water have carried out extensive site surveys of this area and have found Water Voles which has halted further restoration works to the brook and further works up stream. These are protected under the Wildlife and Countryside Act.

This development could harm the long-term conservation or survival of these species. Urbanisation of floodplains and a general increase in development have led to the direct loss of habitat and the loss of riverside vegetation. Water voles in Great Britain are classified as endangered on the GB Red List for mammals. This means they are considered to be facing a very high risk of extinction in the wild.

Impact on Local Services

Currently, over 7,000 homes in the catchment area are without water. Properties in Whitstable and Herne Bay have been affected following a mass outage. Southern Water has confirmed the region is officially water-stressed, meaning that demand for water is approaching—or even exceeding—the available supply. Notably, this situation has occurred without any increase in the population of the catchment area.

Droughts and water scarcity are forecast to become more frequent and severe due to climate change. On average, each person uses 130 litres of water per day. Should this development go ahead we would need at least a minimum of 364,000 litres of drinking water per day.

The majority of our water comes from groundwater aquifers, but 20% is abstracted from rivers. However, water abstraction from the River Medway is not environmentally sustainable.

Maintaining higher water levels in the river can help mitigate the effects of other environmental pressures, such as higher water temperatures and lower oxygen levels, both of which are being driven by climate change.

Swalecliffe Wastewater Treatment Works (WWTW)—lacks the capacity to cope with additional flows. Allowing further development in this area without resolving fundamental infrastructure shortfalls will increase the frequency and severity of harmful sewage discharges into the marine environment and pose significant risks to public health and biodiversity.

Key Concerns:

1. Sewage Infrastructure Is Already at Breaking Point

- The Swalecliffe WWTW has no room for physical expansion, and current capacity is barely adequate to handle existing demand.
- Any additional load from new housing will significantly increase the risk of Combined Sewer Overflows (CSOs)—which already occur with concerning regularity.

2. Environmental Degradation

- Tankerton Beach is already listed as one of the most polluted in the UK, in large part due to sewage pollution.
- Increased discharge of untreated or partially treated effluent into the sea would further reduce marine biodiversity, threaten local fisheries, and damage the protected coastal ecosystem.

3. Public Health and Economic Impact

- There is a real danger of illness from contaminated water—particularly affecting swimmers, shellfish consumers, and vulnerable populations.
- Whitstable's tourism and shellfish industries are deeply reliant on clean coastal waters. Repeated pollution incidents threaten both reputation and livelihoods.

4. Unsustainable Planning

- The proposed development contradicts principles of sustainable development as outlined in the National Planning Policy Framework (NPPF), including commitments to protect the natural environment and manage water infrastructure responsibly.
- Approving this development without sewage upgrades would be irresponsible and potentially unlawful under the Environment Act and associated water quality regulations.

Kind regards

SOS Whitstable

Memorandum



To Stevie Andrews
From Ruth Goudie
Section Transportation
Your ref CA/25/00779
Date 12/06/25

CA/25/00779|

Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.]

Land At Brooklands Farm Whitstable

Thank you for consulting me on this application.

I have read the transport assessment and travel plans and have the following comments on the sustainable transport provision:

The design and access statement and transport assessment place emphasis on the site's proximity to amenities and facilities beyond the site boundary that can be reached by foot or cycle. Whilst the distances are not great, the A2990 and railway line present a barrier even where formal crossing points are available. I find it disappointing that the developer does not consider the completion of the Crab and Winkle way to the harbour to be necessary even though this is a policy requirement for this site.

The existing dual toucan crossing from Chestfield Road to St Johns Road is convoluted and the route north is constrained under the railway bridge with only one narrow footway and no cycle facilities.

The route between Clover Rise and Foxgrove Road has a ramped bridge which is substandard for shared use cycling and would lead pedestrians and cyclists to the Ham Shades Lane railway bridge which also has substandard footways on its approaches.

An upgrade of Grasmere Road will lead to an uncontrolled crossing on the A2990 Thanet Way which is high speed and high volume, and then to Church Street and Castle Road which have discontinuous footways.

It is because of this that the site has a policy requirement to complete the Crab & Winkle Way to the harbour, including bridges because all other routes are less than ideal for walking,

wheeling and cycling and are unlikely to persuade new residents to switch to sustainable transport.

The existing Crab & Winkle way north of Old Bridge Road requires cyclists to use network rail's car park access roads, dismount to wheel down a flight of steps, cycle along a short length of path then dismount again to go under the railway underpass. If this development is going to be significantly increasing the number of pedestrians and cyclists, the developer will have to provide the bridges which will complete the route.

Routes on The Ridgeway and Chestfield Road are also referenced. The Ridgeway is an unmade bridleway. Is there a proposal to surface and light this? I would like to see improvements along Chestfield Road for active travel, both towards the railway station and to link with Molehill Road.

We have prepared a scheme to close Molehill Road which we would like the developer to take forward to link the development with Greenhill where there is an existing secondary school, and a new one proposed within the Local Plan.

The length of South Street which is proposed to be downgraded to a quiet lane is welcomed, however, it will still leave cyclists on South Street north of the new connection for approximately 180m until the off road route starts at the junction with Millstrood Road. This length of route will be more heavily trafficked than at present because of the development traffic. Cyclists and pedestrians will also have to cross the junction of the new connector road. Are interventions proposed to improve this?

Within the site a number of active travel corridors and green corridors are proposed which appear to be on the same route. Are these compatible? For example, is the surface to be suitable for cycling and wheeling? The maintenance liability for any off-road routes will need to be established, and if it is proposed that they should be adopted by the city council, a commuted sum will be required to ensure that this does not detract from our other maintenance liabilities.

At present bus services through Chestfield are one/ hour during the daytime with no provision at night. I consider that this should be improved to 3/ hour and the times extended to cover the evening. The developer will need to show that all houses and employment is within 400m of a bus stop, and that the bus calls at the Hub, and that bus stops will have shelters, high kerbs and bus stop markings.

I felt that the proposed target mode shift is very modest. We are looking for the strategic developments to be exemplars and to be significantly better than the existing as they have the opportunity to masterplan and to design in good practice from the start. I would have liked to see some improved targets and escalation of measures in the travel plan if the targets are not being achieved.

I hope that these comments are helpful.

Ruth

Ruth Goudie
Transportation Team Leader



**Growth, Environment
& Transport**

Canterbury City Council
Development Control
Military Road
Canterbury CT1 1WY

FAO: Stevie Andrews

BY EMAIL ONLY

Invicta House
Maidstone
Kent ME14 1XQ

Phone: [REDACTED]
Ask for: Simon Jones
Email: [REDACTED]

September 2025

Dear Stevie,

Re: Outline application (all matters reserved except for principal access from South Street and Chestfield Road) for a mixed-use development of up to 1350 dwellings at Land at Brooklands Farm, Whitstable (Ref: 25/00779)

Thank you for consulting Kent County Council (hereafter referred to as the County Council) on the request for an outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield at Land at Brooklands Farm, Whitstable.

In summary, and in considering the application as it currently stands, the County Council raises a **holding objection** on the following grounds:

In this response, the Local Highway Authority raises numerous issues with some of the junction capacity assessments that have been undertaken for junctions along the Old Thanet Way (A2990) and it is therefore not currently possible for the impact of the development along the Old Thanet Way to be fully considered.

The County Council has reviewed the planning application and sets out its comments below:

Highways and Transportation

These comments are made as the Local Highway Authority for Kent.

The County Council understands that the site benefits from a draft allocation in the Canterbury Local Plan (Policy W4). The policy requires various highway interventions to mitigate the impact from the proposed development including the following: 1) The need to deliver the east facing slip roads onto the A299 prior to the occupation of 50% of the total dwellings 2) New and improved cycle connections to Whitstable via the Crab & Winkle Way including extension of the Crab & Winkle Way traffic free route to the harbour and pedestrian/cycle bridge from Old Bridge Road to Teynham Road and 3) Provide a diversion of South Street through the site.

The Local Plan is currently under review by the City Council, and it is understood that the end date of the Plan will now be 2042 rather than the previous draft of the plan which was 2040. As such this application needs to be considered based on the revised end date.

The County Council, as the Highways Authority (HA) has the following comments to make on the application:

Transport Assessment

Section 2.4 - Personal Injury Accident Data – The County Council would request that up to date crash data should be sourced from the County Council Crash data team rather than Crash Map. It is also noted that the Transport Assessment does not include any accident data for 2024, and is suggested that this should be included.

Section 3.5 - Local Amenities – It is the view of the County Council that the nearest primary schools are too far from the site to be considered walkable in line with Manual for Streets guidance. This states that 'Walkable neighbourhoods' are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot.' From the far southeastern edge of the site the nearest primary school is over 2.5 kilometres away. The County Council therefore considers that there is a need for the primary school to be provided on site to cater for the proposed development.

Section 4.3 - Kent County Council Local Transport Plan 2016-2031 – This document has now been replaced with Local Transport Plan 5: Striking The Balance. The County Council would therefore suggest that this new document is referred to.

Section 5.2 - The Transport Strategy states that priority should be given to sustainable transport measures. This includes walking and cycling. There is a policy requirement in the current draft Local Plan for this site to deliver upgrades to the Crab and Winkle Way to the harbour. The County Council would echo the comments made by Canterbury City Council (CCC) Transportation Team regarding the need for these improvements as part of this proposed development. This is an important route to the Town Centre from the site given the constraints of other routes as outlined by CCC Transportation.

Paragraph 5.4.13 - The length of South Street which is proposed to be downgraded to a quiet lane is welcomed. However, this will still leave cyclists on the road along South Street north road upto the new connection for approximately 180m until the off-road route starts at the junction with Millstrood Road. This length of route will be more heavily trafficked than at present because of access from the proposed slips roads and access to the proposed site. Cyclists and pedestrians will also have to cross the junction of the new connector road. The County Council would ask that more consideration needs to be given to cycling improvements between the junction of South Street and Millstrood Road and the access to the proposed site.

Paragraph 5.4.14 - The County Council would ask that the main distributor road through the site needs to be 6.75 metres wide as per the policy requirement in the Kent Design Guide for a local distributor road. The distributor road should be subject to double yellow lines throughout its length to prevent any parking to maintain two-way vehicle flows. The proposed distributor road will also cater for buses serving the site. South Street further east towards Chestfield Road should also be widened to 6.75 metres in width as again this will act as a local distributor road to the new slips on the A299. The County Council would also suggest that this distributor road is offered for adoption as buses are not obliged to use private streets, and the site will not be supported by the Highway Authority if not accessible by bus.

Paragraph 5.5.22 – The applicant is suggesting Molehill Road will be turned into a quiet lane. However, CCC Transportation have prepared a scheme to close Molehill Road which they would like the applicant to take forward to link the development with Greenhill where there is an existing secondary school, and a new one proposed within the Local Plan. This would have to be delivered directly by the applicant via a Section 278 Highway Agreement process with Kent County Council Highways and Transportation Service.

Section 5.6 - Public Transport Provision – The proposal for a half hourly bus shuttle between the site and Whitstable will need to be procured directly by the developer with Stagecoach South East. It is suggested that the service runs for a minimum of 10 years from the occupation of the 200th dwelling on site. The County Council would suggest that Stagecoach should be consulted on these proposals to ascertain their views.

Section 5.12 A299 Junction – There is a requirement for the applicant to deliver the A299 on // off slips as per the Draft Canterbury Local Plan. The County Council would request that the slips will need to be delivered directly by the applicant as part of a Section 27B Highway Agreement with the County Council's Highways and Transportation Service. The A299 slips will improve traffic flow along some parts of the Old Thanet Way (A2990) including the existing coastbound off-slip at Whitstable, the traffic signal junction of Prospect Way // Thanet Way and the roundabout junction of Thanet Way // Bonhill Hill // Clapham Hill.

Section 6.2 - Committed Developments – A list of committed developments needs to be included within the Transport Assessment. This should be agreed with the planning department at Canterbury City Council.

Section 6.3 - Assessment Years – It is understood that the new draft of the Canterbury Local Plan will have a future year of 2042, so this future year needs to be included in the capacity assessments. It is also not clear what TEMPro growth rates have been used. The County Council would request that this be clarified as the Behaviour Change Scenario rate is not accepted in this location and the Core rates should be used.

Section 6.4 - Development Traffic Generation – There are no trip rates for the proposed SEND school on the site. The applicant will need to discuss the proposed SEND school further with colleagues in the County Council's Education team to ascertain the likely number of pupils on the site and how they will access the school so that this can be added to the proposed development traffic generation.

Section 7 - Impact Assessment – The proposed assessment traffic scenarios are acceptable and have previously been agreed with the County Council as the Highway Authority.

The County Council has asked its consultants Jacobs to undertake a review of all junction models. Overall, the junction models appear to be significantly overestimating capacity. As it stands, the models do not appear to be fit for purpose, and it would therefore not be possible to comment on the overall development impact until these issues are corrected. The County Council would be happy to share this review with the applicant in due course.

To summarise, the key concerns are:

- Unequal lane usage has not been considered. Junctions 10 APCADY model assumed all the roundabout entry is equally used, where this is not the case, the model can significantly over estimate capacity (in some cases the actual capacity could be up to half of the current modelled capacity).

- Model geometry coding does not appear to match what is on-street. In a lot of cases, half width appears to be taken too close to the roundabout entry, missing flaring from one lane to two.
- Base model validation has not been provided.
- Model files are missing for Belmont Road/Canterbury Road/Oxford Street and the New A229/ Radfall Road Junction

Section 7.5 - South Street/Chestfield Road/Radfall Hill Junction – It is the view of the County Council that the provision of a mini roundabout here is unacceptable for a variety of reasons. The speed limit along Chestfield Road is 40mph and therefore not in accordance with the Department for Transport guidance which states that mini roundabouts should not be installed where the 85th percentile speed exceeds 35 mph. Two-lane entry for mini roundabouts are also contrary to the guidance which only allows one lane entry where there is one lane exit. Junction modelling undertaken as part of the Transport Assessment in Tables 7-4 and 7-5 shows the proposed mini roundabout will be operating at / in excess of practical capacity in a 2040 future year scenario with RFCs on 0.85 in AM peak and 0.89 in PM peak. The queue on Radfall Hill goes almost as far back as the new off/on slips roundabout and there is therefore significant concern that this will result in blocking back to the roundabout and therefore preventing free flow from on/off the slips roads. The above capacity issues are also without the proposed SEND School which will introduce more vehicle trips at this junction. The County Council would therefore request that the applicant investigate an alternative arrangement at this junction that will provide more capacity.

Section 7.6 - South Street/Millstrood Road Priority Junction – It is the view of the County Council as the Highway Authority that the provision of a mini-roundabout in this location is unacceptable. This is because there is no vehicle deflection at this roundabout for vehicles travelling in a northbound or southbound direction, therefore creating potential highway safety issues. The vehicle tracking as submitted in Appendix 10 also shows the refuse vehicle going over the central island. The County Council would request that an alternative junction arrangement at this junction needs to be investigated. It is understood that the verge to the north-west is publicly maintainable highway and so can be used for any junction upgrade.

Section 7.7 - Millstrood Road/Thanet Way Roundabout Junction – It is the view of the County Council that the modelling undertaken overestimates capacity on all arms and does not take into account unequal lane uses. This should therefore be considered.

Section 7.8 - Thanet Way/Church Street Priority Junction – This junction operates within capacity and no mitigation measures are required.

Section 7.9 - Elgar Avenue/Thanet Way Roundabout Junction – The County Council considers that the modelling undertaken overestimates capacity on all arms and does not take into account unequal lane uses. The modelling should therefore be amended to take this into consideration.

Section 7.10 - Clapham Hill Northern Roundabout Junction – The County Council considers that the modelling undertaken overestimates capacity on all arms and does not take into account unequal lane uses. Clapham Hill and Thanet Way West do not account for single lane widening into 2 or 3 at the roundabout entry. The modelling should therefore be amended to take this into consideration.

Google Maps analysis at 5pm on a weekday night shows stationary or slow vehicle speeds along the Thanet Way corridor between the A299 Coastbound off-slip and this roundabout, see image below:



Section 7.11 - Clapham Hill Southern Roundabout Junction - The County Council considers that the modelling undertaken overestimates capacity on all arms and does not take into account unequal lane uses. The modelling should therefore be amended to take this into consideration.

Section 7.12 - Speedwell Road/Thanet Way Roundabout Junction – The County Council considers that the modelling undertaken overestimates capacity on all arms and does not take into account unequal lane uses. The operation of this roundabout is impacted by the capacity at the Thanet Way/ Prospect Way signalised junction as can be seen in figure 7-16 and so further junction modelling of this roundabout is required with exit blocking at this roundabout.

Section 7.13 - Belmont Road/Canterbury Road/Oxford Street – Model files have not been provided for this junction.

Section 7.14 - Chestfield Road/Thanet Way Roundabout Junction – This roundabout should be modelled together with Reeves Way/Thanet Way Roundabout. The County Council notes the comments made by Chestfield Parish Council regarding current operation of this junction. It would appear that the modelling does not appear to take account of how this roundabout is adversely affected by the very well-used formal pedestrian crossings on the western and northern arms of the roundabout. As such the applicant is required to undertake manual surveys of both of these crossings in traffic neutral months so it can be understood how the calling of these crossings affects the operation of this junction. The modelling currently undertaken overestimates capacity on all arms and does not take into account unequal lane uses and the County Council ask that this is addressed.

Section 7.15 - Reeves Way/Thanet way Roundabout Junction – The County Council would request that this roundabout should be modelled together with Chestfield Road/Thanet Way Roundabout. The modelling undertaken overestimates capacity on all arms and does not take into account unequal lane uses and the County Council would ask that this is addressed.

Section 7.16 - Foxglove Road/Clover Rise/Thanet Way Staggered Junction – It is the view of the County Council considers that the 'Major width' appears to be too high (10.5/11m modelled, but appears to be closer to 8/9m max). In addition, Minor Road visibilities also appear to be too high (visibilities do not appear to have considered visibility through bridge structures and trees). Model coding is around 100-150m, whereas some visibilities appear to be closer to 60m to 80m. The County Council would ask that this be addressed.

Section 7.17 - New A299/Radfall Road Junction – Model files have not been provided for this junction.

No junction modelling has been undertaken for Thanet Way/ Prospect Way signalised junction. The County Council request that this junction needs to be modelled as the queues from the junction back onto the A299 off-slip during peak hours. This can quite clearly be seen in figure 7-16 of the Transport Assessment which shows queuing back from this junction to the Speedwell Road/Thanet Way Roundabout Junction.

7.19 Site Access Arrangements – The proposed site access junctions will operate within capacity.

Vehicle tracking (Appendix 10) – The County Council would ask that vehicle tracking be submitted for an 11.35 metre-long refuse vehicle rather than 11.22 metres as currently submitted.

As can be seen above there are numerous issues with the junction capacity assessments that have been undertaken for junctions along the Old Thanet Way (A2990). A significant amount of the junction capacity issues will be resolved by the provision of the A299 slips at a fairly early stage in the proposed development as per the current requirement in the Draft Local Plan which requires the slips to be provided no later than 50% occupation. The County Council will further comment on the suitability of this trigger point once appropriate junction models have been submitted to us and the impact of the development along the Old Thanet Way can be fully considered.

Travel Plan

A Framework Residential Travel Plan and Employment Travel Plan have been submitted to support this planning application.

The County Council would suggest that a £500 sustainable travel voucher should also be given to each purchaser of a dwelling on the site rather than the currently suggested £150 so that sustainable travel patterns are encouraged from the outset. The voucher could be used towards any of the following: 1) Rail Travel 2) Bus Travel 3) Purchase of a bike from a local bicycle shop.

The Local Highway Authority will require a robust monitoring regime over the period of the proposed development (from the date of the occupation of the 200th dwelling or occupation of any the proposed employment uses to 5 years post last occupation on the site) so that the number of vehicle movements associated with the development can be assessed to ensure that the actual number of movements is not greater than those predicted in the Transport Assessment.

Therefore, on-site multi-modal counts will be required at the vehicle and pedestrian site access points at yearly periods over the required monitoring period. Upon final occupation of the last dwelling on-site and all of the commercial units and other on-site uses, the applicant will be required to undertake a fully complaint TRICS survey for the site including for the proposed residential and non-residential uses. This should be sent to TRICS for validation to enable this site to be uploaded to the TRICS database. The County Council would ask that a travel plan should be secured through the proposed Section 106 Agreement together with a monitoring fee of £1,000 per annum until 5 years post last occupation on the site so that County Council's Highways and Transportation Service can effectively monitor the travel plan to ensure that the initial trip rates are met.

Summary

Based on all the above comments, the County Council as the Highway Authority, have a number of significant outstanding concerns with the application as currently submitted, particularly the junction capacity assessments. The County Council would therefore wish to place a holding objection on the planning application until these matters have all been addressed in full by the applicant.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council, and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with the County Council's Highways and Transportation Service at an early stage in the design process.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissionsand-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:
<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-droppedkerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact the County Council's Highways and Transportation Service to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website: <https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissionsand-technical-guidance>. Alternatively, the County Council's Highways and Transportation Service may be contacted by telephone: 03000 418181.

Development Investment

The County Council has assessed the implications of this proposal in terms of the delivery of its community services and the latest information from the applicant. It is of the opinion that it will have an additional impact on the delivery of its services, which will require mitigation either through the direct provision of infrastructure or the payment of an appropriate financial contribution.

The Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) require that requests for development contributions of various kinds must comply with three specific legal tests:

1. Necessary,
2. Related to the development; and
3. Reasonably related in scale and kind

These tests have been duly applied in the context of this planning application and give rise to the following specific requirements (the evidence supporting these requirements is set out in the attached Appendices).

Table 1 – Contribution Request Summary

Non-Applicable Dwellings (under 56sqm GIA)	Per Applicable House	Per applicable flat	Total - indicative mix assumes 10% older person dwellings (nonapplicable for education)	Project
135	945	270		
Primary Education (New Build)	£7,081.20	£1,770.30	£7,169,715.00	Contributions requested towards provision of a new 2FE primary school on the Development.
Primary Education Land	Provision of a 2.05Ha site to accommodate a 2FE primary school. Transferred to the County Council at 'nil consideration' and according to the County Council's General Land Transfer Terms (Appendix 4)			
Secondary Education (New Build)	£5,587.19	£1,396.80	£5,657,030.55	Contribution requested towards provision of additional places within the district, and/or at a new secondary school.
Secondary Education Land	£5,037.86	£1,259.47	£5,100,834.60	Contribution requested towards a new secondary school site required to provide additional places within the district.
SEND Build	£559.83	£139.96	£566,828.55	Contributions requested towards the provision of additional SEND places and / or additional SEND facilities that serve the needs of the development.
SEND Land	Provision of a 2.05Ha site, transferred to the County Council at 'nil consideration' and according to the County Council's General Land Transfer Terms (Appendix 4)			

'Applicable' excludes: 1 bed dwellings of less than 56 sqm GIA, and any sheltered accommodation. Older Person dwellings have been included as they are not expected to result in additional pupils.

	Per Dwelling	Total (Based on 1,350 dwellings)	Project
Community Learning & Skills	£34.21	£46,183.50	Contributions requested towards additional equipment and resources for Adult Education Centres and outreach provision serving the development.
Integrated Children's Service	£74.05	£89,970.75	Contributions requested towards additional resources for Integrated Children's Services to enable expansion of capacity within the hubs and provision of outreach work in the vicinity of the development. <i>(A discount has been applied for the nonapplicable dwellings).</i>
Libraries, Registrations and Archives Service	£62.63	£84,550.50	Contributions requested towards additional library equipment, stock, services including digital infrastructure, infrastructure improvements to increase capacity, shelving and resources for the new borrowers at libraries serving the development, including Whitstable Library.

Adult Social Care	£180.88	£244,188.00	Contributions requested towards Specialist Housing in the District, Assistive Technology & Home Adaptation Equipment, Adapting Community Facilities, Sensory Facilities and Changing Places in the vicinity of the development.
	All Homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2)		
Highways	<i>Kent Highway Services will respond separately</i>		

Please note that these figures:

- are to be **index linked by the All-In Tender Price Index from Q1 2022 to the date of payment.**
- are valid for 3 months from the date of this letter after which they may need to be recalculated due to changes in district council housing trajectories, on-going planning applications, changes in capacities and forecast rolls, projects and build costs.

The Developer Contributions Guide has been approved as County Council policy. Information on the areas the County Council will seek for, contribution rates, methodology for calculation and policy justification are contained within the Guide and can be viewed [here](#).

The County Council has modelled the impact of this proposal on the provision of its existing services and the outcomes of this process are set out below and in the attached appendices:

Education

Kent County Council is the Statutory Authority for Education and is the Strategic Commissioner of Education Provision.

The assessment, using the County Council's Development Contributions Guide assessment will start with the forecast capacity of existing schools, taking in to account existing cohorts, the pre-school aged population, historic migration patterns and new residential developments in the locality. Contributions are sought based upon the additional need required, where the forecast pupil product from new developments in the locality results in the maximum capacity of local schools being exceeded.

Early Years, Education and Childcare Provision

The County Council aims to secure a sufficient long-term supply of sustainable, high-quality early years and childcare provision. It works with existing and potential providers to encourage additional provision where required, whether for Free Entitlements and/or parent/carer funded place.

Where a new 2 Form Entry Primary School is delivered, according to the Education and Skills Funding Agency (ESFA) Baseline Design, the design should include a 26-place nursery. This cost is included in the primary education new-build contribution rates for houses and flats and is therefore not subject to additional contributions.

We request that consideration is also given to the provision of space for additional private nursery premises either through a community or commercial building within the proposed development. The County Council welcomes the inclusion of private early years provision within the on-site community facilities as set out in section 6 of the Design and Access Statement.

Primary Education

The proposal is projected to give rise to additional primary school pupils during occupation of the development. This need, cumulatively with other new developments in the planning group, is assessed in **Appendix 1**.

While the education capacity assessment indicates sufficient primary school places within the planning group to accommodate the projected uplift in pupils from this development, the County Council maintains that a contribution towards primary education provision is necessary.

The proposed development's location, being outside the main urban area of Whitstable and at a considerable distance (at the limit of and beyond the statutory walking distance) from existing primary schools, raises significant sustainability concerns. This distance makes active travel (walking or cycling) to school less feasible for residents, which will likely lead to an increase in private vehicle movements for school journeys. This contradicts with the principles of sustainable development and placemaking by increasing traffic congestion, carbon emissions, and reducing opportunities for healthy lifestyles.

Therefore (and in accordance with paragraph 63 of the DfE's Guide¹), to mitigate the impact of the development on local infrastructure and promote sustainable travel patterns, the county council requests the provision of:

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1176845/Securing_Developer_Contributions_for_Education.pdf

- proportionate financial contributions per 'applicable' house/flat (as set out in Table 1 above) for the school build.
- a 2051^{re} undivided school site, transferred to the county council at nil consideration, in accordance with The County Council's Draft General Land Transfer Terms (Appendix 2)

Special Education Needs and Disabilities Provision

The Children's and Families Act 2014 and Equality Act 2010 sets out the county council's responsibilities for children and young people with Special Educational Needs and Disabilities (SEND) aged 0-25 years. The County Council [SEND Strategy \(2021-2024\)](#) sets out its vision and priorities in respect of this area of its business.

Children with more complex needs are supported through an Education, Health and Care Plan (EHCP) which sets out the provision they are entitled to. School-age pupils with EHCPs are educated in mainstream school classes, in Specialist Resourced Provisions (SRPs) on mainstream sites and in stand-alone special needs schools.

Both nationally and within Kent, the number of children and young people with an EHCP is increasing every year. SEND infrastructure in Kent is currently at capacity. Consequently, The County Council will seek contributions from all housing proposals that meet the threshold to mitigate this new demand. Across Kent, as at May 2024, there were 2074 more pupils requiring specialist SEND provision than the state-maintained sector had capacity to accommodate. 302 of these pupils were placed in state-maintained specialist SEND provisions taking them 4.1% over their capacity. The remaining 1772 pupils were placed in independent specialist provision because of the lack of spaces in state-funded provision.

Mitigation of Need

This proposal gives rise to additional pupils (Appendix 1) with Education and Health Care Plans (EHCPs) requiring extra support through specialist provision. All SEND infrastructure in Kent is currently at capacity.

Consequently, the county council is seeking to provide a new SEND School at this development.

To mitigate this need, the following is sought from this development:

Proposed Primary and SEND School Sites

This response details the County Council's initial assessment and requirements regarding the proposed primary and Special Educational Needs and Disabilities (SEND) school sites within the proposed development. Our comments aim to ensure

that the proposed provisions are suitable, deliverable, and meet the long-term educational and community needs of the development.

Currently, the County Council has concerns regarding the specific locations of the proposed schools' sites, particularly relating to noise, air pollution and increased use of internal roads abutting the school sites.

Site Location and Strategic Planning

Initial discussions with the applicant proposed locating the primary school within the Market Centre and the SEND school further south within the development. Siting schools adjacent to market centres is beneficial as it helps to establish community hubs and can support local commercial activities through increased footfall.

Site Suitability: Constraints and Considerations

The proposed locations of both school sites at the southern boundary now place them away from the heart of the development. Access here by public transport along the South Street/Chestfield Road sections of the site is limited, with more frequent bus access located towards the north, closer to Tesco.

The sites are located in residential areas. The applicant's attention is drawn to the frequent difficulties experienced by residents near schools concerning vehicle parking by parents.

Flood Risk and Public Rights of Way (PROW)

An initial desktop evaluation suggests that the proposed sites are clear of Public Rights of Way and flood zones. However, confirmation of suitability requires the provision of four corner point coordinates for each proposed site and a detailed site visit. The applicant's attention is drawn to the County Council's Draft General Transfer Terms, which specify the requirements for such sites, including any necessary surveys or indemnities.

Site Gradients

The applicant's attention is again drawn to the County Council's Draft General Transfer Terms, as the gradient of the proposed sites would require remediation to render them acceptable in terms of building and pitch layouts.

Proximity to A299 Thanet Way: Air Quality and Noise Pollution

Concerns: Air quality and noise pollution have been identified as significant potential issues due to the A299 Thanet Way being approximately 230m from the southern boundary of the proposed primary school. A site visit on 1 July 2025 at 12:00 BST (accessed via PROW CW27) observed a constant drone of traffic noise, exacerbated by a south-westerly wind. The elevated position of the A299 relative to the proposed

school site also raises the possibility of increased air pollution exposure, to which children are particularly at risk.

This concern is compounded by the close proximity of the proposed A299 slip road and roundabout, which will direct significant traffic volumes towards South Street and Chestfield Road, further increasing localised pollution.

The applicant's attention is drawn to section 1 of the Draft General Land Transfer Terms concerning proximity main roads (A and M roads).

Traffic Routes and "Rat Running" Concerns

Significant concerns exist regarding the potential for roads surrounding the proposed school sites to be used as "rat runs" to cut the corner between Chestfield Road and South Street. This could lead to an unacceptable increase in both pollution levels around the schools and the risk of vehicle related incidents involving children. Robust mitigation measures will be required to address this.

Proximity to Business/Commercial Space

The proposed school sites are located directly north of the designated business/commercial space. Concerns are raised regarding the potential health risks to children arising from the nature of businesses that may occupy these units (e.g., car spray shops or other industrial processes). A detailed assessment of potential business types and necessary protective measures will be required.

Site Sizes and Building Specifications

Site Sizes

The County Council welcomes the master-planned school site sizes of 2.05 hectares for each school, which are considered appropriate to accommodate the required facilities.

Proposed School Heights

The Department for Education (DfE) Basic Need allocation for primary schools is typically based on a two-storey model, and most recently constructed primary schools in Kent are two storeys. Therefore, the County Council does not object to the proposed primary school being up to two storeys in height.

The design of the SEND school will need to be specifically dependent on the educational needs specialism delivered by the facility. Further details on this specialism will inform the final design requirements.

Sports Hall Capacity for Community Use

Should Canterbury City Council request it, the primary school's sports hall could be designed with additional height capacity to accommodate community badminton court use. It is important to note that this would incur an additional build cost.

Transfer of School Sites and Access

Timing of Transfer

Discussions regarding the timing of the transfer of the school sites to the County Council have not yet commenced. It is crucial that these discussions are held at the earliest opportunity to ensure timely delivery.

Access Requirements

To ensure the schools are fully functional and safely accessible from day one of opening, the transfer of the sites must include established and fully operational vehicular, pedestrian, and cycling access routes. These routes must provide direct connections from the schools to both the new development and the surrounding, existing housing. This is paramount for the safety and convenience of pupils, staff, and parents.

The County Council seeks planning conditions to ensure the timely and complete provision of these essential access routes and infrastructure.

Privacy and Safeguarding

Screening of School Space

Residential properties surround the perimeters of the proposed school sites. The County Council would wish to see landscaping outside of the perimeters screening the school grounds. Further detailed discussions are required to ensure the proposed screening measures meet the County Council's specific requirements for privacy, security, and safeguarding in educational settings.

Biodiversity Net Gain (BNG)

The proposed school site sizes and the proportionate build contributions sought by the County Council do not include provision for the statutory Biodiversity Net Gain requirements. As per the County Council's Draft General Transfer Terms, it is expected that the Biodiversity Net Gain for the school sites will be provided for within the wider development and at zero cost to the County Council. This ensures that the development, in its entirety, achieves its BNG obligations without placing an additional financial burden on educational infrastructure provision.

Secondary School Provision

The proposal is projected to give rise to additional secondary school pupils during occupation of the development. This need, cumulatively with other new developments in the planning groups, is assessed in **Appendix 1**. Financial contributions towards construction and land acquisition will be required to mitigate the impact towards the projects identified in Table 1 and will be provided and delivered in accordance with the Local Planning Authority's Infrastructure Delivery Plan (where available) timetable and phasing.

The land acquisition cost is based upon current local (residential) land prices and any section 106 agreement will include a refund clause should all or any of the contribution not be used or required. The school site contribution will need to be reassessed immediately prior to the County Council taking the freehold transfer of the site to reflect the price actually paid for the land.

Provision of Education Places

Please note that the process of education places will be kept under review and may be subject to change (including possible locational change) as the Local Education Authority has to ensure provision of sufficient pupil spaces at an appropriate time and location to meet its statutory obligation under the Education Act 1996 and as the Strategic Commissioner of Education provision in the County under the Education Act 2011.

The County Council will commission additional pupil places required to mitigate the forecast impact of new residential development on local education infrastructure generally in accordance with its [Commissioning Plan for Education Provision in Kent](#) (updated annually).

Community Learning and Skills

The County Council provides Community Learning and Skills (CLS) facilities and services in line with [Framing Kent's Future – Our Council Strategy 2022/2026](#) (Priority 1 – Levelling UP Kent and Priority 2 – Infrastructure For Communities).

Appendix 4 provides detail of; the current shortfall in the provision of this service, the demand generated by the application and proportionate cost requested. Table 1 identifies the mitigating projects serving the development.

Integrated Children's Service – Youth Service/Early Years Service

The County Council has a statutory duty to provide Youth Services under section 507B of the Education Act 1996 and the statutory guidance '[Working Together to Safeguard Children](#)'.

Appendix 4 provides detail of; the current shortfall in the provision of this service, the demand generated by the application and proportionate cost requested. Table 1 identifies the mitigating projects serving the development.

Library, Registration and Archives Service

Under the [Public Libraries and Museums Act 1964](#), the County Council has a statutory duty to provide 'a comprehensive and efficient service'. The Local Government Act 1972 also requires the County Council to take proper care of its libraries and archives.

There is an assessed shortfall in provision for this service. Borrower numbers are in excess of capacity, and book stock in the District at 658 items per 1,000 population is below the National standard of 1,532.

An evaluation of the impact of this development is shown in **Appendix 4**. The appendix demonstrates; the demand generated by the application and proportionate cost requested. Table 1 identifies the mitigating projects serving the development.

Adult Social Care

The proposed development will result in additional demand upon Adult Social Care Services (ASC), including older persons and adults with Learning/Neurodevelopmental/Physical Disabilities and Mental Health Conditions.

Appendix 5 provides detail of the current shortfall in the provision of this service and also explains the statutory duty upon the County Council to provide Adult Social Care services. The appendix demonstrates the demand generated by the application, the projects serving the development and proportionate cost requested to mitigate the impact arising from this development. Table 1 also identifies the mitigating projects serving the development.

The **Department for Levelling Up, Housing and Communities** identified in June 2019 guidance [Housing for older and disabled people](#), that the need to provide housing for older & disabled people is critical. Accessible and adaptable housing enables people to live more independently and safely. The County Council requests these dwellings are built to **Building Reg Part M4(2) standard** (as a minimum) to ensure that they remain accessible throughout the lifetime of the occupants, meeting any changes in the occupants' requirements.

Implementation

The above contributions comply with the provisions of CIL Regulation 122 and are necessary to mitigate the impacts of the proposal. Where contributions will not be fully met by CIL, the Local Planning Authority is requested to seek a section 106 obligation with the developer/interested parties prior to the grant of planning

permission. The obligation should include provision for the reimbursement of the County Council's legal costs, surveyors' fees and expenses incurred in completing the Agreement. Additionally, a County Council monitoring fee of £300 for each trigger point identified for County contributions within the Agreement is also required, irrespective of whether the County Council is party to the agreement.

Any Section 106 or CIL containing contributions for the County Council's services should be shared with the authority via the Developer.Contributions@kent.gov.uk email address prior to its finalisation.

If you do not consider the contributions requested to be fair, reasonable, compliant with CIL Regulation 122 or supported for payment, it is requested that you notify us immediately and allow at least 10 working days to provide such additional supplementary information as may be necessary to assist your decision-making process in advance of the Committee report being prepared and the application being determined.

Minerals and Waste

The County Council as the Minerals and Waste Authority has examined the submitted details and can confirm that there are no land-won safeguarded minerals affected by the proposal. Moreover, it can also confirm that there are no waste management or minerals/mineral product processing facilities within the site or within 250m of the boundary.

There is therefore no land-won minerals or waste management capacity safeguarding objections or comments to make regarding this proposal.

Sustainable Urban Drainage Systems

The County Council, as Lead Local Flood Authority, provided commentary direct to the Borough Council on 2nd July 2025 (Appendix G).

Heritage Conservation

Commentary in respect of Heritage Conservation will be provided direct to the City Council in due course.

Waste

The County Council is the Waste Disposal Authority in the area and as such has a statutory duty to provide Household Waste Recycling Centres (HWRCs) and Waste Transfer Stations (WTSs) with sufficient capacity to accept arisings from across the county. Canterbury City Council is the Waste Collection Authority for this area with responsibility for kerbside collection.

The closest HWRC to the proposed development is Herne Bay HWRC. This does not have a project currently, so we would not be seeking contributions.

While the County Council has no requests, it would like to see waste and capacity mentioned in the supporting documents.

The County Council will continue to work closely with the City Council to help ensure the delivery of new housing and infrastructure in response to local needs. The County Council will welcome further engagement with the City Council and the applicant as this planning application progresses.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely,



Simon Jones

Corporate Director – Growth, Environment and Transport

Enc.

Appendix 1: Primary education evidence

Appendix 2: The County Council's Draft General Land Transfer

Appendix 3: Education Build and Land Contributions

Appendix 4: Communities Assessment Report

Appendix 5: Adult Social care Assessment Report

Appendix 6: Comments from the Lead Local Flood Authority

Appendix 1: Primary Education Evidence

KCC developer contribution assessment for Primary Education

District:	Canterbury	Non-applicable	135
Site:	Land At Brooklands Farm Whitstable	units:	945
Plan ref:	CA/25/00779	Houses:	270
Date:	17/06/2025	Flats:	1350
		Total units:	

Current and forecast pupils on roll for schools within Whitstable planning group

DfE no.	School	2023-24 (A)	2024-25 (A)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2033-34 (F)
3910	Joy Lane Primary School	613	619	608	593	571	539	514	487	474	459	448
3129	St. Alphege CE Infant School	166	168	140	129	121	111	105	103	103	103	103
3715	St. Mary's RC Primary School (Whitstable)	344	309	304	277	253	235	224	215	210	203	199
2643	Swalediffe Community Primary School	546	501	507	494	458	437	409	390	379	367	359
2268	Westmeads Community Infant School	143	141	122	115	109	100	94	93	92	92	93
3339	Whitstable & Seasalter Endowed CE Junior School	212	226	212	212	201	193	176	162	155	145	139
2269	Whitstable Junior School	219	194	217	214	195	188	170	157	149	140	133
Current and forecast pupils on roll (including the expected pupil yield from consented developments up to 31st March 2023)		2,243	2,158	2,110	2,034	1,907	1,803	1,691	1,608	1,563	1,508	1,474
Required capacity to maintain 2% surplus capacity		2,289	2,202	2,153	2,075	1,946	1,840	1,726	1,640	1,594	1,539	1,504

Current and forecast capacity for schools within Whitstable planning group

DfE no.	School	2023-24 (A)	2024-25 (A)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2033-34 (F)
3910	Joy Lane Primary School	630	630	630	630	630	630	630	630	630	630	630
3129	St. Alphege CE Infant School	180	180	180	180	180	180	180	180	180	180	180
3715	St. Mary's RC Primary School (Whitstable)	420	420	390	360	330	300	270	240	210	210	210
2643	Swalediffe Community Primary School	630	630	630	630	630	630	630	630	630	630	630
2268	Westmeads Community Infant School	180	180	180	180	180	180	180	180	180	180	180
3339	Whitstable & Seasalter Endowed CE Junior School	240	240	240	240	240	240	240	240	240	240	240
2269	Whitstable Junior School	240	240	240	240	240	240	240	240	240	240	240
Current and forecast capacity (1)		2,520	2,520	2,490	2,460	2,430	2,400	2,370	2,340	2,310	2,310	2,310

(1) including expansion projects at existing schools that have successfully passed through statutory processes but may not yet be complete

Expected pupil yield from new developments within Whitstable planning group

Planning reference	Development	Houses	Flats	Primary product
CA/25/00585	Smeads Farm, Church Street, Whitstable, Kent, CT5 1PJ	7	4	2
CA/24/00411	Prospect House Markerstudy Business Park Whitstable Kent CT5 3FD	0	7	0
CA/24/00224	Land at Bodkin Farm, Whitstable, CT5 3JD	300	0	84
CA/23/01264	Land At Ladysmith Grove/ Roberts Road, Seasalter, Whitstable, CT5 4BE	21	0	6
CA/23/00379	Land South of Old Thanet Way, Whitstable	220	0	62
CA/23/00256	Former Carters Nursery Whitstable Kent CT5 4LX	10	0	3
CA/21/02034	The Vocations Centre, Northwood Rd, Whitstable CT5 2EY	0	9	1
New developments within the planning area		558	20	158
This development		945	270	284

Assessment summary

Detail	2023-24 (A)	2024-25 (A)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2033-34 (F)
Surplus / (deficit) capacity (including the expected pupil yield from consented developments up to 31st March 2023)	231	318	337	385	484	560	644	700	716	771	806
Expected pupil yield from new developments	158	158	158	158	158	158	158	158	158	158	158
Surplus / (deficit) capacity including the expected pupil yield from new developments	74	160	179	227	326	402	486	542	558	613	648
Expected pupil yield from this development	284	284	284	284	284	284	284	284	284	284	284
Surplus / (deficit) capacity including the expected pupil yield from new developments and this development	-210	-123	-104	-56	43	119	203	258	274	330	365
Expected pupil yield from this development that on current plans for school provision cannot be accommodated	210	123	104	56	0	0	0	0	0	0	0

Background notes:

Pupil forecasts 2024 employed from September 2024. Incorporating roll data from Schools Census Autumn 2023 and 2024. Data from the Health Authority includes pre-school children born up to 31st August 2023. Forecasts use trend data over the previous three years.

Expected pupil product from new developments within the planning area

Where a section 106 agreement has been secured for a development that includes education contributions (indicated by code S106 in brackets), the expected pupil product from that development has been shown as zero. This indicates that the pupil product need arising from the development has been mitigated by the developer. Management Information, Children, Young People and Education, KCC Primary summary KCC developer contribution assessment for Secondary (Years 7-11) Education

District:	Canterbury	Non-applicable	135
Site:	Land At Brooklands Farm Whitstable	units:	945
Plan	CA/25/00779	Houses:	270
ref:	17/06/2025	Flats:	1350
Date:		Total units:	

Current and forecast pupils on roll for schools within Canterbury Coastal non-selective and Canterbury & Faversham selective planning groups

DfE no.	School	2023-24 (A)	2024-25 (A)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2033-34 (F)
5444	Barton Court Grammar School	724	741	712	718	717	724	732	744	739	735	733
5448	Herne Bay High School	1,339	1,340	1,310	1,299	1,276	1,239	1,258	1,266	1,228	1,211	1,197
4534	Simon Langton Girls' Grammar School	893	882	888	884	888	891	901	911	910	905	903
5412	Simon Langton Grammar School for Boys	793	802	784	784	793	806	819	831	832	830	831
6911	Spire Academy	733	672	735	739	741	747	757	785	784	776	782
4091	Whitstable School	1,048	994	987	957	938	907	892	867	828	784	745
5449	Queen Elizabeth's Grammar School	803	827	826	834	867	863	870	896	905	900	904
Current and forecast pupils on roll (including the expected pupil yield from consented developments up to 31st March 2023)		6,333	6,258	6,241	6,216	6,220	6,178	6,229	6,300	6,226	6,141	6,094
Required capacity to maintain 2% surplus capacity		6,462	6,386	6,369	6,343	6,347	6,304	6,356	6,428	6,353	6,266	6,219

Current and forecast capacity for schools within Canterbury Coastal non-selective and Canterbury & Faversham selective planning groups

DfE no.	School	2023-24 (A)	2024-25 (A)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2033-34 (F)
5444	Barton Court Grammar School	750	750	750	750	750	750	750	750	750	750	750
5448	Herne Bay High School	1,290	1,290	1,290	1,290	1,290	1,290	1,290	1,290	1,290	1,290	1,290
4534	Simon Langton Girls' Grammar School	825	825	825	825	825	825	825	825	825	825	825
5412	Simon Langton Grammar School for Boys	750	750	750	750	750	750	750	750	750	750	750
6911	Spire Academy	750	750	750	750	750	750	750	750	750	750	750
4091	Whitstable School	1,050	1,050	1,050	1,050	1,050	1,050	1,050	1,050	1,050	1,050	1,050
5449	Queen Elizabeth's Grammar School	780	810	840	870	900	900	900	900	900	900	900

Current and forecast capacity (1) 6,195 6,225 6,255 6,285 6,315 6,315 6,315 6,315 6,315 6,315 6,315 6,315

(1) including expansion projects at existing schools that have successfully passed through statutory processes but may not yet be complete

Expected pupil yield from new developments within Canterbury Coastal non-selective and Canterbury & Faversham selective planning groups

Appendix 2: The County Council's Draft General Land Transfer

1. Section 1

- 1.1. The following sets out the County Council's general transfer terms for land. Specific terms will be provided where abnormal site conditions exist. Prior to transfer, the developer/landowner must provide a site-specific information pack containing formal desktop reports and, if necessary, intrusive land investigation survey / reports by a competent registered expert(s).

This pack shall confirm that the land designated to be transferred is level and associated areas are free from the following (together with details of any mitigation works):

- Contamination (including radiation) and should not be located adjacent to or in close proximity to a site which would pose a risk through either noise or pollution e.g. garages spray painting, rubbish tip, factories, major roads etc
- Protected species
- Ordnance
- Rubbish (including broken glass)
- Any adverse ground and soil conditions including levels, subsidence, heave, and land slip
- Occupation
- Archaeological remains
- Existing and planned noise generation from adjoining land that would require attenuation measures in the new school design
- Poor air quality that would require mitigation measures in the new school design
- The presence of service mains such as drains sewers, electricity cables, water mains, gas lines and other utility or media crossing the land that would affect the land's ability to be developed as a school.
- Site should be an uninterrupted site e.g. free from PROW, culvert, drainage ditch
- Air monitoring stations
- Mobile masts are not located within a 250m area of the proposed school site or where there is to be an expansion of an existing educational site within the residential development.
- Land is not adjacent to a main road e.g. A or M roads

NB: The land transfer will be subject to valid surveys, which are assignable to the County Council. Surveys are generally valid for 2 years, where surveys have exceeded this period they will be required to be resurveyed to enable the land transfer to take place). Each survey should set out their expiry date and the mitigation measures required to ensure the integrity of the reports right up to the point of transfer. e.g., for ecology, vegetation management when required. The surveys are at nil cost to the County Council.

i) above flood plain level and adequately drained ii) Associated earth works (where applicable) to ensure the site level iii) close to accessible public transport (bus stop or railway station) iv) to the existing site levels (if required), specified by the County Council to allow construction of the new school to local planning authority requirements. This should include any relevant permissions required.

v) BNG Unit Survey Assessment and management plan

- 1.2. Should any of the requirements in section 1.1 not be satisfied, the developer / owner must implement, at their own cost, an agreed remediation / removal / rectification / diversion strategy prior to transfer to the County Council. This should include liaison with all statutory authorities and obtaining all necessary consents from neighbouring landowners and others as required.
- 1.3. Any drainage / remedial / removal / rectification / diversion / earth works must be designed by competent professional companies and covered by a collateral warranty in a standard industry form by the developer, for the benefit of the County Council or its nominated body, who will approve the design prior to works being commenced by the developer. This will be at nil cost to the County Council.
- 1.4. If the site is used for construction or other activities (apart from remedial / removal / rectification / diversion work) after the reports required in paragraph 1 have been provided; the developer/landowner must submit additional reports to ensure the criteria have still been met.
- 1.5. The County Council shall be granted a Licence for access onto the land prior to transfer to conduct surveys and technical investigations.
- 1.6. The land is required to meet the conditions stated within 1.1, and shall be transferred as a single, undivided site, and in the shape capable of accommodating sports pitches to the appropriate size and levels for the type of school proposed with an appropriate size and type of boundary fence, as set out in the Departments for Education School Output Specification Technical Annex 2B: External Space and Grounds – December 2023 or any updated version.
- 1.7. Before the transfer is completed, the boundaries of the land shall be clearly pegged out to the satisfaction of the County Council delegated representative. It must be fenced as per 1.6 on the site boundary in accordance with the agreed GIS co-ordinates.
- 1.8. The land shall be conveyed / transferred as freehold, unencumbered, with unrestricted access to a public highway, with vacant possession and full title guarantee to the County Council. There must be no covenants that would limit use of the land as a school or restrict ordinary school activities. New covenants must not be imposed restricting the future use of the land.

- 1.9. The land must not be within a consultation distance (CD) around any major hazard sites and major accident hazard pipelines, as determined by the Health and Safety Executive.
- 1.10. Prior to land transfer, the developer/landowner must provide, at their own cost and subject to the County Council's approval, suitable free and uninterrupted construction access to an agreed location on the site boundary. Haul roads shall be constructed, at no cost to the County Council, and maintained to a standard capable of accommodating HGVs and other construction traffic.
- 1.11. The developer/landowner is to provide, at their own cost and subject to the County Council's approval, adopted services and utilities in accordance with the requirements of Section 2.1 within an agreed point within the site boundary. These are to be of sufficient capacity and depth to accommodate the maximum potential requirement without mechanical aid upon transfer. They shall include fresh, foul and surface water, gas (if applicable), electricity, and telecommunications with High Speed Fibre Optic Broadband (minimal internal speed of 1000mbps) connection to multi point destinations and capable of connection to commercial broadband providers. Necessary statutory undertakers' plant (such as electricity sub stations or transfer stations) shall be located outside of the site boundary: The County Council shall not be liable for any associated commissioning, installation, or legal costs.
- 1.12. The owner shall provide the County Council with full drainage rights to allow discharge of all surface water from the educational / community land. The surface water management requirements for the school site must be approved by the County Council at design stage, in accordance with the flood risk assessment and/or drainage strategy contained in the planning approval.
- 1.13. Attenuation ponds / ditches sited on the educational / community site will be maintained by that site where the discharge is solely from the site. If the discharged water runs into the site from the residential development, it will be responsibility of the residential development to continue to maintain the attenuation ponds / ditches, (permission will be given at an appropriate agreed time to access the site to undertake the works).
- 1.14. The owner shall provide the County Council with foul drainage rights to allow discharge from the land into the main sewers, which must be approved by the County Council at design stage and is in accordance with the wider development planning approval.
- 1.15. The developer/ landowner, will ensure prior to land transfer that services, utilities and supply (as per the specific requirements identified in section 2) are installed to enable the build out of the educational / community provision.

- 1.16. In the event that a permanent supply not being place at the point of the land transfer the developer/landowner will ensure that they will provide temporary electricity, drainage, and water supplies to the site boundary. The type and size of temporary services shall be advised / approved by the County Council from the start of construction where formal permanent utilities are not present.
- 1.17. The developer / landowner will ensure at their cost that the permanent services, utilities and supply (as per section 2) are installed a minimum of 9 months prior to the educational / community building contract completion
- 1.18. The developer / landowner will ensure there are a minimum of two permanent highway / access points for vehicles and pedestrians which is approved by the County Council and built to the County Council's highways adoptable standard. The County Council, will not be liable for maintenance charges should the developer not chose to build it to these standards. The developer/landowner must also provide crossing points, pedestrian, railway (if required) and cycling routes on the adjoining highway networks and other measures as required by the Highway and Local Planning Authority to service the land. This will include active travel routes, linking the school site with the new development and existing dwellings.
- 1.19. Where a temporary haul road is required (outside the curtilage of the educational site) the developer / landowner will ensure its removal at their own cost, it will be not at the cost of the County Council.
- 1.20. The developer/landowner shall provide two separate points of entry / exit to the site which provides access on to the adoptable highway from the school site. This will be in compliance with the Highway Authority's 'in and out' access requirements and guided by the site layout.
- 1.21. No phone masts, overhead cables etc shall be located within 250m of a new educational site or for an existing educational site within the proposed development of the site. Where possible the developer / landowner must impose a covenant that none will be erected within this distance of any site boundary.
- 1.22. The County Council shall be granted a licence to enter as much of the developer's adjoining land as is reasonably necessary to carry out construction works on the site. The County Council shall be responsible for making good any disturbance, to adjoining owner's reasonable satisfaction.
- 1.23. The developer / landowner shall be responsible for the County Council's legal costs, surveyor's fees and administrative costs incurred during the land transfer negotiations and in completing the Section 106 Agreement. These include Land Registry costs, any easements/licences, and any other related documents (e.g. civils/ layout designs) and project management agreements / surveys / reports.

- 1.24. Site plans to a scale of 1:1250 and marked with GPS coordinates showing site levels, access, boundaries, details of any adjoining development shall be supplied to the County Council in both hard and an electronic format as agreed by the County Council.

1.25. Where the residential development continues to be built out, after the delivery of the school, the developer / landowner will ensure that operation of the school and the delivery of the national curriculum is not be disrupted, and will ensure that there is no interference/ conflict This includes, but is not restricted to, adverse conditions, disruption and inconvenience by noise, dust, fumes, traffic circulation, artificial lighting, etc.

1.26. **Biodiversity Net Gain (BNG)**

The County Council will require the applicant to provide a specific BNG assessment of the school / community land, and the developer / land owner will be required to be actively maintained as the existing habitat or manage as a habitat with the same BNG value² by the applicant at that standard until the land is transferred at Outline stage.

Where there is a land transfer required for an expansion / change of use for a school site, the costs of the necessary BNG units will be required to be provided by the developer / land owner for both the existing site and the new land provision. The developer / land owner will be required to be actively maintained as the existing habitat or manage as a habitat with the same BNG value³ by the applicant at that standard until the land is transferred at Outline stage.

In advance of the land transfer, evidence must be submitted that the agreed management regime has been implemented as agreed. If this is not the case a new BNG assessment is required to be undertaken prior to any transfer of the deemed site.

² If the applicant does not actively manage the site to ensure that habitats do not change from what was recorded within the BNG assessment, the developer / landowner will also be liable to pay for any additional costs for Units. Once the site is passed to the County Council's ownership, it will become the County Council's responsibility who will then ensure the site is actively managed until the planning application is submitted.

³ If the applicant does not actively manage the site to ensure that habitats do not change from what was recorded within the BNG assessment, the developer/ landowner will also be liable to pay for any additional costs for Units. Once the site is passed to the County Council ownership, it will become The County Council's responsibility who will then ensure the site is actively managed until the planning application is submitted.

In advance of the land transfer, the County Council will be obligated to provide a feasibility study of the proposed school design. Following receipt of the BNG assessment from the developer / land owner, the County Council will advise the developer / landowner regarding what Units will be required, which will be determined as standard (10%) or higher as depicted by the Local Planning Authority (LPA).

In advance of the land transfer, the developer / landowner will need to identify; provide sufficient; and demonstrate where the BNG Units⁴ for the school / community provision will be located which is agreed by the County Council, and there after funded / provided by the developer / landowner.

If the BNG Units are allocated within the wider development site, then the site identified for the school site within the wider development site, will require a legal agreement to be in place.

The allocated school site is not be used as a BNG Unit contributor for the wider outlined scheme (as the statutory space requirements cannot be compromised for the educational / community provision).

Where a new school site is separate from the development, a proportionate contribution will be required to cover the costs of surveys, the delivery of BNG in line with the regulations, and any associated legal fees.

Section 2

In accordance with the DFE output specification – general design brief (December 2023) or any updated version.

Primary School Service Requirements – Example for 2 forms of Entry (FE)

INCOMING SERVICES

2.1.1 ELECTRICITY

⁴ To note the identified Units could be in three forms; additional land transferred to the County Council for BNG, BNG delivered by the applicant and reserved for the school build within the wider application site, or off site mitigation secured by the developer/ landowner specifically for the school build

On some occasions, management of surface water runoff generated from the school site may be included within wider development site provision through a strategic surface water drainage system. This must comply with the allowances and provisions specified in the Drainage Strategy approved as part of the original site-wide planning application: the applicant must contact the LLFA before pursuing this approach.

The surface water drainage system must provide service levels that ensure the drainage network does not surcharge for a 1-in-11 year event or result in flooding within the site for the 1-in-30-year event and manages the 1-in-100-year plus climate change event within the site boundaries. It must also provide adequate access for inspection and maintenance.

Any drainage strategy shall comply with the latest version of Kent Drainage and Planning Policy.

Where a bus provision is needed, with the access road leading onto the school provision, the maximum BB103 area will be required to ensure safe bus travel on the curtilage of the site. The County Council's Highways input will also be required.

If land is transferred for community use this will be considered on a case by case basis.

Separate check list for community builds.

- Wrap around care on site // joined community facilities eg library, adult education etc
- Check meters for community shared buildings

2.1.7 NOTE

All of the above are indicative requirements. The County Council will need to confirm exact requirements ahead of the land transfer.

350KVa (500 amp) 3 phase incoming electrical supply for main base building with possible additional capacity supplies for:

2.1.2 GAS

A gas supply is not likely to be required.

2.1.3 WATER

15 cu m/day l/s (63mm NB) in a position to be agreed within 10m of the site boundary.

2.1.4 FIRE HYDRANT

A 200 diameter 20 l/s fire supply in accordance with fire regulations, to be in the Highway adjacent to the school entrance and within 90m from an entrance to the school building.

2.1.5. BROADBAND

Before development commences, details shall be submitted (or as part of reserved matters) for the installation of fixed telecommunication infrastructure and High-Speed Fibre Optic (minimal internal speed of 1000mbps) connections to multi point destinations to all buildings. This must provide sufficient capacity, including duct sizing, to cater for all future development phases, and flexibility to existing and future educational delivery needs. The infrastructure shall be laid out in accordance with the approved details, at the same time as other services during construction.

2.1.6. DRAINAGE

An appropriate manhole chamber shall be constructed on that part of the Site located in an appropriate position within 10m of the site boundary with an invert level of no higher than 1.45m below finished ground level enabling to discharge of foul water at a flow rate of no more than 3.0 l/s.

Surface water drainage shall be discharged in accordance with the approved strategy agreed at planning and following review by the Lead Local Flood Authority (LLFA).

In general, surface water flow from impermeable areas must discharge to the ground in the first instance, as stated within Building Regulations H3. Where underlying ground conditions are not acceptable, the site discharge rate shall be limited to greenfield runoff rates for appropriate design rainfall events. For initial design purposes, this may be assumed as 4 l/s/ha from the total impermeable area or can be calculated using standard guidance approved by the LLFA.

Reference		Year	Amount	Whitcomb
1850-1851				
1852-1853				
1854-1855				
1856-1857				
1858-1859				
1860-1861				
1862-1863				
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2042-2043				
2044-2045				
2046-2047				
2048-2049				
2050-2051				

Appendix 3: Education Build and Land Contributions

Education Build and Land Contributions

	Houses	Flats	Total
Unit Numbers	945	270	1215
Special Education Needs			
		Per house	Per flat
SEN pupil generation rate		0.0110	0.0027
New SEN Pupils generated from this development			11
New Special Educational Need			
		per House	per Flat
New Build/Expansion Rate	£50,893.35	£559.83	£139.96
Contribution requested towards New SEN School Build			£566,828.55

Notes

Costs above will vary dependant upon land price at the date of transfer of the school site to the County Council.
Totals above will vary if development mix changes and land prices change

Appendix 4: Communities Assessment Report

Development Contributions Assessment

Site Name Reference No: CA/25/00779

District: Canterbury

Development Size: 1350

Non-Applicable Dwellings (under 56sqm GIA) Land At Brooklands Farm
Whitstable: 135

COMMUNITY LEARNING & SKILLS (CLS)

CLS generally operates from one central location per district owned by the County Council. Many practical courses require resources (e.g. potter's wheels, kilns, stained glassing making equipment) that are not portable. Locations per district can be found on the Kent Adult Education website.

Provision of general courses (such as modern foreign languages, Maths, English and ESOL) are at capacity within these main centres. To increase capacity, CSL operates an outreach programme to bring services directly to communities: new developments will be required to contribute towards the cost of equipment and resources.

There is currently physical capacity within the hubs for specialist courses. However, increased enrolments will place additional demands on IT, learning technology and other equipment. New developments will also be expected to contribute towards this.

New adult participation from this development: 61 clients
Contributions requested from this development - £34.21 per dwelling

1350 dwellings from this proposal leads to a requirement for £46,183.50

Contributions requested towards additional equipment and resources for Adult Education Centres and outreach provision serving the development.

INTEGRATED CHILDREN'S SERVICES - YOUTH / EARLY YEARS SERVICE

Historically, services for children and young people have been delivered from a static facility, typically youth/children's centres. The level of growth planned for each district will see the majority of development taking place away from the main hubs. To increase capacity and provide for the additional need created by new developments, much of the Youth/Early Years Services will be provided via Mobile/Outreach work. This will enable services to be delivered in the vicinity of new developments, increasing the likelihood of children, young people and parent/carers engaging with them. Therefore, all

development will be expected to make contributions towards equipment and resources to enable Mobile/Outreach work to take place.

For expansions and enhancements of youth hubs and children's centres, including provision of specialist equipment and resources to increase capacity, this will be determined on a case-by-case basis, to mitigate the impact of growth. District provision will be assessed, and contributions requested where there is a project.

This new youth/early years service from this development - 168 clients
Contributions requested from this development £74.05 per dwelling

1350 dwellings from this proposal leads to a requirement for £89,970.75

Contributions requested towards additional resources for Integrated Children's Services to enable expansion of capacity within the hubs and provision of outreach work in the vicinity of the development.

LIBRARIES, REGISTRATIONS AND ARCHIVES (LRA)

New developments will place additional demands for both physical (hard copy) books and digital (eBooks/E-Audio) stock. The National Library Standard upper threshold recommends 1532 items per 1000 population; where stock levels are below this, contributions will be sought.

Library capacity has historically been based on Museums, Libraries and Archives (MLA) recommendation of 30sqm per 1,000 population – the County Council does not currently meet this standard and has no plans to increase the number of libraries in Kent (the possible exception is the provision of new space on strategic sites/garden communities). In most cases, it will seek instead to meet the need generated by new growth by:

- Improving existing facilities
- Refits and reconfiguration
- Intensification of use

Library bookstock items per 1,000 population for Canterbury (Dec 2022) - 658

Target: National Library Standard bookstock items per 1,000

Population Threshold - 1532

New borrowers from this development - 350 borrowers

Contributions requested from this development - £62.63 per dwelling

1350 dwellings from this proposal leads to a requirement of £84,550.50

Towards additional resources, equipment and book stock (including reconfiguration of space) at local libraries serving the development.

Net contributions requested for the County Council's Communities' Services
- £220,704.75

Contributions requested from this development

£244,188.00

Contributions requested towards Specialist Housing in the District, Assistive Technology & Home Adaptation Equipment, Adapting Community Facilities, Sensory Facilities and Changing Places in the vicinity of the development.

Note: These projects will be delivered once the money is collected except where the implementation of the proposed project(s) relies upon pooled funds, then the project will commence as soon as practicable once the funding target has been reached.

Appendix 5: Adult Social care Assessment Report

ADULT SOCIAL CARE ASSESSMENT REPORT APPENDIX 5

Development Contributions Assessment over the planning period 1/1/2019 to 31/12/2039

Site Name	Land At Brooklands Farm Whitstable
Reference No.	CA/25/00779
District	Canterbury
Assessment Date	05/06/2025
Development Size	1,350
Net Social Care contributions requested: Social Care and Health Services	£244,188.00
Kent County Council has statutory* responsibilities to provide a variety of services that support and care for vulnerable adults and children across the county. In line with the County Council's Strategy**, the modern focus of the service is to support adults to live fulfilling and independent lives at home and in their community, ensuring adults receive the right care when they need it, and are also supported to get back on their feet when it is appropriate and possible. To support this strategy, the County Council seeks contributions toward five priority areas and may choose to apply the whole contribution to a single project, or proportionately between projects. The contribution from the development is the same. The result is greater certainty of project delivery and benefit to new communities to put together workable projects for the community and clients. Proposed new housing development results in additional demands upon Adult Social Care (ASC) services from increases in older people and also adults with Learning, Physical and/or Mental Health Disabilities. Available care capacity is fully allocated already, with no spare capacity to meet additional demand arising from this and other new developments. The focus of Adult Social Care is currently on the five areas listed below, offering a preventative approach to providing care. Based on an agreed set of service delivery models, an annual assessment of the impact of new and existing housing on these services has been carried out. Only the financial impacts relating to new housing are displayed. Note: Client numbers are rounded for display purposes, but costs are based on unrounded figures * Under the Care Act 2014, Mental Health Act 1993 and Mental Capacity Act 2005 **https://www.kent.gov.uk/about-the-council/strategies-and-policies/adult-social-care-policies/your-life-your-wellbeing	

A. ASSISTIVE TECHNOLOGY & HOME ADAPTATION EQUIPMENT	Assistive Technology systems and Home Adaptation Equipment are delivered to vulnerable adults in their own homes, enabling them to: live with the confidence that help is available when they urgently need it and to remain independent in their own homes.
B. ADAPTING COMMUNITY FACILITIES	Adapting Community Facilities to be accessible for those with both mental and physical disabilities means vulnerable adults can access other support services and facilities safely and comfortably.
C. SENSORY FACILITIES	Sensory facilities use innovative technology to provide a relaxing or stimulating environment for people of all ages with sensory impairment conditions. The facilities may be used to calm stress and anxiety, or to encourage sensory development and social engagement.
D. CHANGING PLACE	Changing Places have additional features than standard accessible toilets to meet the needs of people with a range of disabilities and their carers. These toilets are usually located in or near a popular public area to ensure suitable facilities are available for use by vulnerable adults when necessary.
E. SPECIALIST CARE HOUSING	Specialist care housing includes extra care accommodation and other care living accommodation for those clients with special requirements. These requirements include but are not limited to, the elderly and those with physical and learning requirements.
New Social Care Clients generated from this development: to 2039)	
125 client(s) 1,883 clients	

Appendix 6: Comments from the Lead Local Flood Authority



Stevie Andrews
Canterbury City Council
Planning Department
14 Rose Lane
Canterbury
Kent
CT1 2UR

Flood and Water Management
Invicta House
Maidstone
Kent
ME14 1XX

Website: www.kent.gov.uk/flooding

Email: suds@kent.gov.uk

Tel: 03000 41 41 41

Our Ref: CCC/2025/105425 **Date:**
2 July 2025

Application No: CA/25/00779

Location: Land At Brooklands Farm, Whitstable

Proposal: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

Thank you for your consultation on the above referenced planning application.

Kent County Council as Lead Local Flood Authority have the following comments:

Having reviewed the Environmental Statement and the accompanying Flood Risk Assessment and Drainage Strategy, we can confirm that we are generally accepting of the principles proposed for managing surface water, namely a system of attenuation basins with a restricted outfall of 4l/s/Ha to existing surrounding watercourse network.

There are however a number of matters which we would appreciate addressed as part of any future Reserved Matters application (given that the drainage design will be required to be submitted at the same time in order to demonstrate feasibility of layout, etc).

Whilst we note and accept that the geology of the Site suggests that infiltration may not be a viable method for surface water discharge, we would point out that the method of utilising permeable surfaces could still be of use and should be considered given the updated requirement within DEFRA's recently updated National Standards and the increased 'promotion' for the interception of the first 5mm of rainfall to be demonstrated.

Further to this the new standards now require for a standardised 10% urban creep uplift value to be applied to all development proposals rather than the old pro rated method based on housing densities. The design submitted utilises a 6% urban uplift figure, however given the land space available to allow for increased provision of attenuation and that SuDS are to be proposed for each net developable area as they come forward we are satisfied that this can be dealt with as part of a detailed design submission.

It is noted that a 45% climate change uplift has only been applied to the 1% AEP rainfall event, as part of the detailed design submission we will expect for the 'upper end' allowance to be designed for both the 30 (3.3%) and 100 (1%) year storm scenarios. Furthermore we note that storm durations only upto the 1440 minute storm have been utilised in the hydraulic analysis, given that this length of storm is cited as the critical event for a number of the AEP in the analysis we would expect for events upto the 10080 minute storm to be considered as part of the detailed design or for the hydrographs of the critical event to be provided to show they are not 'capped off' as a result.

Whilst the unrestricted volume of water from the South Street catchment has been detailed we would ask at what rate will this be discharged at?

Any feature capable of conveying water can be considered to fall under the definition of an 'ordinary watercourse' and we would urge the applicant to contact us prior to undertaking any works that may affect any watercourse/ditch/stream or any other feature which has a drainage or water conveyance function. Any works that have the potential to affect the watercourse or ditch's ability to convey water will require our formal flood defence consent (including culvert removal, access culverts and outfall structures). Please contact flood@kent.gov.uk for further information.

Given that the proposal utilises the Swalecliffe Brook and that this is designated as a main river it is essential that the Environment Agency are consulted and their views considered with regards to base flows, etc. Furthermore Any work in, under, over or within 8 metres of the banks of a designated main river or the toe of a flood defence requires a Flood Risk Activity Permit (FRAP). As of 6th April 2016, the Water Resources Act 1991 and associated land drainage byelaws have been amended and flood defence consents now fall under the Environmental Permitting (England and Wales) Regulations 2010. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Should you be minded to grant approval we would recommend that the following conditions be attached:

Condition:

No development shall take place until the details required by Condition 1 (assumed to be reserved matters condition for layout) shall demonstrate that requirements for surface water drainage for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm can be accommodated within the proposed development layout.

Reason:

To ensure the development is served by satisfactory arrangements for the disposal of surface water and that they are incorporated into the proposed layouts.

Condition:

Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the Flood Risk Assessment and Drainage Strategy dated March 2025 and prepared by Brookbanks Consulting. The submitted scheme shall demonstrate compliance with the required technical standards at the time of submission and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site at a rate no greater than 4l/s/Ha.

The detailed drainage scheme will also be required to demonstrate that any existing surface water flow paths can be accommodated and disposed of without increase to flood risk on or off site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason:

To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the

proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

Condition:

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason:

To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 182 of the National Planning Policy Framework.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

Neil Clarke

Sustainable Drainage Team Leader
Flood and Water Management



National Highways Planning Response (NHPR 25-01)

Formal Recommendation to an Application for Planning Permission

From: Hermes Luli (Head of Planning & Development)
Operations Directorate
South East Region
National Highways
PlanningSE@nationalhighways.co.uk

To: Canterbury City Council (FAO Joanna Dymowska)
Planning@canterbury.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: CA/25/00779

Location: Land At Brooklands Farm, Whitstable

Proposal: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

National Highways Ref: NH/26/14985

Referring to the consultation on a planning application dated 2 January 2026 referenced above, in the vicinity of the M2 Junction 7 (Brenley Corner) that forms part of the Strategic Road Network, notice is hereby given that National Highways formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);

d) ~~recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: 	Date: 23 February 2026				
<table border="0" style="width: 100%;"><tr><td style="width: 50%;">Name: Bidur Rajbhandari</td><td style="width: 50%;">Position: Assistant Spatial Planner</td></tr><tr><td colspan="2" style="padding-top: 10px;">National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk</td></tr></table>		Name: Bidur Rajbhandari	Position: Assistant Spatial Planner	National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk	
Name: Bidur Rajbhandari	Position: Assistant Spatial Planner				
National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk					

Annex A National Highways' assessment of the proposed development

¹ Where relevant, further information will be provided within Annex A.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommend that planning permission not be granted for a specified period:

It is recommended that the application should not be determined for a period of three months until **23 May 2026**.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly at M2 Junction 7.

National Highways was consulted for a preapplication scoping by the Brookbanks on behalf of Hallam Land Management (the applicant) on 24/06/2024 with a scoping note for this development site.

NH provided an Advice Note (referred to as AN01) to Brookbanks on 15/07/2024 with a number of actions for the applicant to consider. These have not been addressed and are outlined below for us to make an informed decision on the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Throughout this response **ACTION points** for the applicant are highlighted in **underlined bold**.

Transport Assessment Review

Policy Context

As has been made clear in AN 01, National Highways considered at the pre-application stage that the impact of traffic using the A299 to reach the M2 at Junction 7 (Brenley Corner) would require further assessment. As such, the requirements of Circular 01/22 should be considered in the policy section and aligned with the corresponding requirements of the NPPF.

Accordingly, the TA is required to explicitly set out how the requirements of Circular 01/2022 have been met. This should include details of the 'Vision & Validate' approach and how this will be implemented.

Comments on the calculation and application of development trip rates are provided below.

Trip Rate and Trip Generation

Transport Vision

The submitted TA does not include any references to DfT Circular 01/2022 and does not specifically provide a transport vision for the site. Setting out the vision is required to comply with the Circular's 'Vision & Validate' approach, as well as the NPPF.

The diagram below illustrates the iterative process and evidence base that is now required in line with Circular 01/2022.

Figure 5 Steps in Preparation of a Vision-led Approach



Our review of the TA report does however identify that the core elements of a Vision-led approach are addressed, in that detailed information is presented in Section 5 of the TA report relating to proposed improvements to walking, cycling and public transport, and features of the site which will support internalization of certain trips. We have taken this into account when commenting on the trip rate calculations presented in the TA report.

Current Scenario Development

In the light of our comments above, we have reviewed the proposed development multi modal trip rates and trip generation presented in the TA, to determine their compatibility with a Vision-led approach.

The TRICS database has been used to calculate the trip rates for the various elements of the proposed development, with a summary presented in TA Table 6.2 and the raw outputs included in Appendix A. The following land uses are included:

- Residential – Private Houses;
- Residential – Affordable/Local Authority Houses;
- Residential – Retirement & Care Community;
- Education – Primary; and
- Employment – Office.

The trip rates presented for residential and education land uses are the same as those presented in the previously reviewed SN. These calculations were successfully replicated at the time of scoping review and deemed to achieve an acceptable level of precision. The trip rates for these land uses were thus accepted in principle on the basis that the vision to be presented in the full TA report would

provide appropriate justification and supporting evidence as to how these would be achieved in practice.

Whilst a full “vision” is not currently part of the TA, in respect of these land use types, we are satisfied that the supporting information provided within Section 5 of the TA is appropriate to demonstrate that the package of transport measures is compatible with the trip rates and mode splits being applied.

However, as also described in AN note 01, the trip rates we calculated directly for office / business land uses were notably higher than those produced by the applicants, generating between 38-46 more two-way vehicle trips during peak periods. After further review we noted that trip rates featured in the Scoping Note provided by Brookbanks included a survey from May 2021. This dates from a period when government restrictions on movement were in place due to the COVID-19 pandemic. With a substantial proportion of office workers working from home, the trip rates for surveys of office sites during this period would be artificially low. It was therefore requested in AN 01 that the trip rates we provided (or equivalent) should be applied in the TA report. This has not been undertaken and remains outstanding as an action.

The applicant is therefore requested to either apply the trip rates set out in AN 01 for this land use, or to present an updated set of vehicle trip rates which exclude surveys from the period when government restrictions on movement due to COVID-19 were operational.

The TA does not include trip generation for the proposed SEND school. It is noted that KCC have queried this in their initial response to the TA report and that as part of their response to KCC, the applicant identifies an additional 55 AM peak trips and none in the PM for the SEND school. We are in agreement with KCC that these trips should be included in the updated assessments.

We have also noted KCC’s request for their higher calculation of external trips in relation to the primary school to be applied, as an alternative to the calculations initially presented by the applicant which utilize Homes England factors. We are content for the applicant and KCC to reach agreement on how these figures should be applied to the wider trip generation and distribution exercises.

Trip Distribution and Assignment

The trip distribution reported in the TA has been undertaken using the 2024 cordoned version of KTM. NH previously agreed to this approach in principle, subject to further discussions around the precise scope of work and assumptions to be applied. These discussions have not taken place.

NH notes that although the Canterbury Cordon of the KTM includes M2 Junction 7 (Brenley Corner) as shown in figure 3.1 of the Jacobs modelling report at Appendix 14, the trip distribution diagrams do not extend to include M2 Junction 7.

NH requested within AN 01 that the distribution and turning-flow assessment diagrams specifically include M2 Junction 7 to capture the development's impact. We note that link-based data is provided within the TA for junction 7 (this is discussed below).

In consideration of the sensitivity of the SRN at the M2 Junction 7, we require that the distribution/assignment analysis and turning flow diagrams include this junction, to indicate the impact of proposed development trips.

SRN Capacity Assessment

The use of the cordoned KTM model (the 2040 Canterbury Cordon) is described in detail within the Jacobs modelling report included at Appendix 14. The TA states that committed developments expected to come forward within the local plan period are included in the strategic model.

AN 01 states: 'We note that the future "with development" forecasting models within the emerging KCTM (i.e. those representing the future year of 2040 with proposed Local Plan allocations included) have not yet been agreed by National Highways as suitable for use in assessing the transport impacts of the emerging Canterbury Local Plan (2040).

National Highways continues to engage in discussions with KCC regarding the model's suitability, however, should the applicant wish to use the model directly to assess the transport impacts of the proposed development, approval of the relevant models by National Highways for this purpose must be obtained first before proceeding.

We consider it unclear how exactly the applicant proposes to use the KTM to assess the impact of development traffic.

The applicant is required to provide records of correspondence (e.g. – emails, meeting minutes) with KCC setting out the exact methodology which has been agreed upon, for the consideration of National Highways.'

The Jacobs report at appendix 14 provides the required information, however it is not clear whether KCC have formally agreed to the methodology presented in the advice note.

It is noted that, subsequent to the preparation of AN 01, Jacobs have undertaken additional work with the KTM on behalf of CCC to inform their Regulation 18 and forthcoming Regulation 19 consultations.

We consider that any further modelling work undertaken using a cordon of the KTM (including any extraction of data for local modelling purposes) should ensure that the most up-to-date versions of the future year models are being

used and this should be discussed and agreed between National Highways, KCC, the applicant and Jacobs before any work commences.

The strategic model assessment includes the following scenarios:

- 2024 Base – No Development
- Scenario 1 - 2040 Future year including all committed/allocated developments and associated highway interventions (No Development)
- Scenario 2 - 2040 Future year (Scenario 1) plus the Full development at Brooklands Farm together with the new A299 junction
- Scenario 3 – 2040 Future Year (Scenario 1) plus 50% of the Brooklands Farm development (Excluding A299 junction).
- Scenario 4 – 2040 Future Year (Scenario 1) plus 75% of the Brooklands Farm development (Excluding A299 junction).
- Scenario 5 - 2040 Future year (Scenario 1) plus the full Brooklands Farm development (Excluding the A299 junction)

It is noted that no opening year assessment is proposed in the TA. **An opening year assessment, including the full development quantum, is required in accordance with Circular 01/2022.**

The TA has used level-of-service forecasts from the strategic traffic model to identify junctions for further review. However, M2 Junction 7 has not been included within these assessments.

While the TA acknowledges previous concerns from National Highways regarding M2 Junction 7, it only presents two-way traffic flow outputs for Scenarios 2 and 5. The flows at M2 Junction 7 have been inferred from the strategic assignment, and they do not provide turning movements. The flows are presented in Table 1 below:

Table 1 : Two-Way Traffic Flows at M2 Junction 7 (Brenley Corner)

Scenario	Two-Way traffic flows			
	A299	A2 Boughton Bypass	M2	A2 London Road
AM Peak				
Future 2040 Scenario 2 (Full Dev + A299 Junc)	139	11	109	20
Future 2040 Scenario 5 (100% Dev No A299 Junc)	132	5	109	20
PM Peak				
Future 2040 Scenario 4 (75% Dev No A299 Junc)	155	25	106	25
Future 2040 Scenario 5 (100% Dev No A299 Junc)	148	18	106	25

Given the size of the development and the sensitivity of the M2 Junction 7 (Brenley Corner) Roundabout, we require (at a minimum) full turning counts for this junction with development traffic flows clearly shown.

We will provide further comment on any highway capacity assessment required for the SRN once the impact of development traffic has been quantified in a satisfactory manner.

Collision Data Analysis

The TA presents CrashMap data, which NH does not consider sufficient. In response to KCC comments, the applicant has obtained Kent County Council (KCC) collision data; however, the scope of the dataset obtained does not include M2 Junction 7.

At this stage, we are unable to advise whether the collision analysis should be extended to include the SRN. At such time SRN impacts have been identified, we will be able to advise further on this matter

Travel Plan

Two Travel Plans are submitted for the development, A Residential Travel Plan and Framework Employment Travel Plan. The applicant has not provided a School Travel Plan. The Residential Travel Plan proposes a target for reduction of 10% in car travel mode share over a 5 year period. The Employment Travel Plan proposes a target for reduction of 5% in car travel mode share over 5 year period.

It is not immediately clear whether the proposed targets are based on reductions in car trips from the totals presented in the trip generation section of the TA. If this is the case, the Travel Plan should identify what additional measures (over and above those identified in the TA report) will be implemented in order to produce the additional modal shift.

CTMP Requirements

Given the location of the proposed development site, we are likely to recommend that a Construction Traffic Management Plan (CTMP) be secured via planning condition at the appropriate stage of the planning process.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 to 116 etc advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.



Active
Travel
England

Active Travel England
West Offices
Station Rise
York
YO1 6GA
Tel: 0300 330 3000

Your Ref: CA/25/00779
Our Ref: ATE/25/00723/OUT
Date: 10 June 2025

Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Planning & Development Division, Active Travel England

To: Canterbury City Council

Application Ref: CA/25/00779

Site Address: LAND AT, BROOKLANDS, BRINKWORTH, SN15 5BA

Description of development: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

Notice is hereby given that Active Travel England's formal recommendation is as follows:

Deferral: ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.

Further comments

Trip generation and assignment

Quantification of all day active travel movements generated by the development appear to be missing from the Transport Assessment and therefore the analysis presented provides very little basis or evidence upon which to build an effective strategy for a healthy and inclusive development. Please note that these must be expressed as numbers rather than percentages, in the main body of the TA rather than in the appendices. ATE expects the applicant to present a multi-modal trip generation analysis

of all modes of transport throughout the day, rather than the analysis being confined to peak hour periods.

Active Travel Route Audit

ATE expects that local pedestrian and cycling routes are identified and assessed on whether these are safe, direct, convenient and accessible for people of all abilities (paragraph 82 of the National Design Guide) or coherent, direct, safe, comfortable and attractive (core design principles in LTN 1/20). Applications that include new dwellings must demonstrate how local schools and colleges will be accessed by active travel modes and the application must include a qualitative analysis to inform any necessary improvements to the design and accessibility of key routes which should include maps, photographs and comments with regard to the following guidance, tools and plans in the assessment of key routes

- Inclusive Mobility (Chapters 3, 4, 6, 7 and 15; and Sections 5.2, 5.7, 9.1, 9.3, 9.4 and 9.7 as appropriate)
- PAS 6463: Design for the Mind (Sections 5.2.1, 5.2.3, 6.4, 7.6.2, 7.6.3, 7.7 and 11.12)
- LTN 1/20: Cycle Infrastructure Design (including Appendix A: Cycling Level of Service Tool; and Appendix B: Junction Assessment Tool)
- the government's Walking Route Audit Tool, and
- any adopted or emerging Local Cycling and Walking Infrastructure Plans (LCWIPs)

In terms of walking, it is expected that the TA will look at the quality of the surrounding and adjacent PROW and highway network, it should thoroughly audit specific walking routes to essential amenities such as public transport, schools and food shops (please note this is not an exhaustive list). ATE would expect that these routes are audited with an assessment provided on whether these are safe, direct, convenient and accessible for people of all abilities (as set out above). Access to schools and colleges is of particular importance. A qualitative analysis should inform any necessary improvements to the design and accessibility of key routes and should ideally include maps and photographs and have regard to the guidance set out above, the Walking Route Audit Tool and any adopted or emerging Local Cycling and Walking Infrastructure Plan (LCWIP).

It is noted that the TA refers to Appendix 5 and suggests that five key routes have been audited, however it was not possible to locate Appendix 5 among the documents submitted and ATE would be grateful if its attention could be directed towards them so that it is able to review these audits. It is also noted that a road safety audit has been submitted.

Pedestrian access to local amenities

Most people will only walk if their destination is less than a mile away, with a typical catchment to ensure most residents are able to walk to nearby facilities being 800 m or 10 minutes' walk. It is noted that there is a recreation ground within 290m, and a Tesco food shop including a pharmacy within 450m. The nearest secondary school is 1km away, while the nearest primary school is 2km away. It is noted that it is intended that the proposed development will include a primary school. Other facilities such as a post office and medical centre are some 1.8km away. Given that these distances are further than is ideal, it is essential that the quality of the routes towards facilities are high. It is expected that footpaths to local amenities should conform to the National Design Guide standards of being safe, direct, convenient and accessible for people of all abilities. This includes aspects such as ensuring footpaths have a minimum width of 2m and are step free, have a smooth, even surface, seating at regular intervals, are uncluttered, have good natural surveillance and lines of sight, streetlighting, wayfinding and crossing points suitable for the speed and volume of traffic along each route. ATE would welcome clarification of this via a detailed audit of the routes to local amenities as set out above; as above, please direct ATE's attention to the location of Appendix 5 of the TA as it has not been possible to locate this.

Cycling Accessibility

Further comments on this can be provided once the detailed route audit has been located as set out above. There would appear to be little dedicated cycle infrastructure in the area, though the Crab and Winkle way is noted, which is a shared facility.

Access to public transport

Bus stops providing access to fairly frequent services are within the recommended distance of 400m away. The TA does not identify whether there is the potential to improve these bus stops. It is

understood that there is a proposal for a new bus service; further information as to the extent of discussions/confirmation around this new service would be welcome.

The nearest rail station is Whitstable, around 1.7km away. While this distance is less likely to be walked, should a high quality route be provided, there is potential that some residents may be encouraged to walk there. There is also strong potential for access by cycle depending on the quality of the route.

ATE would expect that footpaths/ways to public transport nodes must conform to the National Design Guide standards of being safe, direct, convenient and accessible for people of all abilities, which includes but is not limited to routes that:

- have a minimum width of 2m, with limited pinch points no less than 1.5m
- are step-free
- have a smooth, even surface
- have seating at regular intervals
- are uncluttered
- have good natural surveillance and clear lines of sight
- have street lighting
- have wayfinding, and
- have crossing points suitable for the speed and traffic flow of the road(s)

Whitstable station has 32 cycle stands; there is potential to provide further cycle parking depending on how well the existing cycle parking is used.

Off-site transport infrastructure

As set out above, there is potentially an opportunity here to provide bus stops with the any necessary infrastructure such as seating, shelter, real-time passenger information and raised kerbs where these do not currently exist. The TA also suggests that a number of improvements including:

- Improvements to the Crab and Winkle Way along South Street linked to via a new footway/cycleway along PRow CW21, and improvements for links to Whitstable Secondary School
- A contribution towards the upgrade of CW38 between Grasmere Road and Thanet Way.
- Improvements to cycle provision along South Street alongside contributions to further links within Whitstable

ATE would suggest that the applicant work with the LHA to deliver any appropriate nearby improvements required to walking and cycling infrastructure as set out in the Draft Kent Cycling and Walking Infrastructure Plan (KCWIP). In particular, ATE consider that it would be appropriate for this development to contribute towards routes to essential facilities such as Whitstable station, as these will come under further pressure from future residents of this development and therefore it is imperative that these are brought up to standard wherever possible. Further details as to the exact nature of the proposed improvements are welcome, as well as further details around the level of contribution proposed.

Site permeability and access

It is noted that the applicant has proposed a number of access points around the perimeter of the site and the DAS suggests that these are confirmed, which is welcome. ATE considers it essential that these active travel access points are secured at this stage in order to ensure a good level of connectivity and permeability. The applicant must ensure that the the final development is designed in such a way that these routes are both overlooked and lit in order to ensure that potential future users feel safe and secure. ATE requires a commitment to this element at this stage in order to have comfort that this element will be delivered at Reserved Matters stage. It is noted that the DAS makes reference to LTN 1/20 which is welcome in helping ensure that the detailed design comes forward to a high standard.

Placemaking

The proposed development is at outline stage, however the application documents suggest that placemaking principles have been taken into account, particularly the DAS which includes references to the National Design Guide, National Model Design Code and LTN 1/20. The DAS suggests that the

layout will be permeable and easy to navigate, with the main streets tree-lined and legible. The DAS sets out that active travel routes will be prioritised, as well as being appropriately lit and overlooked. The application would benefit from further detail to substantiate how the development can maximise its potential and contribute to more comprehensive active travel routes. This could include traffic calming measures, location and type of wayfinding signage and surface materials for active travel routes; lighting for all attributes of the development and indicating the precise and suitable locations for cycle parking (as detailed below).

Cycle parking

The TA states that cycle parking on site will be compliant with council standards, located close to entrances and covered. This is welcome. Note that any cycle parking in rear gardens must be accessible without taking cycles through the home. For employment uses within the site, it is expected that employees will also be provided with secure cycle parking as well as access to trip-end facilities such as showers, lockers and changing rooms.

Travel planning

A Framework Travel Plan has been submitted as part of this application and it is expected that a final travel plan will be secured either by way of a condition or via S106 agreement. ATE would expect the final document to take into account the Government aim that 50% of all short trips are walked, wheeled or cycled by 2030; currently the projected changes in modal split (with walking forecast to remain the same, and cycling to increase by only 14%) are not ambitious and do not appear consistent with commitments made elsewhere in the application to create a development that prioritises active travel. ATE would suggest that the final document should contain specific targets, measures and sanctions should these not be achieved. The final document should also provide sufficient detail on the active travel and public transport infrastructure to be provided or improved both on-site and off-site and include detail on how its use will be embedded by initiatives and incentives to be secured through planning obligations and conditions. It should include details of effective and influential actions to be taken if targets are not met, with the intention for these to be secured and monitored (if triggered) through planning conditions and obligations.



Active
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England

Active Travel England
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Your Ref: CA/25/00779
Our Ref: ATE/25/00723/OUT
Date: 23 June 2025

Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Planning & Development Division, Active Travel England

To: Canterbury City Council

Application Ref: CA/25/00779

Site Address: Land At Brooklands Farm Whitstable

Description of development: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

Notice is hereby given that Active Travel England's formal recommendation is as follows:

Deferral: ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.

Further comments - cycling/walking route audit and proposed improvements

ATE has now identified the cycling and walking route audit submitted within the planning application and has the below further comments. This further response should therefore be read alongside its previous response.

The cycling and walking route audit identifies a number of routes, some of which include off-road routes including the Crab and Winkle Way, which could be used to access the town centre and rail station, or Thanet Way (to access Chestfield and Swaledcliffe station). While these off-road routes are very valuable leisure routes and are likely to be used during daylight hours, by their nature they are mostly unlit and in many places not overlooked, meaning they are less likely to be used after dark. It is therefore important to consider potential alternative routes likely to be used by those who do not feel safe or comfortable using this route after dark. In general, the audit does not always address issues

around personal safety/perception of safety, and this should also be considered when looking at essential routes likely to be used by future residents.

The route audit identifies a number of deficiencies, including routes that lack a dropped kerb (and presumably also tactile paving). These deficiencies will create significant barriers to those who use wheelchairs and also create difficulties for those using prams or buggies. The audit also identifies points where footways terminate and there are no formal crossing points to enable likely walking routes. It is noted that in some cases the shorter/more direct route will lack a crossing point; at some points this will create a significant barrier due to high traffic volume and speeds (eg Thanet Way junction).

Given the potential increase in trips generated by this development, ATE would expect that the applicant work with the LHA to address deficiencies where practicable and where the LHA considers it appropriate to do so. It is noted that the application documents acknowledge this and the provided audit is followed by a number of proposed improvements.

Proposed upgrades to the route to Whitstable School (via a PRow connecting the Crab and Winkle Way to Invicta) would need to take into account the fact that this route would currently appear to be unlit, which is likely to be an issue in the winter months when children would often be travelling in darkness. It is noted that potential improvements identified around the footway/cycleway on Milstrood Road and Thanet Way are subject to a review of land ownership; it would be useful for ATE to understand what stage this review is at and whether any landowners have been approached.

The potential provision of safe crossing facilities and traffic calming on Chestfield Road is welcome. The question of whether a crossing should be controlled or uncontrolled must be considered by the LHA in light of the amount of vehicle movements and speeds on this road alongside the fact that it is part of a route to a primary school.

It is noted that other potential improvements include those identified in the Draft LCWIP, including the downgrading of Molehill road to make it appropriate for cycling, and the provision of an on-road route along Chestfield Road. It is noted that the applicant states that it considers that a contribution towards this element has already been provided for due to some measures close to the site being implemented as part of the development proposal. ATE would welcome a clearer understanding of the LHA's view of this element, and indeed all potential improvements suggested, in order to ensure that they are both sufficient (in light of the significant size of the proposed development) and deliverable.



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Your Ref: **CA25/00779**
Our Ref: **ATE25/00723/OUT**
Date: 15 December 2025

Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Planning & Development Division, Active Travel England

To: Canterbury City Council

Application Ref: **CA25/00779**

Site Address: Land At Brooklands Farm Whitstable

Description of development: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off // east on slip roads to the south of Chestfield.

Notice is hereby given that Active Travel England's formal recommendation is as follows:

Deferral: ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.

Further comments

ATE notes that the applicant has submitted no further relevant documents since ATE last commented in June 2025. However, it notes that comments have since been submitted from Canterbury City Council Transportation and Kent County Council. ATE has now reviewed these comments where they concern active travel, and would offer its support for these comments.

In particular, ATE supports both KCC and CCC comments around the requirements of the draft site allocation for this site, which include a requirement to extend the Oak & White Way to the harbour, which they highlight as an important route to the town centre and a potential alternative to the barriers presented by the A299 and railway line. CCC go on to set out a number of constraints in the area which would suggest that extending the Oak & White Way would be a sensible choice in order to provide new residents with a choice around using active travel.

KCC also note that the nearest primary school is over 2.5km away. While ATE notes that a primary school is proposed to be provided on site, it is necessary to understand the proposed phasing of this development in order to ensure that future residents are not faced with a period of time where there is no primary school within walking distance.

KCC and CCC both require further consideration to be given to cycling improvements between the junction of South Street and Millstrood Road and the access to the site; ATE is supportive of this.

CCC also requires clarification around specifically which improvements are proposed for routes such as the Ridgeway, which is an unmade bridleway, and Chestfield Road, where improvements are also required. ATE is in agreement with this.



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Your Ref: CA/25/00779
Our Ref: ATE/25/00723/OUT
Date: 26 February 2026

Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Planning & Development Division, Active Travel England

To: Canterbury City Council

Application Ref: CA/25/00779

Site Address: Land At Brooklands Farm Whitstable

Description of development: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1,350 dwellings, including older persons housing (Classes C2 & C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E & F); a primary school and a SEND school, business / employment space (Use Classes B2, B8 & E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off/east on slip roads south of Chestfield.

Notice is hereby given that Active Travel England's formal recommendation is as follows:

- c. **Deferral:** ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.

1.0 Background

1.1 Active Travel England (ATE) is consulted for a further time on the above application. ATE's previous recommendations, submitted to Canterbury City Council (CCC) on **10 June, 23 June, and 15 December 2025** raised the following concerns:

- the absence of complete route audits
- incomplete trip generation, distribution and assignment for all modes
- poor-quality or unsafe off-site pedestrian and cycling routes
- barriers created by the A2990 and railway
- a requirement to complete the Crab & Winkle Way
- infrastructure along South St, Millstrood Rd, The Ridgeway and Chestfield Rd;
- insufficient Travel Plan ambition; and
- the importance of primary school phasing to ensure walkable access.

1.2 The above concerns highlight gaps in the evidence base and clarity required for a major strategic development.

2.0 Technical Note Rv0 – Accessibility Comments Review

- 2.1 A number of the above concerns are addressed in the above document, including reference to a controlled crossing on Chestfield Road, a willingness to contribute to lighting improvements, and support for an east–west link. However, there are no material updates or revisions the original Transport Assessment (TA) to provide the core evidence base around walking and cycling movements that ATE previously requested. Several major concerns remain unresolved, particularly around strategic connectivity and the adequacy of the applicant's active travel assessment.

3.0 Trip Generation, Assignment and Travel Planning

- 3.1 The request for a distribution and assignment of movements by all modes and throughout the day remains outstanding. The continued absence of this essential evidence required to deliver sustainable development fails to satisfy **NPPF paragraphs 109 and 118**, which require a vision-led approach to transport planning. As such, if the needs of pedestrians, cyclists and public transport users are to be prioritised both on and off-site in accordance with **NPPF paragraphs 115 and 117**, it therefore follows – and is reasonable to expect – that these movements are quantified and assigned via a mapping exercise to local routes similar to that which is routinely carried out for vehicle movements.
- 3.2 In respect of Travel Planning, a 10% modal shift away from car dependency is maintained within TNRv0, although ATE would query how this outcome can be considered a 'high-level' modal shift where ATE concurs with the recommendations of **Canterbury City Council (CCC)** that major strategic developments of this nature offer the best opportunity to set out and deliver a far more ambitious outcome than is being presented. This also appears to also be the intention set out within the vision and objectives of the submitted **Design and Access Statement (DAS)** as set out below.

4.0 Off-site infrastructure

- 4.1 The **DAS** sets out within its vision the following aspiration:

“to provide a substantial expansion to Whitstable's active travel network”.

- 4.2 This continues in **DAS paragraph 3.3**, where:

“The design principles strongly promote the use of non-car based travel - with particular emphasis on active travel giving priority to pedestrian and cycle movement (as promoted by the NPPF 2024, Paragraph 117a) - retaining and enhancing existing footpath routes and the provision of a network of new routes across the Site connecting to the Crab & Winkle Way and the wider area. Offering a viable alternative to the car, the aspiration for low car use helps support the creation of healthy new places and numerous other advantages and benefits of active travel.”

- 4.3 ATE notes and supports the above intention and is keen to assist the applicant and local authorities to achieve this. However, the scope of this commitment to infrastructure requires to extend beyond the red line boundary of the site in accordance with **NPPF paragraph 117a**, while a **“viable alternative to the private car”** is unlikely to materialise while the following matters remain outstanding.

4.4 ATE remains concerned that the following matters requiring a more comprehensive approach towards finding solutions if active travel connections are to be prioritised in line with the above intentions, together with the health and wellbeing of a new community that will number significantly in excess of 3,000 people:

- Improvements to the **Crab & Winkle Way** active travel route
- Overcoming the severance resulting from the **A299 / railway line**
- **South Street** and **Millstrood Road** connectivity
- Further improvements to **The Ridgeway** and **Chestfield Road**

5.0 On-site provision

5.1 ATE previously raised a query around the phasing of the proposed primary school in its December recommendations, given the concerns around the potential for the site to become occupied while absent of an educational facility for 4–11-year-olds resulting in longer off-site trips to reach alternative facilities. This query remains outstanding.

5.2 In respect of the internal layout and street typologies, ATE raises further concerns around the proposals for shared pedestrian and cycle provision. Such facilities unfortunately do little to prioritise either mode of travel and commonly lead to conflict where accompanying primary / distributor roads.

6.0 Next steps

6.1 ATE is keen to discuss the above matters in the interests of reaching a solution where confidence can be applied to the applicant's sustainable travel strategy and supporting infrastructure. As a significant and strategic site, the accompanying infrastructure to support sustainable development must match this level of growth.

6.2 Prior to any further documentation, reporting or assessment, it is requested that a meeting is held between ATE, CCC, Kent County Council and the applicant to constructively work through these outstanding matters.

6.3 Until such time as the outstanding issues above are discussed and resolved, ATE recommends application should not proceed to determination.



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Highways and Transportation
Kroner House
Eurogate Business Park
Ashford
TN24 8XU

Tel: 03000 418181
Date: 10 February 2026
Our Ref: MH

Application -	CA/25/00779
Location -	Land At Brooklands Farm, Whitstable
Proposal -	Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

Thank you for the consultation on the transport technical note dated 19th January 2026 on the Canterbury City Council planning web-site. I have the following comments to make in respect of highway matters:

Paragraph 2.1.1 onwards - **Personal Injury Accident Data** – Up to date crash data has been sourced from the KCC Crash data team. This does not indicate a pattern of crashes within the study area that would warrant further investigation as part of this planning application.

Paragraph 2.1.19 onwards – **Crab and Winkle Way upgrade requirement** - The technical note repeatedly deflects responsibility by referring to draft local plan allocation status of the site. However, Policy W4 of the draft local plan explicitly requires strategic cycling upgrades, and the TN does not commit to delivering these improvements. This route is an important active travel route from the site towards Whitstable town and seafront. Furthermore, the NPPF places greater reliance on active travel than travel by motor vehicle. The provision of upgrades to the route by providing a greater section of off-road route will encourage greater active travel to the town and seafront.

Paragraph 2.1.21 onwards – **Cycling provision along South Street** – On-road centrally placed cycle symbols in both directions are now proposed along South Street to increase driver awareness of cyclists and encourage cyclists to position themselves centrally on the lane to help reduce unnecessary overtaking. This is acceptable in principle and details of this can be secured through a suitably worded planning condition in the event that planning permission is granted for the proposals.

Paragraph 2.1.25 onwards – **Widened distributor road and South Street** - The main distributor road through the site is now proposed as 6.75 metres wide as per the policy requirement in the Kent Design Guide for a local distributor road. The distributor road should

be subject to double yellow lines throughout its length to prevent any parking to maintain two-way vehicle flows. The proposed distributor road will also cater for buses serving the site. South Street further east towards Chestfield Road should also be widened to 6.75 metres in width as again this will act as a local distributor road to the new slips on the A2999. This distributor road must be offered for adoption as buses are not obliged to use private streets, and the site will not be supported by the HHA if not accessible by bus. Amended plans should therefore be submitted showing this widened section of new road and a widened South Street.

Paragraph 2.11.26 onwards – Wodehill Road – The applicant is suggesting proposed Section 106 funding towards the closure of Wodehill Road to vehicle traffic. KCC does not currently take Section 106 funding to deliver developer schemes so this scheme would have to be delivered directly by Canterbury City Council or the developer through an appropriate Section 275 Highway Agreement. Please therefore liaise with your transportation colleagues on this matter as I understand they have prepared draft plans for the closure of Wodehill Road to vehicle traffic.

Paragraph 2.11.30 onwards – Public Transport Provision – I am not actually aware that Stagecoach have responded formally on this application. Please ensure they are consulted. The applicant has set out that during the initial phases of development, many residents would have access to the existing Bus Route No. 5 via stops at Virginia Road and Willstroad Road. It should however be noted that these services are only hourly and not deemed to be of a sufficient frequency to serve 50% of development as proposed. As a compromise I would accept the existing bus services being upgraded to half hourly at 300 occupations together with the route being provided through the site to provide this service to ensure that all residents are within a 400-metre walking distance of a bus service. Funding should also be provided for a 10-year period to ensure that funding is provided until the development is fully occupied.

Paragraph 2.11.37 – Committed Developments – The following committed developments are missing, 1)) Land South of Thames Way – 220 dwellings, a 300-space park and bus facility, 400sqm local shopping/ community facility ((23/00379)) 2)) Bodkin Farm – Mixed use development including secondary school ((including sixth form)) with indoor and outdoor sports provision, up to 300 dwellings, a care home, a Local Centre comprising up to 500m² of retail space ((Class E)) ((24/00224)). Both developments need to be included in updated junction modelling for all junctions so that the impact along the Thames Way corridor can be properly assessed.

Paragraph 2.11.39 – Assessment Years – I am prepared to accept a future assessment year of 2040 in this instance given the local plan has not yet been through examination and adopted by Canterbury City Council.

Paragraph 2.11.41 onwards – SEND School – I am satisfied that the proposed trip rates and distribution and assignment for the proposed SEND school are acceptable.

Paragraph 2.11.58 onwards – South Street // Chestfield Road // Radfall Hill Junction – As previously stated the provision of a mini-roundabout here is unacceptable. Furthermore, KCC have undertaken an assessment of current driver speeds along Chestfield Road using current speed survey data and vehicle speeds are currently in the region of the existing 40mph speed limit.

The applicant is however now promoting a 25m (CD Compact) roundabout arrangement, which conforms to design standards provided in the DMRB CD 1116. This design includes a 4m diameter island and a 17m Overtaking area. However, an updated junction capacity assessment is required with the two committed development sites above. Swept path checks for 16.5m articulated HGVs also need to be submitted given there are no width or weight restrictions

along either South Street or Chestfield Road. The proposals also need to be subject to a Stage 1 Road Safety Audit and Designers Response.

Paragraph 2.1.64 onwards - **South Street / Millstrood Road Priority Junction** – In principle a mini-roundabout is acceptable in this location subject to adequate vehicle deflection. A revised layout has been submitted in Appendix 4. However, this does not show any lateral shift on the South Street Northern arm. This needs to be provided. An updated junction capacity assessment is also required with the two committed development sites above. The amended proposals also need to be subject to a Stage 1 Road Safety Audit and Designers Response.

Paragraph 2.1.70 onwards - **Millstrood Road / Thanet Way Roundabout Junction** – An updated junction capacity assessment is required with the two committed development sites above.

Paragraph 2.1.81 onwards - **Elgar Avenue / Thanet Way Roundabout Junction** - An updated junction capacity assessment is required with the two committed development sites above.

Paragraph 2.1.84 onwards - **Clapham Hill Northern Roundabout Junction** – An updated junction capacity assessment is required with the two committed development sites above. Nonetheless the updated modelling predicts a severe impact on the Thanet Way West arm with the RFC going up from 0.96 to 1.02 with no development and 50% development with the total queue going up from 38 vehicles to 74 vehicles. This in my mind represents a severe impact and the new east facing slips are required to be delivered prior to the occupation of 50% of the dwellings on the site as per the current draft Local Plan policy for the site.

Paragraph 2.1.87 onwards - **Clapham Hill Southern Roundabout Junction** - An updated junction capacity assessment is required with the two committed development sites above.

Paragraph 2.1.90 onwards - **Speedwell Road / Thanet Way Roundabout Junction** – An updated junction capacity assessment is required with the two committed development sites above. The operation of this roundabout is impacted by the capacity at the Thanet Way / Prospect Way signalised junction and so further junction modelling of this roundabout is required with exit blocking at this roundabout.

Paragraph 2.1.93 - **Belmont Road / Canterbury Road / Oxford Street Signal Junction** – Model files have now been provided for this junction, and no further assessment is necessary.

Paragraph 2.1.96 onwards - **Chestfield Road / Thanet Way Roundabout Junction** – An updated junction capacity assessment is required with the two committed development sites above. The Chestfield Road / Thanet Way junction includes the signalised crossing on Herne Bay Road only as the DRMB guidance is that crossings only need to be included if they are within 20m of the give-way line, the signalised crossings between the junctions are 30-40m from the give way line and therefore are not included.

Paragraph 2.1.96 onwards - **Reeves Way / Thanet way Roundabout Junction** – An updated junction capacity assessment is required with the two committed development sites above.

Paragraph 2.1.100 onwards - **Foxglove Road / Clover Rise / Thanet Way Staggered Junction** – An updated junction capacity assessment is required with the two committed development sites above. The modelling submitted presents significant increased queuing and delay between a no development scenario and a 50% development scenario on the Clover Rise arm in the PM peak especially on the right hand turn movement. The delay on Clover Rise goes up from 87 seconds to 212 seconds which is considered a severe impact.

This reinforces the need for the east facing slips to be provided prior to the occupation of 50% of the dwellings to reduce queuing and delay on this arm.

It should be noted that a signalisation scheme will be delivered because of the Grasmere Gardens scheme (planning application - 17/00469) off Reeves Way. This signalisation scheme should be modelled so that it can be understood what capacity implications from the proposed development that there are on this signal scheme.

Paragraph 2.1.103 - New A299 / Radfall Road Junction – An updated junction capacity assessment is required with the two committed development sites above.

Paragraph 2.1.105 onwards - Thanet Way / Prospect Way signalised junction - An updated junction capacity assessment is required with the two committed development sites above.

Paragraph 2.1.111 - Vehicle tracking for a refuse vehicle – The updated vehicle tracking exercises are acceptable.

Summary

As can be seen above there are still numerous issues with the updated junction capacity assessments that have been undertaken for junctions along the Old Thanet Way (A2990). A significant amount of the junction capacity issues will be resolved by the provision of the A299 slips at an early stage in the proposed development as per the current requirement in the Draft Local Plan which requires the slips to be provided no later than 50% occupation. KCC will further comment on the suitability of this trigger point once appropriate junction models have been submitted to us and the impact of the development along the Old Thanet Way can be fully considered. I therefore wish to place a holding objection on the planning application until these matters have all been addressed in full by the applicant.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Yours faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.



Joanna Dymowska
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Public Rights of Way & Access Service

The Granary
Penstock Hall Farm
Canterbury Road
East Brabourne
Kent
TN25 5LL

Phone: 03000 41 71 71
Ask for: Louise Adams

Date: 19th March 2026

Your ref: CA/25/00779

Our ref: EK/LA/CW21/a31409

Dear Joanna Dymowska

PROPOSAL: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

LOCATION: Land At Brooklands Farm Whitstable

Thank you for your consultation letter received regarding the above planning application. As a general statement, KCC's Public Rights of Way and Access Service are keen to ensure that their interests are represented with respect to our statutory duty to protect and improve Public Rights of Way (PROW) in the County. The team is committed to working in partnership with all parties to achieve the aims contained within the KCC Rights of Way Improvement Plan (ROWIP) and Strategic Statement for Kent. Specifically, these relate to quality of life, supporting the rural economy, tackling disadvantage and safety issues, and providing sustainable transport choices.

Public Footpath CW21, CW27 would be directly affected and Public Bridleway CW27A and Public Footpath CW28 are adjacent to the site. There are multiple PROW in the surrounding area, e.g. CW22, CW71, CW38, CW44 etc, as well as the heavily promoted County route, the Crab and Winkle Way and the new National Trail, the King Charles III England Coast Path; the surrounding wider network would be significantly impacted in the ways mentioned above and below.

The scale of this development will significantly increase pressure on the surrounding PROW network. Substantial mitigation is therefore required to maintain safe, accessible and sustainable active travel routes.

With more specific reference to affected PROW –

Public Footpath CW21 – crosses through the site as illustrated on access & movement parameter plan. We recommend that the full length of the path is upgraded to bridleway, it is recognised as a primary active travel route and should be converted to reflect this use. This should include the short off site section between no's 158 & 156 South Street, we ask for the applicant to investigate ownership to obtain permission. This would enable a connection to the Crab & Winkle Cycle Track. The downgrading of South Street to a quiet lane is welcomed, we would ask for measures such a signage to enable a safe crossing to CW22 to the South.

The Crab and Winkle Cycle Track is a well-used route in close proximity and I would concur that the provisions of upgrades should be investigated to encourage active travel and links to the town and sea front. PROW would request a contribution towards surface improvements to CW22 to cater for the increased usage from the development.

Public Footpath CW27 – It is difficult to determine the proposals at this stage, I would please ask for engagement with the applicant. The path runs within and outside the red line boundary and it is important to clarify the sections on and an off site with regards to improvements and any upgrades to be made.

Bridleway CW27A – I note the intention to create links from the development to the bridleway off site, the surface of the bridleway is not optimal for cycling or walking and we will be seeking contributions to allow improvements to be carried out.

Public Rights of Way Impact Summary

Overall Network Impacts:

- Multiple PROW within and around the site will be affected.
- Significant increase in use is anticipated.
- Only a small number of PROW are addressed in the application; further assessment is required.
- A holding objection is placed until full mitigation proposals are provided.

Moving forward, the County Council PROW & Access Team would welcome discussions with the applicant to discuss our concerns and agree appropriate measures to mitigate and manage the PROW & access network.

Comments made with reference to NPPF Policies :

105 - Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

KCC ROWIP and Kent Design Guide

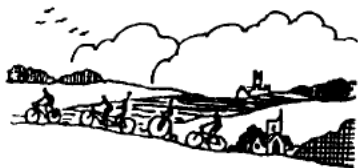
Canterbury Local Plan Policies – SP1 / SP5 / T1 / T2 / DBE1 / DBE7 / OS11 / OS12

This response is made on behalf of Kent County Council Public Rights of Way and Access Service. The views expressed should be considered only as the response of the County Council in respect of public rights of way and countryside access matters relating to the application.

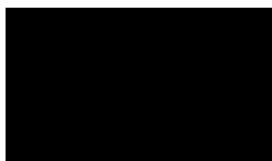
Yours sincerely

L Adams

Louise Adams
Public Rights of Way Officer
Public Rights of Way & Access Service



SPOKES



Web: www.spokeseastkent.org.uk **Email:** spokes@spokeseastkent.org.uk

Development Control
Canterbury City Council
Military Road
Canterbury
Kent
CT1 1YW

6 July 2025

Dear Sir / Madam,

Re: Planning application CA/25/00779: Land at Brooklands Farm, Whitstable

I am writing on behalf of Spokes East Kent Cycle Campaign. We campaign on behalf of our supporters for better cycle provision both in East Kent and beyond. Many of our supporters have had deep involvement with the development of Kent's existing cycle facilities and we've worked with many of KCC's officers and the district/borough officers for many decades.

Spokes aims to increase cycling levels. We wish people to choose cycling as their preferred mode of transport by making the conditions allow that choice. This can be achieved by recognising that cyclists have an equal right to the use of the highway network, recognising that cyclists are more vulnerable than motorised traffic and taking action to reduce this vulnerability, e.g. reducing speed limits, offering motor-traffic-free alternatives for cyclists, or better educating motorists on how to drive more safely. We believe that it is important to recognise that cycling should be correctly seen as an everyday means of transport, as opposed to the widespread perception that it is purely a leisure activity.

Our comments are purely in relation to the cycling aspects of this planning application.

This planning application proposes to add a substantial number of homes, schools, places of employment, and central facilities. It is located close by to an existing popular cycling and walking route, the Crab & Winkle Way. The emerging Canterbury district local plan has a specific policy for this location, policy W4. This, rightly, identifies the importance of maximising the potential for active travel journeys to / from this site.

We welcome that this planning application intends to deliver cycling infrastructure in accordance to LTN 1/20, that the design is centred on a 15-minute neighbourhood, and the applicant's vision:

SPOKES OBJECTIVES

1. To encourage cycling and publicise its benefits for the community and for individuals.
2. To ensure that local authority and government policies actively encourage cycling and make full provision for it as part of an overall transport strategy through which all members of the public can enjoy cheap, safe and environmentally sound travel for work and leisure.

Spokes East Kent Cycle Campaign is affiliated to Cycling UK

It is our aspiration to provide a substantial expansion to Whitstables' active travel network, including connecting into the existing Crab & Winkle Way.

In terms of cycling, policy W4 in the emerging local plan states:

2. Design and layout

The design and layout of the site should:

...

(b) Create a complete, compact and well-connected neighbourhood, where everyday needs such as food shopping, primary education and outdoor recreation, can be met within a 15 minute walk or short cycle, to support the local economy, to promote health, wellbeing and social interaction and to address climate change by reducing car dependency;

...

4. Access and transportation

The access and transport strategy for the site should:

(a) Provide safe and convenient pedestrian and cycle connectivity including:

(i) Walking and cycle connections to Chestfield and to the Crab and Winkle Way including upgrade of CW21 and upgrade of CW38;

(ii) New and improved cycle connections to Whitstable via the Crab & Winkle Way including extension of the Crab & Winkle Way traffic free route to the harbour and pedestrian/cycle bridge from Old Bridge Road to Teynham Road;

(iii) New and improved walking and cycle and walking connections to Site 12 in Policy CF1;

(iv) New and improved walking and cycling connections to school locations, both within the site and surrounding communities;

(v) New and improved walking and cycling connections to Herne Bay via A2990 Thanet Way and including the investigation of downgrading Molehill Road to a green lane; and

(vi) Improvements to the PRoW network crossing and around the site as required.

(d) Provide pedestrian and cycle only access from Rayham Road

The Canterbury District Draft Local Cycling and Walking Implementation Plan 2025-2040 (LCWIP), which accompanies the emerging Local Plan, includes these proposals to support cycling in the vicinity of the proposed development:

- W1 Extension of Crab and Winkle cycle route on railway embankment and on road to link to existing route to the Harbour.
The scheme includes bridges over Old Bridge Road and railway line, Teynham Road, and an on-road link at The Sidings and Station Road
- W5 Ramp from northern footway of A2990 to Invicta Way
This would provide a link down the embankment from the road bridge over the cycle path
- W6 Link from Clifford Road to Invicta Way to be improved
This link requires widening and clearing to become usable
- W12 Crab and Winkle cycle route at South Street to Greenhill via Brooklands development site, Grasmere Road and Molehill Road
This route provides an off road/ lightly trafficked road connection to Greenhill from

the existing off road Crab and Winkle route and would require a formal crossing point on Chestfield Road

- W20 The Ridgeway to John Wilson Business Park including an off road link at Chestfield recreation park

We note that all of these proposals identify potential funding sources of either the Community Infrastructure Levy or a contribution via Section 106 of the Town & Country Planning Act. Proposal W1 additionally identifies a bid for Active Travel tranche 4 funding.

The policies can be associated as follows:

Emerging local plan	Draft LCWIP	Comments
W4(4)(a)(i)	W12	
W4(4)(a)(ii)	W1, W5, W6	
W4(4)(a)(iii)	W12	
W4(4)(a)(iv)	W1, W6, W12	Community College Whitstable, Herne Bay High, and proposed school at the proposed Bodkin Farm development
W4(4)(a)(v)	W12	
W4(4)(a)(vi)	W20	
W4(4)(d)	W12	Access to Rayham Road at junction with Lismore Road.

The applicant's Accessibility Review table 71 assesses compliance against policy W4 of the emerging local plan. We have the following observations:

Emerging local plan	Comments
W4(4)(a)(i)	We welcome that CW21 will be improved as part of the development; the applicant's plans show that much of it is proposed to be made cycleable. The applicant's assessment has confused PRow CW38 with CW28. CW38 follows Grasmere Road and doesn't cross Chestfield Golf Course as stated by the applicant. Therefore, due to this mistake, the applicant comes to the wrong conclusion of not upgrading it. We consider that the applicant should be improving CW38 too, as part of draft LCWIP W12.
W4(4)(a)(ii)	In assessing compliance against this policy the applicant has cited access to the town centre, which the applicant has taken to be in the vicinity of 37-69 High Street. Whilst we don't deny that this is part of Whitstable town centre, we note that the wording of W4(4)(a)(ii) explicitly states to the harbour and that Whitstable's town centre extends to the harbour. The applicant's conclusion that "improvements to the existing routes would be far more beneficial" is based upon inaccurately assessing the policy. It is our view that the applicant should be expected to make provision towards draft LCWIP scheme W1, as supported by the emerging local plan. This provides a more direct route to the harbour, the policy's explicit objective, as well as a more direct route than at present towards key destinations such

as Whitstable Leisure Centre and Whitstable Health Centre.

W/4(4)(a)(ii)

The applicant states:

The primary route for walking and cycling to Site 12 would be along Thaxet Way although a crossing would be required at the junction with Willmott Road for cyclists.

This is incorrect. Site 12 is the draft local plan's policy C11 is "Land South of Ridgeway (John Wilson Business Park), Whitstable", i.e. the Gurners Gardens development currently under construction. This is closer to the Brooklands Farm site than the A2990 Thaxet Way, thus the latter doesn't need to be crossed to reach site 12.

Access to Gurners Gardens can be achieved via the Lismore Road cycle access that the applicant proposes for their development. This would form part of the provision towards draft LCWP proposal W12.

We note that the Gurners Gardens development plan include a path connection on its southern side to Gurners Road (i.e. the W12 alignment). We believe that this is wide enough to permit cycling. To the south of the Gurners Gardens site we note that that development has already funded the construction of the shared cycle / foot path beside Reeves Way, which provides access to destinations such as the employment at John Wilson Business Park, Sainsbury's supermarket, Chertfield Medical Centre, and water via the tunnel crossing over A2990 Thaxet Way near to KPC.

We further observe that, almost opposite this path connection is the road Boundary Close and that it is only a short distance of approximately 30 metres at the edge of Chertfield Cricket Club's ground to reach the applicant's Brooklands Farm site. If a cycleable path could be delivered here with permission of the landowner, then this could provide an almost entirely traffic-free path from the applicant's site to a number of key destinations, which would clearly be beneficial to the Brooklands Farm development. We therefore ask that the applicant works with Chertfield Cricket Club and the Gurners Gardens developer to take forward provision of this improvement.

W/4(4)(a)(iv)

We welcome that the applicant intends to provide improved cycling and walking connections to both the schools proposed within Brooklands Farm and the existing schools within the area.

In terms of access to the on-site schools we observe that the applicant's plans show the path beside the proposed road, south to the west of the proposed SEN and primary schools as just a pedestrian path. Providing this as a cycleable path would provide improved permeability for cyclists, both people arriving at the SEN school from the north, and people cycling to the primary school from the south. Cycle access to the on-site schools from off-site would primarily via the Inverna Way portion of the Oak & Wandle Way, via Lismore Road, and from Chertfield Road. We note, in particular, that provision towards draft LCWP scheme W11 widens the accessibility of the on-site schools for cyclists by overcoming the barrier of the railway and making journeys more direct. Therefore we believe that the applicant must be expected to make contributions towards this.

For access to off-site schools:

- Community College Whitstable would be improved by provision towards draft LCWIP scheme W6 because this would make cycle access between Invicta Way and the school easier. We are glad to see that the applicant proposes to fund this.
- Herne Bay High would be improved by provision of draft LCWIP scheme W12 together with the cycle path being provided across the Oxenden Park development beside Hawthornden Street, Greenhill. The proposed plan to demote Molehill Road to a green lane is welcome, but the applicant's proposal to narrow the road to 3m wide for a section shortly east of the junction with Birkdale Close, doesn't in our view do enough to detract from motor vehicle use and could result in cyclists being squeezed in the limited space by motor vehicles. We note that the stage 1 Road Safety Audit observed that the "Extensive length of road narrowing may increase the risk of vehicle to cyclists type collisions as drivers may attempt to overtake them.". We would support provision of removable bollards at this location to prevent motor vehicle access here, but still allowing access to be opened in an emergency. We note that applicant's transport assessment notes in paragraph 5.5.21 a two-way daily flow of 617 vehicles at this point, so this would not inconvenience many journeys and would improve safety further for cyclists. At the Molehill Road / Thornden Wood Road junction we note that applicant's transport assessment paragraph 5.20 proposes "...enabling on-road cycling up to Thornden Wood Road at which point there would be a short section of on-road cycling to join Hawthornden Street...". We think that provision of a cycle path beside Thornden Wood Road here would be more appropriate. As the applicant's transport assessment states, this is short (we measure this as approximately 120 metres). However, the traffic volumes along Thornden Wood Road are higher, national speed limit applies at this point (with the transition to 30 mph just to the north), and traffic approaching from the south has a bridge over the A299 Thanet Way which limits their visibility of cyclists coming onto Thornden Wood Road ahead.
- The proposed new school at the Bodkin Farm development, plus an alternative route to Herne Bay High, would be improved by provision towards draft LCWIP scheme W12. A large portion of the route to the school would be via traffic-free, using the Reeves Way and A2990 Thanet Way cycle paths. Provision of our proposal of the route around the edge of Chestfield Cricket Club would make it more direct, thereby improving the proposition of choosing to cycle.

W4(4)(a)(v) See our comments above about more direct connectivity towards the A2990 Thanet Way cycle path our proposal around the edge of Chestfield Cricket Club's ground and in respect of downgrading Molehill Road to a green lane by using removable bollards.

W4(4)(a)(vi) The development of public footpath CW21 within the site to support cycling is welcome, however, we note that the applicant's plans for this appear to show varying lengths of this as proposed for cycling vs pedestrian-only. For

example, the Illustrative Framework Masterplan on page 69 of the applicant's Design & Access Statement appears to show only central portion of CW21, between the two NW-SE shared cycle path, as a shared cycle path, with some ambiguity on the portion of CW21 to the west of that, which meets the existing South Street near to the traffic-free Crab & Winkle Way towards Canterbury (a cycle symbol is shown, but the symbology here is just showing the existing PRoW alignments, not that definitively showing the cycle / foot paths, which we're interpreting as the dotted purple lines.

We believe that supporting cycling along the full extent of CW21 would deliver the most permeable development for cyclists. It would allow cyclists to reach the traffic-free Crab & Winkle Way to Canterbury from the upgraded PRoW. We note that the current visibility from CW21 along South Street to the north is poor, and thus presents a potential safety concern for future cyclists crossing southwards to the Crab & Winkle Way towards Canterbury. We think that the works to make this portion of South Street into a quiet lane should include a build-out into the road here, allowing cyclists to get a better sight-line with the protection of the build-out before crossing the road.

Permitting cycling on CW27 would allow a connection from cycling-enabled-CW21 to the more direct route to Grasmere Gardens via the edge of Chestfield Cricket Club's grounds that we're proposing above.

We're glad to see that CW27A, along Rayham Road, is connected to the cycle / foot paths proposed within the development. See our comments below.

At the northern end of CW22, used by the Crab & Winkle Way towards Canterbury, there's currently a motorcycle inhibitor which also makes cycle access difficult (and impossible for some bicycles). We suggest that the development should remove / improve this barrier such that it doesn't inhibit legitimate cyclist use.

We welcome the applicant's proposed improvements towards CW38, CW40, and CW44 / CW44A as part of their contributions towards delivering LCWIP schemes W12, W20, and W6.

W4(4)(d) We welcome the connection of Rayham Road to the proposed cycle / foot paths within the development. As the applicant notes, the surface on Rayham Road is not optimal for cycling. However, we disagree with their conclusion; rather than dismissing it as unsuitable for cycling, we suggest that funding is sought from the applicant to improve the surface of Rayham Road, which has public bridleway CW27A following its alignment, to improve its suitability for everyday cycling.

The applicant's Accessibility Review highlights that there is good potential for a large number of work-related journeys to be made by bicycle, showing that almost half of the people work within the town, which are cycleable distances, which paragraph 2.2.2 of the government's Local Transport Note 1/20 states, and the applicant references. We agree with this.

The Accessibility Review assesses travel by train and bus. It points out that there isn't cycle parking provision at Chestfield and Swalecliffe station and rightly proposes provision of this near to the station entrance, which we support. We note, however, that the applicant's

language is weak here, committing just to “investigate new station cycle parking bays”, rather than an outright commitment to deliver them. A stronger commitment to delivery, secured via a development condition, should be made. Further, the assessment doesn’t conclude that similar provision would be useful to encourage cycle-bus integration too. In mature cycling countries, such as the Netherlands, cycle parking beside bus stops is common, such as pictured in figure 1 below, allowing multi-modal sustainable journeys to be made.



Figure 1: Cycle parking next to a bus stop, Tilburgseweg, Kaatsheuvel, The Netherlands. Credit: Google StreetView

We welcome that the applicant notes that a number of local recreational & leisure sites all have good cycling times from the Brooklands Farm site. However, only some of the sites that they’ve highlighted have cycle parking provision at them. We would suggest that the applicant should fund provision of cycle parking at local sites to encourage people to cycle from their development. For example, provision of cycle parking at Whitstable Football Club, Whitstable Leisure Centre and the adjacent bowling alley, and Westmeads Recreation Ground.

In the applicant’s assessment of pedestrian and cyclist connectivity to Whitstable and Tankerton Hospital from their proposed development we note that they propose using the bridge over the A2990 Thanet Way between Clover Rise and Foxgrove Road. Currently there are no signs here indicating that cycling is permitted. We suggest that the applicant should agree with the Highway Authority that cycling here is permitted, and fund works to the bridge to permit cycling if found necessary to make it cycleable. This should include adding cycling signs (for example sign 956 for a shared cycle / foot path in the Traffic Signs Manual¹).

In the Accessibility Review’s assessment of an active travel connection to Community College Whitstable we support the applicant’s proposal of funding the delivery of scheme W6 in the draft LCWIP. However, we also note that an alternative / additional alignment connecting Invicta Way with the corner of Clifford Road / Invicta Road may be able to be delivered with a wider path width, thereby reducing the potential for cyclist / pedestrian

¹<https://assets.publishing.service.gov.uk/media/5c78f895e5274a0ebfec719b/traffic-signs-manual-chapter-03.pdf>

conflict. This would need that landowner's permission. We show this below in figure 2 with the applicant's / LCWIP's proposed W6 in black and our alternative in blue. Figure 3 shows the existing access to this alternative alignment from Invicta Way.



Figure 2: Alternative / additional active travel connection to Community College Whitstable



Figure 3: Existing access from Invicta Way to alternative to W6

The applicant's Accessibility Review indicates the potential for a cycle path to be provided on the south side of Millstrood Road, beside Tesco, with provision of an at-grade crossing over the A2990 Thanet Way, thereby avoiding the stepped bridge. In figure 4 below we indicate on the applicant's plan that addition of a length of cycle path (indicated in red; we measure this to be approximately 60 metres) would enable the Millstrood Road cycle path to

be connected to the cycle path connected with the western end of Tesco's car park (indicated in pink).



Figure 4: Extension to Millstrood Road cycle / foot path

In the applicant's figure 5-5 of their Accessibility Review they show a proposed east-west cycle connection following the alignment of the draft LCWIP's scheme W12. Their paragraph 5.20 notes:

Molehill Road would be downgraded to a Quiet Lane/ Green Way enabling on-road cycling up to Thornden Wood Road at which point there would be a short section of an on-road cycling to join Hawthornden Street that serves a new residential development where it is likely that either a segregated cycle route is available...

The applicant is right that there is a segregated cycle route becoming available at Hawthornden Street as part of the Oxenden Park development currently under construction there. However, we disagree that the portion of cycle route along Thornden Wood Road should be on-road. Thornden Wood Road has much greater traffic volumes than Molehill Road. The speed limit at the Thornden Wood Road / Molehill Road junction is national speed limit, becoming 30 mph approximately 50 metres to the north. Traffic approaching from the south will be passing over a humped bridge over the A299 Thanet Way where the forward visibility is thereby restricted. Placing cyclists in the carriageway here places them at elevated risk. Instead, we believe that provision of a short (we estimate 120 metres) section of shared cycle / foot path on the western side of Thornden Wood Road here would avoid this risk and enable cyclists to cross to the Oxenden Park development further away from the blind bridge crossing within the 30 mph limit. We show this below indicated by a blue line in figure 5.



Figure 5: Cycle path beside Thornden Wood Road

Also in the applicant's figure 5-5 a connection to the existing traffic-free portion of the Crab & Winkle Way (PRoW CW22) towards Canterbury is shown using PRoW CW21. We welcome this, but note that the visibility here to the north is restricted for anybody emerging from CW21 (see figure 6). We believe that this can be mitigated by building the east side of the road out here, providing a point where crossing pedestrians and cyclists can get a better sight-line. This should be possible given that traffic volumes here would be reduced due to this portion of South Street being made a quiet lane.



Figure 6: Restricted visibility northward along South Street from junction with CW21

The applicant's Illustrative Framework Masterplan shows that their proposed foot / cycle path passing Hurricane Hill Park to connect with Lismore Road will have a steep section. See figure 7. We believe that the site layout can be improved here to achieve a more gradual incline (e.g. see our blue line).



Figure 7: Steep foot / cycle path to Lismore Road, with potential alternative to lessen the incline

In the same Illustrative Framework Masterplan we see that the path beside the roads to the west of the schools (see figure 8), which appears to pass their entrances, doesn't appear to be proposed as being cycleable. Permitting cycling here would maximise access for cyclists to these schools. For example, cyclists wishing to reach the SEND school from the Lismore Road entry point would need to take an indirect route if they wished to avoid roads within the development. Permitting cycling here would also improve the general cycle permeability of the development.



Figure 8: Path to west of proposed schools

Further in the Illustrative Framework Masterplan, no traffic-free cycle connectivity to Woodside Park and the adjacent housing appears to be being proposed. Permitting cycling here would make it easier for the schools and sites to the north of the development to be reached by bicycle.

Additionally, we observe that not making this into a cycleable path is missing the opportunity to design in a cycle connection beneath the A299 Thanet Way to the south. An additional connection to the Crab & Winkle Way could be made here to provide for a more direct cycling route towards Canterbury from this side of the development. This would require the permission of the landowner to the south of the A299 Thanet Way to complete the link, but delivering a cycle path to the boundary would be beneficial should this land become developed in the future.

We show these cycle / foot path proposals indicated with blue lines in figure 9 below.



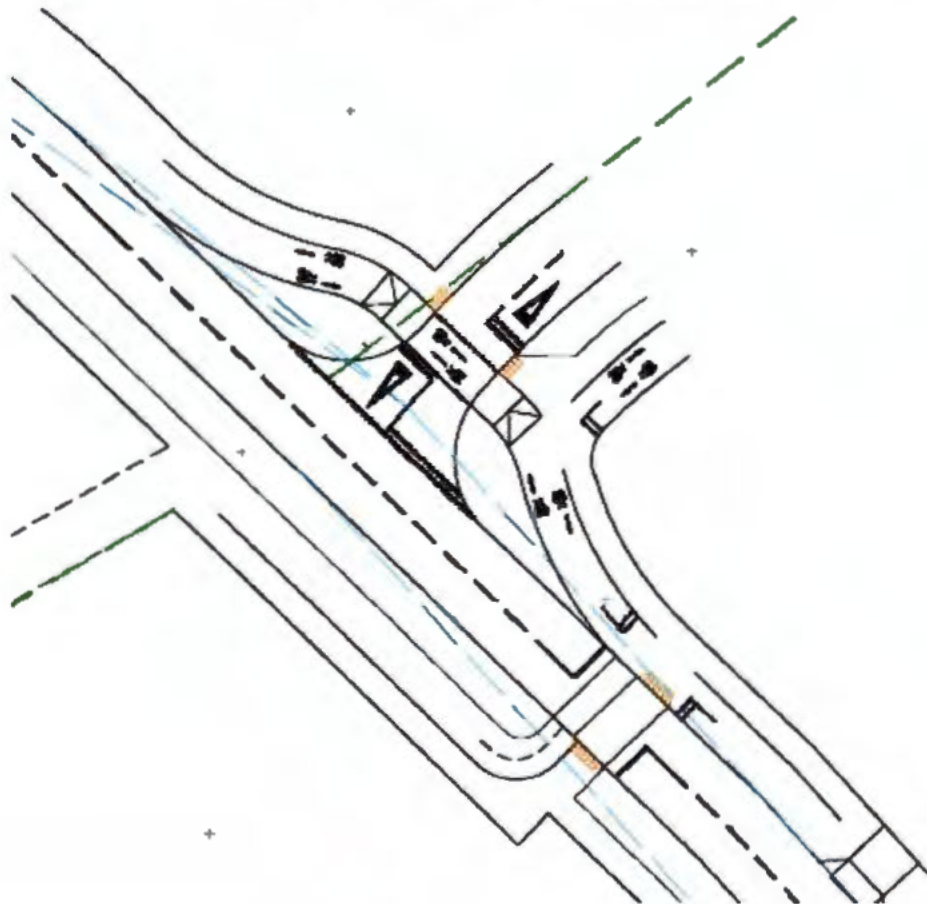
Figure 9: Cycle connections to Woodside Park, adjacent housing, and southward to the Crab & Winkle Way

Earlier we proposed forming a more direct connection for cyclists and pedestrians towards Chestfield and Swalecliffe station, Chestfield Medical Centre, Sainsbury's supermarket, John Wilson Business Park, via the edge of Chestfield Cricket Club's ground and the Grasmere Gardens development currently being constructed. We show this as the blue line in figure 10 below:



Figure 10: Cycle route via Chestfield Cricket Club

The applicant's drawing 10709-HL-006 revision F shows two junctions with the proposed New South Street where cyclists and pedestrians are given crossing priority over road traffic. An inset is shown (see figure 11) with greater detail for one of them. Similarly, in the applicant's drawing 10709-HL-08 revision D we see that pedestrians and cyclists are given priority over South Street at a couple of crossing points (see figure 12).



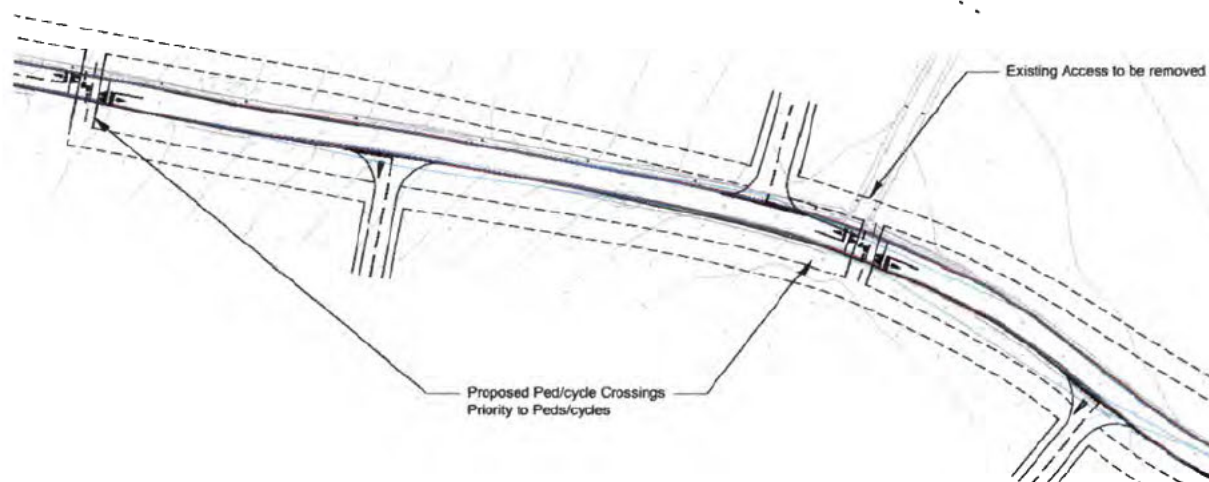


Figure 12: Excerpt from applicant's drawing 10709-HL-08 revision D, crossings of eastern South Street

We support these arrangements. They adhere to emerging local plan policy DS13 Movement Hierarchy in enabling pedestrians and cyclists to move more freely, and follows Active Travel England guidance². However, we note that these are the only four crossings where pedestrians and cyclists have been given crossing priority over road traffic. A further 11 side road crossings are shown where such priority is not indicated. All junctions should ensure that pedestrians and cyclists are given priority in order to satisfy DS13 Movement Hierarchy.

The planning application documents show different arrangements for the South Street / Chestfield Road junction. It is not clear which design the applicant is proposing. Both have issues. See figures 13, 14, and our comments below.

Drawing	Comments
10709-HL-10 rev E	This arrangement doesn't give northbound cyclists from Radfall a logical and safe way to join the New South Street cycle / foot path. The path in the SW corner of the junction isn't wide enough for cycling, and no crossing to the path on the NW corner is shown.
10709-HL-15 rev C	This arrangement doesn't give northbound cyclists from Radfall a logical and safe way to join the New South Street cycle / foot path. The path in the SW corner of the junction isn't wide enough for cycling, and the crossing to the path on the NW corner doesn't indicate that it's designed for cyclists. The NW corner cycle path junction with Chestfield Road expects cyclists to look back almost 180 degrees in both directions behind them to check for road traffic coming from the south (from Radfall and the proposed A299 junction) and west (from South Street) whilst simultaneously ensuring that pedestrians aren't about to cross via the indicated dropped kerbs just to the north. Cyclists entering the carriageway from the cycle / foot path are afforded no protection from coming from the south or west behind them.

²<https://www.activetravelengland.gov.uk/planning-active-places/side-road-crossings>

drawings about cyclists expected reach shared cycle path south South Street that's shown.

Additionally drawing 10709 H-00a revision figure which shows South Street Chesfield junction conjunction proposed A229 Tilman Way junction shows specific provision cyclists between northern southern Tilman Way junction. VISEM modelling undertaken shows significant increases traffic levels which would reduce safety cyclists severance effect. Support provision additional A229 junction favours vehicle journeys cycling walking would expect proposed junction inhibit cyclist movements safety would expect separate shared cycle provision linking Radford Chesfield Brooklands which facilitates cyclist movements directions.

additionally observe whilst proposed designs extend existing mph speed southwards Chesfield portion mph being quite increase approximately would make existing Chesfield Radford mph speed limits joined leading confusion environment could joining mph speed limits between Blunton Rough Common made several linking mph speed limits between Tyler Canterbury made recently.

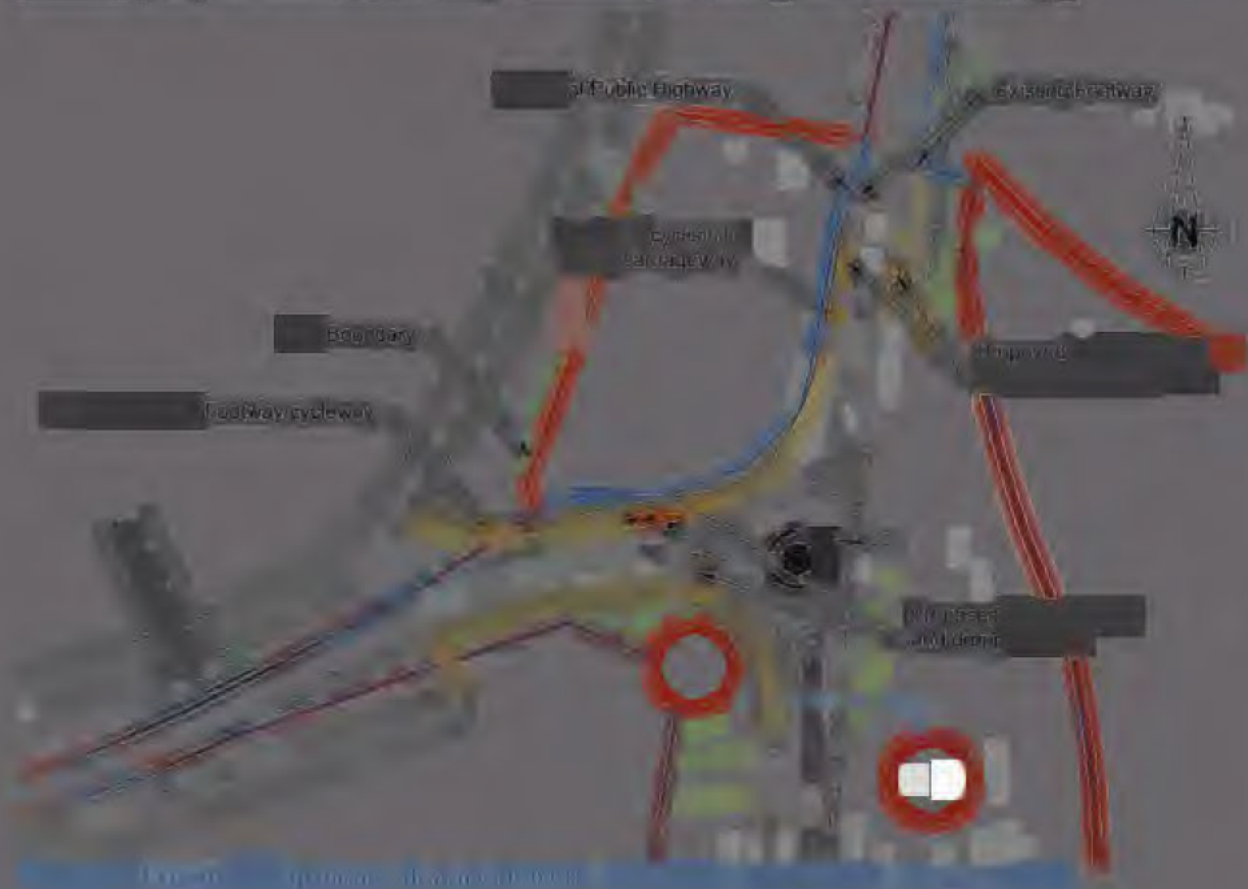
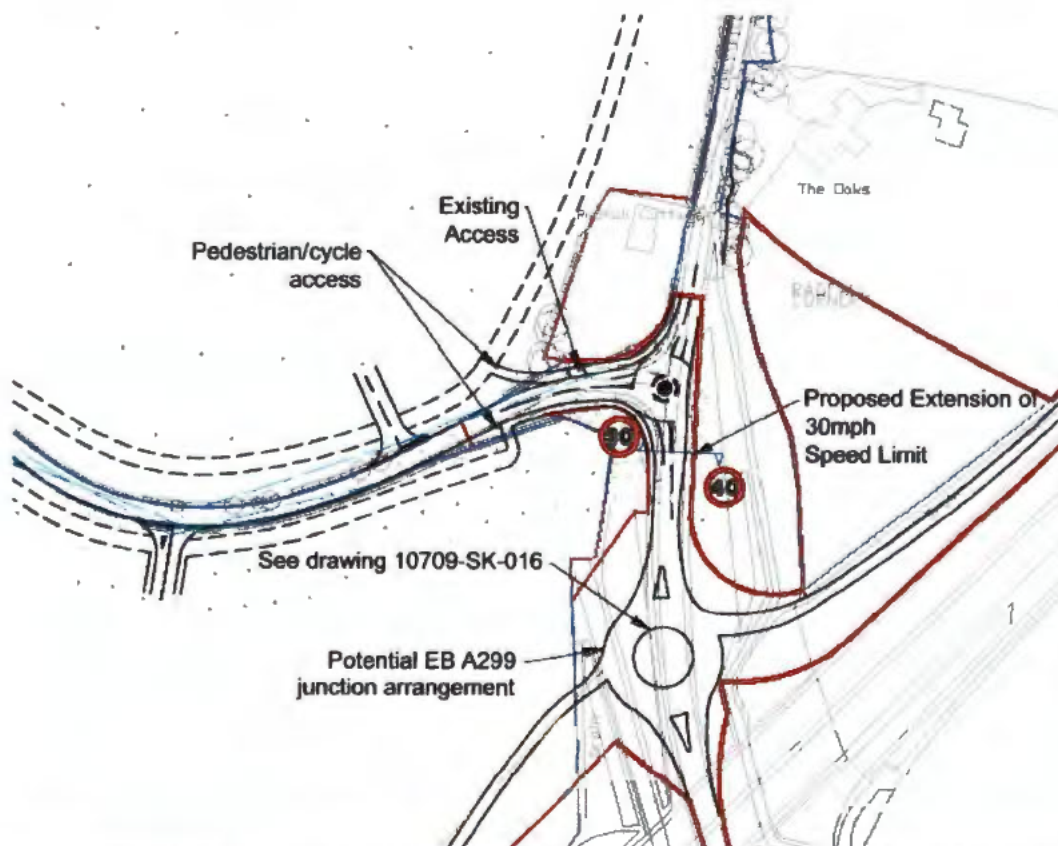


Figure 10-10 Proposed cycle routes



Figure 14: Excerpt from applicant's drawing 10709-HL-15 revision C, South Street / Chestfield Road



The applicant's proposal for the western South Street / New South Street junction can be seen in figure 16 below:



Figure 16: Excerpt from applicant's drawing 10709-HL-08 revision D, western South Street / New South Street

This junction presents several safety concerns for cyclists:

- Northbound cyclists following the Crab & Winkle Way from Canterbury to Whitstable are expected to cross the entrances to 79,, 77, and 77a South Street, being aware of potential vehicles on their left here whilst simultaneously being aware of vehicles on New South Street to the right (and needing to look back to do this). The arrangement also shows cyclists are expected to give way to road traffic here, despite the emerging local plan policy DS13 Movement hierarchy placing cyclists above motor vehicles, thus is contrary to that policy.
- Southbound cyclists following the Crab & Winkle Way from Whitstable to Canterbury are expected to turn right across New South Street to continue onto the quiet lane portion of South Street. However, no refuge is shown in the design to facilitate this. The transport modelling shows that traffic levels on New South Street will pose a barrier for cyclists here.
- North / west bound cyclists wishing to head from the New South Street cycle path in the Brooklands Farm site towards Invicta Way are expected to cross or enter the New South Street carriageway at a corner where their visibility to traffic coming along South Street from the north will be restricted. If crossing, they will be expected to make a further crossing of the quiet lane portion of South Street before giving way to the driveway of 77a South Street and, again, to New South Street traffic joining onto the northbound existing South Street. Cyclist journeys from the Brooklands Farm site towards Invicta Way and Tesco are likely to be the most amongst the most common. Designing in such barriers is both contrary to DS13 Movement hierarchy.

Stifling cyclist movements, by ignoring DS13 Movement hierarchy, will be stifling the effectiveness of the modal shifts to more sustainable transport modes that the emerging local plan aims to achieve by making cyclist journeys more inconvenient and less safe than they should be.

We also note that the design leaves cyclists in the carriageway of the existing portion of South Street between the New South Street and Invicta Way (traffic-free Crab & Winkle Way into Whitstable) junctions. The traffic levels on this portion will increase significantly (doubling to trebling) as a result of this development, thus making cycling here riskier and less appealing, which'll prove to be a barrier to wider cycling adoption. The applicant's modelling shows these movements on this stretch of road (values in parentheses are the full development's change compared with the baseline):

Scenario	Northbound	Southbound
1 Baseline 2040 AM	222	216
1 Baseline 2040 PM	212	169
2 Full development 2040 AM	509 (229%)	459 (213%)
2 Full development 2040 PM	437 (206%)	498 (295%)

Almost all of the movements are expected to be into / out of New South Street, impacting the safety of crossing the road here, or transitioning between cycle path and road:

Scenario	Eastbound	Westbound
2 Full development 2040 AM	439	499
2 Full development 2040 PM	478	427

The modelling shows that there will be significant increases in the traffic turning into / out of Millstrood Road:

Scenario	Eastbound	Westbound
1 Baseline 2040 AM	254	362
1 Baseline 2040 PM	267	279
2 Full development 2040 AM	420 (165%)	719 (199%)
2 Full development 2040 PM	562 (210%)	410 (147%)

We believe that the issues can be resolved by extending the Invicta Way shared path southward over the Millstrood Road junction, along the western side of South Street, and then on the southern side of New South Street west of PRow CW21. Cyclists can then cross to the northern side of New South Street at the CW21 crossing already shown in the inset of the applicant's drawing 10709-HL-006 revision F. To meet DS13 Movement Hierarchy and follow the aforementioned Active Travel England guidance we believe that pedestrians and cyclists must have priority over road traffic where the Invicta Way is extended over Millstrood Road. The road surface should be raised to the path level at this point (which

makes crossing easier for cyclists, people using wheelchairs and buggies, etc., as well as helping to slow traffic through some vertical deflection), give way markings for the road made in favour of the path, and a distinct surface for the crossing used to make it clear that active travel modes have priority. The geometry of this junction can also be tightened in order to help to achieve lower speeds, rather than the loosening of the geometry that the applicant appears to be proposing (see figure 18). The arrangement can be seen below in figure 17. New South Street can be seen as the white line without a border. Foot / cycle paths can be seen as blue lines.

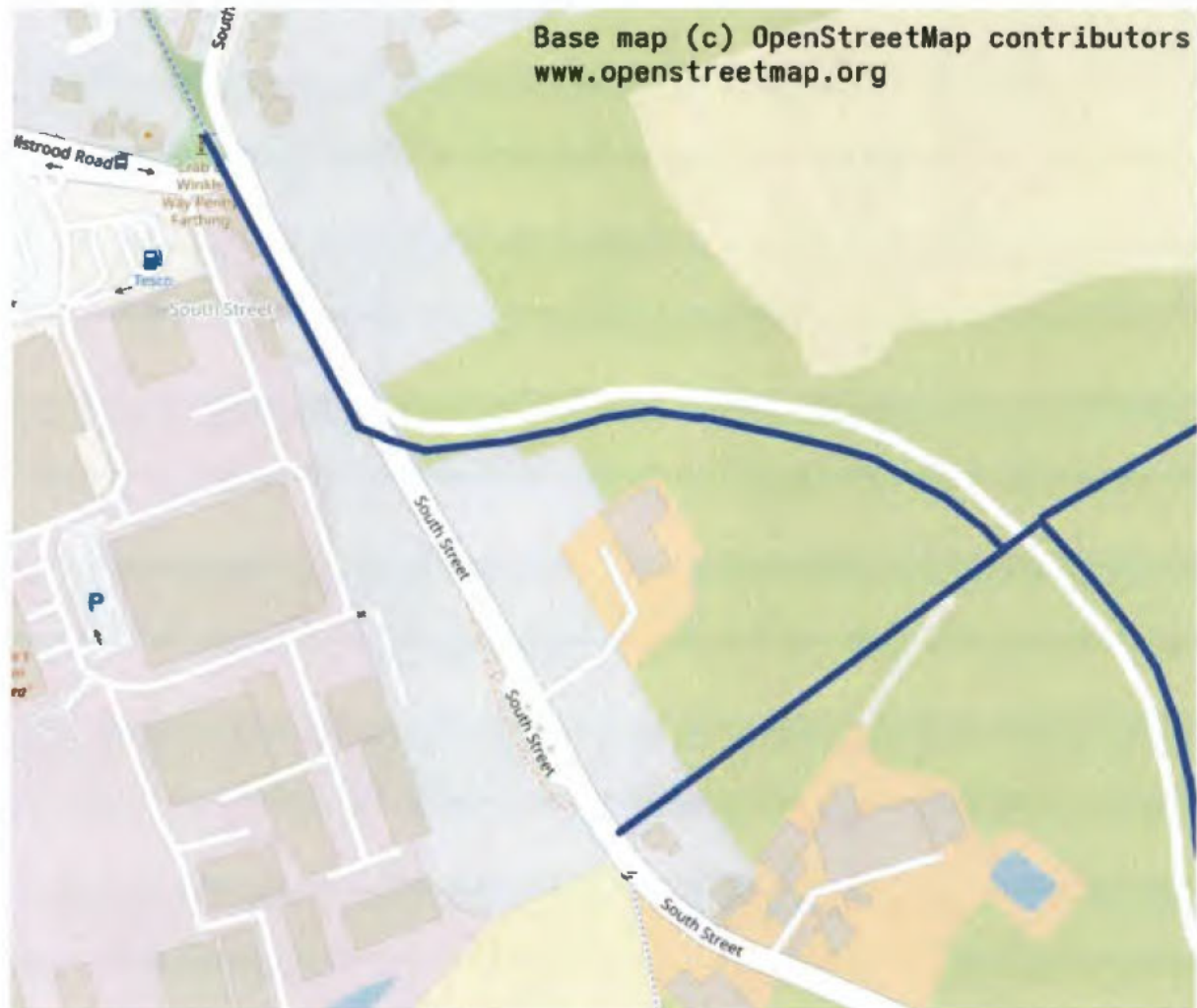


Figure 17: Improvements to western South Street / New South Street junction



Figure 18: Excerpt from applicant's drawing 10709-HL-08 revision D, Millstrood Road / South Street junction

In table 5-1 of the applicant's Transport Assessment we note that the applicant proposes a target speed limit of 20 mph or less for the majority of the roads in the development, which we welcome. However, we note that New South Street is proposed to have a target speed limit of 30 mph, despite KCC's parameters permitting a 20 mph limit for this type of road. We believe that having a 20 mph speed limit here too will lead to safer cycling conditions, leading to greater cycling levels, and less confusion due to changing speed limits. I.e. we believe that the entire development should have a 20 mph speed limit. Explicit signing should be in place to this effect, and the road geometry designed to help to enforce this.

Yours sincerely,

Gregory Williams

Spokes East Kent Cycle Campaign

Ref: CA/25/00779

3 July 2025

Stevie Andrews
Canterbury City Council
Military Road
Canterbury
Kent
CT1 1YW

Directorate of Strategy and Partnerships
NHS Kent and Medway Integrated Care Board

2nd Floor, Gail House
Lower Stone Street
Maidstone
Kent
ME15 6NB

Kmicb.gpestates@nhs.net
www.kentandmedway.icb.nhs.uk

Dear Stevie

PLANNING APP REF CA/25/00779 – Land at Brooklands Farm, Whitstable, CT5 3EL

NHS Kent and Medway Integrated Care Board (ICB) is the NHS organisation that plans and buys healthcare services to meet the needs of 2 million people living in Kent and Medway. It is our responsibility to ensure health services and all future proposed developments are sustainable from a revenue affordability, capital investment and workforce perspective. We must also ensure that, wherever possible, we maximise the delivery of care closer to where people live.

NHS Kent and Medway Integrated Care System brings partnership organisations together to plan and deliver joined up health and care services to improve the lives of people across Kent and Medway. Within the Integrated Care System there are place-based partnerships, referred to as Health and Care Partnerships (HCP), that bring together the providers of health and care services, along with other key local partners, including local councils, to work together to plan and deliver care.

This letter provides a response to the above application which concerns up to 1,350 residential dwellings, including older persons housing, and non-residential development.

We set out in the [NHS Kent and Medway Developers Contributions Guide](#), how the ICB uses the SidM health tool to analyse planning applications in order to understand the population demand arising from the new housing units. Our assessment normally utilises the housing information provided in the application. However, as this has not been provided, the ICB has used the Canterbury City Council's dwelling assumptions. If dwelling numbers or mix of units changes, then we would need to re-assess this response.

In line with the Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) requests for planning obligations must comply with the three specific legal tests:

1. Necessary

Chair | Cedi Frederick
Chief Executive | Paul Bentley



2. Related to the development
3. Reasonably related in scale and kind

We have applied these tests in relation to this planning application and can confirm the following specific requirements.

Area	£ contribution	Population	Required obligation
Primary Care and Community	£1,795,554	3079 population (with gain factor applied)	Towards refurbishment, reconfiguration and or extension to general practice and other healthcare facilities within a 3-mile radius of the development site or towards new healthcare facility to be provided in the community in line with the healthcare infrastructure strategy for the area. To allow the contribution to be used towards professional fees associated with feasibility or development work for existing or new premises projects. To enable proactive development and delivery of a project, the trigger of the healthcare contribution should be linked to commencement or an early stage of development, with the funding being available in full and not provided in phases.
Acute	£4,492,154		NHS Trust to utilise the contribution for refurbishment, reconfiguration, general expansion or enhancement of Kent and Canterbury Hospital, Canterbury or and Queen Elizabeth The Queen Mother Hospital, Margate, which will benefit the population of Whitstable. To enable proactive development and delivery of a project, the trigger of the healthcare contribution should be linked to commencement or an early stage of development, with the funding being available in full and not provided in phases.
Total	£6,287,708		

Justification for primary care and community infrastructure development contributions request

The proposed development will increase demand on primary and community healthcare services provided to the local population. The proposed development currently falls within the general practice boundary of Whitstable Medical Practice.

The objectives and principles set out in the Kent and Medway ICB Estates and Infrastructure Strategy and East Kent Health and Care Partnership Estates Strategy are to support transformation to deliver placed-based care and improving population health outcomes through healthcare facilities that maximise integrated working.

The ICB Estates Strategy and area-based estates plans and priorities will continue to change and evolve as strategic assessments continue to be undertaken for an area informed by changes to healthcare provision, national policies and guidance and council's local plans. However, the need from this development, along with other new developments, will need to be met through the creation of additional capacity in primary and community care facilities.

Whilst it is not possible at this time to set out a specific premises project for this contribution, we can confirm that based on the current coverage of health care services and location of this application, we would expect the contribution to be utilised as set out above. Any premise's plans will include the pooling of S106 contributions where appropriate.

Impact on Acute Hospital - East Kent Hospitals University NHS Foundation Trust

The proposed development will increase demand on acute healthcare services provided to the local population. The proposed development falls within the catchment area of Kent and Canterbury Hospital, Canterbury and Queen Elizabeth The Queen Mother Hospital, Margate.

Whilst it is not possible at this time to set out a specific project for the acute contribution, we can confirm that based on the current coverage of acute health care services and location of this application, we would expect the contribution to be utilised as set out above. NHS Kent and Medway would also wish to reserve the right to pool S106 contributions where appropriate to allow for larger improvement projects to be delivered.

The funding contributions set out above are required to be provided within the early phases of the proposed development to enable East Kent Hospitals University NHS Foundation Trust to develop the acute site so that services are available in a timely manner to respond to population growth. Without this a viable plan cannot be progressed.

Funding requirement

The NHS assessment above indicates the overall additional capital required by the healthcare system, specifically focused on primary, community and acute care infrastructure, arising from this housing development. This is based on the projected housing mix, and the expected tenure, type and size of homes coming forward.

Whilst mental health services would also be impacted by this development, a request for capital has not been included as these will be predominantly community-based services that should not require major capital expense. The NHS will however keep this under review.

For the avoidance of doubt, the NHS is not seeking any additional revenue funding to cover the day-to-day running costs of providing healthcare services for this new population.

It also must be noted the cost estimations include costs for population increase due to new housing while deducting the impact due to internal migration.

The availability of NHS capital funding for estate development is severely constrained. Annual capital is allocated by NHS England to NHS Kent and Medway based on existing footprint and is directed towards specific spend to manage the current estate. There is no allowance for additional footprint in that general allocation. There is also no funding programme available to enable NHS Kent and Medway to secure additional capital to fund the new health care facilities needed to mitigate the demand for health services created by population growth from new developments. As such, developer contributions are necessary to mitigate the impact of this development.

Historically, the NHS in Kent and Medway has sought developer contributions to mitigate the impact on primary care only. It is, however, important to note that large housing developments impact on the provision of acute, community and mental health services. New housing developments should not negatively impact the existing population's access to healthcare services. NHS Kent and Medway is therefore using new models and methodologies to assess these impacts to ensure an informed response to planning applications.

Yours sincerely



Simon Brooks-Sykes

Deputy Director for Strategic Estates and Sustainability
NHS Kent and Medway

Date: 16th June 2025
Ref: CA/25/00779
Site address: Land at Brooklands Farm, Whitstable

Canterbury City Council
By email only planning@canterbury.gov.uk



Kent
Wildlife Trust

RE: Application Ref. CA/25/00779 – Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

SUMMARY

Kent Wildlife Trust (KWT) are concerned regarding the potential ecological impacts that the proposed development may have on both the site itself and the wider landscape, particularly the onsite and adjacent ancient woodlands, statutory designated sites, Local Wildlife Sites (LWS) and important habitats for a range of protected and priority species. Furthermore, we consider that the application fails to adequately account for cumulative impacts stemming from this and other nearby developments. The proposal will collectively undermine the ecological integrity of the Blean Woodland Complex and associated habitats through increased recreational pressure, cat predation, and further fragmentation of habitats.

IMPACTS TO BIODIVERSITY

Ancient Woodland and Local Wildlife Sites (LWS)

Convict's Wood LWS, an important connective stepping stone for the wider Blean Complex Special Area of Conservation (SAC), sits within the application site. The LWS is designated for its ancient woodland inventory, including 19 ancient woodland indicator species. It's also an important site for woodland birds and passerines and comprises a good bryophyte flora. LWS are protected under Section 15 of the National Planning Policy Framework (NPPF, 2024), which sets out the Government's current planning policy in relation to conserving and enhancing the natural environment. Paragraph 192 states *"To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."*

Convict's Wood LWS is also protected under policies LB7, LB8, LB9 and LB10 of Canterbury Council's current Local Plan (adopted in 2017). Our main concern with Convict's Wood LWS is the adverse effects from direct and indirect impacts. These include an increase in artificial lighting, noise, water and dust pollution during the construction phase and increase in light, noise, water pollution, and recreational pressures, including cat predation, during the operational phase. The current plans propose a 15m buffer, however for a development of this scale we have concerns that this is not a large enough buffer to protect the LWS and ancient woodland from indirect effects. For example, we disagree with the submission's conclusion that

“Significant effects due to recreational disturbance or cat predation were scoped out” simply because the land has not been identified as Functionally Linked to any SPA designated features. The absence of a formal functional linkage designation does not diminish the ecological value of the site and its surroundings, particularly when it supports protected, priority and red-list species, such as dormice, skylarks, nightingale, and greenfinch. Studies have suggested a figure of 320 – 330 cats per 1,000 homes¹, which for the proposed 1,350 homes would give an estimate of 430 – 445 cats living within the new development. We disagree that “thorny hedgerows” will deter cats. Recent evidence from comparable sites demonstrates that such measures are often ineffective. Likewise, research has shown that domestic cats kill billions of native prey species annually, and as a result, pet cats around the world have an ecological impact greater than native predators concentrated within 100m of their homes². This impact is magnified by the high density of domestic cats within localised areas. Even within small home ranges, cats can exert substantial pressure on prey populations, particularly ground-nesting birds, small mammals, and other vulnerable species. One study looking at 925 pet cats from six countries identified that on average one cat killed 3.5 prey items per month, leading to an estimated ecological impact of 14.2–38.9 prey killed per hectare per year by individual cats, an alarming figure when considering the 430 – 445 cats likely to inhabit this development. Of particular concern is the applicant's failure to adequately address the risks posed to known vulnerable species onsite and in the surrounding areas.

Statutory Designated Sites

The proposal must be viewed in context of cumulative pressures from nearby developments and land use change. The Blean Complex SAC comprises a network of ancient woodlands and designated sites that collectively form a key ecological stronghold in North Kent. A growing number of large-scale housing developments in this area are adding to the pressure on these habitats through increased recreation, disturbance from nearby human activity, and gradual erosion of their ecological buffers and connectivity. These cumulative impacts result in the incremental reduction in a conservation site's ability to maintain its ecological integrity and to act as a functional network. The Blean Complex SAC is recognised under both national and local policies as a priority for conservation. SACs are internationally important areas characterised by NPPF as *“areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites”*. SACs are protected under the European Union's Habitat Directive, which is transported into UK law by the Habitats and Species Regulations 2017. The purpose of SACs are to help conserve the habitat and species identified in Annex I and II of the Directive. They are the habitats and species that are most in need of conservation at the European level (excluding birds). The Blean Complex SAC is designated for its sub-Atlantic and medio-European oak or oak-hornbeam forests, with its conservation objectives to *“ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features [sub-Atlantic and medio-European oak or oak-hornbeam forests]”*. The ES and related assessments underestimate the cumulative pressure this development will place on nearby statutory designated sites, LWS and ancient woodland. Therefore, we strongly advise Canterbury City Council to consider this application in the context of its surroundings and other nearby proposals.

PROTECTED SPECIES

¹ Underhill-Day, J. (2005). A literature review of urban effects on lowland heaths and their wildlife. In: English Nature Research Report No. 623. English Nature, Peterborough

² The small home ranges and large local ecological impacts of pet cats - Kays - 2020 - Animal Conservation - Wiley Online Library

The submission makes no mention of surveys for beaver, a European protected species under Conservation of Habitats and Species Regulations 2017 (Schedule 2), which received legal protection in October 2022. As beavers are present in the wider landscape and watercourses are nearby, we strongly advise specific surveys for beaver to determine their presence or likely absence. This is particularly important for designing appropriate mitigation and avoiding an offence under wildlife legislation.

We agree with KCC Ecology that the application's conclusion – that a precautionary approach is appropriate and a full reptile survey is not required – is flawed. Suitable reptile habitats are present in scrub, hedgerows and field margins; therefore, a reptile survey across the entire site should be carried out prior to determination to allow an accurate assessment of impacts.

The proposal results in permanent and total loss of breeding and foraging habitats for a small population of skylarks, however no specific mitigation has been proposed with the ES stating *"Proposed mitigation measures for this development will ensure there are no significant residual effects on any protected and notable species listed above, with the exception of skylarks for which no adequate mitigation is proposed and a minor adverse effect on skylark is anticipated, which is assessed as being significant at the local level."* This is unacceptable and we strongly urge that bespoke mitigation for the loss of breeding skylark habitat is, as a last resort, compensated if it cannot be avoided. As skylark are a Priority Species within England under the Natural Environment and Rural Communities Act (NERC Act, 2006), the failure to allow the adverse effects of the species goes against NPPF 2024, which states developments need to *"promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species"*. It would also go against local policies, such as but not limited to, LB7 – Locally Designated Sites which states *"[...] wildlife have been mitigated to their fullest practical extent. Where mitigation alone is not sufficient, adequate compensatory habitat enhancement or creation schemes will be required."* We therefore strongly advise submission of a Skylark Mitigation and Management Plan. This should outline how the applicant will avoid, minimise or, if necessary, compensate for this permanent loss of breeding skylark habitat.

BIODIVERSITY NET GAIN

We note from submission documents that the proposal currently shows 23.7% net gain in habitats and 41.07% for hedgerows. We appreciate the applicant's ambition; however, we agree with Kent County Council (KCC) Ecology's view that there is potential to enhance this further and delivery should be demonstrated through a legally secured Biodiversity Gain Plan.

If you require any further information or would like to discuss these points in more depth, please do not hesitate to get in touch.

Yours sincerely,

Emma Waller
Planning and Policy Officer
Kent Wildlife Trust





ECOLOGICAL ADVICE SERVICE

TO: Joanna Dymowska
FROM: Helen Forster
DATE: 10 November 2025
SUBJECT: Land At Brooklands Farm Whitstable CA/25/00779

The following is provided by Kent County Council's Ecological Advice Service (KCC EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the county council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application and if sufficient/appropriate ecological information has been provided.

Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the planning officer, who will seek input from the EAS where appropriate and necessary.

We advise that additional information is required prior to determination regarding the Habitat Regulations Assessment

Protected/notable species

We have reviewed the submitted ecological information and we advise that it provides a good understanding of the ecological interest of the site however we advise that insufficient survey information has been carried out to assess the impacts on the Designated Sites

The submitted information has detailed the following species/species groups were recorded within the site during the surveys carried out between 2020 and 2025

- 23 trees with potential to support roosting bats
- At least 8 foraging bat species
- 42 species recorded during the breeding bird survey (including ground nesting birds)
- At least 45 species recorded during the wintering bird survey including Golden Plover and Curlew – birds associated with Thanet Coast SPA and the Swale SPA respectively.
- GCN considered to be present

- Dormouse present
- Good population of slow worm
- Hedgehogs likely to be present

Other than GCN limited information has been provided on the proposed mitigation however as the site is an actively managed farmland field we do acknowledge that the creation of the proposed open space will benefit many of the species found within the site – if managed appropriately and in the long term.

However we highlight that no mitigation has been proposed for ground nesting birds and we advise that off site mitigation will be required. Details of the proposed off site mitigation must be provided prior to determination of the planning application.

A Countersigned Great Crested Newt District Level Licencing Impact Assessment & Conservation Payment Certificate (IACPC). Has been submitted to demonstrate that the site has been accepted on to the District Level Licencing Scheme.

Ancient woodland / Local Wildlife Site

An area of ancient woodland and Convicts Wood Chestfield Local Wildlife Site is located within and adjacent site. Paragraph 193(c) of the NPPF 2024 states: *“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”*.

Canterbury Local Plan Policy LB7 - Local Wildlife Sites states the following:

“Development or land-use changes likely to have an adverse effect, either directly or indirectly, on:

- a) Local Wildlife Sites;*
- b) Local Nature Reserves; or*
- c) Regionally Important Geological / Geomorphological Sites*

will be permitted if the justification for the proposals clearly outweighs any harm to the intrinsic nature conservation and/or scientific value of the site. Where development is permitted on such sites, careful site design should be used to avoid any negative impact. Where negative impact is unavoidable, measures should be taken to ensure that the impacts of the development on valued natural features and wildlife have been mitigated to their fullest practical extent. Where mitigation alone is not sufficient, adequate compensatory habitat enhancement or creation schemes will be required. Any application affecting locally important sites will be expected to demonstrate enhancement measures to benefit biodiversity.

The area of Ancient woodland is located within an area of open space and the ES has confirmed that a 30m buffer will be established around the woodland. Access through the woodland has been proposed but we understand that it is on existing tracks through the woodland and it will not result in the direct loss of the woodland.

The Ancient woodland has been assessed as moderate condition within the BNG report and therefore it is possible that with active management the condition of the woodland could be improved. However we highlight that the woodland would have to be actively managed to ensure that it is not used for recreation and the increase of cats within the site could have a negative impact on species found within the woodland (and within the wider site).

Therefore it is possible with active management the area of Ancient Woodland and Local Wildlife Site may not deteriorate as a result of the proposed development.

Clowes Wood & Marley Wood LWS is directly accessible from the site via the Crab and Winkle Way and therefore it may be negatively impacted by the proposal. We advise that a financial contribution is made to the Forestry Commission towards the management of the woodland.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications⁵⁸ for development (unless exempt^{59,60}), must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development. Significant on-site gains, and all off-site gains will need to be secured for at least 30 years. Having reviewed submitted information⁶¹, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development.

Any application which is required to achieve a 10% BNG must submit the following information as a minimum¹:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- the pre-development biodiversity value(s), [either on the date of application or earlier proposed date \(as appropriate\)](#);
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- [the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('[degradation](#)'), and where they have:
 - a statement to the effect that these activities have been carried out;
 - the date immediately before these activities were carried out;
 - the pre-development biodiversity value of the onsite habitat on this date;
 - the completed metric calculation tool showing the calculations, and

¹ <https://www.gov.uk/guidance/biodiversity-net-gain#para11>

- any available supporting evidence of this;
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

We have reviewed the submitted information and we are satisfied that sufficient information has been submitted to meet the requirements for mandatory net gain.

The metric details that the proposal can achieve 23% gain for habitats and a 41% gain for linear features. We advise that we do agree that it is likely that a BNG of over 10% can be achieved for habitats and linear features due to the proposed open space.

However it is not clear if the proposal had taken in to account additionality in relation to species mitigation. Habitat enhancement works will be required to enhance the site for reptiles, dormouse and breeding birds and therefore the enhancements required can not be taken in to account above *no net loss*. Further details can be found on the BNG Guidance pages on gov.uk ²

The BNG assessment has detailed that proposed areas of grassland and scrub will achieve moderate condition and the woodland on site will be enhanced to good condition. We agree that this is possible but the site will have to be actively managed, monitored and reviewed to ensure that the proposed condition can be achieved. Otherwise the BNG will be lower than anticipated.

We advise that details of the proposed habitat creation is a post determination matter and therefore these points can be addressed prior to determination.

Due to the proposed habitat creation and enhancement it is our view the site meets the requirements for on-site significant. Significant on-site gains are areas of habitat creation or enhancement which contribute significantly to the proposed development's biodiversity net gain relative to the biodiversity value before development. Retention of existing habitat cannot count as an on-site significant gain.

Government guidance states: *"The maintenance of these significant enhancements must be secured with a legal agreement (planning obligation or conservation covenant) or planning condition for 30 years in the same way as off-site gains. LPAs will consider the most appropriate mechanism and this will need to be agreed at the planning permission stage."*³

It is our view that these significant on-site gains should be subject to a S106 agreement or conservation covenant to secure a monitoring fee and ensure enforceability over a 30-year period. It is our view that monitoring fees should be secured for these significant on-site

² [What you can count towards a development's biodiversity net gain - GOV.UK](#)

³ [Make on-site biodiversity gains as a developer - GOV.UK](#)

gains as these gains will need to be subject to monitoring reports across 30 years, which will need to be reviewed (and acted upon as necessary) by the LPA at their own cost. We provide details of suggested monitoring fees in our March 2025 advice note 'KCC Ecological Advice Service suggested BNG Monitoring Fees' which has been distributed to all LPAs in Kent.

Habitat Regulation Assessment

We advise that we disagree with the conclusion that the site does not provide functionally linked land for Golden Plover as insufficient survey effort has been carried out.

30 wintering bird visits have been carried out and only three of those surveys were nocturnal. To accurately assess the site for golden plover usage nocturnal visits are required and golden plover were recorded on every nocturnal survey carried out in 2025. Therefore if additional nocturnal visits were included in the three year survey period a higher usage of golden plover may have been recorded using the site. This view is supported by a study carried out over 6 years concluded that only a very small proportion of fields were used during the day in marked contrast to the distribution at night when smaller flocks used many more fields and different habitat types⁴

For a site to be considered functionally linked land, it needs to be shown to be critical to the population of the qualifying species and necessary to maintain or restore the favourable conservation status of the species. A likely significant effect upon the designated site would be an effect which might undermine the conservation objectives of the site. An effect over a very small area of functionally linked land, which is rarely used, might not undermine the conservation objectives, whilst the same effect over an area which provides prime feeding ground, would be of greater concern. The site's integrity is linked to the concept of sustaining the population of a species for which a site has been designated. Where functionally linked land is necessary for the population to be sustained, then it will be linked to the site's integrity⁵.

For a site to be considered as functionally linked land, the site has to be shown to be 'regularly used'⁶ by the relevant species concerned and by sufficient numbers of birds to be considered important in maintaining or restoring the favourable conservation status of the species concerned. Peak monthly counts of at least one interest species meeting or exceeding the equivalent of 1% of the SPA population (as indicated by the most recent 5-year rolling Mean Peak estimates provided in the latest Wetland Birds in the UK Report) has previously been used to indicate functional linkage of a site with an SPA^{7,8,9,10,11,12}. This includes SPAs with golden plover.

⁴ [Diurnal and nocturnal ecology of Golden Plovers \(*Pluvialis apricaria*\) and Lapwings \(*Vanellus vanellus*\) wintering on arable farmland - British Ornithologists' Union](#)

⁵ Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions - NECR207 ([naturalengland.org.uk](https://publications.naturalengland.org.uk))

⁶ Defining regular usage means counting the number of times a significance threshold is surpassed. Stroud *et al.* (2001) defined 'regular' as when a threshold is met in two thirds of the season for which adequate data are available ([Identification of Functionally Linked Land supporting Special Protection Areas \(SPAs\) waterbirds in the North West of England - NECR361](#)).

⁷ J1.12 - Extracts from Palmer and Smart FLL report.pdf

⁸ TR03001 - NMC - Test for Likely Significant Effects Report

⁹ Revised sHRA 2020

¹⁰ <https://publications.naturalengland.org.uk/file/6572958821646336>

¹¹ 20201217-spa-bird-survey-methodology.pdf

¹² ED53 HRA_Final_Updated

We highlight that the number of golden plover exceed the 1% of the SPA population for the Thanet Coast and Sandwich Bay but acknowledge that it is below the 1% of the SPA population for the Swale SPA. However the lack of nocturnal survey effort may have resulted in an underestimation of the numbers of golden plovers using the site and it is possible that the number of golden plovers exceed the 1% SPA population for the Swale and The Thanet Coast and Sandwich Bay SPA.

We advise that as the site is equidistance from the Swale and the Thanet Coast and Sandwich Bay SPA it can not just be assumed that the birds recorded within the site are associated with the Swale SPA.

It is our view that additional nocturnal surveys are required to fully understand how Golden Plover are using the site and if the site does provide functionally linked land.

If the site provides functionally linked land we advise that details of mitigation will be required to be submitted as part of this application.

If you have any queries regarding our comments, please do not hesitate to get in touch.

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:

- ES Chapter 13 Ecology and associated Appendix
- Illustrative Masterplan; Define; April 2025
- Biodiversity Net Gain Report; PFCR; April 2025
- Shadow HRA; FPCR; April 2025

--Email From External Account--

Our ref: 541124

Your ref: CA/25/00779

Dear Sir or Madam

Planning consultation: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

Location: Land At Brooklands Farm, Whitstable

Thank you for your consultation on the above dated 10 February 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Further information on when to consult Natural England on planning proposals is here- [Planning and transport authorities: get environmental advice on planning - GOV.UK \(www.gov.uk\)](#)

Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details. Although we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes, we offer the further advice and references to Standing Advice.

Natural England advises Local Planning Authorities to use the following tools to assess the impacts of the proposal on the natural environment:

Impact Risk Zones:

Natural England has provided Local Planning Authorities (LPAs) with Impact Risk Zones (IRZs) which can be used to determine whether the proposal impacts statutory nature conservation sites. Natural England recommends that the LPA uses these IRZs to assess potential impacts. If proposals do not trigger an Impact Risk Zone then Natural England will provide an auto-response email.

Standing Advice:

Natural England has published Standing Advice. Links to standing advice are in Annex A

If after using these tools, you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require Natural England's advice.

Further information on LPA duties relating to protected sites and areas is here- [Protected sites and areas: how to review planning applications - GOV.UK \(www.gov.uk\)](#)

Further guidance is also set out in Planning Practice Guidance on the natural environment [Natural environment - GOV.UK \(www.gov.uk\)](#) and on Habitats Regulations Assessment [Appropriate assessment - GOV.UK \(www.gov.uk\)](#)

Non detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent

with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.

Should the proposal change, please consult us again.

Yours faithfully,

Gabriel Brooks

Officer

Natural England

Consultation Service

Natural England, County Hall, Spetchley Road, Worcester, U.K., WR5 2NP

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england

Annex A – Natural England general advice

Protected Landscapes

Paragraph 189 of the [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2023/1/section/245) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](https://www.landscapeinstitute.org/resources/guidelines-for-landscape-and-visual-impact-assessment/) for further guidance.

Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/14/section/40) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/complying-with-the-biodiversity-duty) for further information.

Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/habitats-regulations-assessments-protecting-a-european-site) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/appropriate-assessment) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sites-of-special-scientific-interest-public-body-responsibilities)).

Annex A – Natural England general advice

Air Quality

Natural England has produced ['Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site'](#). This standing advice is to help planning authorities understand the impact on statutory protected sites from particular developments that emit specific air pollutants. The advice covers emissions of ammonia (NH₃), nitrogen oxides (NO, NO₂ or NO_x), nitrogen deposition, acid deposition and sulphur dioxide (SO₂).

The standing advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts.

Note that this advice cannot be used to assess Nationally Significant Infrastructure Projects (NSIPs) or local plans.

Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities - GOV.UK](#) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply](#) (www.gov.uk) for more information.

Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK](#) (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England](#) (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](#) for more information and Natural England's [Open Mosaic Habitat \(Draft\) - data.gov.uk](#) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Unless exempt major development (defined in the [National Planning Policy Framework](#) (publishing.service.gov.uk) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement was extended to minor development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from May 2026.

Annex A – Natural England general advice

[Biodiversity Net Gain](#) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](#) (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](#) for more information. For minor development sites, [The Small Sites Metric](#) may be used where these sites meet the criteria to use this Small Sites Metric. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](#)

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The [Natural England Access to Evidence - Ancient woodlands Map](#) can help to identify ancient woodland. Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#). [Find open data - data.gov.uk](#) on Agricultural Land Classification or use the information available on [MAGIC \(defra.gov.uk\)](#).

The Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](#) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to [Reclaim minerals extraction and landfill sites to agriculture - GOV.UK \(www.gov.uk\)](#), which provides guidance on soil protection for site restoration and aftercare. The [Soils Guidance \(quarrying.org\)](#) provides detailed guidance on soil handling for mineral sites.

Annex A – Natural England general advice

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](https://naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green 'liveable' places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](https://naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails:

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to [Find your perfect trail, and discover the land of myths and legend - National Trails](#) for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk).



The countryside charity

Kent

Application: CA/25/00779

Proposal: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

We are CPRE, the countryside charity. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected environmental groups in England, with over 40,000 members and supporters living in our cities, towns, villages and the countryside. CPRE Kent is the largest of the CPRE County branches with over 1,170 members, including over 173 parish councils, civic societies and other Kent organisations and companies.

Our vision is of a beautiful and thriving countryside that enriches all our lives, and our mission is to promote, enhance and protect that countryside.

We believe that the planning system is a toolbox for achieving better – for people, nature and the economy – while supporting the delivery of more badly-needed homes to end the housing crisis.

Overall, it is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that plan led development is sustainable and in accordance with national planning policy.

We therefore object to this application on the following grounds,

1. The Site is located outside of the current urban area of Whitstable as identified on the Adopted Local Plan Proposals Map and does not fall within one of the 'exceptions' criteria listed in policy HD4 of the Adopted Local Plan (2017), as suitable for new dwellings. As such the proposed development does not comply with the aims and objectives of policies SP4 and HD4 of the Adopted Development Plan.

We strongly object to this application as this site has not been allocated and is contrary to the CPRE's development policy of brownfield first.

The applicant points out that site has been included the Council's emerging development plan – the Canterbury Local Plan to 2040 – under Policy W4. However, this is only at the Reg 18 consultation stage. The emerging local plan is at such an early stage that it does not have sufficient weight. To grant permission for CA/25/00779 would undermine the plan-making process by predetermining decisions about the scale, location and phasing of new development that is central to the Reg 18 Local Plan.

This development would also have a cumulative impact with the other development planned in and around Whitstable. To grant planning permission here would therefore result in an undesirable precedent being set.

2. Flood Risk: The site is located within Environment Agency Flood Zones 2 and 3, indicating a high risk of flooding. Development in such areas poses significant challenges for effective flood management and risks to future residents. A linear stretch of land running east to west across the site is also located in an area of high risk to surface water flooding.

3. Ecological Importance: The Site is located within the Thames Coast & Sandwich Bay / 7km Zone of Influence and Thames, Wealdway & Swale Estuaries 6km Zone of Influence.

Convent's Wood, a designated Local Wildlife Site (LWS), and areas of Ancient Woodland, is located centrally within the Site. The LWS is designated for its ancient woodland inventory, including 13 ancient woodland indicator species and is protected under policy 157 Locally Designated Sites of the Adopted Local Plan. We agree with Kent Wildlife Trust's concerns about the adverse impact, both direct and indirect, of the proposal on Convent's Wood.

The proposed development would put this ancient woodland at risk from recreational damage, rod predation, light pollution and of being isolated and losing its connectivity.

We ask for a 50m buffer around this ancient woodland rather than the 30m proposed in the Arboricultural Assessment.

We are also concerned about encroachment on the waterways and ask for a 50m buffer from all waterways.

Further afield, the West Elm and Thornodon Wood Site of Special Scientific Interest (SSSI) is located circa 0.3km south of the A229. The presence of Ancient Woodland and sections covered by Natural England Priority Habitat Inventory underscores the ecological value of the site. Ancient Woodland is irreplaceable and crucial for biodiversity, making its protection paramount. This is an area of high biodiversity value with rare bushflies and breeding birds. As such its ecological, biodiversity and landscape value would be adversely impacted by a development of this scale. Limited consideration is given to these impacts within the evidence provided by the applicant.

We agree with the comments of KCC Ecology that more information is needed. In particular we would like a reptile survey to be carried out on more information to be provided as to why the applicant believes one is not necessary. Similarly, we strongly recommend genetic survey to be carried out because of their known presence in the wider landscape.

We are concerned at the lack of specific mitigation for the total and permanent loss of breeding and foraging habitat for skylarks. We ask for specific mitigation for the loss of skylark habitat if that loss cannot be avoided.

Wormtail (*Myrmica ruginodis*) has been recorded to be growing on the site. *Myrmica ruginodis* is regarded as Vulnerable to the risk of extinction, both in England and Great Britain as a whole. There are no known records of it growing anywhere else in east Kent.

We ask for a planning condition to ensure no lighting near woodland or hedgerow and for a bat friendly lighting scheme in the residential areas of the development.

4. Trees: We agree with the comments of KCC's tree officer and ask for the new access road from Chestfield Road to be sowed so that any removal of trees takes place in H9, a Category C hedgerow, and not, as it currently suggested from G15, a Category A landscape-scale belt of trees, some of which are 250mm diameter.

Any removal of trees to form an access road through G15 would create a breach which would significantly reduce their wider value.

Therefore, we support the tree officer's call for a TPO on tree belt G15 owing to their wider landscape value and scale.

5. **High Landscape Value:** The site is almost entirely within the Blean Woods Area of High Landscape Value. This designation recognizes the area's scenic quality, which would be significantly impacted by the proposed development contrary to Policy LB2.

Policy LB2 Areas of High Landscape Value Within these areas, development will be considered in relation to the extent to which its location, scale, design and materials would impact on or protect the local landscape character and enhance the future appearance of the designated landscape and its heritage and nature conservation interest. Development proposals that support the landscape character (including settlement character), and have no significant impact upon historic setting, archaeological or nature conservation interests, where relevant, will be permitted

The Canterbury Landscape Character Appraisal designates the site as being within LCA C2 Chestfield farmland. The Canterbury Landscape Character Assessment and Biodiversity Appraisal October 2020 says that any development should:

- Continue to conserve the open rural setting of the A299 resisting pressures for unsympathetic linear development along the corridor to help reinforce the open rural setting south of Chestfield and Whitstable.
 - Conserve and enhance the lanes at South Street ... maintaining rural character of grass verges, and hedgerow boundaries and seek to manage heavy traffic use.
6. **Agricultural Quality:** Parts of the site are assessed as Grade 3 agricultural land, considered 'best and most versatile'. Developing this land would result in the loss of valuable agricultural resources.

Much of the development site has historically been farmed for cereal crops. Although the applicant's soil analysis concludes that the majority of the site is grade 3b, with a small proportion of grade 4, the fact that it has been used so successfully for cereal crops suggests that it is likely that much of it may be Grade 3a rather than Grade 3b land. Grade 3a is Best and Most Versatile (BMV) agricultural land and its development for housing would be contrary to policy EMP 12 (Agricultural Land) of the Adopted Local Plan (2017).

it is noted that the applicant's Agricultural Land Classification report confirms that points 52 and 53 of the applicant's soil tests are graded 3a (BMV). As the site has consistently been farmed for cereals we query whether the assertion that the site comprises no BMV is correct.

7. **Minerals Safeguarding:** A small central section of the site falls under KCC Minerals Safeguarding for Brickearth. This indicates the land's potential value for mineral resources, which should be preserved.
8. **Highway and Infrastructure Concerns:** The surrounding highways, particularly along the southern boundary, are rural with no footways or lighting. The necessary infrastructure improvements would spoil the area's rural character and significantly increase traffic, especially through the Blean Woods, as residents commute to Canterbury.
9. **Heritage Impact:** The Chestfield Conservation Area lies to the east, with three Grade 2 Listed Buildings in close proximity: Brooklands Cottage and Brooklands Farmhouse to the

southeast, and Rayham Farm and its barn to the northeast. The proposed development's size and proximity are likely to cause substantial harm to these heritage assets, contrary to the principles of preserving historical integrity and Policy HE1 (Historic Environment and Heritage Assets) of the Adopted Local Plan.

It is therefore CPRE Kent's view that the site's flood risk, ecological significance, landscape value, agricultural importance, mineral safeguarding status, and potential negative impacts on local infrastructure and heritage assets make it an unsuitable location for development.

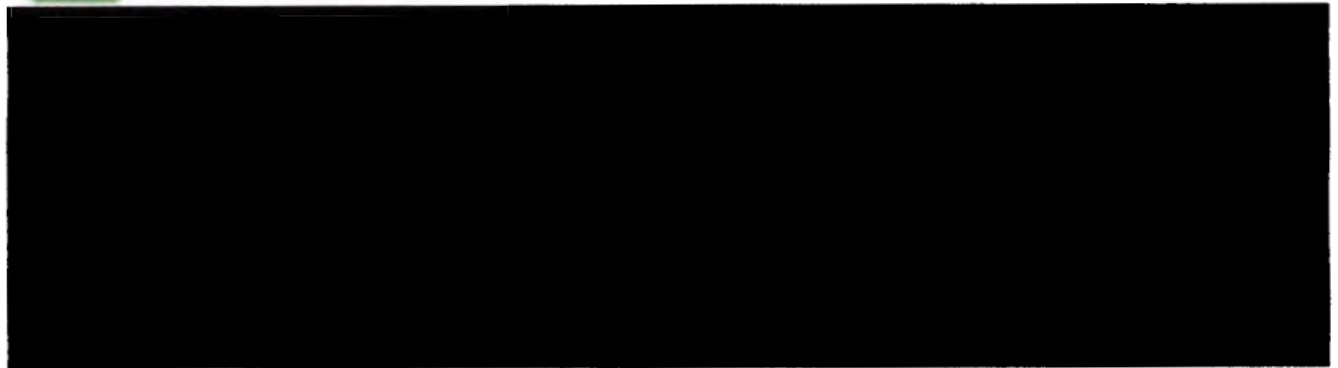
It is our view that, for the above reasons and notwithstanding the presumption in favour being applied, that the proposal remains contrary to the development plan as a whole and therefore should be refused.

Yours sincerely

Canterbury committee – CPRE Kent



The countryside charity



THE UNIVERSITY OF CHICAGO
DIVISION OF THE PHYSICAL SCIENCES
DEPARTMENT OF PHYSICS

PHYSICS 321
LECTURE 10
THERMODYNAMICS

LECTURER: JOHN H. COLEMAN
DATE: 1964

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Save Brooklands Farmland Campaign Group – Objection

To: The Planning Department, Canterbury City Council, 14 Rose Lane, Canterbury CT1 2UR

From: Save Brooklands Farmland Campaign Group

Subject: Objection to the Outline Planning Application for Brooklands Farmland Development – Reference CA/25/00779

Date: 2nd July 2025

We write to formally object to the proposed Brooklands Farmland Development covering the following main areas:

1. Highways & Transport
2. Sewage, Flood Risk & Surface Water
3. Water Supply
4. Health & Education
5. Area of High Landscape Value
6. Landscape & Visual Impact Assessment (LVIA) & Build Design.
7. Best & Versatile Farmland
8. Biodiversity and Wildlife
9. Miscellaneous

1. Highways & Transport

1.1 Congestion and traffic modelling

1.1.1 The Brooklands Farm planning application for 1350 new homes plus new A299 road junction is clearly based on the assumption that there is sufficient highway capacity to cope with the additional traffic flows. The Developers' traffic modelling fails to demonstrate this, their over-simplistic modelling grossly under-estimates the congestion already experienced by local residents.

1.1.2 At Chestfield's main roundabout (Chestfield Road / Herne Bay Road / Thanet Way), the very variable *morning* peak hour queues on the northern and eastern arms can regularly reach over 400 metres long. (On the A2990, queues can start at Garden Centre X and on Herne Bay Road they start west of Burnham Road). The Developers' traffic modelling claims these queues are merely 1.2 cars and 2 cars long, respectively, as shown below in the Developers' modelling for 2024 morning peak period. (Note PCU means Passenger Car Unit = 1 Car).

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.67	10.51	2.0	B
2 - Thanet Way (E)	0.53	4.44	1.2	A
3 - Chestfield Road	0.42	5.65	0.7	A
4 - Thanet Way (W)	0.36	2.61	0.6	A

It should be noted that similar queues on Herne Bay Road also occur at c 15:30 at the end of the school day at Swalecliffe Primary.

1.13 The Developers' modelling does not appear to take sufficient account of how this roundabout is adversely affected by the very well-used signalised crossings on the western and northern arms of the roundabout. Nor does the modelling appear to take account of the proximity of the St John Road roundabout and the Reeves Way roundabout. Sometimes queues from the St John's Road roundabout can extend back onto the main Chestfield roundabout.

1.14 The Developers' modelling also under-estimates queue lengths at the Millstrood Road / Thanet Way roundabout, at Long Reach roundabout and the junction of Belmont Road and Canterbury Road. So far as we can see, the Developers have omitted to model the junction of A2990 Thanet Way / Prospect Retail Park. This is absolutely unacceptable because very long queues form from this junction onto the A299 dual carriageway, which is a safety problem due to the high-speed nature of this road.

1.15 The Developers have also failed to model the proposed alternate one-way working on South Street. This would be of particular interest in the scenario with the new A299 / Radfall junction.

1.16 Further uncertainty about the value of the modelling is due to the Developers not clearly stating which planned housing in Canterbury District is included in the model. Presumably it does not include traffic from the already-approved 220 houses at "Land south of Thanet Way" (application 23/00379). Does it include the 220 houses approved in 2023 in application 22/01527 (Church Lane, Seasalter)? Presumably, it does not include the houses and school at Bodkin Farm (application already submitted), nor the 2000 houses at the University of Kent site as set out in CCC's draft Local Plan. The latter scheme would have a major impact at the A299 / Radfall junction and at Long Reach and Clapham Hill roundabouts.

1.17 Noting the very poor-quality modelling provided for the existing road junctions, this gives no confidence in the Developers' modelling for the traffic impacts of the proposed A299 / Radfall junction.

1.2 Road safety

1.2.1 The Developers have provided insufficient data about road safety

To look at the highway safety record we had to look at the well-presented data provided by the Developers for the Bodkin Farm application, although this does not extend sufficiently south in the direction of Canterbury, nor does it appear to include South Street or Millstrood Road. The Bodkin statistics show a cluster of traffic accidents happening in the vicinity of the Thanet Way / Chestfield road roundabout and crossings. The proposed Brooklands development would be likely to exacerbate these problems, especially in the early stages of construction, when it is very unlikely there would be any primary school or shops at Brooklands and the proposed A299 / Radfall junction would still be a long way in the future.

1.2.2 One safety hazard requires particular attention: this is the lack of any pedestrian pavement on the west side of Herne Bay Road under the railway bridge, and therefore no safe pedestrian route from Herne Bay Road southern pavement to McDonalds and Sainsbury's.

1.2.3 A pedestrian was injured 20th Oct 2020 crossing Herne Bay Road at the uncontrolled crossing north of the railway bridge, due to a misunderstanding whereby the pedestrian mistakenly thought the driver was allowing them to cross the road. It is not uncommon to see pedestrians (including children) walking in the road under the railway bridge to avoid crossing the road twice on their way to McDonalds, Sainsbury's etc. It appears likely that there will be further pedestrian injuries here, especially in winter / poor light / or when the driver has poor eyesight or confuses their brake and accelerator pedals (as has apparently happened in other

crashes). The Brooklands Farm proposals increase the risk of such crashes occurring, especially in the earlier stages of development before the planned primary school is built (if it is ever built).

12.4 Another serious road safety concern is the very significant increase in traffic likely to result from the Brooklands proposals on South Street, which is supposed to be a cycle-friendly segment of the Crab & Winkle cycle route from Whitstable to Canterbury. The Brooklands proposals appear to raise unacceptable risks to cyclists on the Crab & Winkle route, especially where joining / leaving South Street from the adjacent Crab & Winkle cycle paths. This is not just due to traffic to / from the new development, but also due to traffic (including HGVs) short-cutting between Whitstable and the proposed new junction with the A299 dual carriageway.

12.5 A third road safety problem likely to be made more hazardous by the Brooklands application is the lack of formal pedestrian crossing across Clapham Hill, where numerous pedestrians (especially children) cross the road to catch a bus. A pedestrian was seriously injured crossing Clapham Hill here in 2017. All scenarios of the Brooklands proposals would increase southbound traffic levels on Clapham Hill, as this would be the main route from the 1350 new homes to the M2 motorway, Faversham, Maidstone, Medway towns and London.

12.6 The fourth road safety problem concerns the increased traffic from the A299 to the Brooklands development. In all scenarios before the completion of any new A299 / Radfall junction, there would be increased tendency for traffic to queue back from Prospect Retail Park signals onto the A299 dual carriageway, raising the risk of rear-shunt type collisions, especially in poor visibility.

12.7 A fifth highway safety issue relates to the proposed narrowing of South Street at Red Bridge. As stated by the Developers' safety audit, this raises the risk of head-on type collisions due to visibility issues. The Developers proposed to define a visibility splay within which vegetation must be maintained (by whom?). This is not acceptable as the Highway Authority are clearly unable to keep up with all the existing vegetation alongside our roads. Moreover, the alternate one-way working raises the risk of head-on collisions in poor visibility, which is a particular concern here due to the lie of the land in a hollow next to the river.

12.8 The issues raised above highlight the lack of assessment by the Developer of potential impacts of their proposals on the existing highway network, especially in regard to pedestrians and cyclists.

1.3 Public transport

13.1 Chestfield has a relatively infrequent bus service to / from Canterbury, despite so many residents working in Canterbury and going to school there. The last bus to Chestfield leaves Canterbury at 17:50, which is useless for late working staff and anyone wanting to enjoy Canterbury's evening cultural activities.

13.2 For longer distance commuters, Whitstable does not enjoy Canterbury's good rail connections. From Whitstable, there are no direct rail services to Ashford, Maidstone or Dover. This shows how Whitstable is not such a sustainable location for development as Canterbury, which also has far more employment opportunities plus the local grammar schools.

13.3 The Travel Plan indicates that the no 5 bus service from Canterbury to Seasalter via Chestfield Road runs every 30-60 minutes. This is misleading. In the 38 years we have lived near this bus route the service has never run at intervals of less than an hour.

In fact on weekdays this service currently runs Monday to Friday hourly between the hours of 0922 and 1816 (Canterbury to Seasalter) and 0704 and 1711 (Seasalter to Canterbury) (times given are at Maydowns Road, Chestfield) apart from an extended break in service mid-afternoon of 1.5 hours in the direction of Whitstable High Street and 2.5 hours to Canterbury when the buses are diverted for use by schoolchildren travelling between Canterbury and the coastal towns. There is no evening service, including at weekends. These hours of operation mean that it is of little use to anyone wishing to commute to a full-time job in Canterbury. As the Travel Plan notes, route no 5 is the only regular service to this part of Whitstable.

Much of the implementation of the Travel Plan is described as the responsibility of the 'Travel Plan Co-ordinator'. The role and responsibilities of this person and an indication of to whom they will be responsible are not specified, nor is the mechanism for appointing them. This requires detailed clarification.

1.4 Cycle infrastructure

1.4.1 The existing level of traffic on South Street is at the upper limits of acceptability for a cycle route intended for users of all abilities. The additional traffic from the proposed development and the proposed A299 Radfall junction would render this route dangerous and unsuitable for children and other less experienced cyclists.

1.5 Final comments on Highway Issues.

1.5.1 The Developers' proposals are unacceptable due to the resulting highway safety hazards described above. The proposals would also be unacceptable due to the levels of severe congestion and delay at the Chestfield Road / Herne Bay Road roundabout, and the Prospect Retail Park signals and the Long Reach roundabout which are already close to capacity. The Developers' modelling is clearly erroneous. It lacks credibility and is not fit for purpose. It would require to be fundamentally re-worked before any possible re-submission of an application by the Developers.

2. Sewage, Flood Risk & Surface Water

2.1. Inadequate Sewage Treatment Capacity at Swalecliffe Water Treatment Works (WTW)

Southern Water has explicitly acknowledged via their own consultee comment (dated 10th June 2025) that there is currently inadequate capacity at Swalecliffe WTW to support the proposed development of 1,350 new homes.

In addition, following direct correspondence with Southern Water in February 2025, they have confirmed in writing that based on their own modelling (assuming 2.4 persons per household) for c.1,400 homes they estimate an additional 1,092 m³/day of wastewater. This when added to the Swalecliffe WTW's existing three-year average inflow of 6,543 m³/day, exceeds their legal Dry Weather Flow (DWF) capacity of 7,608 m³/day.

This calculation:

Excludes wastewater from other consented, but not fully completed local housing developments (e.g. Whitstable Heights, Pearson Heights, Oxenden Park (as advised by Chestfield Parish Council))

ignores future development plans in nearby areas (e.g. Land South of Thanet Way (220 houses) Bodlin Farm (200 houses), Care home off Old Thanet Way (75 bed)).
Does not account for wet weather inflows or combined sewer overflow events (CSOs).

Objection: There is demonstrable evidence that Swale JF is WTM location above capacity, and further loading will breach environmental thresholds and regulatory permits.

2.2 Inadequate Capacity in the existing Foul Network

Southern Water has also explicitly acknowledged via their own consultant comment (dated 10th June 2025) that there is currently inadequate Network Capacity in their underground assets that carry water and waste water to Swalecliffe WTM. Part of their evaluation looks at the risk of flooding incidents arising from the additional flow of materials in terms of 'Hydraulic overload'. Southern Water's own checks indicate that the impact of the additional foul sewerage flows from the proposed development on the existing public sewer network may lead to an increased risk of foul flooding from the sewer network. We have already seen evidence locally of raw sewage running down road within Whitstable Heights development and along the old Thanet Way

Objection: There is demonstrable evidence that there is insufficient network capacity for a development of this size, especially when factoring in all the existing developments currently being built. The risk of foul flooding from the development into Swalecliffe Brook which feeds into a SSSI site (Long Road) is environmentally unacceptable.

2.3 History of Pollution and Regulatory Non-Compliance

In 2024, Southern Water CSOs at the Swalecliffe Water Treatment Plant were used 76 times, discharging 2m³ of raw sewage and rainwater into the estuary over 704 hours.

In 2025 alone, there have already been 33 sewage overflow alerts, with no meaningful trend of improvement despite recent upgrades, with the latest sewage overflow occurring as recently as 11th June 2025 following a storm.

Southern Water has a documented record of environmental non-compliance, including:

- A £500,000 fine in 2014 following a pollution incident in Swalecliffe Brook.
- £400 illegal discharges of raw sewage across Kent and Sussex between 2010–2015, resulting in a £90 million fine in 2020.

Objection: The continued and frequent discharges confirm that the existing foul sewage network feeding into Swalecliffe WTM cannot reliably prevent environmental harm due to the existing load being placed on the foul network and treatment works – let alone under further strain from this proposed development.

2.4 Insufficient Surface Water Drainage and SuDS Risk

While the application proposes a Sustainable Drainage System (SuDS), there are several shortcomings:

The primary outfall is into Swalecliffe Brook, a flood-prone watercourse that flows into a SSSI site (Long Rock)

There is no provision for long-term storage, nor a clear strategy for SuDS maintenance and adoption.

The SuDS plan is incomplete, vague and fails to guarantee performance over the lifetime of the development.

Southern Water have confirmed no soakaways should be connected to the public surface water network and they require clarity over future maintenance responsibilities.

The application excludes consideration of green roofs, proprietary treatment system, attenuation storage tanks or ponds/wetlands.

Objection: The site's surface water management strategy lacks robustness and presents a risk of overwhelming both foul and surface drainage systems, particularly during storm events.

2.5 Increased Flood Risk and Incomplete Sequential Test

The site includes land in Flood Zones 2 and 3, particularly around Swalecliffe Brook. Key concerns include:

Flood records exist for surrounding roads (e.g. South Street, Rayham Road).

The historic flood map shows evidence of surface water flooding at both the bridge over the Swalecliffe Brook on South Street and underneath the Thanet Way on Radfall Hill. There is as yet no evidence of how the development will counter either, despite the latter being acknowledged in their Transport Assessment as a risk to the efficiency of the A299 slip road.

The site topography forms a natural basin, concentrating runoff.

The Sequential Test fails to consider recent updates to climate risk (post-2021 guidance) and does not assess alternative sites.

Exceedance routes, compensatory storage, and buffer zones are insufficiently defined.

In the submitted documents, ditch 8 is a natural stream and has continuous flow of water throughout springtime and therefore cannot be replaced by a series of SUDs.

Risk to the downstream Long Rock SSSI has not been assessed — this omission is significant given the potential impact of treated and untreated discharges on a protected site.

Objection: The application is non-compliant with the NPPF 2024 (Paras 170 - 181) due to an incomplete and out-of-date Sequential Test, thus rendering the proposal unlawful. In addition, it has not identified correctly a natural stream (labelled ditch 8)

2.6 Construction Phase Risks

During the build-out phase:

1. Alterations to drainage channels, earthworks, and stockpiling in the floodplain may exacerbate short-term flood risk.
2. Dewatering activities could disrupt local hydrology without appropriate recharge systems.

Objection: The proposal lacks a detailed mitigation strategy for construction-phase flood risk and must be revised.

3. Water Supply

“Water is a basic necessity of life. South East Water is responsible for the fresh water for the whole of Kent” (Source: Wikipedia)

South East Water is a UK supplier of drinking water to 2.2 million consumers in Kent, Sussex, Surrey, Hampshire and Berkshire and is a private limited company registered in England and Wales.

South East Water is at least 75% owned by entities domiciled outside of the United Kingdom. Each day the company supplies on average 521 million litres of drinking water from its 83 water treatment works and manages more than 14,500 kilometres (about 9,000 miles) of its water mains. The company's supply area covers 5,657 square kilometres. The company takes water from rivers, reservoirs at Ardingly and Arlington, and underground sources (aquifers) under abstraction licences issued by the Environment Agency.

South East Water was one of eleven water providers fined by the water regulator for England and Wales, Ofwat, in October 2022. South East Water's fine was £3.2 million.

As of 21 December 2022, South East Water continued to receive criticism, including from MPs, as a result of widespread and long-lasting water outages affecting thousands of homes and businesses across its network. Bottled water stations were set up at several sites but supplies quickly ran low. Various sites were forced to unexpectedly close at short notice to restock or as they became overwhelmed.

The Guardian reported on 21 December 2022 that South East Water had admitted that it couldn't guarantee that all customers would have their water supply restored by Christmas Day. Speaking to Kent Live, Greg Clark, MP for Tunbridge Wells and former Cabinet Minister, said: “I have spoken every day with the chief executive of South East Water, David Hinton. I wish I could tell you that I am confident that reliable supplies will be resumed imminently, but I'm afraid I can't.” Mr Clark later described the leadership of South East Water as “deficient” in a crisis situation.

Mr Clark confirmed that he had raised the issue in The House of Commons, asked the government to intervene, and further described South East Water's approach to resolving the crisis as “unacceptably bad and in some instances chaotic.”

Further mass outages affected customers in June 2023, with several schools across Kent and Sussex being forced to close as a direct result of the lack of water supply. A BBC article described how elderly residents - many of whom did not have social media - were “beginning to panic and worry about how they are going to get water.” MP Nus Ghani described the situation as “groundhog day” and urged South East Water to urgently remedy the situation. On 26 June 2023 the company introduced a hosepipe ban across the area, blaming increased domestic demand through more people working at home. This was despite reservoirs in the region being almost full, following a wet winter and spring.'

Objection: This company will clearly struggle to provide a safe and satisfactory fresh water supply to an ever-increasing number of homes in Kent.

During 2023/24 South East Water had a leakage rate of 101.4 million litres a day, resulting in an underperformance fine of £3.704 million. How do the developers propose to supply 1350 houses, a care facility, two schools, a community hub and industrial areas with the fresh water that they will need?

Currently, when a new development is added to the existing water network, the pressure is increased in order to maintain supply. This inevitably causes burst mains in a system that has been poorly maintained over decades because the pipework cannot withstand the higher pressure. This leaves homes and businesses without fresh water while the leak is fixed, and the service resumed. There is also the added issue of the road closures required while the work is completed, causing travel disruption.

Objection: Inevitably, the higher pressure still required causes ruptures to the pipes further along the same poorly maintained pipework and the main bursts again, but further along the system - usually within a short distance of the original burst. The process then repeats itself. The entire network of fresh water supply pipes needs updating and replacing in order to supply all of the proposed developments to the area.

4. Health & Education

HEALTH

4.1 Health Service Provision

Document ES (Environmental Statement) Volume 1 concludes that there is excess GP capacity at Whitstable Medical Practice of 13,416 patients, equating to approximately 7 FTE (Full-Time Equivalent) GPs.

However

- i) the CCC Scoping Opinion (p 10) says that *'due to the overall scale of the proposed development it is likely to generate significant demand for health provision ...'*
- ii) the Grasmere Land report states (para 136) that *'the NHS has commented that local health centres are at capacity'*.
- iii) at a public meeting held in Whitstable in April 2024 Dr Ribchester, Director of Whitstable Medical Practice, said:

"We're very concerned that there's no specific mention of general practice or community health plans, ... Our three neighbouring centres at Chestfield, Whitstable Harbour and Estuary View are full. We have no spare consulting rooms, and we would very much like to work with you to make sure the people in this hall and all new people in this area have decent NHS health services." (Source: Kent Online, 29 April 2024). He also stated that with the projected increase in population, a further 31 GPs would be required to maintain the current level of patient care. ES Volume 1 makes a vague reference to there being a new health centre. There are no further details on this. Will it be GP-led or staffed by e.g. nurses, paramedics? Has there been liaison with Kent and Medway Clinical Commissioning Group or with Whitstable Medical Practice so

as to ascertain the most beneficial provision? Who will fund any services? Has there been any assessment of the likely impact on existing health provision? Under Section 106 and CIL regulations there are significant hoops to be jumped through before funding for new or extended GP practices can be obtained.

There appears to be no assessment of the impact of the development on local hospitals – especially A&E Departments, all of which are generally recognised locally to be often overwhelmed.

ES Volume 1 confirms that there are five dentists in the Whitstable area, none of which is currently accepting new NHS patients.

Document references:

1) The CCC Scoping Opinion: a report from CCC Deputy Planning Officer on the application (CA/2400788) for a pre-application scoping opinion on the current proposal.

2) The Grasmere Land Report: a Delegated Report (i.e. decision) from CCC detailing the grounds for refusal of a planning application (CA/16/02971) for 170 houses at on land at Grasmere Road (also part of Brooklands Farm), which contains a number of comments relevant to the current proposal.

Conclusion

There is inadequate health care provision for the current local population, and the service providers cannot sustain safe and robust care to thousands more residents who will be brought to Whitstable with the proposed development of Brooklands Farm. It should also be noted that people from the entire district attend the Urgent Treatment Centre at Estuary View due to the overwhelmed emergency departments at both QEOM Hospital at Margate and the William Harvey Hospital at Ashford, therefore the demand on the service provided there will be increased not just by the population of Whitstable, but also by the ever growing population in the entire district. There is also the issue of proximity to the two Accident and Emergency departments and the time it takes to get there from Whitstable - potentially a situation where an unnecessary death could be the outcome of prolonged travel time.

Objection

There is insufficient health care provision for the existing residents of Whitstable, and the current providers will be unable to cope when the proposed Brooklands Farm development adds approximately 3250 more people (in addition to the unfinished building projects and their inhabitants in the area).

4.2 Open Space Provision

The current Local Plan highlights (para 11.4) that open space *improves health and wellbeing – physical exercise, recreation and psychological calming*, and (para 11.5) that it is *'seen as a key component to raising the quality of life of the District's residents and visitors'*. Para 11.7 highlights that *'it is important open space is a key design component in large scale developments...at the start of the process'* while para 11.9 says that *connected, well designed, high quality open spaces with opportunities for active recreation are a priority*.

One reason for refusal of application CA/16/02971 at Grasmere Road – which is also part of Brooklands Farm – was that it would result in *'the loss of an area of protected open space, to the detriment of the visual and recreation amenity of the area, with no justification which would outweigh the harm caused'* (para 170 of the Grasmere Land Report). It was also noted (para 111) that *'it is considered that as a large arable field, the site is distinctly rural in character, which is of value to the semi-rural landscape of the surrounding area.'* And (para 112) that *'On this basis, it is considered that the development would have an adverse impact on landscape and visual amenity of the area'.*

The current proposal is for a development some 8 times the size of the Grasmere Road one, in an area south of Grasmere Road which intrudes further into the surrounding rural landscape. The loss brought about by the current proposal would therefore be significantly larger than that described for the Grasmere development.

The Grasmere Land Report gives as a concluding reason for refusal of planning permission that:

'The proposed development would result in the loss of an area of protected open space which supports the social and cultural well-being of the local community, to the detriment of the visual and recreation amenity of the area, with no justification which would outweigh the harm caused. As such the proposed development is contrary to the core principles of sustainable development as set out in the National Planning Policy Framework, Policy C28 of the Canterbury District Local Plan 2006, and policy OS9 of the Canterbury District Local Plan 2014 publication draft.'

ES Volume 1 states at p7.56 *'According to the draft Canterbury District Open Space Strategy 2023 to 2040 (Ref 7.16), there are quantitative deficiencies District-wide across most open space typologies, but particularly parks and gardens, amenity greenspace, provision for children and young people, allotments, and outdoor sports. Additionally, the quality of open spaces available in Whitstable is mixed, with more than half considered to be below the quality threshold'.*

4.3 Allotments

The proposal lists allotments as an important aspect of open space. Of the seven local ones mentioned, three are in Whitstable. Two of these (Millstrood Road and Joy Lane) are no longer accepting applications *as allotments rarely become available and the waiting list is very long.* The third Whitstable site (Thanet Way/Ham Shades Lane) has a two-year waiting list.

4.4 Outdoor play area and gardens

Is there any assessment of how much area will be set aside for these? Who will manage and maintain these areas?

Education

4.5 School Places

ES Volume 1 states that there are 163 spaces in local primary schools and 141 spaces at the Whitstable School. The report does not mention the proposed primary school and SEND school on the Brooklands Farm site. Birth rates fluctuate year on year so requirement for school places does the same. Does Canterbury City Council intend for the proposed primary school to be solely for the resident children of the development, or will that be for the LEA to decide? Will the LEA decide that there are sufficient places within existing schools and that the building of any further schools is not an immediate requirement?

4.6 Grammar Schools

The issue of selective education for residents on the site does not seem to be addressed. The latest news (2020?) on the proposed Coastal Grammar School seems to be that plans are on hold.

This means that children from the site who pass the Kent Test will either have to walk to Whitstable or Chestfield Station to get the train to Faversham (see comments below about walking down the Crab and Winkle route in the dark) or get a bus to Canterbury. Active Travel England has said that it is unable to support the current proposal on account of the lack of safe walking routes from the development.

School buses to Canterbury are already overcrowded and the KCC Travel Saver is £580 per year per child. This is likely to encourage parents to take their children to school in Canterbury by car, with obvious implications for traffic levels in the city.

Have assessments been made of the impact of additional travel to school on local transport services?

4.7 Transport and Traffic

The developer's Residential Travel Plan states that *'travel plans for the schools have not been provided as they are generally prepared by the education authorities'* (para 1.1.2.).

Some of the estimated times for walking to local schools may be realistic for able-bodied adults but for young children – especially if accompanied by younger pre-school siblings – are rather ambitious.

There are questions about the safety of the walking route from Whitstable station to the development. During the dark hours of the winter months that walk would either have to be made down the poorly-lit Crab and Winkle cycle path – one that many people (especially women and girls) avoid - or down South Street which has only a narrow pavement and only on one side of the street.

On-site Primary and SEND schools. What are the traffic implications at drop off and pick up times? Will parents park on site or in nearby roads? It is noteworthy that parents' cars cause problems for local traffic at Blean School, Joy Lane Primary School, Swalecliffe Primary School and The Whitstable School.

Conclusion:

There are no firm plans for the provision of any school on the site – it appears to be included in order to tick an 'infrastructure' box within the planning application. There are no projections of likely numbers of children for whom schools will be required.

Objection

If the overall population of the area (with several new build estates in progress) increases the population by approximately 2500 houses, there could be in the region of 1000 children or more of primary school age. The only proposed primary school for the area is on the Brooklands Farm proposal. To accommodate the numbers of children, the school would need to be twice the size of Joy Lane Primary School. This would therefore cause huge increases in traffic movement as it would have to accept children from the entire area and not just the immediate vicinity. The allocated area on the plan produced by Hallam Land does not appear to provide enough space for a school of this size and there are no specific plans in place, therefore this development should not go ahead until this matter is addressed and concluded in a satisfactory way for the community.

5. Area of High Landscape Value

Brooklands Farm is part of the Blean Woods Area of High Landscape Value (AHLV), recognising its role as part of the setting of the Ancient Woodland of the Blean. It has had protected status since its inclusion in the Canterbury Local Plan of 1998, at which time the Blean Woods AHLV was called a Special Landscape Area.

The Canterbury Local Plan 2017 (see page 10), states that the Blean Woods AHLV "identifies landscapes important to the character and setting of the Blean Wood Complex. It is an important objective of the Council and other agencies to preserve and enhance this landscape, with long term objectives to meet habitat network potential for woodland and heathland, particularly where it improves habitat connectivity of the Blean woodlands."

The site offers expansive panoramic views over the valley of the Swalecliffe Brook which runs through the site, extending to the forested Blean Hills in the distance.

The inclusion of the farmland within the AHLV is entirely appropriate because not only are the Blean Woods clearly seen across the farmland, but the farmland can be seen from within the woodland, especially in winter when there are no leaves on the trees. If the farmland was covered in housing, this would seriously detract from visitors' experience of the woodland. Another factor is that urban development needs to be kept at distance from the woodland to reduce damage caused by recreational activity and also predatory hunting by residents' pets. The Canterbury Landscape Character and Biodiversity Appraisal places the area within LCA 10: Chestfield Wooded Farmland, noted for its high biodiversity value, including habitats for rare butterflies and breeding birds. The public right of way along the northern edge of the site offers protected views that contribute significantly to local amenity and heritage.

Development in this area would severely compromise its ecological and visual integrity. The tranquil green valley would be transformed, and long-distance views of the Blean would lose much of their meaning if seen only above rooftops.

It is worth noting that nearby Land South of the Thanet Way—also within the W5 allocation—is proposed to be preserved under Green Gap policy, further highlighting the need for consistent landscape protection across the entire area.

Given these considerations, the landscape, ecological, and biodiversity value of Brooklands Farm warrants its exclusion from strategic development proposals. The area should instead be designated as part of a continuous Green Gap between Whitstable, Chestfield, and the edges of Blean Woods and Radfall, ensuring long-term protection for its unique rural character.

Also, though it remains elusive, an agreement, made when the A299 was upgraded in 1989 – 1997, was to stop any development between the A299 & A2990, thus preventing urban sprawl. Many people in Whitstable remember this and are still talking about it. They can't all be wrong?

5.1 Archaeology

An 'Historic Environment Desk-based Assessment' was conducted by Orion for the applicant in March 2025. The Executive Summary of that document is reproduced below in full on account of its interesting content. The relevant paragraph is given in bold below.

Executive Summary

This historic environment desk-based assessment considers land at Brooklands Farm, Whitstable, Kent (hereinafter referred to as the "study site"). In accordance with government policy (National Planning Policy Framework), this assessment draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage significance and archaeological potential of the study site.

A geophysical survey of the study site was carried out in September 2024. The survey captured the First World War military trenches and circular redoubt which are recorded on the HER (TR 16 SW 135) within the study site's southernmost development parcel. Within the study site's northernmost development parcel responses associated with the roads of the late 19th century planned but never constructed Rayham Hill Estate were recorded. Across the study site numerous trends, pit-like anomalies and discrete responses were detected in the survey data, which have been categorised as being of uncertain origin. It is likely that they were caused by underlying geological variations, agricultural processes or deeply buried ferrous debris, however, an archaeological origin cannot currently be ruled out. Former field boundaries, land drains and pipes were also recorded, as were bands of amorphous responses caused by the underlying geology. Zones of magnetic disturbance in Areas 2 and 11 were likely caused by demolition of the buildings of Southstreet Farm and a barn associated with Radfall Cottages and subsequent spread of debris.

A review of the available evidence indicates that the study site has moderate potential for prehistoric remains and a low but possible potential for Roman remains. It is considered to have a low potential for remains of all other periods, although medieval and post-medieval agricultural remains/features may be present.

Should as of yet unknown archaeological remains be present, based on the existing evidence, they are considered unlikely to be of more than local, or possibly of regional, significance. Therefore, they are considered unlikely to be a design constraint.

As the proposed development is progressed through the planning system, a programme of archaeological evaluation will be undertaken. While the scope of this work will be agreed with Canterbury City Council, it is envisaged that this will comprise archaeological trial trenching. Any subsequent mitigation measures will be agreed with the City Council.

The proposed development has the potential to have a less than substantial harmful effect on Brooklands Farm (grade II listed) and Rayham Farm & barn (both grade II listed). The current masterplan includes suitable design responses to limit any harmful effects on the significance of the listed buildings and it is anticipated that the less than substantial harmful effects will be at the low and very low level respectively for the assets. Therefore, the planning balance test of NPPF paragraph 215 will apply.

The proposed development will have no effects on the significance of all other designated heritage assets within the study area.

The reference here to the proposed archaeological evaluation is very vague. Where does responsibility for initiating, implementing and overseeing this lie? Again, more detailed clarification is required.

6. Landscape & Visual Impact Assessment (LVIA) & Build Design

An LVIA is essential for any major development within an AHLV. It must:

1. Establish a baseline—mapping existing landscape character, visual receptors (e.g., walkers, drivers, residents).
2. Model visual effects—e.g., photomontages from public viewpoints.
3. Propose mitigation—buffer planting, hedgerow retention, sustainable drainage.
4. Design for landscape sensitivity—minimising adverse effects on woodland, farmland, chalk slopes.

Brooklands Farm's AHLV status means:

Formal LVIA is mandatory with detailed mitigation strategies.

Planning proposals must clearly demonstrate minimal harm to scenic and ecological attributes.

Any major development **MUST** meet high thresholds akin to AONB tests—only permitted with proven exceptional need and public benefit.

Design and landscaping will be scrutinised against Kent's landscape character and green infrastructure standards.

The designation of Brooklands Farm under Policy W4 means that any outline or detailed planning proposals must be accompanied by a full LVIA and demonstrate how they preserve or enhance the landscape character.

Therefore, the proposed building design most certainly is inappropriate. Low lying buildings such as bungalows would be the most appropriate if the council decides against the people and gives the green light to the development. Hallam Land have presented plans in which the

buildings proposed are between 1.5 and 4 storeys. These building heights are completely out of keeping with the surrounding homes, most of which are bungalows. To propose 2.5 storey buildings next to existing bungalows is intrusive into existing residents' privacy and shows complete disrespect for their welfare. A large number of the properties on the periphery of the site are individual and sit well within the landscape, unlike the generic style of today's new developments, which appear to aim at maximising profits for the developers rather than providing the most suitable homes for new residents. They are aesthetically displeasing to look at and are totally out of keeping with Whitstable's unique character.

7. Best & Versatile Farmland

7.1 The Developers' Agricultural Land Classification Report Appendix 4A shows that two survey points (52 and 53) were estimated to show grade 3a (Best and Most Versatile) land, although the main body of the report implies that none of the site is Best and Most Versatile land.

7.2 Appendix 4a of the Developers' report also shows that at 10 survey points the depth of topsoil was said to be 40cm. This is on the boundary of the criteria of Best & Most Versatile category of land but not included in it. Appendix 4a shows that the measurement of topsoil depth was to the nearest 5cm.

7.3 This implies that 12 survey points (16% of site, or 12 Hectares), are either Grade 3a land or likely to be grade 3a within the estimated accuracy of measurement.

7.4 As the farm's arable fields produce good crops of wheat and barley year after year, fertilised by dung from the cattle-yard, the proportion of 3a land would be expected to be higher. We see that paragraph 10.3 of the Developers' report that "the site is limited by wetness except where soils are very shallow where they are limited by droughtiness." We suggest that the actual proportion of 3a land would be higher if the fields were ploughed each year to aid drainage in the soil.

8. Biodiversity

8.1 Biodiversity requirements

Biodiversity Net Gain (BNG) is required by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under this framework, developers must deliver at least 10% increase in biodiversity relative to the pre-development biodiversity value of on-site habitats.

[Source: [Biodiversity net gain - GOV.UK](https://www.gov.uk/guidance/biodiversity-net-gain)]

The Developers' Biodiversity Net Gain report states that their planned development at Brooklands Farm will achieve a Biodiversity Net Gain of:

Habitat units: +23.69%

Hedgerow units: +41.07%

Watercourse units: +30.49%

However, we consider that these values have been achieved by under-valuing the existing biodiversity and over-valuing the nature of their yet-to-be-delivered proposals. This is illustrated by the following examples.

8.1.1

The Developers' assessment of the biodiversity of the cattle meadows makes no mention of the presence of the rare plant Mousetail *Myosurus minimus* growing there. Its presence has been confirmed photographs from 2023 and 2025. There are no known records of it growing anywhere else in east Kent. On the Red List for England, it is classified as "vulnerable". If the proposed planning application is approved, this species is likely to become extinct in Kent.

8.1.2

The Developers' BNG report describes the largest cattle meadow as being in Poor condition with a "homogenous short sward". In practice, parts of the meadow are far from homogenous, and have flora showing the influence of the surrounding field boundaries. The sward height does not appear to be short in most of the first half of the year, because there are no cattle grazing during the winter or early spring (in practice until April). When the sward is shorter in the latter half of the year, this favours species which prefer shorter swards, including various species of mushrooms. These are not mentioned in the Developers assessment of the meadow.

8.1.3

The cattle meadows have a relatively high level of insect life, partly due to the presence of cow dung. The associated flies and dung beetles form the basis of an ecosystem that supports bats, swallows, pied wagtails etc. The BNG report and Ecology reports make no reference to the insects or the ecosystem.

8.1.4

The Developers' assessment of "Ditch D8" is totally inadequate. They describe it as "occasionally wet", however it is a natural brook that flows throughout the winter and springtime. Note that according to the UK Habitat Classification (UKHab 2023, p305), a ditch is an artificial standing water or dry linear ditch feature. According to the Statutory Biodiversity Metric User Guide (DEFRA 2024, p 40), "to complete an assessment of a watercourse, you will need to review features found across the whole of the riparian zone, even if segments of the riparian zone are outside of the site boundary."

8.1.5

The arable fields are described by the Developers thus: "Floral diversity was low due to the intensive management practices and the input of fertiliser, pesticide and herbicide and the fields supported narrow margins with more grass/ruderal dominated vegetation". Distinctiveness was described as low. The biodiversity assessment appears not to consider the numerous species of birds that visit these fields at particular times of year, including skylark, linnet, pheasant, wood pigeon, black-headed gull, jackdaw, jay, magpie, carrion crow, heron, snipe, golden plover, meadow pipit, and redwing. The assessment does not appear to consider the full biodiversity of the field margins which include a variety of flora and fauna (especially insect life), and a hedge not described in the Developers' hedgerow assessment but nevertheless very popular with insect pollinators in the springtime.

The Developers' biodiversity assessment appears to have omitted to evaluate the full riparian zone of the Swaledale Brook, especially where the brook flows between cattle meadows north of the indicated area of Longnye Wood. There is no public access to this area, but even from a distance it can be seen to be wildlife-rich, with flora including oak, hawthorn, spindle, "lady's smock", drooping rush and lesser celandine, and fauna including bats, squirrels, dormice, weasels, blackcaps and green woodpeckers.

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The Developers' Environment Statement report states in sections 13.125 and 13.126 that the proposals necessitate removal of 11900m of hedgerows, and creation of 6179m of new hedgerow. They also plan to enhance some existing hedgerows, although gaps must be created for new roads and walking routes. So, simply by claiming that the new hedgerows will be higher quality, they can use the Statutory Biodiversity Metric to demonstrate that the net loss of 1280m of hedgerow will lead to an increase in "Hedgerow Units" Biodiversity of 41%. This seems implausible. In the words of a (retired) Whitstable councillor, the process by which developers provide biodiversity assessments of their proposals, effectively means they are "making their own homework".

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The Developers' assessment of hedgerows is so counter-intuitive that it requires more detailed evidence. For example, in asserting that hedgerow H11 has low distinctiveness, how does this take into account the very old ivy-clad oak trees included in this hedgerow with particular explanation of how the assessment takes into account that ivy is "brilliant for wildlife" (according to Suffolk Wildlife Trust). This hedgerow is likely to contain elements of the adjacent part of Longnye Wood that was cleared in the 1940s at a time when food was rationed in Britain due to the effects of WW2.

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The Developers' biodiversity assessment in practice only evaluates floral habitat, and makes no attempt to assess the rich insect life of Brooklands Farm. The assessment is therefore totally inadequate and unrepresentative of the actual Biodiversity.

We note that the Government's Biodiversity Metric User Guide (DEFRA, 2024) states the tool the Developers used for evaluation "is not a complete or comprehensive ecological model and is not a substitute for expert ecological advice." Furthermore "this biodiversity metric is designed to inform decisions in conjunction with local guidance". Before any judgement can be made of the biodiversity or net gain in this application, it is essential to seek specialist advice from an independent expert.

For the above reasons, this application should be refused permission due to lack of clear evidence that biodiversity would be increased by 10% as required by Schedule 7A of the Town and Country Planning Act 1990.

8.1.10 Sites of Special Scientific Interest

8.1.11

The Developers' assessments do not sufficiently address the impact of the anticipated 4000 new residents and their pet cats and dogs on the nearby Blean Ancient Woodland and associated Sites of Special Scientific Interest sites (SSSIs). These would be less than 400m walking distance from the proposed development.



Sketchmap showing the proposed Brooklands Farm development (shown in red) relative to the Blean Woods SSSI (outlined in mauve). The yellow arrows denote underpasses under the A299 dual carriageway, provided for agricultural vehicles.

8.1.12

The West Blean and Thornden Wood SSSI would also be adversely impacted by the additional traffic on Radfall Hill / Radfall Road, from both the proposed development and the proposed new A299 junction. This would leave the woodland victim to even more traffic when the proposed 2000-house development is built on the University of Kent's land at Blean.

8.1.13

For the reasons listed above, this application should be refused planning permission due to the likely adverse impact on the West Blean and Thornden Wood SSSI. Development would be contrary to NPPF policy 193b which states "development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted".

8.1.14

The Developers do not sufficiently assess the impacts of the proposals on the Blean Ancient Woodlands. Their submission does not mention that in Clowes Wood there are rare Fritillary butterflies which would be only about 700m from the proposed development. Off-road cycling is already causing some damage in this wood.

8.1.15

The Developers do not sufficiently assess the impact of their development proposals on the adjacent Convicts Wood Ancient Woodland and Local Wildlife Site (LWS). This is at a lower level than proposed housing and is likely to experience water run-off from the housing estate, dumping of domestic and garden waste (as already happens in the woodland behind Longtye Drive), recreational pressure and straying domestic pets hunting wildlife. Simple fencing and planting thorny bushes will have little deterrence. People would still be able to access Convicts Wood via the Swalecliffe Brook or farmland on the opposite bank of the Brook.

8.1.16

The Developers do not sufficiently assess the impact of their development proposals on the adjacent Long-tyre Wood Ancient Woodland and Local Wildlife Site (LWS). This is also likely to be subject to dumping of domestic and garden waste, "light pollution" from street-lighting, recreational pressure and straying domestic pets hunting wildlife. Simple fencing and planting thorny bushes will have little deterrence. People would still be able to access Longtye Wood via the Swalecliffe Brook.

8.1.17

For the reasons listed in 7.2.4 – 7.2.6 above, the application should be refused planning permission due to likely adverse effect on Ancient Woodland, which would be contrary to NPPF paragraph 193c, which states "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused....".

8.1.18

We note that Developers have claimed that their proposals would be less damaging to Longtye Wood than existing farming practices. However, these assertions are unsound. Firstly, the allegation that ploughing damages tree roots (Environment Statement paragraph 13.116) appears to be false, because observations show that the farm use "no till" techniques that avoid ploughing. Secondly, there are many possible reasons why recent wildlife surveys in the riverside woodland may have yielded slightly different results from earlier surveys (Environment Statement paragraph 13.47), possible reasons including different observer techniques, visiting different parts of the site or at different times of year.

8.2.1 Other impact on wildlife

Wildlife surveys on behalf of the Developers revealed dormice nesting in the southern boundary of the site. It is highly likely this habitat would be destroyed (or at very least severely disturbed) by construction of the proposed development and slip road.

8.2.2

The Developers' proposals for mitigation are unrealistic and inadequate. They state that their overall proposals for "hedgerow, scrub and woodland planting across the site" would more than compensate for the loss of dormouse habitat, so creating a positive result. This is simply wishful thinking – dormice do not live in new housing estates, they generally live in diverse, well-structured woodland, rural hedgerows and scrub. Domestic cats will certainly predate them. It will not be possible to prevent domestic cats and dogs from the proposed development hunting in the hedgerows on the new estate, or in Longtye and Convicts Wood.

8.2.3

Hazel dormice are a European protected species protected under the Conservation of Habitats and Species Regulations 2017. It is an offence to deliberately disturb or capture them, or damage or destroy their breeding sites and resting places, including when hazel dormice are not present. [Source: UK Government website - [Hazel dormice: advice for making planning decisions - GOV.UK](https://www.gov.uk/guidance/hazel-dormice-advice-for-making-planning-decisions)]

8.2.4

For the reasons listed above, the Application should be refused planning permission because the effects would be contrary to the Conservation of Habitats and Species Regulations 2017, and the proposed mitigation would be totally ineffective.

9 Miscellaneous

9.1 Air Quality

The CCC Scoping Opinion states (p7) that:

'With regard to air quality, consideration of the cumulative impact of this development in conjunction with other proposed development nearby must be carried out. Your ES should include an assessment of the pollution concentrations from road vehicles and plant during construction...It is requested that any air quality mitigation measures recommended are suitably costed and the emissions reductions quantified where possible.

You should ensure that the effectiveness of any proposed air quality mitigation measures in reducing the impact of the proposal on air quality are robustly explained and should seek to ensure that the scheme will be designed to minimise the carbon output from the development. Mitigation to minimise the release of greenhouse gas emissions from the development during construction and the operational phase of the development should also be detailed as set out in the Scoping Report.'

The applicant's air quality assessment (ES Air Quality) shows (Appendix 9.3) that in many local streets (extending as far as Joy Lane and Faversham Road) traffic flow will significantly increase and in some streets (e.g. Radfall Hill, South Street south of Millstrood Road and South Street west of Chestfield Road) will more than double. However, there seems to be no assessment of the cumulative impact of this and other proposed developments nearby, as was requested by CCC.

9.2 Noise and vibration

The CCC Scoping Opinion states (pp 9-10) '*Given the scale of the development and the potential for noise and vibration impacts during construction in particular, but also the operational phase..The ES should include an assessment of noise and vibration during construction, considering the noise levels affecting the proposed residential development and existing neighbouring property..*'

The Noise and Vibration Assessment carried out by Clover Acoustics carried out in April 2024 at 4 points on or near the site appears to be simply an assessment of noise levels on those days with no assessment of the cumulative effect of this and other proposed developments, as was requested by CCC.

The CCC Scoping Opinion additionally says: '*Your submission should also include an assessment of the impact of baseline noise levels, particularly from the A299, on the completed development, and specify mitigation measures likely to be required (if any), in order to provide an acceptable standard of amenity for any future residents. Details of any mitigation required to offset adverse noise impacts on existing residents during the construction and operational phase should also be clearly set out as part of any future proposal.*'

These do not appear to have been provided.

9.3 Disabled access

Will there be provision for people with disabilities, e.g. wheelchair access to residences, businesses and community areas? How do the developers or local authority propose to address the fact that neither Whitstable Station nor Chestfield and Swalecliffe Halt have disabled access despite the fact that they are promoting the use of public transport?

Request for Refusal

We urge Canterbury City Council to refuse this outline planning application for the following reasons:

1. Highways & Transport

Increase risks to highway safety:

- at A299 offslip (Seasalter) due to increased risk of shunt-type crashes due to increased occurrence of tailback from Prospect Retail Park signals
- increased risk to pedestrian safety in vicinity of Chestfield Station and adjacent roundabouts
- increased risk to cyclist safety due to substantially increased traffic on South Street (Crab & Winkle cycle route).

Severe traffic congestion at Long Reach roundabout.

Note: Other highway safety issues may become apparent when the Developers provide the necessary crash data. The Developers must be asked to provide comprehensive crash data (including exact locations and type of vehicles involved) for the entire area likely to be affected by all the traffic from this large development. The

area should extend from A299 at Yorkletts to Greenhill roundabout, and Chestfield Road / Radfall Road / Hackington Road as far south as the University of Kent campus.

2. Sewage, Flood Risk & Surface Water

The clear capacity shortfall in wastewater infrastructure.

The ongoing and historic environmental harm from caused by sewage discharges.

The failure of the Sequential Test to meet national planning requirements.

The high flood risk to and from the site.

3. Water Supply

South East water struggles to provide a consistent, reliable and safe supply of potable water to the residents of the area. Adding new properties to the existing network only highlights the frailties of the system.

The proposed reservoir at Broad Oak is the only realistic way to try and resolve the current issues of hosepipe bans and broken mains.

4. Health & Education

With an already struggling health service, there should not be any further building in the area until health providers can guarantee safe and reliable health care to those residents.

There is insufficient planning with regard to the size of any school within the Brooklands Farm proposal and nothing should go ahead until the questions and observations are fully addressed and resolved to offer future generations access to an educational establishment that is suitable and inspirational.

5. Area of High Landscape Value

Failure to comply with paragraph 129d of the National Planning Policy Framework, i.e., the proposals would not maintain the area's prevailing character and setting – they would totally destroy it, as well as the character of Chestfield village.

Failure to comply with paragraph 135a of the National Planning Policy Framework, i.e., the proposals would not add to the overall quality of the area.

Failure to comply with paragraph 135c of the National Planning Policy Framework, i.e. the proposals would not be sympathetic to local character ..including the surrounding landscape setting, which is rural and forms the setting of the Ancient Woodland of the Blean, Longtye Wood and Convicts Wood.

Failure to comply with paragraph 135d of the National Planning Policy Framework, i.e. the proposals would not maintain the strong sense of place, which is very much a

traditional mixed landscape of brook, woodland, pasture and arable fields, largely unchanged for hundreds of years.

Failure to comply with paragraph 187a of the National Planning Policy Framework, i.e. the proposals would not protect and enhance the valued landscape (AHLV).

Failure to comply with paragraph 187b of the National Planning Policy Framework, i.e. the proposals would not contribute to or enhance the natural and local environment by recognising the “intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services”.

Failure to comply with paragraph 198 of the National Planning Policy Framework, i.e. the proposals would not “be appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site and the wider area to impacts that could arise from the development.” The proposals would also not “protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value”. The proposals would also create light pollution from artificial light impacting on local amenity, the intrinsically dark rural landscape and nature conservation.

6. Landscape & Visual Impact Assessment & Build Design

Due to Brooklands Farm standing in an Area of High Landscape Value a full LVIA is essential and must be carried out.

The building designs must be reassessed with regard to the LVIA as the proposed building heights are inappropriate and out of keeping with both the surrounding homes and Whitstable in general.

7. Best & Versatile Farmland

Failure to comply with paragraph 124 of the National Planning policy Framework, i.e. the proposals fail to promote effective use of landwhile safeguarding and improving the environment.

Failure to comply with policy 187 of the National Planning policy Framework, i.e. the proposals do not “contribute to and enhance the natural and local environment by... recognising ..the economic and other benefits of the best and most versatile agricultural land...”.

8. Biodiversity and Wildlife

Lack of credible, trustworthy evidence that a 10% biodiversity increase is achievable, as required by Schedule 7A of the Town and Country Planning Act 1990.

Likely adverse impact on the West Blean and Thornden Wood SSSI. This would be contrary to policy 193b of the National Planning Policy Framework.

Likely adverse impact on Ancient Woodland at Blean Woods, Longtye Wood and Convicts Wood. This would be contrary to policy 193c of the National Planning Policy Framework.

However, if Canterbury City Council do decide to approve the outline planning application, we respectfully request that this is subject to the following actions being carried out and Grampian Conditions imposed:

1. Highways & Transport

A299 / Radfall Junction Completion

No development shall commence until the proposed new junction onto the A299 (Radfall junction) is fully constructed and operational, in accordance with plans approved by the local highway authority and National Highways.

Justification: Essential to prevent overloading existing access routes and reduce pressure on South Street, Chestfield Road and Herne Bay Road.

Comprehensive Local Network Modelling and Mitigation Plan

No development shall commence until a revised, independently validated traffic modelling and mitigation strategy has been submitted to and approved by the local planning authority. The modelling must:

Accurately reflect queue lengths at Chestfield Roundabout, Millstrood Road, Long Reach, Clapham Hill, and Prospect Retail Park.

Incorporate all consented and proposed developments within a 10km radius, including Bodkin Farm, Church Lane, and University of Kent proposals.

Be agreed in consultation with National Highways and Kent County Council Highways.

Justification: Existing traffic models are significantly flawed and underrepresent congestion.

Highway Safety Improvements (Pedestrian & Cyclist Infrastructure)

No development shall commence until the following safety improvements are implemented:

Installation of a continuous pedestrian footway on Herne Bay Road under the railway bridge.

Installation of a formal, signalised pedestrian crossing at Clapham Hill (bus stop location).

Mitigation works at South Street / Red Bridge including visibility improvements and formal traffic controls.

Justification: Significant pedestrian and cyclist hazards exist, worsened by the proposed development.

Cycle Route Protection Plan

No development shall commence until a cycle safety audit and mitigation plan has been approved for the South Street section of the Crab & Winkle cycle route, including protection measures for cyclists and mitigation of increased traffic volumes.

Justification: Brooklands traffic will compromise a key leisure and commuting route for cyclists, particularly vulnerable users.

Public Transport Enhancement Package

No more than [e.g., 50] dwellings shall be occupied until a Public Transport Improvement Plan (PTIP) has been submitted and implemented, including:

*An agreement with the local bus provider to increase frequency and extend operating hours of route no. 5.
Subsidy or funding mechanism to ensure continued viability for at least 5 years.
A defined and accountable Travel Plan Coordinator appointment process, role scope, and oversight mechanism.*

Justification: Bus service is inadequate; mitigation is needed to support sustainable travel aims of the development.

Junction Improvements Prior to Occupation

No more than [e.g., 100] dwellings shall be occupied until physical improvements are completed at the following junctions:

*Chestfield Roundabout (to address queue lengths and signal timings).
Millstrood Road / Thanet Way.
Long Reach and Clapham Hill roundabouts.
Prospect Retail Park / A2990 junction.*

Justification: These junctions are already over capacity or dangerous. Phasing occupation avoids cumulative pressure.

Construction Traffic Routing Plan

No development shall commence until a detailed Construction Traffic Management Plan (CTMP) is approved, including restrictions on construction vehicle access via South Street and peak time limits.

Justification: Safety concerns and congestion risks are particularly acute during early stages of construction.

2. Sewage, Flood Risk & Surface Water

A full Surface Water Modelling Report is submitted.

A revised Sequential Test with alternative site assessments is provided.

Concrete infrastructure commitments from Southern Water are made, and in place before the commencement of the development.

An independent flood risk assessment and environmental impact review is conducted.

Condition that any wastewater from construction and demolition activities is not be discharged into Swalecliffe Brook but to be removed via tankers on site.

If it is the intention of the developer for Southern Water to adopt the proposed SuDS, the system shall be designed and constructed in line with the Design and Construction Guidance www.water.org.uk/sewage-sector-guidance-approved-documents.

If the SuDS form part of a continuous sewer system and are not an isolated end of pipe SuDS component, adoption of SuDS will be considered if requested by the developer if they comply with Design and Construction Guidance (Appendix C), CRIA guidance and Southern Water SuDS Guidance.

No Soakaways should be connected to the public surface water sewer.

3. Water Supply

South East Water plans to construct Broad Oak Reservoir and have it supplying water to the area by 2025. A condition is imposed that no construction takes place on Brooklands Farm land until there is a reliable, efficient and safe water supply to residents of the proposed new built houses, public buildings and businesses at Brooklands Farm.

4. Health & Education

Should the proposed development of Brooklands Farm go ahead, Canterbury City Council should be required to secure land within the estate from the developer for the provision of a Health Centre (including sufficient space for parking). Canterbury City Council should be required to secure s106 and CIL funding from the developer/developers to both build and equip the Health Centre in liaison with the Local Health Authority and the management of Whitecliffe Medical Practice.

Should the proposed development of Brooklands Farm go ahead, Canterbury City Council should be required to secure land within the estate from the developer for the provision of both a primary and a SEND school. Both plots should be allocated sufficient green spaces for play and sport, and sufficient space for parent and teacher parking to make parking safe for children, staff, parents and local residents.

Canterbury City Council to apply a planning condition to ensure that the land that is set aside for healthcare and schooling can never be used for any other purpose. Thus, protecting it from any future housing development.

Canterbury City Council should also be required to ensure that developers improve walking and cycling routes to enable children and carers safe travel to school.

Canterbury City Council should be required to secure s106 and CIL funding from the developers to both build and equip the schools in liaison with the LEA.

5. Area of High Landscape Value

Should the council go against the voices of their electorates, certain conditions must be put in place:

It is extremely important for the wellbeing of existing residents, that no new build property should overlook any existing property, garden and house.

Detached houses and semi-detached but no huge blocks unless these are situated lower down near the corner of South Street & Chestfield Road Junction.

The housing design to be drastically changed to a more appropriate style in keeping with Chestfield, Whitstable and the immediate countryside.

All gardens must have trees.

Roads must have trees.

6. Landscape & Visual Impact Assessment & Build Design

A full LVIA must be carried out and full documentation supplied as to how the developer proposes to mitigate.

Building heights must be reassessed in full to be in keeping with the surrounding homes and to maintain the character of Whitstable.

AHLV and LVIA must be considered under the same umbrella.

7. Best & Versatile Farmland

The Developers' Agricultural Land Classification report (Appendix 4A) identifies two survey points (52 and 53) as potentially Grade 3a (Best and Most Versatile) land, despite the main report suggesting otherwise.

Appendix 4A further indicates that at 10 survey points, the topsoil depth was measured at 40cm—the threshold for Best and Most Versatile classification. Given measurements were taken to the nearest 5cm, these may reasonably qualify as Grade 3a.

Taken together, 12 points (approximately 16% of the site or 12 hectares) are either confirmed as Grade 3a or are likely to be within that classification based on estimated measurement accuracy.

The site's agricultural productivity, as demonstrated by consistent yields of wheat and barley fertilised with manure, supports the likelihood that a greater proportion of the land could qualify as Grade 3a, especially if improved drainage (e.g., annual ploughing) is accounted for.

(New – Grampian Condition Justification)

Given the uncertainty surrounding the classification of land as Grade 3a and its implication for national policy protecting Best and Most Versatile agricultural land (NPPF Paragraph 174 and 180), a Grampian condition should be imposed to restrict any development from commencing until a full, independently verified resurvey of the site's Agricultural Land Classification is completed. This should:

Use higher-resolution sampling across the entire site.

Include seasonal variations (e.g., during drier and wetter months).

Be peer-reviewed by Natural England or another statutory consultee.

(New – Grampian Enforcement Clause)

Should the resurvey confirm that a significant portion of the land qualifies as Grade 3a or above, development shall not proceed unless and until the Local Planning Authority is satisfied that there are no alternative lower-grade sites available and that overriding public interest justifies the loss of high-quality agricultural land.

8. Biodiversity

The developer must provide evidence that a 10% biodiversity increase is achievable.

The developer must document how West Blean and Thornden Wood SSSI will be protected.

The developer must document how Long-Tyre Wood and Convicts Wood will be protected with Specific reference to the Hazel Dormice

Yours sincerely,

Save Brooklands Farmland Campaign Group

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[REDACTED]

from the A2990 Toucan. This is a well-used Toucan crossing used by about 60 people / hour in peak periods.

The KCC officer suggests that such modelling is not required if the crossing is more than 20m from the junction. He / she should be challenged to justify the statement and specify an authoritative reference that would support it. Simply suggesting it is in the DMRB would not be helpful, these guidelines being the size of Encyclopaedia Britannica and without a user-friendly index.

The suggestion that the A2990 Toucan does not require modelling seems to have originated with the Applicants for the Bodkin Farm development. However, to model a junction meaningfully, it is clearly necessary to model ALL significant obstructions, whatever the cause.

2. The Herne Bay Road Toucan crossing.

The Applicants were required to model the Herne Bay Road Toucan crossing, just south of the railway bridge. However, they failed to correctly assess its performance in future years, because they specified that NO people crossed the road during each of the modelled hours. The KCC Highways officer should have asked for this to be corrected.

3. Lack of analysis of highway safety issues in wider area.

The Applicants' study of crash data fails to include the area around the Clapham Hill roundabouts, which will see significant increases in traffic if the application is approved. This area must be included in the Applicants' analysis of highway safety. Pedestrians and cyclists already experience difficulties crossing roads in this area, and their needs should be assessed carefully. To do otherwise would be negligent. There have been at least two crashes here in the last 12 months, both (according to media and social-media accounts) involving a teenager / young person, one a pedestrian and the other a cyclist.

A second safety issue is that the increased traffic forecast on the A2990 eastbound approach to Whitstable (through the Prospect Retail Park traffic signals) would be likely to lengthen traffic queues extending back onto the A299 dual carriageway. This would increase the risk of high-speed rear-impact collisions. This problem needs to be assessed, quantified and solved.

4. South Street

The Applicants should clearly state estimated future traffic flows (in all scenarios) on South Street, between Millstrood Road and the development site. This length of street forms part of the Crab and Winkle cycle route, yet traffic levels appear to be likely to increase to at least 360% of existing levels (so far as we can see in the existing documentation).

As pointed out by the Whitstable Society in their response of 10th February, the proposed design of the Millstrood / South Street roundabout creates hazards for cyclists, so improvements are required. This roundabout needs to be Safety Audited by someone with specialist knowledge of cyclist safety issues.

The applicants must produce tracked-path drawings to demonstrate that even the largest articulated lorry can safely use the redesigned Millstrood Road / South Street roundabout. Note that the KCC officer requested a tracked path drawing for this type of vehicle at the proposed roundabout at the east end of South Street.

5. South Street – single-track road on bridge

The Applicants' proposal to reduce South Street to a single-track road over the Swalecliffe Brook is fundamentally flawed and a potentially dangerous design. Consider, for example:

- a) Some of the highest levels of traffic in Whitstable area are due to journeys to and from schools. South Street will be a route used by many parents to drive to schools. The school traffic needs to be estimated and the traffic at the 'Give-way' at the bridge must be modelled.
- b) Traffic queues at the pedestrian crossing east of the river could block the road over the bridge in both directions.
- c) Traffic from the west will be approaching the one-way sections around a bend, where visibility may be restricted due to obstructions at the edge of the road – e.g. pedestrians or parked vehicles on the verge. Or, in foggy weather, an eastbound driver may approach around the bend and without warning find themselves facing a vehicle approaching on the wrong side of the road.
- d) The road at the bridge is prone to flooding, so any new road markings, kerb-line and build-outs could potentially be under water and therefore not visible to drivers.
- e) The one-way design will cause permanent and unnecessary source of noise and pollution due to vehicles constantly being forced to slow or stop prior to accelerating again – all of which completely unnecessary.

6. Induced demand

It is clear that if the new A299 junction is constructed, it will cause additional traffic on the road network, NOT simply what the Applicants have modelled, i.e. (a) traffic from the new Brooklands development and (b) existing traffic re-routing to a quicker route.

Due to faster journey times from the M2 motorway to Chestfield, the new junction would attract:-

(c) house-buyers who in future will see existing Chestfield properties as attractive purchases with fast access to the motorway network – resulting in a higher proportion of long-distance commuters, and

This “induced demand” (i.e. items c and d above) has not been modelled, but its size needs to be evaluated because it is as an almost inevitable consequence of the new junction. It will certainly affect traffic flows on the A299 and M2, as well as the A299/Radfall junction and surrounding roads.

The SaveBrooklands residents group do not claim to be traffic modelling experts, but even lay-people can see there are errors in the Applicants' traffic modelling. For example:-

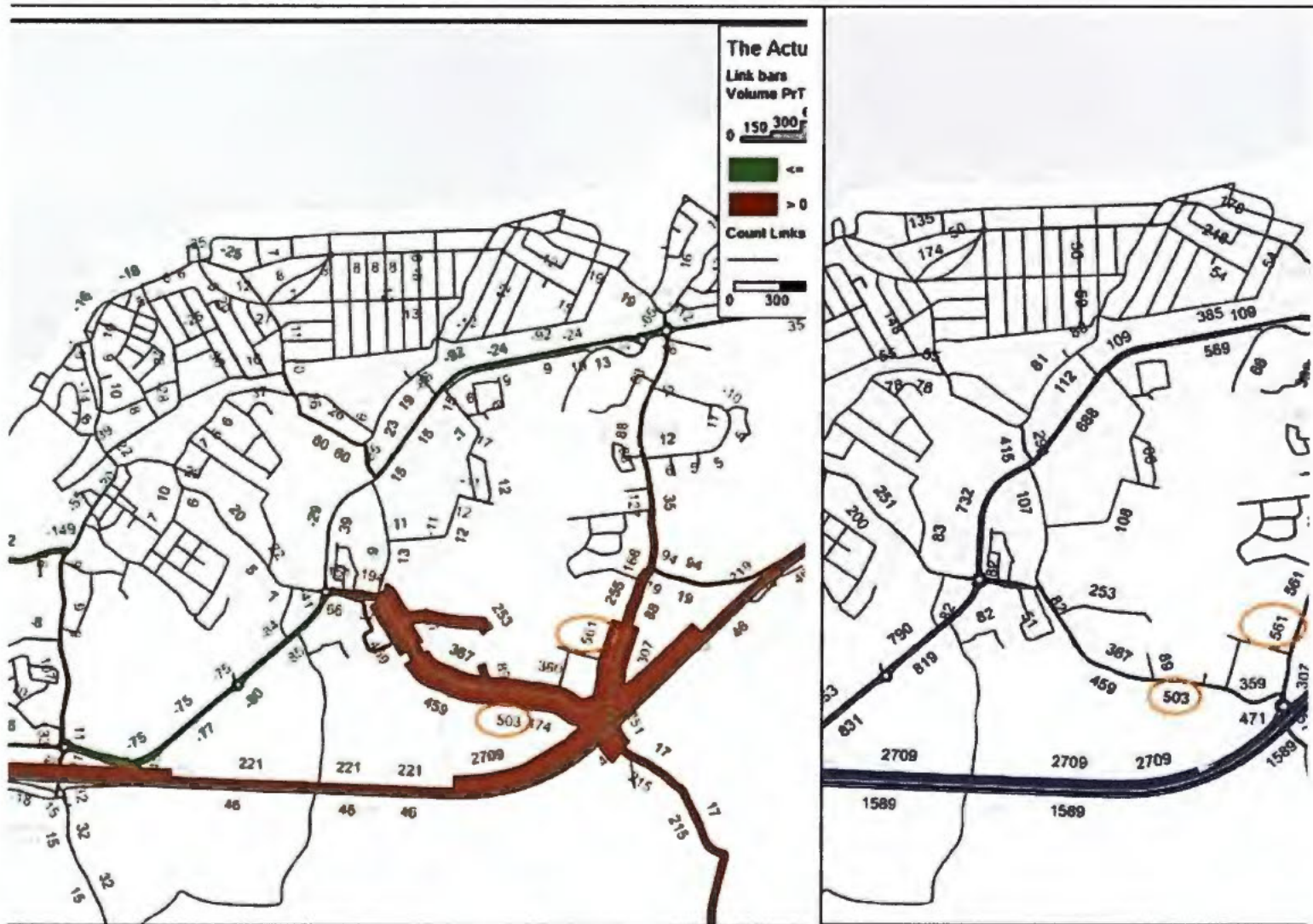
2040 Scenario 2 Hybrid, PM

Severity	Area	Item	Description
Warning	Geometry	1 - Thanet Way / Reeves Way - 3 - Reeves Way - Roundabout Geometry	Effective flare length is over 30m, which is outside the normal range. Treat cap
Warning	Pedestrian Crossing	2 - Thanet Way / Chestfield Road - 1 - Home Bay Road - Pedestrian crossing	Pedestrian crossing uses default flow of 0. Is this correct?

[illegible]

4

(c) In Appendix 14 of the original Transport Assessment, it appears that not all vehicle flows are correct in the Applicants' illustrated scenarios. The excerpts shown below show some identical numbers in Scenario 2 and in "Scenario2 minus Scenario 1", even where Scenario 1 would not be zero. These are ringed in orange on the excerpts below.



4-11: Actual Flow Difference, Scenario 2 vs Scenario 1 PM

4-8: Actual Flow, Scenario 2 PM

Traffic modelling undertaken by the Applicants in application 24/00224 (Bodkin Farm) suggests that the full built-out of all development in the draft Canterbury Local Plan would increase eastbound PM peak-hour traffic on the A299 virtually to the capacity of the road between the M2 and Whitstable in the year 2045. This suggests that the eastbound M2 motorway would be at (or in excess of) capacity in the PM peak-hour. When local people have tried to raise this issue with KCC and National Highways in FOI requests, they receive comments to the effect that the authorities have no knowledge of the relevant traffic flows. The Applicants must examine and clarify this issue, as the strategic highway network appears to be unable to support their development.

Part B: Hydrology and Flooding

The Applicants' consultants have demonstrated that, *provided certain assumptions are correct*, the proposed SUDS bunds can temporarily accumulate run-off from the proposed built-up areas. The accumulated water would be gradually released into the Swalecliffe Brook at the "green-field run-off" rate.

This raises a number of issues:

1. So far as we know, no independent and suitably-experienced hydrologist with adequate local knowledge of the site has audited the Applicants' submissions.
2. The Applicants' Flood Study Report (Appendix 11.3) looks only at "surface water" issues. It needs also to consider flooding from the Swalecliffe Brook, i.e. extent of floods due to water brought down the valleys from the south, in particular under future climate change scenarios over the expected lifetime of the development. What is the footprint of the anticipated flood waters of the Brook, taking into account global warming over the expected lifetime of the development, presumably greater than 100 years? Clearly, nothing should be constructed in the areas likely to become fluvial Flood Zones under global warming conditions – but these areas have not been mapped.
3. The proposed development will discharge more water into the Swalecliffe Brook than the present farm, because at present water is absorbed by crops, and also because considerable amounts of rainfall stands on the open fields until evaporation takes place.
4. As noted in Part A above, the new A299 junction included as part of the current planning application will inevitably lead to further urban development along the A299 corridor, for example on land between Convicts Wood and the Joseph Wilson Industrial Estate (which is slowly being expanded towards the A299 as shown in the draft Local Plan). Water that is currently absorbed by crops or evaporates from these fields would in future be added to the Swalecliffe Brook, contributing to the flood risk on the Brooklands site.

Other comments on the Flood Study Report:

- a) Figure 5.1 does not show various culverts that feed the water channel network: for example, the watercourse in the northwest part of the Farm receives water from a culvert leading from west of South Street, allegedly starting in the Joseph Wilson Industrial Estate.
- b) Paragraph 6.2.0.21 is clearly incorrect.

Some examples of areas of Brooklands Farm where water persists are shown in the pictures below. These were photographed on 15th February 2026 after 16mm of rain.



In conclusion

The outstanding issues outlined above cannot be dismissed, they need to be addressed adequately before this application can be considered ready for consideration by the Planning Committee.

This is not simply just another planning application. It is not just another development site. Not only would this be the largest single development that has been imposed on Whitstable, but the planned new A299 junction would unlock the development potential of the remaining green fields of the surrounding area. As such, this application would substantially change the character of Whitstable, and the decision-making process will be the subject of particular scrutiny and publicity.

The *Save Brooklands* residents' group, 20th Feb 2026



The Whitstable Society

**The Whitstable Society
Objection to
CA/25/00779 Brooklands Farm**

July 2025

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The Whitstable Society strongly objects to Application CA/2500779 Brooklands Farm on multiple grounds, as we did in response to consultation for the CCC Local Plan 2040 which had a similar proposal put forward for this site (W4). **Section 8** tailors the grounds for objecting to those permitted for an Application in Whitstable.

1) Relationship of the Application to the Local Plan

The Brooklands Farm scheme has been in the current Local Plan draft for most of 2024. The developers have chosen to jump ahead of the Local Plan by making this application. This is a dangerous step for a development of this size for these reasons:

- i) The interactions of this development with other schemes in the draft Local Plan are difficult or impossible to assess in the time made available to consider this application, especially regarding the impact on highways.
- ii) Planning Committee members are vulnerable to have their views preconceived by the pressure not to upset the Local Plan's targets.

2) Traffic Highways, Transport, Accessibility and movement

a) Introduction

We start with a brief review of two of the more serious congestion issues that affect Whitstable traffic in 2025.

The longest regular traffic queue in Whitstable occurs in the evening peak period when the traffic queue on the western arm of the Long Reach roundabout extends about 280 m to the next junction (Prospect Retail Park), and then effectively becomes continuous with the tailback from that junction. This can sometimes stretch back to the A299 dual carriageway, as shown in Figure 1. The total queue length therefore becomes almost 1500 m. The total time to drive through the queue sometimes exceeds 6 minutes.

In the morning peak period, long but very variable queues can form on the northern approach to the Long Reach roundabout (Borstal Hill). Some days these extend to about 700m. Similar queues can be seen at about 15:30 when children are collected by parents from primary schools in Whitstable. Queues of up to c.700m length can sometimes also be seen here at weekends.



Figure 1: Queue on western arm of the Long Reach roundabout. Top: Eastbound queue approaching stop-line with Long Reach PH in background (June 2025); Middle: traffic signals at Prospect Retail Park, with eastbound queue to right (June 2025); Bottom: eastbound queue extending from slip road onto A299 (Thursday 22nd May 2025).

The Chestfield Road / A2990 / Herne Bay Road roundabout also has long queues, albeit relatively transient, in the morning peak period and at about 15:30 in the afternoon. The queues on the eastern arm of the roundabout and the Herne Bay Road arm can stretch over 400m from the roundabout. The effective capacity of this roundabout is impacted by tailbacks from busy Toucan crossings on its western and northern arms, and also by queues from the St John's Road roundabout on its northern arm.

b) Applicants' Traffic modelling

There is clearly something badly wrong with the Applicants' traffic modelling. At the

Long Reach roundabout, instead of a maximum queue of almost 1500m on the western arm in the evening peak period, the applicants calculate a maximum queue length of 1.7 *vehicles* in the 2024 modelling scenario. This rises to 1.8 *vehicles* in Scenario 5 (1350 new homes at Brooklands farm but no new A299 junction at Radfall).

The modelled queue lengths on the other arms of the roundabout are also absurdly optimistic. On the northern arm, the maximum queue in the morning peak is stated to be 1.6 *vehicles* in 2024 and in Scenario 5, whereas in practice on different days it can vary from 10 *vehicles* (say 60 - 70 metres) to almost 700 metres. On the eastern arm, the maximum morning queue is stated to be less than one vehicle, rising to 1.5 *vehicles* in Scenario 5, whereas in reality maximum queue lengths of 17 - 20 *vehicles* in the morning peak are frequently experienced.

At the Chestfield Road / A2990 / Herne Bay Road roundabout, the Applicants calculate for the 2024 scenario a maximum morning queue length of 2 *vehicles*, rising to 3.2 *vehicles* in Scenario 5. When we checked this, we measured a maximum queue length of more than 400 metres and a queue time of 4 minutes.

On the eastern arm of the same roundabout, the Applicants calculate a maximum queue length of 1.2 *vehicles* in 2024, rising to 1.5 *vehicles* in Scenario 5. When we checked this there was a maximum queue length of over 400 metres, reaching back approximately to the "Garden X" entrance, as shown in Figure 2 below.



Figure 2: Morning traffic queue on eastern arm of A2990 / Chestfield Rd roundabout 19.6.25

There appear to be a number of errors in the modelling methodology for this roundabout:

Firstly, it appears that the modelling does not include the effects of the toucan crossing on the western arm, from which queues can form to block the exit from Chestfield Road.

Secondly, although the modelling does make reference to the Herne Bay toucan crossing, the model has been programmed with the wrong parameter value. There is

not room for a queue of 15 cars between the roundabout and the crossing, there is only room for about 3.

Thirdly the modelling does not appear to take account of the nearby St John's Road roundabout, from which queues can extend back onto the main Chestfield Road / A2990 roundabout.

Fourthly the modelling does not take account of the Reeves Way roundabout, from which queues could potentially extend back onto the Chestfield Road / A2990 roundabout.

To model the three Chestfield roundabouts accurately, they need to be modelled with the two toucan crossings as an inter-acting group. Figure 3 provides an illustration of how the tailback from the Herne Bay Road toucan and the St Johns Road roundabout can block the A2990 / Chestfield Road roundabout.



Figure 3: Queue from Herne Bay Road toucan crossing (or St John's Road roundabout) blocking A2990 Thanet Way, Friday 21st June 2024 at 8:33am.

In the limited time available in this planning application consultation, we also carried out checks at the Tesco roundabout (Millstrood Road / A2990) and the Belmont Road / Canterbury Road junctions. At the Tesco roundabout in the AM peak, queues were observed that had maximum length longer than any of the scenarios modelled by the Applicants, likewise at the Belmont Road junction in the PM peak. It was noted that at both locations there are upstream signalised crossings that affect traffic flows and need to be included in the modelling. Another issue at the Tesco roundabout is that the Tesco car-park and nearby streets appear to be used by some parents setting-down and picking-up children commuting to and from The Whitstable School.

So far as we can see, in the morass of modelled traffic data provided by the Applicants (without any index!) they do not appear to have provided any predictions of traffic flows for Millstrood Road (North) in Scenario 2 (after new A299 junction operational); or if they have it may have been mislabelled. We are very concerned about any increase in traffic on this route, as it serves The Whitstable School. Traffic can be hectic at school commuting times, and pedestrian pavements are narrow.

Presumably, the applicants have not explicitly modelled school traffic, so they have not assessed these issues?

We note that Jacobs (KCC's modelling consultants) recommended that "the impacts of hot spot areas are assessed in greater detail within local junction models". The most serious congestion PM Peak hour "hot spot" in the Jacobs model was the junction between the A2990 and the Prospect Retail Park. Nevertheless, the Applicants have not provided any evidence of them modelling this junction as part of the Brooklands Farm traffic assessment. **It is essential that the Applicants model the Prospect Retail Park junction in all scenarios of the Brooklands development.**

Jacobs high-level modelling showed that at this junction "the 'with development' scenarios that do not include A299 eastbound slips are all shown to further exacerbate the operational capacity and performance of this junction which results in varying levels of rerouting on local roads." [Excerpt from Jacobs modelling report in Transport Assessment Part 6, page 52].

The Applicants should also be requested to model the proposed alternate one-way working on South Street. This would be of most interest in Scenario 2 which models the effects of the new A299 / Radfall junction.

It follows from the above that **the Applicants must be asked to rework their traffic modelling to produce results that are verifiable against current traffic flows and queue-lengths.** Noting that it is unclear which developments are included in the Applicants' modelling, it should be ensured that the modelling includes traffic from the recently-approved developments at "Land south of Thanet Way" (application CA/23/00379) and Church Lane Seasalter (application CA/22/01527).

The Applicants should also be requested to model a scenario including their proposed development with traffic from the proposed Bodkin Farm development (application CA/24/00224), and the proposed 2000 houses at the University of Kent Site (as specified in CCC's draft Local Plan 2040). It is possible that those two developments could be built before completion of the proposed development at Brooklands Farm.

As it is likely that the Applicants' proposals will require the proposed A299 / Radfall junction to be built, i.e. a new junction on a trunk road, this is likely to have widespread consequences. Therefore, **modelling is required to show the effects on traffic levels and congestion on the Hackington Road and St Stephens Hill (Canterbury).**

It is unclear exactly how the modelling predicts where residents will be travelling in their car journeys. The Jacobs modelling report mentions that the distribution will be based on the characteristics of **Zone 102030 – but exactly what area does that represent?** This needs to be clarified, because residents' travel patterns vary across the Whitstable area.

It is likely that the proposed development will be poorly connected by public

transport, but well connected to the road network via the new road junction. This suggests there would be a high level of car usage for commuting.

c) Highway Safety

The Applicants should be asked to provide highway safety data clearly showing the exact location and nature of each accident relevant to this application site. The data provided so far by the Applicants in their Appendix 3 is totally inadequate because it does not specify locations. The area of analysis needs to be expanded to include the Radfall Road / Hackington Road / St Stephens Hill commuter route into Canterbury.

There is a high probability that the Applicant's proposals will worsen several existing highway safety hazards:

- i) Lack of formal pedestrian crossing at Clapham Hill, where pedestrians (including children) cross the road when catching or alighting from buses. A pedestrian was seriously injured at this location in 2017. Since that time, a block of flats has been completed on Clapham Hill and the number of people crossing Clapham Hill has increased. All scenarios of the Brooklands proposals are likely increase traffic levels on Clapham Hill.
- ii) Queues of stationary traffic on the eastbound A299 at the off-slip to Long Reach roundabout, raising the possibility of shunt collisions. The frequency of this queue extending onto the A299 would be likely to increase in all scenarios of the Brooklands proposals apart from Scenario 2 (new A299 Radfall junction).
- iii) Lack of pedestrian pavement on the west side of Herne Bay Road under the railway bridge at Chestfield station. Consequently, pedestrians must cross two roads when walking between (1) Herne Bay Road (or Swalecliffe Primary School) and (2) Sainsbury's or McDonalds. Some impatient pedestrians (including children) sometimes walk in the road under the railway bridge, perhaps because of the length of time pedestrians must wait for "the green man" at the toucan crossing. A pedestrian was injured here in 2020 while crossing Herne Bay Road. The Brooklands proposals would be likely to increase traffic levels here, especially before any primary school is built at Brooklands.
- iv) Potential collisions between traffic on South Street and cyclists using the "Crab and Winkle" cycle route. The amount of traffic on South Street would be likely to increase substantially if the proposed development is built, making South Street no longer suitable as a link in the Crab and Winkle cycle route.

d) Bus services

We note that the Transport Assessment Part 1 states that Stagecoach would not be willing to divert the route 5 bus into the proposed development, and the Applicants

are therefore suggesting a “hopper” type local bus service might be provided. Such proposals are often made by developers, but how much credibility do they have? How many developer-provided hopper services survive two or five years? If Stagecoach’s commercial acumen tells them it would not be worth diverting their bus service even a short distance, it suggests that any new bus service is unlikely to be commercially viable and unlikely to survive beyond the initial period of developer funding.

Chestfield’s existing Route 5 bus provides a relatively infrequent service to Canterbury. The last bus to Chestfield departs Canterbury at 17:50 pm, too early for late workers. It is not surprising that so many Chestfield residents use their cars for journeys to Canterbury.

3) Area of High Landscape Value

Brooklands Farm is part of the Blean Woods Area of High Landscape Value (AHLV), as shown in the CCC Local Plan of 2017. This should justify its protection from development under NPPF policy 187a.

CCC has proposed to remove the Farm’s AHLV status in the draft CCC Local Plan 2040, perhaps to facilitate its use as a development site. However, this was done without systematic evaluation of its role in enhancing the Blean Woodland and providing its “setting”.

When assessed against criteria used in CCC’s *Local Landscape Designations Review and Recommendations* (LUC, 2021), it is clear that the Brooklands Farm landscape clearly justifies a *Local Landscape Designation* status. This is shown in Appendix 1.

It should be noted that the views of the edge of the Blean Woodland and of the woodland in its broader landscape setting are important to their distinctive character. The distinctive and unique core woodland landscape is not only experienced from within the woodland itself, but from adjoining countryside.

This can be seen in the panoramic view from the hill at Rayham Road towards the broad spread of Blean Woodland on the horizon (Figure 4).



Figure 4: Part of the panoramic view from Rayham Road, across Brooklands Farm, to the Blean Woods on the horizon.

4) Agricultural Land

The Applicant's Agricultural Land Classification report states the application site comprises 76 Ha of Grade 3b land and 3.5 Ha of Grade 4 land, i.e. 4% Grade 4 and 96% Grade 3b land.

Reading through the text of the assessment, two fairly obvious errors are apparent:

1. Paragraph 3.2 states "the river which runs from the north to the south", whereas the opposite is true.
2. Paragraph 8.3 states "At two survey points the gleyed slowly permeable horizon does not start until 45cm giving ... a limitation of **grade 3a.**" This appears to contradict the report's conclusions that the land is entirely grade 3b or 4.

The report's paragraph 8.2 states that "Where there is a slowly permeable layer and gleyed horizon starting at 40 cm or less the assessment gives wetness class III. Table 6, <125FCD, wetness class III and clay, silty clay or heavy silty clay loam topsoil gives a limitation of **grade 3b.**" In other words, with this type of soil, whether the upper layer of soil is greater than or less than (or equal to) 40cm is critical to determining whether that land is 3a (Best & Most Versatile) land or simply grade 3b.

Looking at the assessment's survey results in the Applicants' appendix 4a, column 3, it is apparent that at 10 survey points (out of 77), the depth of topsoil was stated to be 40cm, i.e. right on the boundary of Best & Most Versatile land but nevertheless excluded from it. It is also apparent from Appendix 4a that the assessors only measure topsoil depth to the nearest 5 cm, presumably because the soil boundaries are unclear and this is considered to be the degree of accuracy.

This suggests that **12 survey points, representing 16% of site, or 12 Ha, are either Grade 3a land or potentially 3a within the limitations of measurement accuracy.**

One point worth raising is that the Farm's policy of no longer ploughing their arable land could affect the permeability of the soil, potentially lowering the Agricultural Land Assessment grade. There is some evidence from several Brooklands fields, that ploughing might benefit small patches of land susceptible to ponding after heavy rain. Anecdotal evidence from another farm (not in Whitstable) suggests their ploughed fields drain quicker than their neighbour's non-ploughed fields.

5) Flooding

Drainage calculations and capacity of SuDS:

According to the Applicant's *Hydrology and Flood Risk Appendix 11.2 Drainage Strategy* document, paragraph 5.3 "National policy requires that new developments control the peak discharge of storm water from a Site to the baseline, undeveloped, Site conditions."

The Applicants' paragraph 5.7 states: "a discharge rate of **4 l/s/ha** has been used within the drainage calculations, which has been agreed with the LLFA in the pre-application meeting 3rd July 2024."

The Applicants' minutes of that meeting (in the Applicant's Appendix E) state that "POST MEETING NOTE: the following is proposed (as discussed in the meeting): For the calculations we will be using ...a discharge rate of **4 l/s/ha** in accordance with Canterbury City Council Guidance."

This parameter of **4 l/s/ha** underpins (a) how large the SuDS storage ponds need to be, and (b) how many properties in Chestfield and Swalecliffe will be flooded in future storm events. It is therefore crucial that the right value is adopted. We therefore need to be crystal clear how this value has been determined. Can a clear explanation please be provided.

We understand that 4l/s/ha is a rule-of-thumb estimate of the surface water run-off from green-field sites in the CCC's Drainage Zone 1, which includes Whitstable – can this be confirmed please. If so, it takes no account of the particular characteristics of the Brooklands landscape, such as the standing water in fields after rainfall (Figures 5 and 6). If this were taken into account, then perhaps the parameter ought to be 3.8 l/s/ha (for example), in which case the SuDS area should be made larger. Can the LLFA (i.e. KCC) comment please?



Figure 5: Standing water after rainfall, April 2024, in the north-eastern field at Brooklands Farm.



Figure 6: Standing water in the northern field at Brooklands Farm, December 2022.

The Applicants' paragraph 6.4 states "The existing drainage channel located within the northern half of the Site will be diverted through Basin B, before connecting back into the Swalecliffe Brook". Does this refer to the natural brook (un-named) that flows along the southern boundary of the northernmost field at Brooklands Farm? This is shown in the aerial photo below, dated 1990.

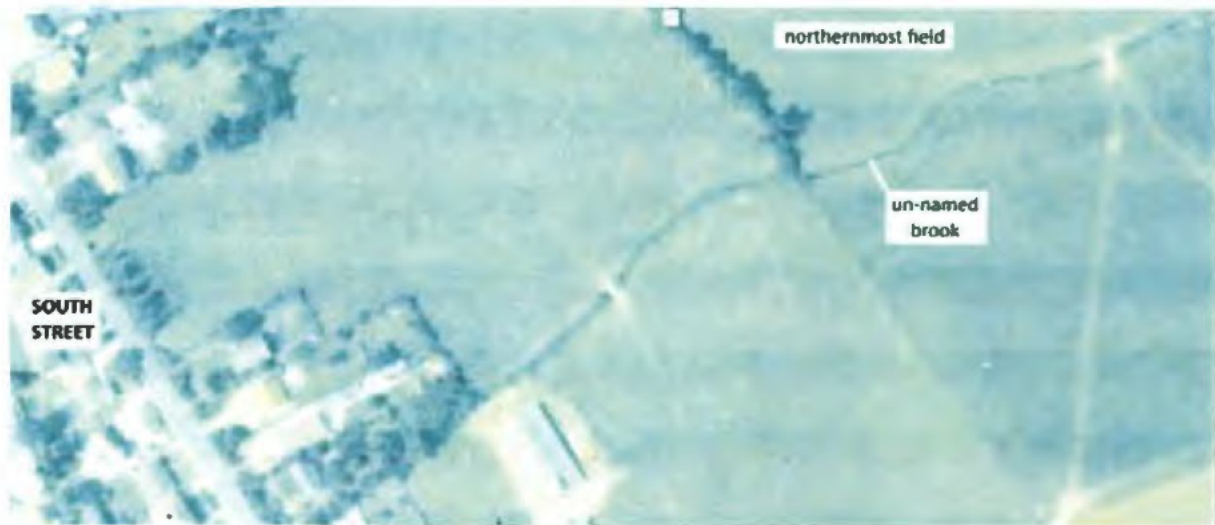


Figure 7: Aerial photo from 1990 showing unnamed brook flowing eastwards across Brooklands Farm. Photo from Kent Historic Environment Record

If the "existing drainage channel" refers to this brook, surely it would not be sensible to direct it into the proposed SuDS? The un-named brook usually flows continuously through the winter and springtime. According to local people, this brook passes under South Street and has previously experienced incidents of discharges from the Joseph Wilson Industrial Estate.

Please note that the Southern Water sewer record shown in the Applicants' Appendix F (shown in Figure 8 below) is incorrect. It shows the Blackberry Way drain emptying into public footpath CW27, whereas it actually discharges into the Swalecliffe Brook further south.

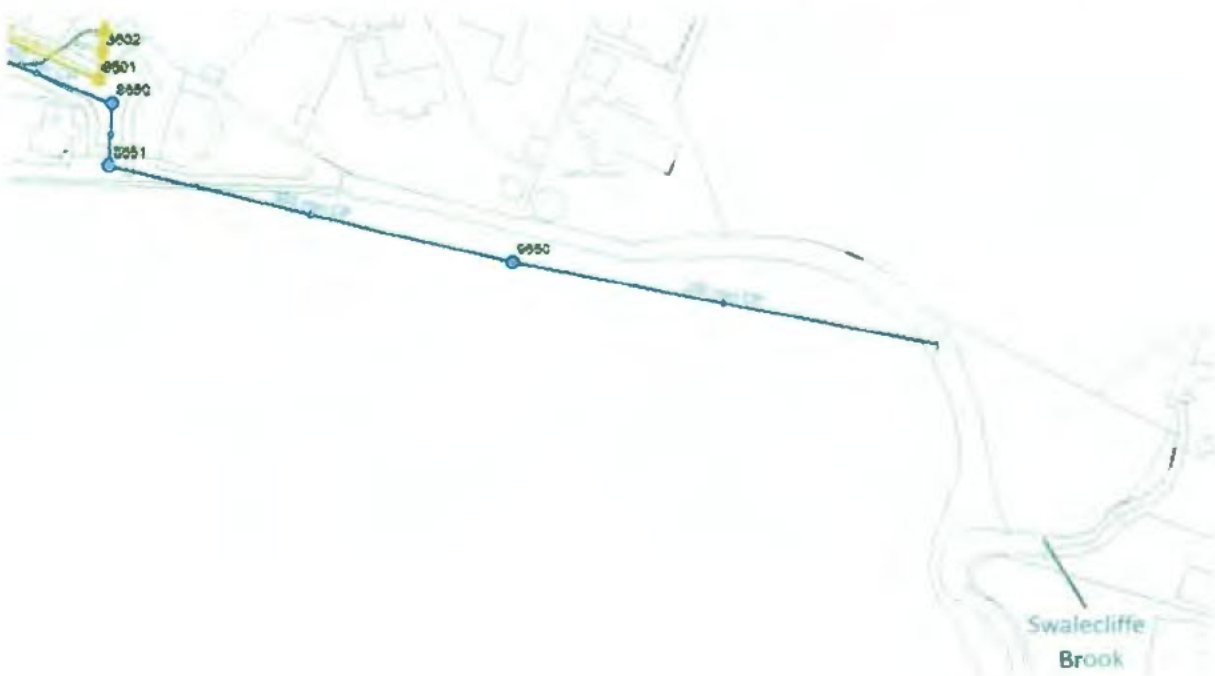


Figure 8: Part of the incorrect sewer record in Applicant's Appendix F.

With regard to the Applicants' Figure 4.2 *EA Historic Fluvial Flood Maps*, please note that other areas likely to flood are known as shown in Figure 9 and 10.



Figure 9: Flooding of Molehill road at junction with Birkdale Close, 2021. Image courtesy of Chestfield Parish Council



Figure 10: Flooding of Chestfield Road at junction with Maydowns Road in 2023. Image courtesy of Chestfield Parish Council.

There is a risk of further development to the west on unprotected land in the Swalecliffe Brook basin, which will add to the load through Brooklands.

The hydrology papers focus on the flood risk in the site but appear not to assess the downstream risks to Chestfield. The flow gauge situated on the Swalecliffe Brook by Grasmere was not mentioned, despite relatively frequent flood events which are an indication of climate deterioration.

6) Biodiversity

a) Net Gain Assessment

The Applicants report that their proposals for developing Brooklands Farm would achieve Biodiversity Net Gain of 23.69% increase in Habitat units, a 41.07% increase in Hedgerow units and a 30.49% increase in Watercourse units.

If this was correct, it would more than meet the Biodiversity net gain (BNG) target set by Schedule 7A of the Town and Country Planning Act 1990 as updated by the Environment Act 2021. This requires developments to deliver at least 10% increase in biodiversity relative to the pre-development biodiversity value of all on-site habitats.

However, examination of the Applicant's Biodiversity Net Gain Report suggests there has been a significant under-valuation of the existing biodiversity and probably an over-estimation of the biodiversity that might be achieved by the Applicant's concept design.

We will endeavour to illustrate some of these discrepancies as follows. Please bear in mind that as members of the public, we can only visit a small proportion of the site, i.e. the public footpaths and roads that cross the site.

In 2024 a report was published describing the discovery on Brooklands Farm of "several thousand plants" of the rare species Mousetail (*Myosurus minimus*). A photo taken in April 2025 showed that the plant was still present on site (Figure 11). Nevertheless, the Applicants' Biodiversity Report makes no mention of this species. There are no other records from East Kent of Mousetail, and it would probably become extinct in East Kent if Brooklands Farm were to be developed for housing.



Figure 11: Mousetail growing at Brooklands Farm, April 2025.

The Applicants' BNG report describes the Brooklands cattle meadows as being in

Poor condition with a “homogenous short sward”. So far as can be seen from the public footpath, parts of the meadows are far from homogenous, and have flora showing the influence of the surrounding field boundaries. As there are usually no cattle in the meadows during the winter or early spring, the sward does not become short until later in the year.

Due to the presence of cattle dung, the meadows have a relatively high level of insect life including dung beetles and various varieties of flies. The associated ecosystem supports swallows, wagtails and bats, and would be likely to disappear if the application is approved. The Applicants’ reports make no reference to the insects.

There is a watercourse flowing eastwards along the northern edge of the largest cattle meadow. The Applicants’ report refers to it as Ditch 8, and the western end of it is shown in Figure 7. According to the UK Habitat Classification (UKHab 2023, p305), a ditch is an *artificial standing water or dry* linear ditch feature.

Judging by D8’s irregular course and relatively persistent flow, it is a natural tributary to the Swalecliffe Brook. It follows the same course as shown on maps from 125 years ago.

The *Statutory Biodiversity Metric User Guide* (DEFRA 2024, p 40) requires the Applicants to review features found across the whole of the riparian zone of watercourses, even if segments of the riparian zone are outside of the site boundary. Although the Applicants’ BNG assessment makes brief reference to D8 being “occasionally wet”, and implied that it has 2m margins on either side dominated by rank grasses and ruderals including cow parsley and broad-leaved dock, this is not a comprehensive or adequate assessment.

In the Applicants’ plans, this probably natural brook and associated riparian zone and wildlife would be replaced by an entirely artificial network of “sustainable drainage systems”.

There is even less evidence of any assessment of the riparian zone of the Swalecliffe Brook where it flows between cattle meadows north of Longtye Wood. The tree-line and informal hedgerow here form a potentially valuable wildlife corridor along the course of the Swalecliffe Brook. The riparian zone appears to be an area of wildlife interest, with species including spindle and drooping rush, both of which are Ancient Woodland indicator species. The adjacent meadow on the east side of the Brook was part of Longtye Ancient Woodland before it was cleared in the 1940s.

The Applicants’ Biodiversity net gain assessment does not properly assess the margins of the arable northernmost field of Brooklands Farm. This is home to a good variety of flora and insect fauna (Figure 12). This is a south-facing location sheltered by hedgerows and mature oak trees. Bats frequently hunt in this area.

Similarly, the margins of the arable northeastern field have not be adequately assessed (hedgerow H7 etc). This long strip alongside public footpath CW27 includes natural grassland and mature oak trees, and there are various types of fungi in the autumn. The tree-lined field margins are popular with insects and bats, and swallows feed here too.

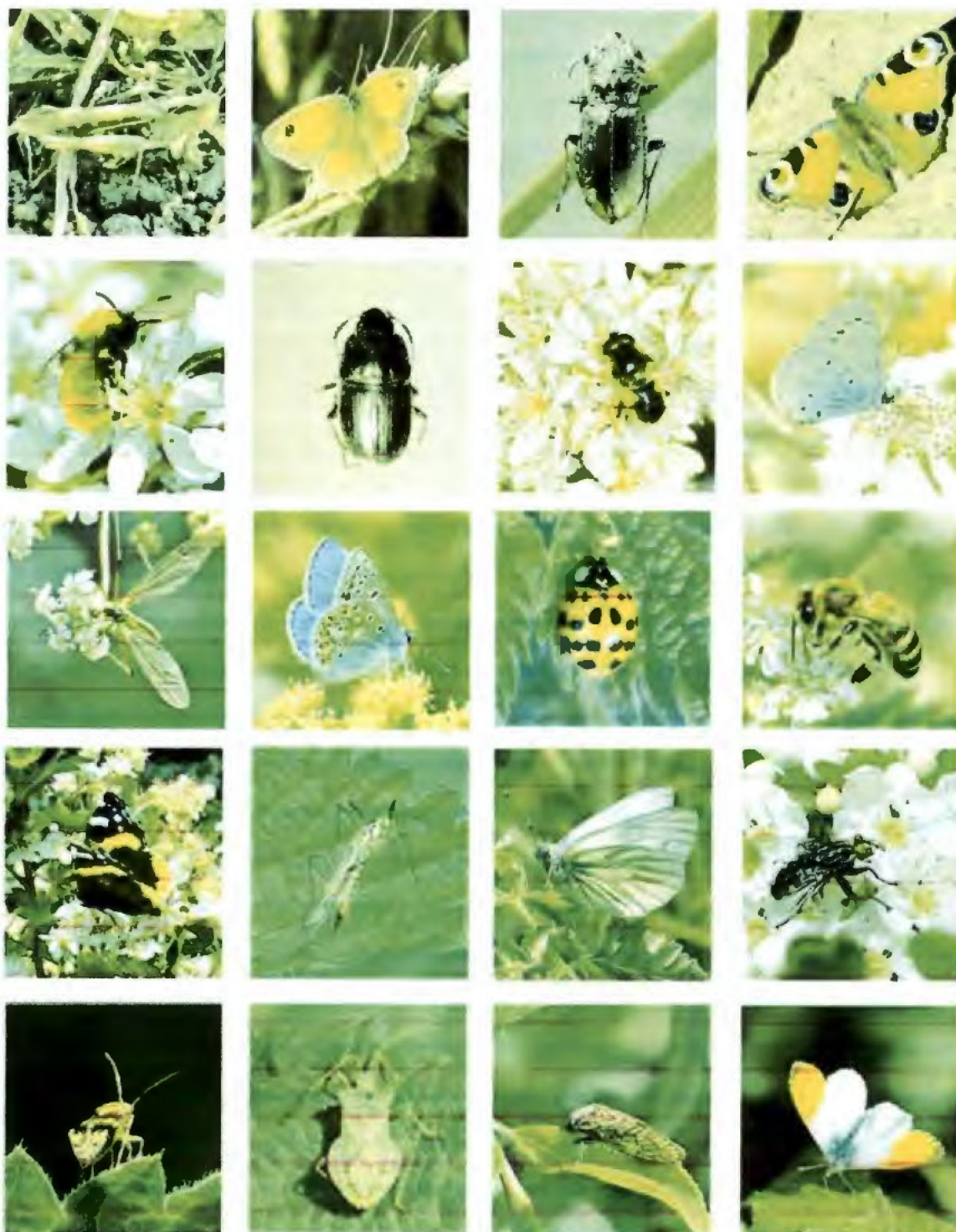


Figure 12: Some insects of North Field and margins:

Row 1: Field grasshopper, Gatekeeper butterfly, *Notiophilus* sp., Peacock butterfly.

Row 2: Tawny mining bee, awaiting ID, drone fly, Holly Blue butterfly;

Row 3: Unidentified crane fly, Common Blue butterfly, Harlequin ladybird, Honey bee;

Row 4: Red admiral butterfly, Unidentified crane fly, Green-veined white butterfly,

Awaiting ID; Row 5: *Liocoris tripustulatus*, Dock bug, Caddis fly, Orange-tip butterfly

b) Other Biodiversity concerns

The Applicants have made a number of questionable statements about Longtye Wood, in support of their suggestion that their proposed development would enhance it.

Firstly, comparisons of their surveys with earlier surveys, lead them to conclude that the woodland “appears to be declining in condition”, with a suggestion it is under pressure from adjacent agricultural practices. However, any significant lowering of survey results is more likely due to differences of survey methods, for example it is believed that earlier surveys were probably heavily focussed on Convicts Wood whereas the Applicant’s surveys appear to have been focussed primarily on Longtye Wood. The time of year that a survey was carried out may also affect results, as some species are often overlooked except when in flower or bearing fruit.

The second statement is that trees in Longtye Wood may be suffering damage to their roots due to ploughing the adjacent field. However, observations from local people suggest that the farm does not plough their arable fields, preferring to practice “no till” farming.

The Applicants’ assessments do not sufficiently address the impact of the anticipated 4000 new residents on the nearby Blean Ancient Woodland and associated SSSI sites. No mention is made of rare Fritillary butterflies in Clowes Wood, although they are only about 700m from the site.

The Governments’ Statutory Biodiversity Metric software is heavily dependent on surveys of flora, and is unrepresentative of impacts of development on fauna. Marshall et al (2023) have already demonstrated this in regard to birds and butterflies.

Open-landscape species such as skylarks and hares are being forced out of the areas between Chestfield and The Blean, and Whitstable and the A299 New Thanet Way. Over the last 10 years or so CCC has approved housing developments on two other areas of hare habitat near Whitstable, namely at “Whitstable Heights” and “Land south of Old Thanet Way”. This problem is not simply about losing habitat, it also eliminates areas of open-landscape connectivity.

The Applicants’ assessment of the loss of hedgerows and trees on bats is stated to be “not significant, negligible, adverse effect for bats due to the small scale of losses and availability of alternative habitats on site and within the wider landscape”. This does not take account of the probability that if there are indeed equivalent habitats elsewhere, they may already have local populations of bats dependent on them. Moreover, even if there are similar hedgerows and trees elsewhere, they might not have the insect populations to feed the bats.

The Applicant’s Environment Statement report states in sections 13.125 and 13.126 that the proposals necessitate removal of 1900m of hedgerows, and creation of 619m of new hedgerow. They also plan to “enhance” some existing hedgerows, although gaps must be created for new roads and walking routes. By claiming that the new hedgerows will be higher quality, they can use the Statutory Biodiversity Metric to demonstrate that the net loss of 1281m of hedgerow will lead to an increase in Hedgerow Units Biodiversity of 41%.

The proposed development and associated new junction between the A299 dual carriageway and the Chestfield – Canterbury road will result in considerable extra traffic through the Blean Woods, close to the West Blean and Thornden Wood SSSI. The impact on wildlife has not been assessed.

The proposed new road junction between the A299 and Chestfield – Canterbury road will almost certainly result in follow-on developments around the new junction. One likely additional development would be west-facing slip roads on the Radfall side of the A299. Other major developments would be likely to follow due to the “good connectivity” of this area resulting from the new junction. This would be in addition to the anticipated traffic from this junction via Tyler Hill to the proposed University of Kent proposals for 2000 new homes.

It should be noted that the Governments’ Biodiversity Metric User Guide (DEFRA, 2024) states that “this biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.” Furthermore “this biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert advice or guidance”.

We conclude that the Applicants’ biodiversity ecology and biodiversity reports contain errors, omissions and bias. The claimed Biodiversity Net Gain figures are therefore flawed and unreliable. These serious issues should be corrected and the results and evidence interpreted by an independent unbiased wildlife expert.

7) Socio Economics (including Medical Facilities)

The proposed large-scale development of 1,350 homes at Brooklands Farm poses significant risks to the physical, mental, and social health of Whitstable residents if not planned and supported appropriately. While housing is needed, this development does not sufficiently reflect local demand—particularly for social and affordable homes—and risks worsening the stress and poor mental health already felt by many in the community struggling to access suitable housing.

a) Inadequate Infrastructure and Public Services

Whitstable’s existing public services are already at breaking point. There are currently:

- No NHS dentists accepting new patients,
- Severe pressures on GP practices and mental health services,
- A lack of local A&E provision,
- Overstretched hospital facilities in ageing buildings,
- Full schools with insufficient capacity for additional pupils,
- Limited availability of social care services.

An increase in population of this scale, delivered over a short period, would dramatically increase demand on already overstretched services. This would inevitably result in longer waiting times, reduced access to essential care, and force residents to travel longer distances—exacerbating health inequalities and negatively

impacting community wellbeing.

b) Environmental and Urban Planning Concerns

This development will contribute to urban sprawl, extending the town boundary southwards into one of the few remaining open green spaces. Such land is critical to community wellbeing, providing opportunities for exercise, nature connection, and mental respite. Loss of this space will reduce quality of life and exacerbate sedentary behaviour, increasing risks of obesity, diabetes, hypertension, and depression.

Poorly designed developments with monotonous housing, minimal tree cover, and a lack of green and recreational spaces can feel oppressive and uninspiring. This impacts emotional wellbeing and reduces residents' satisfaction with their environment.

Moreover, the local road network, particularly the A2990, is already congested. Adding thousands of car-dependent residents will increase traffic, worsen air quality, and elevate risks to pedestrians and cyclists. Air pollution, particularly along traffic corridors, is associated with asthma, cardiovascular conditions, and even premature death—highlighted by a coroner's ruling linking the death of a child to high pollution levels. Increased traffic and poor air quality will create a public health burden that must not be overlooked.

c) Water and Sewage Capacity

Whitstable already faces a chronic shortage of drinking water. Despite long-standing discussions around constructing a new reservoir, no such project has materialised. Approving further major developments without addressing this fundamental resource issue places the area at risk of water shortages in the near future.

Sewage treatment infrastructure is similarly inadequate. The Swalecliffe Wastewater Treatment Works frequently discharges untreated sewage into the sea, with documented impacts on public health and marine water quality. There are no clear plans to increase treatment capacity or separate grey water from sewage. This is unacceptable in the context of a development of this scale, and failure to address it will result in further health hazards and damage Whitstable's reputation as a coastal town.

d) Cumulative Impact of Local Developments

The Brooklands Farm development is one of seven major housing schemes proposed in close proximity, totalling nearly 3,000 homes. All will feed into the same overstretched infrastructure and transport routes, compounding congestion, pollution, and pressure on public services. Concentrating such a large volume of development in one area without phasing or adequate investment will increase noise pollution, which is known to disrupt sleep, increase stress levels, and impair cardiovascular and immune health.

e) Lack of Community Facilities and Open Space

Whitstable lacks sufficient community infrastructure. There is no dedicated leisure or sports centre, limited access to entertainment or recreational activities—particularly for young people—and no central green space for community gatherings or markets. Some sports facilities are shared with schools and not consistently available to the

public.

This development offers no meaningful provision to address those gaps. Replacing lost green space within the town is vital if such developments are to be even partially acceptable. Without it, residents will face diminished opportunities for physical activity, social interaction, and community cohesion.

f) Mental Health and Social Impacts

Poor planning and overdevelopment can alienate residents who feel they are not listened to. Dismissing concerns as nimbyism ignores the very real distress caused by rapid and unbalanced change. This can increase feelings of isolation, frustration, and disconnection—known risk factors for mental health disorders such as anxiety and depression.

A healthy town needs more than just houses. It requires thoughtful planning that provides for people's physical, mental, and emotional needs. Whitstable currently lacks a coherent community centre, and this absence of shared space limits opportunities to build strong social ties.

g) Conclusion

Large housing developments have the potential to meet real housing needs and improve living conditions. However, when delivered without the supporting infrastructure and services, they can create significant health, environmental, and social challenges.

If the Brooklands Farm development proceeds without addressing these issues—particularly healthcare, sewage, traffic, air quality, water supply, green space, and social facilities—it risks contributing to a long-term decline in Whitstable's wellbeing, sustainability, and attractiveness as a place to live.

To protect public health, enhance quality of life, and ensure long-term resilience, any major development must:

- Be based on genuine local housing need,
- Include phased, coordinated infrastructure delivery,
- Preserve and enhance green and recreational spaces,
- Support accessible healthcare, education, and community services,
- Address environmental impacts including air quality, water, and sewage.

Only then can such developments form the foundation of a healthy and thriving community, rather than be a source of worsening inequality and health burden.

8) Summary of Permissible Grounds for Refusal

The Whitstable Society objects to the Applicants' proposals on many grounds. Because the District is in 'Presumption', reasons for refusal are likely to be limited to

grounds in the NPPF. So we suggest to the Planning Committee that the application would be contrary to (or inconsistent with) the following NPPF policies: 7, 8c, 110, 115, 116, 124, 129d, 135a, 135c, 135d, 170, 187a, 187b, 187d, 193a, 193b, 193c, 198b.

- a) NPPF Paragraph 7 (Sustainability):** We must stress that the Applicants' proposals are far from "sustainable". In aiming to meet the needs of the present (primarily meeting CCC's target for house construction), they would be compromising the ability of future generations to meet their own needs, including loss of highly productive farmland, loss of much-loved high-value amenity landscape, and loss of rare and endangered wildlife.

The proposals are also unsustainable because the development is located in an area where the vast majority of residents commute by car (or van), more residents are employed in Canterbury than Whitstable*, and bus services are sparse. [* This statistic comes from National census table WF01BEW for Lower Layer Super-Output Area 005A South Chestfield].

The proposals would also add significantly to the quantity of sewage discharged into the sea at Swalecliffe, polluting the protected Ramsar site there and an area where local fishing boats catch fish. Windsurfers say they can see the effluent on the surface of the sea, and visitors on the beach and swimmers have become ill. The proposals therefore are clearly detrimental to Whitstable's livelihood as a tourist destination.

Moreover, due to existing traffic congestion arising from previously-approved unsuitable developments, the proposals would necessitate construction of a new junction between the A299 dual carriageway and Radfall Hill. Having much better high-speed road connectivity than public transport will reinforce residents' car-dependency. The new junction would damage the relatively quiet nature of the local residential roads (South Street, Chestfield Road, Molehill Road etc), and in the longer term will lead to pressure for even more unsustainable green-field development all along the A299 corridor.

- b) NPPF paragraph 8c (Protection of environment):** The Applicants' proposals fail to protect or enhance the natural environment. They would destroy the timeless grazing meadows at Brooklands Farm, and its associated wildlife including bats, swallows and the rare Mousetail plants that thrive in the nutrient-rich soils. The proposals would also result in degradation of the ancient woodland at Longtye Wood, Convicts Wood and The Blean, and the West Blean & Thornden Wood SSSI site.

As described above, the proposals would not make most effective use of the highly productive agricultural land. Moreover, there is no convincing evidence that any true measure of biodiversity would be improved, especially taking into account the animals that are currently associated with the farmland. These include dormice, slow-worms, hedgehogs, more than 60 species of birds and countless species of insects, all of which are missing from the Applicants' biodiversity assessment.



Figure 13: A few of the bird species of Brooklands Farm: Green woodpecker, skylark, whitethroat, buzzard, swallow, chaffinch and kestrel.

- c) **NPPF paragraph 110 (Limiting need to travel):** The application site is not a location that limits the need to travel or offers a genuine choice of transport modes. As described above, this part of Chestfield is characterised by high car dependency, sparse bus services, and a relatively high proportion of residents commuting to Canterbury for work and education. Comparatively more sustainable locations exist closer to Canterbury, (for example as set out in draft CCC Local Plan 2045).
- d) **NPPF Paragraph 115 (Prioritising sustainable transport):** The effect of the Applicants' development would be to change South Street, Chestfield Road and Radfall Hill in ways that would benefit and substantially increase motor traffic and result in a more hazardous environment for cyclists and pedestrians.
- e) **NPPF Paragraph 124 (Effective use of land):** The proposals would be a particularly ineffective use of land, because not only would they destroy highly productive agricultural land, they would destroy land that protects and enhances the Ancient Woodland of The Blean, Longtye Wood and Convicts Wood. Looking further into the future, the associated A299 / Radfall junction would inevitably result in loss of large tracts of other productive farmland along the A299 corridor and northern edge of the Blean Woodland.
- f) **NPPF paragraph 129d (Maintaining an area's character and setting):** The Applicants' proposals to transform Brooklands Farm into an urban environment, together with the associated new A299 / Radfall junction, would completely change the character and setting of not only the Farm, but Chestfield village, south Tankerton and the Ancient Wood of The Blean. That is why the Farm was included in the Blean Woods Area of High Landscape Value more than 25 years ago (the AHLV originally being termed the Special Landscape Area).

Taking into account the likely additional development likely to follow from the A299 / Radfall junction, local people see this application as a "Trojan Horse" development with far-reaching consequences that will fundamentally urbanise Chestfield and Whitstable, throwing away their unique character and charm.

- g) **NPPF paragraph 135a (Quality of Area):** The proposals would significantly damage the quality of a wide area, centred at Brooklands Farm, including the Ancient Woodlands of the Blean, the Chestfield Conservation Area, and the whole area of

South Tankerton and South Whistable. This is clear from consultation with Chestfield residents, and from the amount of opposition and objections from all across Whistable, from Seasalter to Swalecliffe and even Fenne Bay. Chestfield residents want their village to continue to enjoy green fields to the east, south and west, they do not want to be overwhelmed by increased traffic and high-density urban development linking them to south Whistable.

- ii) **NPPF paragraph 135c (Character and landscape setting):** The proposals would be within the Blean Woods Area of High Landscape Value, and would damage the character and landscape setting of the Ancient Woodland of the Blean. They would also be detrimental to the edge-of-suburbia character and setting of Chestfield and South Tankerton.
- iii) **NPPF paragraph 135d (Sense of place):** Brooklands Farm has a special sense of place. It offers tranquil mixed-landscape countryside, with large open fields allowing views of the Blean Woodland, meadows, hedgerows, large and well-established woodland trees, local woodland (Langhys Wood and Cornicks Wood), and the usually peaceful Swalecliffe Brook meandering through the trees. This is enhanced by all the wonderful transformations to the landscape and wildlife that we enjoy with the passing seasons. All this will be destroyed by the Applicants' proposals, and would be replaced by the same standard suburbia you will find around any European city.
- iv) **NPPF paragraph 170 (Risk of flooding):** Brooklands Farm is an area where there is a history of flooding, and it is known that farmland naturally stores surface water after heavy rainfall, releasing it gradually over subsequent days. The extensive planned areas of hard surfaces will substantially change the drainage of the site, and could release water at an increased rate into the Swalecliffe Brook, potentially increasing the risk of flooding downstream. The application relies on simplistic modelling and a key parameter whose value has not been demonstrated to be appropriate for the particular characteristics of the site.
- v) **NPPF Paragraph 167a (Valued landscapes):** The application site lies within an Area of High Landscape Value. It has had this or similar protected status since 1988, because of its role in enhancing the Ancient Woodland of the Blean. The Blean Woods can be seen from numerous viewpoints within the farmland, and the farmland can be seen from within the Woods. Seeing tranquil farmland through the trees is a timeless scene in keeping with the characteristics of the woodland edge, but seeing large housing estates from within the woods will devalue the experience of being in Ancient Woodland. Brooklands farmland also provides a buffer keeping dense urban development and recreational pressure away from sensitive wildlife.

We should point out also that if the proposed development were to be authorised, there would be considerably increased traffic (and traffic noise) on the A299 Thanet Way and also on the Redfall Hill route to Canterbury through the SS51.

- l) NPPF paragraph 187b (Recognising intrinsic character and beauty of the countryside, and the wider benefits of best and most versatile agricultural land, and of trees and woodland):** Clearly the Applicants' proposals would destroy attractive countryside and AHLV, and would build on best & most versatile agricultural land. Consequently, they fail to comply with paragraph 187b.
- m) NPPF paragraphs 187d and 193a (providing net gains for biodiversity):** The Applicants have failed to convincingly show their proposals would increase biodiversity, and they would clearly diminish faunal biodiversity (skylarks, dormice, hares etc) without realistic mitigation.
- n) NPPF paragraph 193b (Sites of Special Scientific Interest):** The planned development would be contrary to para 193b because it would be likely to adversely affect the West Bean and Thornden Wood SSSI, because of recreational pressure and predation by cats and dogs from the new development, and due to increased traffic through the SSSI on the Chestfield – Canterbury road.
- o) NPPF paragraph 193c (Ancient Woodland):** The planned development would be likely to adversely affect the Ancient Woodland at Longtye Wood, Convicts Wood and the The Blean.
- p) NPPF paragraph 198b (Tranquility):** The proposals would urbanise the footpaths and destroy the tranquility of the open landscape alongside the Swalecliffe Brook, where local residents like to come to unwind, de-stress and enjoy the countryside. A recent survey of more than 2,000 British people by Censuwide reported that 87% of respondents who visit the British countryside and farmland said visits to Britain's farmed landscape had improved their wellbeing. A recent proposal by Chestfield Parish Council to preserve a small part of the riverside landscape as a Local Green Space was rejected by the Applicants and landowners.
- q) NPPF paragraph 116 (Highway Safety)**

The Whitstable Society also object to this application on the grounds of Highway Safety (in accordance with NPPF paragraph 116) for the following reasons:

1. Increased risks to highway safety at the A299 offslips to Long Reach roundabout, due to the increased likelihood of long queues from the Prospect Retail Park signals and associated shunt collisions;

2. Increased risks to safety of pedestrians including children on Herne Bay Road adjacent Chestfield Station;
3. Increased risks to pedestrians and cyclists crossing Clapham Hill due to increased levels of traffic at a location with a known safety hazard;
4. Increased risk to pedestrians and cyclists on South Street and Milstrood Rd due to substantially increased levels of traffic, with particular regard to, respectively, the Crab and Winkle Cycle Route and the sports grounds.

r) Biodiversity.Schedule 7A of the Town and Country Planning Act 1990. This application should also be refused permission due to lack of clear evidence that biodiversity would be increased by 10% as required by Schedule 7A of the Town and Country Planning Act 1990.

s) NPPF paragraph 11. We would also make the point that NPPF paragraph 11 indicates that the presumption in favour of sustainable development does not apply to proposals where there are strong reasons to refuse permission on grounds of protecting SSSI or Ramsar sites. As the Applicants' proposals would have adverse impact on the West Blean & Thornden Wood SSSI and Swalecliffe Ramsar site, it appears to follow that "Presumption" does not apply to this application, and it may be assessed against the policies of the CCC Local Plan 2017.

Appendix 1. Landscape Assessment Criteria – how the Brooklands landscape measures up.

CCC's 2021 *Local Landscape Designations Review* described the methods used by consultants LUC for assessing CCC's Valued Landscapes, as part of research for draft Local Plan 2045. It should be noted that CCC plan to replace the term "Area of High Landscape Value" with "Local Landscape Designation (LLD)".

Criteria helping to justify inclusion of a landscape in an LLD include:

- a) Local distinctiveness and sense of place
- b) Landscape Quality
- c) Scenic Qualities and perceptual aspects
- d) Natural and Cultural Qualities
- e) Recreational value
- f) Associations

Part A. Local distinctiveness and sense of place:

LUC's guidance is shown in italics:

A.1 A coherent landscape character conferring a recognisable sense of place. A landscape with a strong sense of place derived from its combination of elements.

The Brooklands Landscape is cohesive with the Blean Woods for a number of reasons:

- Convicts Wood and Longtye Wood are Ancient Woodland, outliers of the Ancient Woodland of the Blean.
- Being on private land and remote from habitation, their inaccessibility has preserved the "wildness" that is such a valued quality of the Blean Woods. This factor is lacking in more accessible woodland such as Benacre Wood which is half-surrounded by suburbia. "Wildness" and remoteness from habitation are not just human sentiments, these factors determine whether certain wildlife species are likely to survive there.
- The Brooklands Farm landscape is part of the supporting ecosystem of the Blean Woodland. For example, the buzzards that live in the Blean Woods hunt over the surrounding farmland.

- The Blean Woods, Convicts Wood and Longtye Wood and adjacent open fields appear relatively close together when seen from the surrounding landscape. Moreover, Convicts Wood / Longtye Wood can be seen from within the Blean Woods (specifically from Clowes Wood); and when people walk and drive past Convicts Wood they see the Blean Woods dominating the southern horizon.

A.2 LUC guidance (continued): A landscape which is rare/unique or special in the local Canterbury/Kent context. A landscape which contains character/features or elements which are considered to be important typical or rare examples

Although there are other extensive areas of Ancient Woodland in Canterbury District, such as Denge Wood, one of the characteristics that makes the Blean Woodlands distinctive is their proximity to the sea (CBA 1997). Indeed, from Clowes Wood the sea can be seen across the fields of Brooklands Farm. Likewise, from the south-eastern part of Brooklands Farm the sea can also be seen.

The Brooklands Farm meadows that flank the Swalecliffe Brook are long-established and include at least one plant species that, so far as is known, is found nowhere else in East Kent, and possibly nowhere recently in the whole of Kent. This is *Myosurus minimus*.

A.3 LUC guidance (continued): A landscape with a strong sense of place derived from its combinations of elements. A distinctive, rare or representative land cover. A distinct landform or topography forming a discrete or recognisable area.

The character of the northern Blean, and the outlying areas of woodland and fields, clearly combine three distinctive elements, namely woodland-edge, open farmland and small brooks. This is as true of the north edge of Clowes Wood as Convicts Wood and Longtye Wood.

There is intervisibility between the Brooklands farmland and the northern slopes of Clowes Wood, i.e. the fields of Brooklands Farm can be seen from within Clowes Wood (especially in winter), and the Blean Woodland forms part of the southern horizon from the Brooklands farmland.

The factors described above combine to form an inspiring character and sense of place. This is further enhanced by the visibility of the sea on the northern horizon, as seen from the northern slopes of Clowes Wood and from Brooklands farmland near the highest point on South Street.

Where else in Canterbury District are there any other public footpaths through traditional landscapes of brook-side cattle pastures with Ancient Woodland and fields of arable crops?

A.4 LUC guidance (continued): An area representative of a particular phase in landscape history/development

It is likely that the open farmland around Brooklands Farm dates back more than 500 years, as evidenced by the 15th century date of Clowes farmhouse, 2.3 km (1.4 miles) to the south of Brooklands farmhouse. The long-term nature of Brooklands Farm cattle pastures is evidenced by the name of the adjacent wood – Longtye. “Tye” meant common pasture in Kentish dialect, as used more than 500 years ago (Parish & Shaw, 1888).

There is also evidence for earlier human occupation of the Brooklands Farm site, namely

- 1st/2nd century AD Roman remains immediately south of Joseph Wilson Industrial estate;
- Late Bronze Age / Earliest Iron age remains east of Convicts Wood.

Near the northern edge of Clowes Wood, a pair of Late Neolithic or Bronze Age “bowl barrows” are located at the top of the slope overlooking the fields of Brooklands Farm and neighbouring farmland.

According to Historic England it is rare to find bowl barrows surviving in the clay areas of south eastern England. Therefore, in the presence of such barrows, it will be equally rare to find a landscape with traditional river-side cattle-grazing that may have been familiar to the peoples who built them. Hence Brooklands Farm could indeed be a rare and historic landscape.

On a more prosaic note, Brooklands Farm and Bodkin Farm (also with a planning application for a housing estate) are the last working farms within easy walking distance for most Whitstable residents. If CCC grant planning permission for replacing these farms with housing estates or other urban development, Whitstable residents would see yet another large swathe of the town’s rural heritage and character lost forever.

Part B. Landscape quality:

Guidance: The physical state of the landscape, intactness of the landscape and the condition of individual natural and cultural elements e.g. hedgerows

Functional aspects of the landscape e.g. ecological integrity, visually coherent

Presence of characteristic and valued features;

Presence of well managed features in good condition

Absence of incongruous features/detractors or not visually intrusive

The Blean Woods, Convicts Wood and Longtye Wood are all Ancient Woodland, and would have been part of the same area of forest for many thousands of years before the arrival of Neolithic and Bronze Age peoples creating farmland. The surviving areas of woodland are therefore ecologically and historically “coherent”. Convicts

Wood and the fields of Brooklands Farm can still be seen from Clowes Wood in the northern Blean.

As Convicts Wood lies on private land, and because it is still at some distance from human habitation, it remains relatively undisturbed. Surveys recorded that the woodland flora retains “a surprisingly large number of ancient woodland indicator plant species” (KWT, 2007). In that assessment, “Convicts Wood” includes Longtye Wood.

Convicts Wood and Longtye Wood are directly linked to the Blean Woods (Woodside Wood SSSI and Clowes Wood) by a narrow wildlife corridor which follows the Swalecliffe Brook and an un-named tributary that rises in Clowes Wood. There are also two nearby underpasses under the A299 that can be used by agricultural vehicles and wildlife.

A network of wildlife-friendly hedges, ditches and field boundaries extends across Brooklands Farm providing wildlife connectivity. Consequently, surveys show a good variety of wildlife including at least 15 butterfly species and 60 bird species, including skylarks, swallows, buzzards and kestrels. Hazel dormice and a hare have also been observed.

Brooklands Farm is crossed by the A299 road, however this is relatively well integrated into the landscape. The most intrusive feature can be traffic noise, depending on the wind direction. Traffic noise from the A299 does not simply affect the area close to the road, it also blights parts of the northern Blean Woods, such as Clowes Wood. If loss of the AHLV results in Brooklands Farm being developed for housing, this is likely to result in an increase in traffic noise.

Part C. Scenic quality and perceptual aspects:

*Guidance: A landscape that appeals to the senses – primarily visual; Perceptual and aesthetic qualities such as sense of tranquility, remoteness * Strong visual character e.g. patterns/composition of vegetation/ landform * Memorable, important or distinctive views * Qualities of expansiveness, openness, enclosure, seclusion * Tranquility or perceptions of tranquility – peace, quietness, birdsong, dark skies, presence of water – streams, sea * Uninterrupted tracts of land with few built features * Relative lack of human influence/absence of incongruous features*

Brooklands Farm is certainly a landscape that appeals to the senses. It includes open landscape, distant views, ancient woodland and the meandering Swalecliffe Brook. There are numerous mature trees visible in all directions, including in hedgerows, in Longtye Wood, Convicts Woods, and in the Blean Woods on the horizon.

Arable fields at Brooklands Farm have uncultivated margins with wild flowers, and there are hedgerows rich with blossom in the spring and early summer. Plenty of butterflies can be seen, and on the flowers and blossoms are various types of bees,

including Early bumblebees, White (or Buff) tailed bumblebees, common carder bees, and mining bees. Widespread bird-song in the spring includes whitethroat, blackcap, wren and dunnock.

There is definitely an air of tranquillity and freedom from suburbia. East of the Swalecliffe Brook, there are no buildings visible in the view southwards to the Blean Woods. People come here to enjoy the countryside and escape the overdevelopment of Whitstable. For example, two visitors interviewed recently said they walk their dog here now rather than in Grasmere Pastures, which they regard as no longer an attractive place for recreational use since the new housing estate was constructed.

The most memorable and distinctive views at Brooklands Farm are probably the rural panorama from Rayham Road, and various picturesque glimpses of the Swalecliffe Brook as it meanders through the fields and trees.

Part D: Natural & Cultural qualities

*Presence of natural and cultural attributes or particular associations that contribute to the value of the landscape * Visible expression of geology creating distinctive sense of place * Presence of wildlife and/or habitats/species that make a particular contribution to sense of place or scenic quality * Presence of settlements, buildings or other structures that make a particular contribution to sense of place or scenic quality * Visible presence of historic landscape types or specific landscape elements or features that provide evidence of time depth or historic influence on the landscape*

The Brooklands historic landscape combines three key qualities, namely The Swalecliffe Brook that formed the valley where the farm is situated, the traditional farmland that has probably been grazed for 3000 – 4000 years, and the Ancient Wood at Longtye and Convicts Wood, with the Blean Woods forming the backdrop. This is a first-rate example of the traditional (but fast-disappearing) mixed farmland of the North Kent coastal plain.

There is an abundance of wildlife in the Brooklands Farm landscape. At any time of year there may be buzzards and kestrels hunting over the fields, in the spring there are whitethroats and blackcaps singing in the hedgerows, and skylarks displaying over the larger fields. There are numerous species of butterflies and bees on the flowers and blossoms. There are also various species of flies, dung beetles and rove beetles in the cattle meadows, forming the basis of an ecosystem supporting other species such as swallows, wagtails and bats.

Although wildlife is becoming rarer in the Whitstable area, as the town gradually expands into the surrounding countryside, there is still a pleasant variety of wild plants and flowers in the Brooklands landscape. The flora visible from the public footpaths includes species that are less well-known locally (such as Midland Hawthorn), and others regarded as indicative of ancient woodland, for example

spindle-trees and red campion. So, although the ancient woodland at Longtye and Convicts Wood are inaccessible to the public, the presence of ancient woodland indicator species adjacent the public footpath enables visitors to experience some of the delights of ancient woodland.

The rarest plant that has been documented on the farm is called Mousetail, *Myosurus minimus*. This is not known anywhere else in east Kent.

Part E: Recreational value:

*Guidance: Evidence that the landscape is valued for recreational activity where the experience of the landscape is important * Evidence of recreational activity based on experience of the landscape (e.g. walking routes, access opportunities, activities such as birdwatching) * Note: needs to be more than just 'popularity'*

Public footpath CW27 crosses the farm, linking Tankerton to Chestfield and the Blean Woods. It is very popular, especially with dog-walkers. There is some evidence that people use this path to experience the pleasures of its rural nature, for example the open countryside and trees. In the summer, sometimes people relax sitting beside the Swalecliffe Brook at the edge of the northernmost field of Brooklands Farm.

Part F: Associations

*Guidance: Landscapes associated with particular people such as artists or writers or events in history that contribute to their character * Associations with written descriptions, artistic representations, and associations of the landscape with people places or events.*

Convicts Wood is associated with the smuggling of French prisoners of war to France at the time of the Napoleonic wars (Harvey, 1971).

As described above, the traditional grazing landscape of Brooklands Farm is almost certainly associated with the two Neolithic or Bronze Age burial mounds in Clowes Wood. The mounds are situated on the northern edge of the Blean upland, precisely where the ground drops steeply to the coastland plain. Parfitt (2020) notes that several burial mounds overlooking the Dour valley near Dover appear to have been designed to be both viewed and approached from the downhill side, and that the settlements associated with these monuments should be sought on the lower slopes and in the nearby valley. At Brooklands Farm, two prehistoric settlements have already been found in the specified area, one thought to be from c 900 BC, the other from c 1000 – 600 BC (Parfitt et al, 2016). The first of these archaeological sites was within the boundaries of Brooklands Farm.

Conclusion

The analysis in this appendix shows that the Brooklands Farm landscape complies with the requirements of the Local Landscape Designation as specified by LUC,

consultants for CCC's *Local Landscape Designations Review* (LUC 2021). The Brooklands Farm land area should therefore be retained as an Area of High landscape Value or assigned Local Landscape Designation status in the emerging Local Plan 2040.

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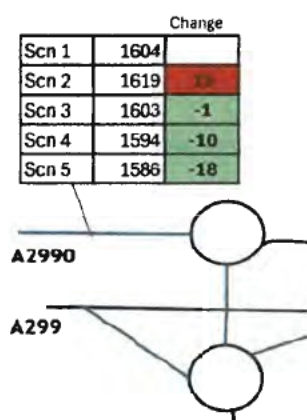
Planning application 25/00779 – Brooklands Farm:

Comments on Brookbanks "Technical Note 15 Rv2: Response to KCC Comments" 17-12-2025

Note the Technical Note was only made public on the CCC website on 19th January 2026.

1. Data

- 1.1 The applicant has re-modelled numerous road junctions. **What traffic estimates were used as input to these calculations**, i.e. where did they come from? **Can it be confirmed that the data does not include traffic from other developments in the draft Local Plan?**
- 1.2 The data used as input to Brookbanks' recent traffic re-modelling is questionable for other reasons too. For example, the modelling for the Prospect Retail Park traffic signals, eastbound A2990 traffic approaching the junction in the PM peak hour is shown to decrease from scenario 1 (no Brooklands development) to scenario 5 (full Brooklands development but no new A299 junction). Consequently, the modelling predicts a slight DECREASE in queueing at the junction in the PM peak. "Common sense" suggests that building 1400 new homes would be likely to cause an increase in traffic. **This discrepancy needs to be convincingly explained, because it appears to be an error.**
- 1.3 Similarly, Appendix 18 ("Link Road Impact Review") of the original TA shows *more* traffic on A2990 in the PM peak in scenario 2 (full development *with* new A299 junction) than scenario 5 (full development *without* junction). **Can this be explained please?** It appears to be erroneous, because one of the reasons for building the A299 Radfall junction would be to *reduce* the overloading of the A2990 and Long Reach Roundabout.



- 1.4 Note: In contrast to the above, Jacobs' area-wide modelling (Appendix 14 of original TA dated April 2025) shows the intuitively-expected increase in eastbound A2990 traffic from from scenario 1 to scenario 5, with a decrease for scenario 2 due the new A299 Radfall junction.

2. Chestfield Roundabouts (Appendix 11, P822 of the Technical Note)

- 2.1 The modelling is still not "fit-for-purpose", as shown in the following examples.
- 2.2 Brookbanks have not modelled the effect of pedestrian crossings on traffic congestion in future years, despite KCC asking for this to be included. In respect of the Herne Bay Road toucan crossing, adjacent the railway bridge, this is evident because on p850 we can see the warning message "Pedestrian crossing uses default flow of 0. Is this correct?". We can also see the text "ped/hr=0.00".
- 2.3 The reason for not modelling the Toucan crossing on Thanet Way is said to be that the Toucan is more than 20m from the roundabout, and because it is alleged that "the guidance is that crossings only need to be included if they are within 20m of the give-way line". That would be absurd. What guidance is that? Blockages of roundabouts by ANY queues from signalised crossings **MUST** be assessed by the modelling, otherwise the modelling would be invalid due to not accurately describing the real-life junction.



Figure 1: Queue from Toucan crossing between Reeves Way roundabout and the Chestfield Road roundabout blocking the latter junction, 8.17am 29th January 2026.

- 2.3. The developers have not included the St John's Rd roundabout in the modelling, because KCC didn't ask for it. (KCC should have asked for it to be included, as St Johns is closer to the Chestfield Rd roundabout than the Reeves Way roundabout, and tailbacks from St John roundabout DO tail back onto the A2990, as shown in Figures 2 and 3).



Figure 2: Traffic queue from St John's Road roundabout tailing back onto the Chestfield Road roundabout, 8.34 am 28th Jan 2026



Figure 3: Traffic queue from St John's Road roundabout tailing back through the Chestfield Road roundabout, 8.37 am 29th Jan 2026

- 2.4 It should be noted that the Thanet Way Toucan crossing is well-used. A survey of its use showed 60 people (and a dog) crossing here 8am-9am on 24th September 2025.
- 2.5 So far as we know, the applicants' traffic modelling does not explicitly include traffic from the proposed Bodkin Farm development and the proposed secondary school on that site. School traffic is a significant proportion of vehicle flows in Whitstable, and has a significant effect on delays at pedestrian crossings. **As the Bodkin development is in the draft Local Plan and also the subject of a planning application, it needs to be incorporated into the detailed modelling of the Chestfield junctions at an appropriate level of detail, i.e. including increased pedestrian flows at pedestrian crossings.**
- 2.6 **Modelling of the Chestfield roundabouts should include the period 8:45am – 9:00 am. Why does the modelling not include 8:45 – 9:00 am? Conventionally, modelling usually includes this period. See for example the modelling report from Jacobs submitted for this Application in part 6 of the original Transport Assessment. (*Modelling Report By Jacobs – 240917 Brooklands Farm Technical Note & Flow Calculation Methodology*). By omitting the 8.45-9.00am period, the Applicants' modelling fails to model the morning peak period on Herne Bay Road, when there are queues stretching back more than 300m from the A2990 roundabout.**
- 2.7 The accident analysis shows 4 crashes in the vicinity of the A2990 / Chestfield Road roundabout between 1st July 2022 and 30th June 2025. Two of these involved motorcycles, one of the accidents is classified as a "serious" collision. What is being proposed to stop increased traffic causing more injuries?
- 3 **A2990 Thanet Way / Borstal Hill / Clapham Hill roundabout (Appendix 7, p419 of the Note)**
 - 3.1 **A safety assessment needs to be undertaken of the impact of the increased traffic on the safety of pedestrians and cyclists in the vicinity of this junction. The process should include surveys of the number of people and type (adult, child, elderly etc) crossing each arm of the junction, and the problems they encounter. The assessment must be reported as one of the submitted documents in this application, so that local people can review it. Too often,**

decisions are made by council officers with apparently inadequate knowledge of local conditions, leading to adverse consequences for residents. This has already happened *at least twice* at this junction, firstly as part of application 15/01296 Whitstable Heights, secondly application 20/00925 (Montpellier) which was supposed to provide a crossing on A290 Clapham Hill prior to occupation of any dwelling, but of course this never happened.

- 3.2 The modelling does not assess the impact of the Toucan crossing on the eastern arm of the roundabout. Tailbacks from this crossing can reach the Borstal Hill roundabout, as shown in Figure 4.



Figure 4. Queue from Toucan crossing on east arm of Borstal Hill roundabout in AM peak period.

- 3.3 On the eastern approach to this roundabout, the Applicants' modelling (pages 425-439) estimates a 95% queue length of approximately 9 vehicles in the AM and PM peak periods in 2024. (The 95% figure is a representation of a typical maximum queue length.) However, observations show that this figure is regularly exceeded, e.g. queues of 20 vehicles. Figure 5 illustrates this.



Figure 5. Westbound queue on east arm of Borstal Hill roundabout, 7:46am 30th June 2025

- 3.4 On the western approach to the roundabout, the Applicants' modelling (pages 425-439) estimates a 95% queue length of approximately 10 vehicles in the AM peak in 2024. However, a queue-length survey undertaken 13th May 2025 shows this figure is frequently exceeded. For example, a queue was recorded more than 20 vehicles in length at 08:55am, stretching back out of sight through the Prospect Retail Park signals.
- 3.5 The queue lengths estimated on Borstal Hill (road) for the 2024 modelling also appear to be too low. In practice, queues can sometimes extend 400 - 700m. For example, on Mon 9th February 2026, the queue at 08:50am stretched to Clovelly Road, i.e. approximately 440m.
- 3.6 **As the modelled queue lengths for 2024 appear to be too low, the predictions of roundabout capacity for future years have no credibility.**

4 A2990 Junction at Prospect Retail Park (Appendix 14, page 1013 of the Technical Note)

4.1 Background.

- 4.1.1 This junction and the Borstal Hill roundabout have the longest regular traffic queues in Whitstable, especially if/when the queues at the Borstal Hill roundabout stretch back as far as the Prospect Park Signals. The fact that eastbound queues can stretch back onto the A299 Thanet Way raises safety issues due to the potential for high-speed shunt-type collisions.



Figure 6: Queue estimated to be longer than 50 eastbound vehicles tailing back from the Prospect Retail Park signals at 17:28 hrs Friday 30th January 2026

- 4.1.2 It should be noted that if the signals and/or junction were modified to increase throughput, this would increase pressure on the already-stressed Borstal Hill roundabout. It would also increase southbound queues on Borstal Hill (road), because increased traffic on the roundabout would offer less gaps allowing Borstal Hill traffic onto the roundabout.
- 4.1.3 There is a requirement for the Brooklands developer to deliver A299 on / off slips at Radfall, to aid access to the new development and to relieve congestion at the Borstal Hill roundabout and the Prospect Retail Park traffic signals. KCC's corporate response to the

Brooklands application states that “The County Council would request that the slips will need to be delivered directly by the applicant....” However, this creates a serious risk that the developer simply builds houses up to the maximum allowed without the new junction and then states they cannot afford to build the slip-roads, or abandons the project.

- 4.1.4 Traffic modelling by Jacobs (and reported in part 1 of the original Transport Assessment for this application) shows that in Scenario 5 (full development but no new A299 junction), there would be an increase in A2990 traffic arriving at the Prospect Retail Park signals (see number ringed in red). However, other drivers will try to avoid the A2990 congestion by short-cutting through the new Seasalter housing development, causing an increase in traffic in Joy Lane (shown by number indicated by red arrow).

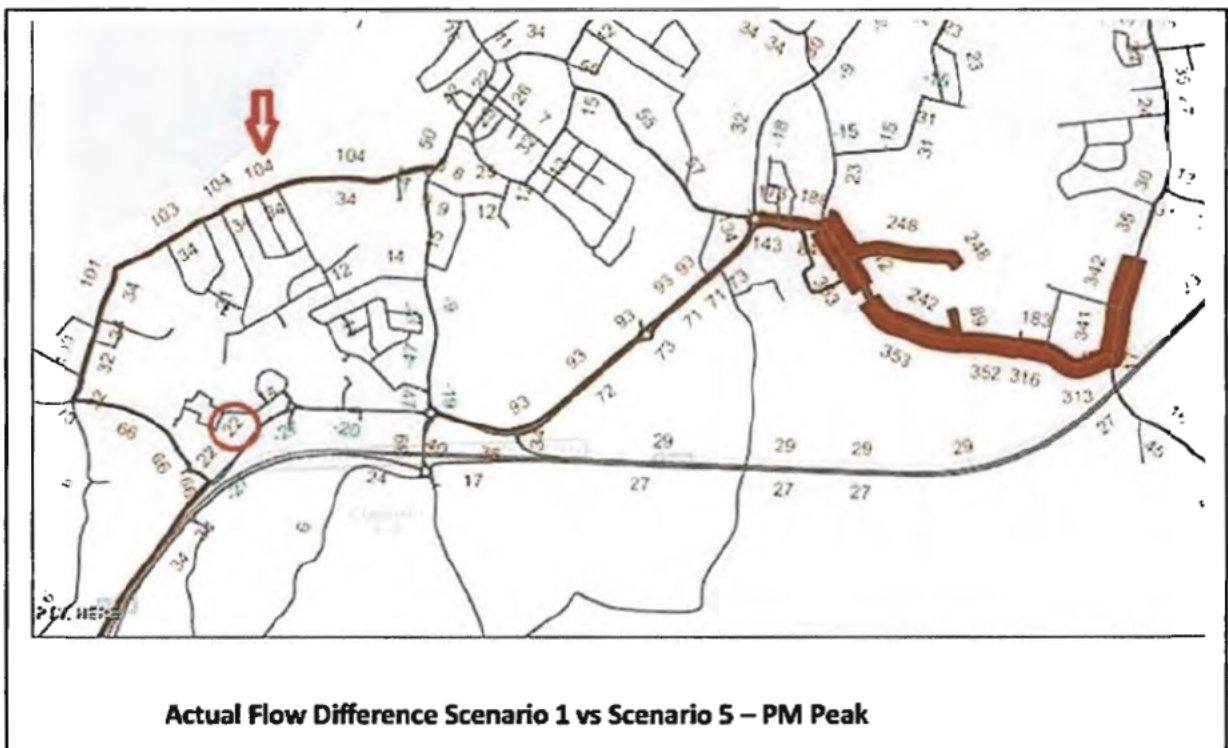


Figure 7: Predicted traffic increases (in vehicles per hour) in the year 2040, after construction of the full Brooklands development. Numbers in red (or brown) are increases in vehicles per hour relative to traffic levels if no Brooklands development was built. Map reproduced from Part 1 of the original Transport Assessment for application 25/00779.

- 4.1.5 Jacobs’ traffic modelling showed a significant decrease in traffic in Joy Lane if the new A299 Radfall junction is built.
- 4.1.6 The new road from the A2990 to Joy Lane in Seasalter, being built under planning application 22/01527, could (according to traffic assessments for that application) divert up to 120 vehicles per hour onto Joy Lane in the morning peak period, and 140 vehicles per hour in the evening peak period. However, *in practice* we do not know how much difference the new road may make to flows on the A2990, because there has always been a vehicular route

through Church Lane, and it is well-used in peak periods. The development simply replaces the narrow old road (with alternate one-way working) with a deviated and widened replacement allowing unimpeded two-way traffic.

4.2 Technical Note 15 Rv2: Response to KCC Comments

4.2.1 In appendix 14, the data used to model the Prospect Way junction appears to be incorrect. For example, in scenario 5 (Full Brooklands development but no A299 Radfall junction) the developers assume a lower eastbound A2990 demand flow in the evening peak hour than in scenario 1 (year 2040 with no Brooklands development), whereas Jacobs' modelling (reported in the original Transport Assessment) shows an increase, which is what would be expected. The effect is to reduce the apparent need for the A299 Radfall junction to be built. **Can the applicants please explain the data they input?**

4.2.2 The applicants' assessment does not provide any information about how traffic from the Brooklands development may affect tailbacks onto the A299 dual carriageway. **As this is a highway safety issue, it should be clearly investigated and evidenced in the Transport Assessment.**

4.2.3 It appears from part 6 of the original Transport Assessment that traffic from other sites in the draft Local Plan has not been included in the modelling submitted for this Application. This would include at least 750 new dwellings in the Whitstable area, as well as a large secondary school. **Traffic from these developments should be included in the modelling in order to judge at what point the new slip roads would need to be built.**

5. Tesco roundabout – junction of A2990 and Millstrood Road.

- 5.1 The developers have apparently "solved" traffic congestion in future years at the Tesco roundabout by widening the approaches of Millstrood Rd on either side of the roundabout.
- 5.2 As the Brooklands development would be widening Millstrood Road (east) at the same time as increasing traffic on Millstrood Road, there needs to be a formal review of whether a zebra crossing is required for pedestrians crossing Millstrood Road between the A2990 footbridge and Tesco's. Many pupils from The Whitstable School cross Millstrood Road here, a significant number of them driven to / from Tesco's as part of their daily commute.
- 5.3 Due to the increasing local population it is becoming unacceptable that there is no pedestrian or cyclepath link between Millstrood Road (east) and the east side of the A2990 at Golden Hill. In other words, there is no pedestrian pavement on the southeast side of the roundabout. At present, pedestrians and cyclists must cut through the Tesco carpark, which is private property. If the Brooklands development were to be approved, there should be a requirement for the applicants to provide the missing pedestrian pavement / cyclepath.

6. Junction of South Street and Millstrood Road

- 6.1** The latest drawing for this junction (Figure 8 below) shows that a non-round roundabout is proposed – in fact round with a segment removed on the eastern side. This would be unsafe, because drivers approaching the roundabout from the west would be assuming the roundabout was round and offered more room on the eastern side. It would certainly need to be the subject of a formal road safety audit.



Figure 8 Applicants' latest proposal for the South Street / Millstrood Road junction.

- 6.2** Where is the tracked-path drawing for HGVs at this roundabout? An HGV tracked path analysis of the roundabout (and the proposed roundabout at the other end of South Street) should include proof that the proposed junctions can accommodate a maximum-length articulated lorry, not just a refuse truck. This is because the new A299 junction will provide the quickest access from the adjacent Joseph Wilson industrial estate to the strategic road network. Although there is a 7.5 tonne weight limit sign at this junction, it states it applies three-quarters of the mile to the west. This suggests it refers to the Radfall Hill route to Canterbury. (Note that South Street has no weight limit sign at the east end of the road).
- 6.3** In the design shown in Figure 8, pedestrians waiting to cross Millstrood Road northbound do not appear to have sufficient visibility of traffic approaching from South Street (east), bearing in mind that the green area behind them is private property and we do not know what vegetation may grow there or how the landowner may develop the site. If in fact there would be sufficient visibility, can this please be demonstrated clearly.
- 6.4** The proposed layout creates a hazardous environment for northbound cyclists on the Crab & Winkle route, and is likely to lead to eastbound drivers misunderstanding the intentions of northbound cyclists. The design of the roundabout diverts northbound cyclists into the

mouth of Millstrood Road, as if they are turning into it, but then they have to cross the exit of Millstrood Road before being able to reach the safety of the cyclepath to Whitstable. It should be noted that the Applicant's latest crash data shows a collision between a car and a northbound e-bike at this junction.

- 6.5 The proposed development would add considerably to the volume of traffic on South Street. The outlined provision for cyclists would be totally inappropriate for the Crab and Winkle cycle route, which is supposed to be an off-road / quiet-lane route suitable for use by cyclists of all levels of experience.

7. Junction of A2990 and Foxgrove Road and Clover Rise.

- 7.1 Crash data shows four collisions (three of them serious) at the A2990 / Foxgrove junction in the three years 1st July 2022 – 30th June 2025. One of these involved a cyclist and a motor-cyclist. There was also a collision nearby at the A2990 / Clover Rise junction. This is an unusually high number of accidents for what is essentially a single location (a staggered junction). The proposed Brooklands development would increase the amount of traffic using Clover Rise at the same time that traffic levels on the A2990 would also be increasing. How do the applicants and KCC intend to ensure that these proposals would not increase the number of injuries at this location?

8. Other considerations

8.1 **The road safety (crash data) analysis is too restricted.** Figure 2-1 on page 2 of the Note shows that the Long Reach roundabout and Clapham Hill are not included, although the development would increase traffic here, and there are road safety concerns in this area and pedestrians have been injured.

8.2 There appear to be errors in the traffic model used in the Canterbury Local Plan and in area modelling for the Brooklands application. The latter is shown in Appendix 14 of the original Transport Assessment. An excerpt is shown in Figure 9 below.

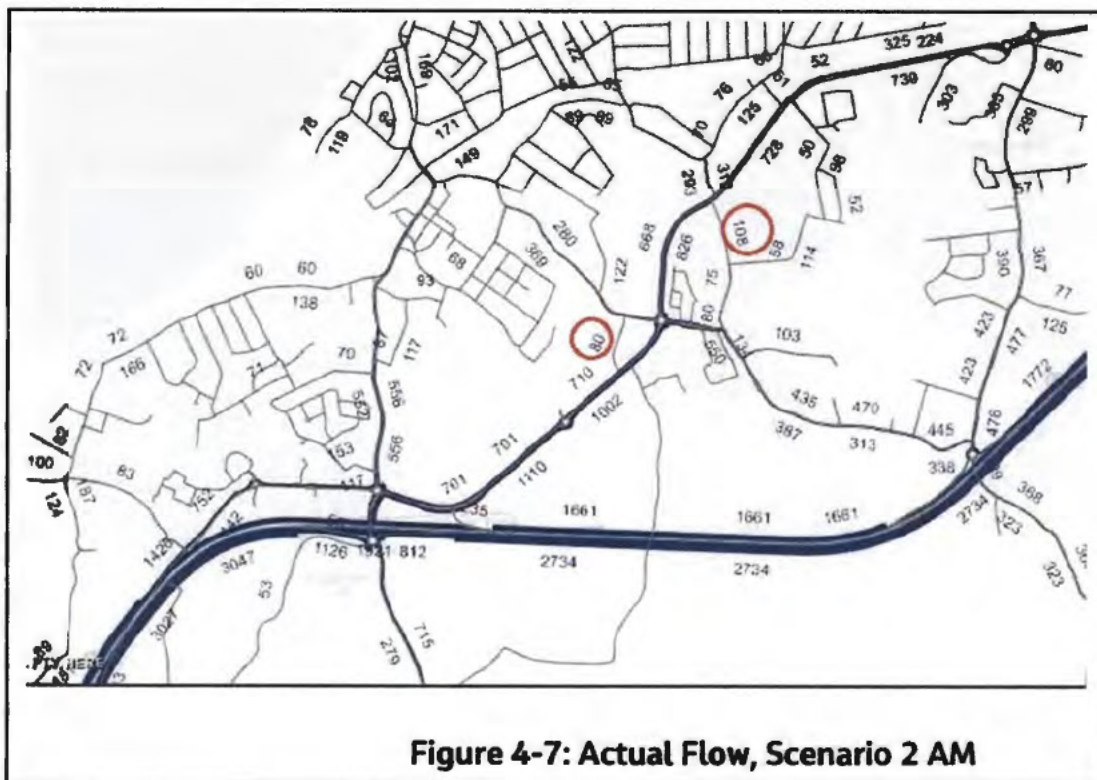


Figure 4-7: Actual Flow, Scenario 2 AM

Figure 9: Jacobs' estimates of vehicle flows in 2040 in the AM peak period, after construction of the Brooklands development and new A299 Radfall junction. The ringed numbers appear to be errors.

8.3 In Figure 9, two figures appear to be wrong, and have therefore been ringed. They provide estimates of traffic flows on two roads (Golden Hill and South Street), both of which are cul-de-sacs albeit closed former through-routes. The indicated traffic flows suggest that the closing of these through-routes may have been omitted from the traffic model, allowing them to be used to by-pass the Tesco roundabout, resulting in an under-estimation of congestion at the roundabout.

8.4 If this is the case, it could lead to under-estimation of the amount of traffic that would use the A299 Radfall roundabout, because whether drivers use the A2990 or the A299 to travel from the A299 at Seasalter to Chestfield depends on the relative journey-times on the two routes. Hence, the estimates of the impact of the new junction on levels of through-traffic on Chestfield Road through the Conservation Area may be wrong.

On behalf of the
The Lismore/Rayham Road Action Group

4TH June 2025

I Strongly object to the following,
FAO Canterbury City Council planning department.
Planning reference number, CA/25/00779 (Outline planning application)

Dear Sir or Madam,

Reference: Proposed Development of Brooklands Farm

Whilst it is acknowledged that it is exceedingly difficult for young people to get onto the housing ladder, and many people have concerns about this issue for their children and grandchildren, there has been no enthusiasm expressed for this proposed scheme.

In part this reflects anger and anxiety related to the proposed scale of this further development. In recent years, this locality has seen the ongoing development of the former Grasmere Pasture, the development at Whitstable Heights and the development at Pearson's Heights, all of which are still only partly built, so that the full impact has yet to be experienced. Nonetheless everybody is already aware of greater traffic and greater pressure on local services.

Combined with other developments across the Canterbury district, the scale of development in recent years has had a significant adverse impact on the quality of life of residents. My view is that the local infrastructure is insufficient to cope with any more large-scale development.

I wish to voice objections specifically to the Brooklands Farm development on a number of grounds:

Loss of agricultural land.

It seems to us incomprehensible that developers and the Canterbury City Council should even consider as suitable sites for development areas which are currently used as farmland for many reasons (There are policies written into the councils own local plan which protect farming and green areas from development.)

- We have a growing population, which need feeding as well as housing.
- We have great concerns about climate change, which drives the need for more emphasis upon use of local produce and locally sourced food to minimise our carbon footprint.
- We have concerns about food security following in the wake of the Russian invasion of Ukraine.

Against this backdrop, it seems frankly bizarre that any consideration should be given to converting agricultural land which is currently used for both beef and crop farming into further housing and industrial development. The developers seek to present the proposed development as a means of improving biodiversity, when it is quite apparent that the loss of agricultural land will lead to loss of biodiversity.

. Loss of Green Space:

Local residents are already concerned about the lack of green space, not just in South Tankerton, but across Whitstable. There is little green space in the town, apart from small areas in Westmeads Road and the Church Street Playing fields. adjacent to the Thanet Way. The Church Street site is also under threat, with proposals for the development of a SEN school by Kent County Council which owns the land.

The only green amenity for South Tankerton was that at Grasmere Pastures which is now being developed, in spite of the City Council originally having objected to it on the grounds of unsuitability.

The development of Brooklands Farm will inevitably change and destroy the character of a semirural environment, with the loss of valuable hedgerows, historic trees, ancient farmland, and habitat for wildlife.

The development proposals show a small strip of land which is referred to as a "green corridor", and this is presented as if it were increasing biodiversity, whereas the reality is that many acres of open farmland will be destroyed. Whilst the patch of green may take the edge off the prospect of total urbanisation, it hardly represents an amenity for local people.

. Increased traffic and road noise.

All the local residents are concerned about the increasing volume of traffic which is already being experienced as a result of the developments mentioned above.

A proposal for a further 1400 houses will inevitably create further traffic, bringing with it dust, dirt, air pollution and noise pollution. There does not appear to have been any modelling of what this might mean in terms of additional vehicles, but a reasonable guesstimate is that there might be a further 2500 cars and 4000 people living on the new estate. As well as the ordinary residential traffic, there will be rush hour congestion around the opening and closing times of any school that is built; and vans and lorries servicing the industrial units that may be developed. The local road infrastructure is not adequate to support this scale of development.

Although reference is made in the proposals to creating sustainable local communities, the reality is that incoming residents will need to use the facilities provided in Whitstable town centre, the Tankerton shopping area and the shops and services at Swalecliffe. Whitstable town centre is now always busy. The town is hugely over congested at weekends and is not able to cope with the huge volume of through traffic. It is exceedingly difficult to find parking spaces.

At the morning and evening rush hour, and when the schools close, there are major pinch points all around the area. The roundabouts on the Thanet Way alongside Chestfield Station are frequently blocked by drivers queueing for the takeaway facilities at McDonald's and KFC.

There is already a huge build-up of traffic trying to exit the John Wilson Industrial Estate at Reeves Way. This junction will become much worse once Grasmere Pastures has been further developed, as the traffic exiting the industrial estate and housing development will increase significantly. Traffic backs up much of the way to Greenhill at busy times. Queues build up on St John's Road and the Herne Bay Road on both sides of the mini roundabout.

Neither the Council nor the Police ever seem to have taken any action to resolve this problem satisfactorily. Given the proximity of the Thanet Way to the railway line, engineering solutions are difficult.

Our local roads are already in a poor and unsafe state of repair. Navigating the local area has become increasingly difficult with roads being closed and diversions being put in place. In spite of the constant disruption caused by digging up the roads, or perhaps because of it, road surfaces remain dangerous and full of potholes. Adding increased traffic into the mix can only make things much worse.

. Water Supply, Wastewater and Sewerage:

After a very wet spring and early summer, we have not faced major water shortages or outages locally in 2024, but local residents are very mindful of the fact that hosepipe bans have been a commonplace in recent years, creating problems for gardening and car washing.

We recently asked Southern Water for further detail following a recent letter to residents which warned of limited capacity on the existing network for future developments. We quote from their detailed response (in bold italics):

"Land at Brooklands Farm

As the statutory wastewater undertaker for Whitstable, Southern Water has undertaken an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for this proposal should the development connect to our network in future. The assessment reveals that local sewerage infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure the occupation of the development is phased to align with the delivery of wastewater infrastructure.

Proposals for up to 1400 dwellings at this site will generate a need for reinforcement of the wastewater network. This reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development programme. Planning policies and conditions help ensure connection of new development is aligned with new infrastructure delivery, and does not contribute to pollution of the environment, in line with paragraph 180 (e) of the revised National Planning Policy Framework (NPPF) (2023)".

In separate communications, Southern Water have stated that it will be at least 20-25 years until the Long Rock pumping station is able to cope with current demands and existing levels of usage, without factoring in Grasmere Gardens, Whitstable Heights and so on.

In other words, residents face the problem of water shortages and sewage spills for years to come, as the existing inadequate network will only be developed incrementally.

For the past 12 months or more, concerns have been regularly expressed about the discharge of human waste into the sea, because of the repeated failure of the sewerage system to cope with rainfall. These episodes have repeatedly happened during what most commentators have described as normal seasonal weather conditions, in spite of the claims of the water companies. Climate change threatens more abnormal and unpredictable weather patterns, leading to increased risk of flooding, with Swalecliffe and Chestfield at particular risk.

This will be exacerbated by the ongoing development of the Grasmere Pastures site, where the lower end closest to the Brook has frequently flooded, even before the new development was started.

In summary, I am genuinely concerned that additional development on this scale will prove very challenging, bringing with it a risk of flooding and sewage spills, with the likelihood of increased risk to human life and health and damage to property.

. Increased pressure on local services and schools.

We have been lucky in this locality in having the services of the Chestfield Medical Centre, but these services are under increasing pressure and local residents now regularly experience difficulty in obtaining appointments to see their doctors. There are now delays where previously patients could be seen within 1-2 days. This will get worse with an increasing population.

Shopping and parking in Swalecliffe has become more difficult than ever, as it is in Tankerton, with all the side roads being jammed with parked cars.

As mentioned above, we have yet to see the full impact of the developments that are already underway, and the prospect of another 1400 homes can only add to the difficulties currently being experienced.

We note that there are proposals for a school to be developed on the Brooklands Farm site, but it is not clear what this is based upon, given that there are reports of falling rolls in the Whitstable primary schools, and some classes closing. We have been informed that the primary school would provide 400 places, but there are already 600 places available within the town.

. Lack of affordable housing:

We have been advised that the proposed new development would have to consist of 30% of affordable homes. This information appears to be very misleading, because when further detail is requested, it transpires that this 30% will include a mixture of rented properties and shared ownership schemes. Detail about who the social landlords would be does not yet appear to be available.

We as local residents recognise that there is a need for affordable housing. What we would like to see, however, is property that enables our children and grandchildren to get onto the housing ladder with a first-time purchase of 100% of the equity. Young people want to have a home of their own, in the same way that previous generations were able to do.

Given that the average wage in the area is £28-30.000pa, it is now almost impossible for young people to get on to the housing market given the current prices of houses in the area.

The proposals as they stand do not offer any comfort in this regard. Some local residents tell anecdotes about their children or grandchildren having to move out of the area-to the detriment of family and community life- in order to find more reasonably affordable houses.

Property for rental is also needed but should not be presented as if it were affordable homes to buy.

At the same time, we are aware of housing being offered to London Boroughs, who are exporting their overspill into our locality, and adding to the pressure on local services. These boroughs are now not taking up these dwellings due to lack of funds.

This is a development that offers no benefits to local people, and we feel that it is driven by financial gain and not out of necessity and we object to it for that reason.

. Issues specific to Lismore Road:

Conflicting information has been given as to the possible use of Lismore Road as an access route. On the one hand, we have been told that it will provide vehicular access. On the other hand, some members have been told that Brooklands Farm does not own all the land which would be necessary to create vehicular access.

For obvious reasons, the use of Lismore Road as an access route is a major concern to our residents. Many of the houses do not have sufficient space on their drive for more than one vehicle, and many residents therefore have to park vehicles on the road. At times, there is nose-to-nose parking on both sides, leaving barely more than a car's width, and making it difficult for larger vehicles, emergency vehicles, and dustbin lorries to proceed safely. It can be difficult exiting some driveways because of limited vision. The idea that this could become a major thoroughfare enabling access to Brooklands Farm is appalling, if only from the point of view of road safety.

It would also completely change the character of Lismore Road, which is a quiet road (parked cars notwithstanding) of about 30 houses. It is effectively a cul-de-sac, given that Rayham Road is an unmade road with very little traffic flow. Creating access for vehicles to 1400 homes, industrial units, a school, and shops would be unsustainable.

. If the proposals for affordable housing do not meet local need, who needs this development?

There is evidence that houses on the new estates already mentioned are not selling well. As mentioned above, housing is being offered to London boroughs, rather than providing accommodation for people on the local council's waiting list for housing. This cannot be right.

It is clear that before any further developments are undertaken, some assessment needs to be undertaken of local housing need, in the sense of homes that are affordable to young people living and working in this area, linked to local income levels. It is of no use to provide housing which costs many multiples of a young family's earnings and will just lead to more people from London and elsewhere being drawn into Whitstable.

Summary.

We are unable to see any merit in this proposal, which does not appear to provide any benefits for local people.

There is a huge amount of proposed development in the Local District Plan. If it were all developed, the character of the district would be changed for ever, and it would become an urban sprawl facilitating greater migration from London, rather than meeting the housing and employment needs of local people.

I will ask my local councillors to oppose the proposed development on Brooklands Farm, and we will lobby the district council not to give planning permission.

Yours sincerely

Hilary @ Robin Stokes



GRASMERE VILLAGE RESIDENTS' ASSOCIATION (GVRA)

OBJECTION TO PLANNING APPLICATION CA/25/00779 – BROOKLANDS FARM - SUBMITTED BY THE GRASMERE VILLAGE RESIDENTS' ASSOCIATION (GVRA)

1. Introduction

1.1 This objection document is submitted by The Grasmere Village Residents' Association (GVRA) in respect of planning application CA/25/00779 proposing to build a development consisting of 1350 dwellings, a mixed use Local Centre, a primary school, a SEND school and business employment space on the Brooklands Farm site in Chestfield.

1.2 This formally constituted Association, originally set up with KCC assistance, represents the interests of the 42 properties situated on the unadopted section of Grasmere Road.

2. Local Plan Considerations

2.1 All major new housing developments are required by law to be included and fully justified in a current Local Plan.

2.2 We begin by pointing out that the current lawfully authorised Local Plan is the Canterbury District Local Plan which was adopted in 2017. This is the last Canterbury District Local Plan that has gone through the full legislative procedures required, including review by Planning Inspector at open Public Inquiry before any formal adoption.

2.3 The lawfully existing Canterbury District Local Plan 2017 outlines the authorised plans for the district's development until 2031. It makes no mention of any Brooklands Farm site.

2.4 While a draft Local Plan 2045 is in existence, it has not gone through the full legislative review process required, including review by Planning Inspector at open Public Inquiry, and therefore does not have any lawful standing and this would be challenged.

2.5 In practice, any revised Local Plan must be the subject to assessment by an independent Local Plan Inspector appointed by the Secretary of State to determine whether they consider the Plan to be sound in terms of national planning policy, and compliant with all relevant legislation.

2.6 The draft Local Plan 2045 is therefore not relevant until all this process has been fully completed.

3. Impact on the Environment

3.1 Brooklands Farm lies within an area which has long been regarded as an Area of High Landscape Value (AHLV). It was identified once more as an AHLV in the currently adopted Canterbury District Local Plan 2017 and remains so (see the map and statements contained on page 10 of that currently existing Plan).

3.2 The farmland itself lies in, and provides a wide panoramic view of, the valley of the Swalecliffe Brook with the Blean Hill ancient forests on its' southern side. It directly abuts the historic Blean Forest area. The Brooklands Farm name is indicative of the site's long-standing association with the Swalecliffe Brook.

3.3 The Brook itself runs down through its' valley to Chestfield and Swalecliffe and on to the sea at Swalecliffe. It has historically been a source of flooding in some of the low-lying London clay areas, including housing and other areas, through which it runs to the sea. This is before any additional widespread concreting over of the Brooklands Farm site is authorised.

3.4 A number of long-established popular registered footpaths cross the site which currently provide the public with opportunities for open rural walking and simply enjoying the countryside and its wildlife, with no overbearing roads or buildings spoiling the view.

3.5 It is also an area of high biodiversity value with rare butterflies and breeding birds. As such its ecological, biodiversity and landscape value would be seriously and adversely impacted by a major housing development and associated facilities of the scale proposed. These cannot realistically be replaced by whatever the prospective developer proposes. Use of footpaths through built-up urbanised areas bear no comparison or an equal degree of public satisfaction.

3.6 A major part of the attractiveness of the view over the green valley of the Swalecliffe Brook is its rural tranquillity. Little or no convincing consideration is given to these impacts, including the loss of its Area of

High Landscape Value (AHLV) designation, specifically attributed to it by Canterbury City Council's (CCC's) current Local Plan 2017.

3.7 The National Planning Policy Framework (NPPF) requires the Local Planning Authorities should seek to use areas of poorer quality land for future developments.

in preference to that of a higher quality and, if agricultural land is to be proposed for development, the economic and other benefits of that land should be fully considered and set out. The housing evidence base for this site which supports latest draft Local Plan proposal does not address this NPPF requirement.

3.8 Historic maps (see The History of Chestfield published by the Chestfield History Society) show clearly that the Brooklands farmland has been and remains long existing and viable farmland.

4. Loss of Best and Most Viable Farmland

4.1 Significant areas of Brooklands Farm land, which has existed as a farming for centuries, have been and still are farmed for cereal crops and cattle grazing, and it is therefore likely that these are Grade 3a rather than Grade 3b land. Grade 3a is Best and Most Versatile (BMV) agricultural land and its development for housing would be contrary to both policy EMP 12 (Agricultural Land) and policy DS12 (Rural Economy) of the current draft Local Plan.

4.2 The housing evidence base for this site which supports this development proposal does not address any of the above points.

4.3 Given these facts, along with the clear adverse landscape and biodiversity impacts in both the short and long term, it is asserted that, more properly, it would be appropriate for the Brooklands Farm Site to be nominated as a Green Gap between the existing building line of Whitstable/Chestfield and the edge of Blean Woods and Radfall settlement, rather than being authorised for large scale urban development of the kind being proposed.

5. Impact on Traffic and Transportation

5.1 We will start this section by going to page 90 of the draft Local Plan 2045 and the sub-section entitled “4. Access and Transportation” for the proposed Brooklands Farm development.

5.2 Careful reading of that subsection reveals an important missing fact that it provides no detail as to how additional traffic from the extensive Brooklands Farm site – and indeed other proposed Whitstable development sites - to and from Canterbury, of which there will be many, will be catered for.

5.3 There is mention of the A299 and A2990 but these run east to west not north to south so are essentially irrelevant for Canterbury journeys. The other content of this section is all about mainly local journeys. So let us consider the more important Canterbury journeys.

5.4 In reality, there are only two realistic options:

- Use of 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;
- Use of 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.

5.5 Both these alternative routes will face major problems with large increases in peak traffic in future, particularly the Thornden Wood and 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. There is also unavoidable roadside parking throughout the day in Tyler Hill village, leaving only half road passing down much of its length. Existing developments have caused these problems, which will be significantly worsened by more car and cycle trips to and from Canterbury. There will inevitably come a time where additional traffic loading on these routes from a range of other already committed developments is going to increase loading on these routes to heavier and more dangerous levels.

5.6 The Brooklands Farm site with its' proposed 1300 dwellings, a 3FE primary school, a SEND school, and other buildings will be a day long major traffic generator to and from Canterbury as will much of the other

ongoing and proposed proposed Whitstable area development. The existing draft Local Plan 2045 does not address in any substantive way how the Canterbury journeys will be properly and efficiently addressed and catered for in future. This is a key point which any new Plan must address.

5.7 Additionally, the proposed off-slip from the A299 onto South Street and hence onto the Chestfield Road would lead to extensive through traffic passing through the designated Chestfield conservation area village onto the overloaded onto the complex multi-roundabout system at the northern end of Chestfield Road leading to further overloading of it, particularly on summer weekends (when Long Reach roundabout queues can stretch back onto the A299) and weekday evenings.

5.8 These Movement and Transportation issues have not been fully and openly addressed by CCC officials in their current – unapproved by Planning Inspector - draft Local Plan. The process for which, as has been pointed out, has not been fully and lawfully completed.

5.9 Or are CCC officials claiming, without any proven justification that the whole Local Plan legal basis, including the necessary scrutiny and approval by Planning Inspector, can be ignored and overridden? This needs to be fully and openly clarified for publicly information and for our representative Councillors involved.

6. Flood Issues

6.1 Part of the proposed Brooklands Farm development site is in Flood Zone 3. There is therefore a high probability of flooding which will be exacerbated by future climate change not least due to run off from extensive concreted over areas. It is long established that the Swalecliffe Brook and its tributaries cause flooding in Chestfield and parts of Swalecliffe (see Environment Agency latest future flood risk maps on the gov.uk website).

6.2 More incidences of abnormally heavy rainfall in future as a result of climate change will serve to increase the incidences of future flooding. This cannot be just ignored by a Local Planning Authority, in this case Canterbury City Council.

6.3 Extensive published knowledge of the flooding caused to central Chestfield and parts of Swalecliffe by the upper catchment of the Swalecliffe Brook indicate that any substantial further development of the main valley origin and this catchment down through Chestfield and Swalecliffe is likely to cause future flooding problems – see for example current gov.uk risk of future flooding map for Swalecliffe Brook.

6.4 Local inhabitants would therefore be reasonable in demanding proof, before the proposal to include Brooklands Farm is finalised and sent to the Planning Inspectorate, that proper and effective steps can be taken and paid for by any future developer to be sure to prevent any increase in flood risk, including into the longer term, from future downpours, e.g. from very extensive sustainable drainage/water storage provision or other greater protection. This not only for the proposed development but also downstream to the coast. Greater rainfall intensity is already causing historically novel issues in the Whitstable area, such as the flooding in Joy Lane from a line of downpours arriving from the sea.

6.5 The surface of the fields already naturally retains rainwater due to its relatively high clay content which is resistant to the soaking-in of surface water. The ‘waterlogging-plus’ builds across the whole site even without adding in extra the run-off from the extra roads, hard standings and roofs of any development proposed. In other words, the Brooklands Farm area already has no extra water holding capacity. We believe vague reference to “sustainable drainage systems”, with no details set out in full up front, is simply seeking to sidestep and cover up this issue.

7. The Inadequacy of Foul Water Drainage Provision in the Area of the Proposed Development and Surrounding Areas

7.1 In combination with other housing developments (including those already under construction), the large Brooklands Farm housing development proposed would add to the sewage effluent pollution problem on the beaches at Swalecliffe and surrounding areas.

7.2 It is clear that Southern Water’s sewage works are unable to operate safely with even the current level of discharges in the Whitstable and Swalecliffe areas let alone with greatly increased amounts from new housing and accompanying building requirements.

7.3 Whitstable's sewage disposal uses the Short Sea Outfall method. There have been many repeated problems, including the release of untreated effluent and raw sewage, which been washed back onshore. The effect on people's health is not known because there is no reporting system for beach users who become infected.

7.4 Southern Water's plans for replacing the Short Sea Outfall are currently unclear and unapproved, but it appears that any replacement would be another "short" outfall but with somewhat higher capacity. It could therefore be likely to still result in sewage effluent being blown back onto the beach when winds are from the west or north. Has any final detail of the supposedly improved arrangement been agreed and where are the details set out for public inspection? They should be!

7.5 It would also have to be shown that any increase in effluent treatment provision could deal with not only all the existing housing arisings, already causing problems, but also any new arisings from the large amounts of additional housing proposed under the currently only draft Local Plan 2045. So far as we can see, there is no demonstration of such provision, or even consideration of it, in the draft Local Plan 2045 documentation.

8. The future housing water supply problem

8.1 On the day this objection document was prepared, 29 May 2025, the Water Minister, Emma Hardy, announced that England could face housing and drinking water shortages within a decade unless new reservoirs are built. In recent years, there have been several hosepipe bans in Canterbury district, with another looking likely later this year.

8.2 This household water problem will soon transform into a crisis in the Canterbury, Whitstable and Herne Bay areas with the amount of additional new development being proposed. It is unclear and unstated as to how this will be managed in future.

8.3 A new reservoir for the Canterbury area at Broad Oak has been postulated for many decades now and has got nowhere. Even if approved it would be highly controversial and would undoubtedly take a minimum of many decades more to implement. In reality, it may never come to fruition.

8.4 Carrying on with exceedingly large volumes of new development in the Canterbury, Whitstable and Herne Bay would therefore also be unwise

or impracticable for this reason. And it is no good being wise after the event.

8.5 This on top of many other reasons why the Brooklands Farm planning application should be rejected.

9. Movement and Transportation

9.1 We will start this section by going to page 90 of the draft Local Plan 2045 and the sub-section entitled "4. Access and Transportation" for the proposed Brooklands Farm development.

9.2 Careful reading of that subsection reveals an important missing fact, that it provides no detail as to how additional traffic from the extensive Brooklands Farm site – and indeed other proposed Whitstable development sites - to and from Canterbury, of which there will be many, will be catered for.

9.3 There is mention of the A299 and A2990 but these run east to west not north to south so are essentially irrelevant for Canterbury journeys. The other content of this section is all about mainly local journeys. So let us consider the more important Canterbury journeys.

9.4 In reality, there are only two realistic options:

- Use of 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;
- Use of 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.

9.5 Both these alternative routes will face major problems with large increases in peak traffic, particularly the Thornden Wood and Hackington Road option which is narrow and width restricted for most of its length. There is also unavoidable roadside parking throughout the day in Tyler Hill village, leaving only half road passing down much of its length.

9.6 The Brooklands Farm site with its' proposed 1300 dwellings, a 3FE primary school, a SEND school, and other buildings will be a day long major traffic generator to and from Canterbury as will much of the other proposed new Whitstable area development. The draft Local Plan 2045

does not address in any substantive way how the Canterbury journeys will be properly and efficiently addressed and catered for.

9.7 Additionally, the proposed off-slip from the A299 onto South Street and hence onto the Chestfield Road would lead to extensive through traffic passing through the Chestfield designated conservation area village onto the overloaded onto the complex multi-roundabout system at the northern end of Chestfield Road leading to further overloading of it, particularly at peak periods and on summer weekends (when Long Reach roundabout queues can stretch back onto the A299) and weekday evenings.

9.9 The Whitstable, Chestfield and Herne Bay areas are simply being overloaded with traffic growth from new development with no new off-site road provision to deal with it, a recipe for future disaster!

9.8 The fact that residents along Chestfield Road have not been made aware of these issues as part of the formal consultation process surely contravenes clause 16 of the NPPF which states that "Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities". This should include dealing with all the relevant considerations.

9.9 These Movement and Transportation issues have clearly not been fully and openly addressed by CCC officials in the current draft Local Plan or the planning application received.

10. Summary and Conclusion

10.1 Publicly declared policies and legislation are there to be fully and properly followed

by local authorities, including CCC, not put aside and disregarded. The proposed Brooklands Farm development proposals are both ill-conceived, improperly analysed, cannot be properly justified and are not included in any finally approved Local Plan. The application Brooklands Farm planning application - CA/25/00779 - should therefore be rejected forthwith. Indeed, it should be deemed inadmissible until it is included in a fully approved Local Plan that has been fully approved, according to the required legislative procedures by Planning Inspector.

May 2025

Comments for Planning Application CA/25/00779

Application Summary

Application Number: CA/25/00779

Address: Land At Brooklands Farm Whitstable

Proposal: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

Case Officer: Stevie Andrews

Customer Details

Name: Hackington Parish Clerk

Address: Not Available

Comment Details

Commenter Type: Parish Council

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We would like to voice our strong concerns about this application as the Brooklands development will have far-reaching implications for the area between the site and Canterbury City.

Our primary concern is the impact of increased traffic on Hackington Parish. Although a new junction connecting Thanet Way to Chestfield Road and Radfall Hill is proposed to mitigate traffic issues, it could instead create a new shortcut for vehicles heading to Canterbury from other areas. This would add to the development's traffic and send more vehicles through ancient woodland and the village of Tyler Hill, leading to increased pollution and congestion along narrow country lanes.

Tyler Hill is a small village divided by Hackington Road. The pavements are narrow, and there are no designated crossing points despite the parish council campaigning for a pedestrian crossing for many years. Any rise in traffic will heighten the danger for pedestrians, especially children crossing the road to reach the bus stop, use the playing field and playground, or access the village hall. At the edge of the village on Canterbury Hill, traffic frequently queues from the junction at Giles Lane and St Stephen's Hill. Increased traffic from the development would likely push this congestion further into the village, worsening air pollution from idling vehicles.

While the developers have acknowledged that issues remain even with the promotion of buses,

cycling, and walking, we question their confidence that residents will not default to using cars. In our experience due to the poor public transport provision, the residents mostly rely on cars to get to places.

In short, this development threatens to create a constant stream of traffic through our parish, eroding the quality of life for Hackington residents. We therefore urge the planning authorities to commission a full independent traffic impact assessment that includes Hackington Parish and surrounding rural routes, and to explore alternative access strategies that do not divert traffic through sensitive residential and environmental areas.

30 June 2025

By email: To Stevie Andrews, Planning Case Officer, Canterbury City Council
c.c. planning@canterbury.gov.uk
c.c. Simon Thomas, Head of Planning, Canterbury City Council

Please find below Chestfield Parish Council's response to the Outline planning application submitted:

CA/25/00779 - Land At Brooklands Farm Whitstable

Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

Chestfield Parish Council objects to this Outline planning application.

As it is fully understood that the bulk of this application would be dealt with under subsequent reserved matters application(s) should this outline application be given approval, we have not therefore commented on the indicative or illustrative designs, drawings, and diagrams.

Our detailed representation below raises concerns/comments around the following headings:

1. Lack of foul drainage capacity and a call for a Grampian condition;
2. Early engagement with Hallam Land Management Limited;
3. Construction Environmental Management Plan; and
 - 3.1 Lack of a Traffic Management Plan;
 - 3.2 Need to secure construction and implementation of the slip roads at an earlier stage of development; and
 - 3.3 Scope for Westbound slip roads to reduce flows westbound on the A299.
4. Surface Water Management and the Long-term management of SUDS, WwTW, MUGA, play areas, etc;
5. A welcoming of the two proposed speed limit reductions;
6. Primary school and SEND school
7. Parking provision
8. Brooklands Farm and the Blean Area of High Landscape Value;
9. Support for CCC Arboricultural representation and revised access point;
10. Mention of the emerging Chestfield Neighbourhood Plan and Neighbourhood Plan area to include the whole of the Brooklands Farm development;
11. The 2025 Chestfield Housing Needs Survey information;
12. Four-storey build height proposal;
13. Secured by Design;
14. Transport, Accessibility and Movement
15. Response to Socioeconomic and Human Health document (Volumes 7 and 8)
16. Bio Diversity plans and the design responses in the DAS document to identify the possible effect the development will have on protected species, their habitats and arboriculture
17. Conclusion.

1. Call for a Grampian Condition

Foul drainage capacity is a major concern for the parish council.

This is exacerbated in the area as a whole by the planned Bodkin Farm Strategic site (outline application CA/24/00224 for a secondary school; up to 300 dwellings; an 80-bed care home; and a Local Centre) – adding stress to the local foul network – together with the Oxenden Park emerging development (planning application CA/21/01430) adding a further 450 homes at Greenhill and which is routed and discharging along Maydowns Road - with its new connection at the top of Maydowns Road now completed in 2024.

Swalecliffe Waste Water Treatment Works has three 1000m³ storm storage tanks but once these are full, sewage water is discharged into the sea.

In response to incidents of sewage discharged into the sea, Southern Water did undertake upgrades to the Swalecliffe site. In August 2023, the company completed a £750,000 project to optimise the site, increasing available storage and reducing storm overflows by 36%. This optimisation involved installing new chambers and pipework to redirect stormwater during heavy rainfall, thereby reducing the frequency of discharges into the sea.

However, in 2023 despite the improvements reducing the storm overflows, Southern Water reported that Swalecliffe Waste Water Treatment Works still discharged sewage 11 times over a total of 37.9 hours, accounting for approximately 0.43% of the year. (In 2024, there were 3 discharges over 15 hours, or about 0.17% of the year).

For this outline planning application, we request, and consider it imperative, that CCC imposes a Grampian condition to align the build/phasing/occupancy of Brooklands Farm with capacity in the Southern Water network.

We understand that the Grampian condition must be imposed at outline planning application stage (rather than at a discharge of foul drainage condition application) – so this is the only opportunity to request this.

We feel this request is justified.

A Grampian condition to align the build/phasing/occupancy of Brooklands Farm with capacity should mean that the potential risk of flooding to properties and/or environmental pollution can be mitigated in a timely manner.

Southern Water's own Briefing Note to Local Planning Authorities – [briefing-note-for-lpa-on-infrastructure-provision-1.pdf](#) details that Water and Sewage Companies (WaSC) cannot object to, or the Council refuse to grant, planning permission for development on the grounds that no improvement works are planned for a particular area.

Southern Water will therefore instead request conditions on the grant of planning permission. This is intended to enable Southern Water to agree with the developer the layout, drainage and water use strategy, preferred point of connection, whilst also allowing for existing capacity to be considered and upgrading work to be programmed. Such an approach allows the legal right to connect to be sensibly managed.

There is a right for a development to connect under section 106 of the WIA 1991. However, problems can arise from the fact that this right to connect can be exercised on 21 days' notice - too short a period of time for the WaSC to effectively plan, design and deliver reinforcement works.

The use of Grampian style planning conditions has been affirmed in case history eg the Welsh Water decision (2009) relating to wastewater connections - *"The planning authority can make planning permission conditional upon there being in place adequate sewerage facilities to cater for the requirements of the development without ecological damage.. Thus the planning authority has the power, which the sewerage undertaker*

lacks, of preventing a developer from overloading a system before the undertaker has taken steps to upgrade the system to cope with the additional load."

The purpose of Grampian style conditions is to enable Southern Water to manage the impacts of development and the connections to the public network. This approach therefore allows the legal right to connect to be sensibly managed prior to occupation of the development. The LPA has no further purpose in pursuing such conditions, and scrutiny of WaSC performance and decision making is through the statutory regulatory body Ofwat. Alongside the LPA planning conditions, Southern Water will agree with the Developer:

- an appropriate drainage strategy, including surface water management and SuDS,
- a water-efficient use strategy (where applicable), and
- the preferred points of connection,

whilst allowing for existing capacity to be considered and upgrading work to be programmed.

When consulted on a planning application, where necessary Southern Water will therefore request that a Grampian style condition is imposed upon the grant of planning permission.

Southern Water's response to CCC is on the CCC Planning Portal dated 10 June 2025:

Southern Water has undertaken a capacity check to understand the impact that the additional foul sewerage flows from the proposed development will have on the existing public sewer network. This indicates that these additional flows may lead to an increased risk of foul flooding from the sewer network. Any network reinforcement that is deemed necessary to mitigate this will be provided by Southern Water.

Whilst Southern Water confirms inadequate capacity to accommodate this development, it states it cannot object on these grounds, and confirms the developers' right to connect. But Southern Water requests that development aligns occupation with its provision of services – unambiguously supporting our call for a Grampian condition.

This condition should read: **"Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate waste water network capacity is available to adequately drain the development."**

2. Early engagement

Chestfield Parish Council undertook early engagement with the applicant Hallam Land Management Limited.

Given the importance and weight we accord to the foul drainage capacity and the request for a Grampian condition (above) we have led with that as our first paragraph, however we would take this opportunity to thank Hallam Land Management Limited for meaningful engagement with both the parish council and residents – the dialogue was extremely useful, and we thank Hallam Land Management Limited for listening and responding positively to make changes to the master plan etc. We are grateful for the opportunities afforded and found it very constructive.

3. Construction Environmental Management Plan (10709 CEMP 01; Rev.01)

Whilst the above document covers all aspects of environmental management during the construction of the Brooklands Farm site, it is largely generic in content, and (with the exception of certain specific statements therein) wording and phraseology that one would find in any such document for the highlighted purpose.

Having now read and fully digested the content of this CEMP, the following (related) sections/paragraphs give cause for comment/concern – for ease of both reference and clarity these are referenced in document order, although in no way should they be considered as being prioritised:

1.1.0.5

CEMP Comment: 'The purpose is to reduce the risk of adverse impacts of construction on sensitive environmental resources and to minimise disturbance to local residents'

Parish Council Comment:

Whilst this both identifies and considers possible risk of disturbance to local residents, this is very much considered as a generalisation, as this does not consider the actual cause of such disturbance to local residents (and, it should be stated, the undoubted adverse impact on village life in general). Document 10709 CEMP document (otherwise referred to as CEMP) neither highlights nor investigates possible risks likely to be experienced by local residents (including immediate non-parished areas, namely South Street). The approach to managing risk as per IOSH guidelines and directives is to initially eliminate any perceived risk from the outset.

This therefore infers that a localised, site-specific risk assessment should be considered from the outset planning approval stage, particularly given that 'CEMP item 7.16.23.69' serves to confirm that site access routes will be used under the 'Canterbury Phasing Policy' (this is additionally commented on further within this document). Whilst the intention of the CEMP is focussed on environmental impact, it cannot be ignored that impact of possible or perceived risk to local residents extends far and beyond those highlighted within. For example, there is no mention or consideration given towards the possible (many may say – undoubted) effect on current village life, particularly mental health.

2.1.0.1

CEMP Comment: 'These proposals will need to remain flexible and be adapted throughout the works as necessary to accommodate changing needs and circumstances'

Parish Council Comment:

Going by the exact definition of this statement, the proposals will effectively be a 'live' document presumably subject to ongoing re-assessment and evaluation.

We would therefore ask how this will be achieved, and as to which (if any) the consultees of any such adaptation will be, particularly given the likelihood of impending and future Local Government Reorganisation.

2.4.6.15

CEMP Comment: 'Method statements will contain as a minimum (line 6) Health, safety, and environmental considerations'

Parish Council Comment:

As a 'follow-on' from 2.1.0.1 (above), it is assumed that this statement applies to site conditions and those working within its confines only. This is seen as a complete disregard to affected residents. As in our above comment/query, health and safety of all parties should be considered – this should include areas outside of site perimeters, particularly as by virtue of de-facto inference and planning, both Chestfield Road and South Street will effectively both be considered part of the proposed construction and logistics route.

We would therefore request clarity of this point, particularly given the absence of a specific construction traffic and logistics plan.

2.9.11.28

CEMP Comment: 'It is noted that as development progresses through the phases, the situation will arise where residents will occupy early development phases whilst construction continues on nearby plots. The future residents will then become receptors in their own right and therefore measures are provided within the CEMP to ensure that any effects in terms of air quality/dust, noise, lighting and construction traffic routing are minimised'

Parish Council Comment:

3.1 Lack of a Traffic Management Plan

Whilst it is somewhat reassuring of further measures in regards to site conditions and associated traffic routing for future residents, we believe that this statement is seen as somewhat of a slight towards existing residents, as it is apparent that those same existing residents' comments and concerns, voiced in the presentation and consultation events held, have not been either considered or addressed during initial planning proposal stage. Therefore, we do not feel that the effects of construction traffic routing on existing residents have been considered – should this not be the case, we would request copy of any relevant consultative documentation or findings as we

do not believe that due consideration has been afforded towards existing or current residents and/or village life.

Furthermore, we don't believe that a satisfactory Transport Management Plan is achievable. If permission is granted, then the scheme will be sold on to one or more developers. The unknown is how many developers. Most housebuilders build out at the rate of around 100 dwellings per year – so a sole builder could take 14 years to finish this scheme. And likewise, if there are several developers then this will mean more vehicles all at the same time to serve their own parcels of land.

A Traffic Management Plan should be provided now before outline permission, notwithstanding that we appreciate that the final number of developers is unknown – but a Traffic Management Plan should be sought by Canterbury City Council with maximum and minimum scenarios modelled – to include weight of vehicles, number of vehicles, size of vehicles, times for deliveries, and routing paths.

6.3.1.8

CEMP Comment: 'Quarterly newsletters will be produced and distributed to update the local community on construction progress and contain information such as working hours and contact information'

Parish Council Comment:

Whilst it is pleasing to note that the developer will be producing quarterly updates to the local community, it is unclear whether the term 'local community' applies to existing residents, or confined/applicable to new or future residents. It is also unclear how such information will be distributed to all affected residents – particularly as the effect of the proposed development will affect the entire village of Chestfield and also the residents of South Street.

We would therefore seek clarity and confirmation as to how such regular information updates will be distributed.

6.3.3.10

CEMP Comment: 'Formal and informal liaison with the Community Lead Housing at Canterbury City Council to act as a representative of Whitstable's community about construction works'

Parish Council Comment:

It is likely that Canterbury City Council will experience full breakdown due to Local Government Reorganisation during the duration of the proposed development.

In this regard, Chestfield Parish Council would therefore propose to be considered as representative of the community from the outset, particularly as any impending Local Government Reorganisation will not affect Town/Parish council organisations.

7.3.2

CEMP Comment: 'Develop and implement a stakeholder communications plan that includes community engagement before work commences onsite'

Parish Council Comment:

It is pleasing to note that the developer intends to maintain community engagement prior to any site works commencing. Whilst this is most welcome in context, we would ask how such meaningful discussions can be entered without a full complement of documents being available for comment or consideration. We have been informed that the actual construction and logistics plan will not be issued until after planning approval. This we feel is totally unacceptable, given that there will without doubt be a significant impact on the village and its parishioners in its current plan. We would therefore draw your attention to our comment regarding general hours of operation.

7.15.23.66

CEMP Comment: 'Working hours for construction traffic are to be restricted as follows:

** 08:00 and 18:00 weekdays*

** Occasional working outside these hours may be required which will be agreed with Canterbury City Council and neighbours will be notified.'*

Parish Council Comment:

In October 2024, Chestfield Parish Council commissioned an all-day traffic survey between the hours of 07:00hrs – 18:00hrs. This traffic survey was carried out in-person by volunteers stationed on the junction of Chestfield Road and South Street, without reliance or reference to

any designed traffic modelling. It should be further emphasised that this exercise was carried out during normal school term time so that a true peak of highway usage was evidenced. The resultant findings (as shown below) clearly show that the peak use times recorded indicate that the proposed timings of construction traffic coincide with those of residents' use, exemplifying the fact that there WILL be significant and adverse risk and disruption to local residents and this is therefore seen as direct conflict to developer comments/assurances (see 1.1.0.5).

Brooklands Farm Traffic Counting

Date:

Wednesday 16 October 2024

	Traffic coming OUT of South Street going towards Chestfield	Traffic coming OUT of South Street going towards Canterbury	Traffic going IN to South Street from Chestfield village direction	Traffic going IN to South Street from Canterbury/ Radfall Hill	Traffic on Chestfield Road from Radfall direction	Traffic on Chestfield Road from Chestfield Village direction
7am- 8am	16	128	32	42	71	247
8am-9am	30	155	55	55	139	299
9am-10am	15	76	35	33	148	195
10am-11am	23	71	21	63	145	130
11am-12pm	17	66	36	63	149	146
12pm-1pm	23	58	20	70	173	166
1pm-2pm	23	63	32	63	146	128
2pm-3pm	16	62	25	61	171	139
3pm-4pm	35	76	44	79	177	152
4pm-5pm	51	79	33	121	239	155
5pm-6pm	20	93	27	138	215	171
Totals:	269	927	360	788	1773	1928

Whilst a certain degree of disruption would be both expected and acceptable for a short duration – the fact that this would likely be for a prolonged (unknown) period cannot be considered as conducive to ongoing village life.

This is further commented on within this document (see 7.16.23.69 – 72 inclusive).

It is also noted that "occasional working outside these hours will be agreed with Canterbury City Council and that neighbours will be notified". Given the previous assurances within the CEMP that the developer intends to engage with the community before work commences, it is most disappointing that decisions such as out of hours working (and therefore introducing further disruption to residents) can be agreed between the developer and the City Council without consultation of the community.

This we see as a direct conflict with regards previous statements of assurance or intention. As referred to previously within this document, the introduction of Local Government Reorganisation (and therefore the possible cessation of Canterbury City Council) leads to the question as to who will then be the consultee with the developer / project team?

Traffic Modelling

Traffic modelling of the Chestfield Road roundabout (Chestfield Road / Herne Bay Road / Thanet Way)

In the morning peak period, drivers using the Chestfield Road roundabout can experience delays (queue-times) of **more than a minute** on the east arm of the roundabout (i.e. approaching from

Greenhill). Also in the morning peak, drivers can experience delays of up to **4 minutes** approaching the roundabout from the Herne Bay Road.

However, when the Applicants model this roundabout, they state the maximum AM queue time is (in 2024) **4.44 SECONDS** on the A2990 from Greenhill, and **10.51 SECONDS** on the Herne Bay Rd. This is clearly not reflecting the actual situation of the current experience before Brooklands Farm is built out and grossly under-estimates the congestion already experienced.

When assessed by actual length of queues, the Applicants state that the maximum queue length on the eastern arm in the morning peak period is **1.2 cars** (more or less 1 car!) and **2 cars** on the northern arm of the roundabout. In reality, the queue on the eastern arm can stretch back to Garden Centre "X" (about **450m**), and it is almost as long on the northern arm (up Herne Bay Rd in the direction of Swalecliffe Primary School).

The Applicants' modelling for 2024 is in Transport Assessment Part 7 (document 3665896), and copied out below is the most important modelling:

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.67	10.51	2.0	B
2 - Thanet Way (E)	0.53	4.44	1.2	A
3 - Chestfield Road	0.42	5.65	0.7	A
4 - Thanet Way (W)	0.36	2.61	0.6	A

Applicant's modelling of
Chestfield Rd roundabout
2024 AM peak

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.72	13.60	2.4	B
2 - Thanet Way (E)	0.48	3.97	0.9	A
3 - Chestfield Road	0.38	4.76	0.6	A
4 - Thanet Way (W)	0.55	3.55	1.2	A

Applicant's modelling of
Chestfield Rd roundabout
2024 PM peak

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.69	10.38	2.1	B
2 - Thanet Way (E)	0.57	4.69	1.3	A
3 - Chestfield Road	0.56	8.12	1.3	A
4 - Thanet Way (W)	0.32	2.43	0.5	A

Applicant's modelling of
Chestfield Rd roundabout
Scenario 2 AM peak

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.72	13.19	2.5	B
2 - Thanet Way (E)	0.51	4.15	1.0	A
3 - Chestfield Road	0.47	5.68	0.9	A
4 - Thanet Way (W)	0.52	3.41	1.1	A

Applicant's modelling of
Chestfield Rd roundabout
Scenario 2 PM peak

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.77	14.49	3.2	B
2 - Thanet Way (E)	0.60	5.34	1.5	A
3 - Chestfield Road	0.52	7.21	1.1	A
4 - Thanet Way (W)	0.30	2.74	0.7	A

Applicant's modelling of
Chestfield Rd roundabout
Scenario 5 AM peak

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.77	16.32	3.1	C
2 - Thanet Way (E)	0.52	4.35	1.1	A
3 - Chestfield Road	0.43	5.35	0.8	A
4 - Thanet Way (W)	0.56	3.64	1.4	A

Applicant's modelling of
Chestfield Rd roundabout
Scenario 5 PM peak

The most relevant column in the table is "MAX Q PCU", which means maximum queue in terms of cars (PCU = passenger car unit.....a term used by modellers to adjust vehicle counts if there is a high percentage of HGVs, but the important thing to remember is 1 PCU = 1 car).

It should be noted that similar queues on Herne Bay Road also occur at c 15:30 at the end of the school day at Swalecliffe Primary, and in the evening peak hour (17:00 – 18:00).

The Developers' modelling does not appear to take sufficient account of how this roundabout is adversely affected by the very well-used signalised crossings on the western and northern arms of the roundabout. Nor does the modelling appear to take account of the proximity of the St John Road roundabout and the Reeves Way roundabout. There are certainly occasions when queues from the St John's Road roundabout can extend back onto the main Chestfield roundabout.

The Developers' modelling also under-estimates queue lengths at **the Millstrood Road / Thanet Way roundabout**, at **Long Reach roundabout** and the junction of **Belmont Road and Canterbury Road**. So far as we can see, the Developers have omitted to model the junction of **A2990 Thanet Way / Prospect Retail Park**. This is completely unacceptable because very long queues form from this junction onto the A299 dual carriageway, which is a safety hazard due to the high-speed nature of this road.

Further uncertainty about the value of the modelling is due to the Developers not clearly stating which planned housing in the Canterbury District is included in the modelling.

Does it include the 220 houses approved in 2023 in application 22/01527 (Church Lane, Seasalter)? Presumably it does not include the houses and school at Bodkin Farm (application CA/24/00224 as yet undetermined), Benacre View (CA/23/00379 granted in April 2025 for 220 houses, 400sqm local shopping/ community facility and a 300 space Park and Bus facility), nor the 2000 houses at the University of Kent/Blean strategic site in CCC's latest draft Local Plan (which would have a major impact at the A299 / Radfall junction and at Long Reach and Clapham Hill roundabouts).

The traffic modelling submitted for the most recent application at Benacre View (CA/23/00379) when compared with Brookbanks' modelling for this Brooklands Farm application is noticeably higher – so we can reasonably assume the modelling for this application is not accurate as it would be higher if it were accurate.

3.2 Implementation of the slip roads at an earlier stage of development

7.16.23.69

CEMP Comment: *'The eastern parcel of the scheme will be accessed primarily from South Street and Chestfield Road. A299 slip roads are not anticipated to be delivered until at least 50% of the scheme has been developed (Canterbury Phasing Policy).'*

Parish Council Comment: We feel that this statement is somewhat spurious in as much that the designed A299 slip roads "are not anticipated to be delivered until at least 50% of the scheme has been developed". Clarification is therefore sought as to the true intent of this statement, as (based on an average build of 100 houses per year per developer), both Chestfield Road and South Street could experience traffic disruption for approximately seven (7) years! This period could also be prolonged should house sales/occupancy not be fulfilled, and therefore development of new homes could be suspended by the developer for lack of economic viability – thus causing further disruption to residents and village life in general.

An alternative could be that a new access is created off the Thanet Way at the outset for delivery/construction traffic only – one lane could be used purely for construction traffic.

Chestfield Parish Council would push for the slip roads to be delivered ideally at the outset of development, or at 15%, or 25% occupancy.

The Whitstable Labour councillors' representation to this application (submitted 20 June 2025) points out that the Jacobs transport assessment very usefully includes a number of scenarios which show the impact of the development with and without the A299 slips at various different stages of occupation. It shows the necessity for an A299 slipway and how this will reduce

eastbound flow on the Thanet Way but increase flow westbound as people travel via Clapham Hill to Canterbury.

Chestfield Parish Council supports the Whitstable Labour Councillors' opinion that planning permission should only be granted with conditions relating to the building of the A299 slip. At present the evidence suggests that if 50% of the homes are occupied without the A299 slip being built the capacity of the road between Estuary View and Clapham Hill will be reached. We believe that the assessment needs to consider a further scenario of 25% and 15% occupancy so that the phasing of any infrastructure can be adequately conditioned. Paragraph 116 of the NPPF stipulates authorities should be able to judge whether the plan will have an unacceptable impact on highway safety or severe impact on the road network. We don't believe this is possible until the LPA can be confident that its own phasing won't compromise the traffic network during the build and an assessment of the impact on Radfall Road has been made.

3.3 Scope for Westbound slip roads to reduce flows westbound on the A299.

Whilst we welcome the eastbound slip roads on the A299 which substantially mitigate the effect flows (particularly eastbound on the Thanet Way) we consider it short sighted that westbound slips onto the A299 were also not considered as a means of reducing flows westbound on the A299.

It would be good to go further and extend this site with additional homes in order to build a further two slip roads to completely future-proof this junction/development. It is a missed opportunity not to have both East and West access and egress.

Before granting any permission CCC should ask the applicant to explore if there is any scope for negotiating further land (which is in the same landowner ownership) and providing a further two more West-bound slip roads which would bring benefits:

- i) to 'future-proof' the whole development
- ii) benefit the existing Chestfield village and wider region
- iii) bring cost economies of scale in both the planning and build process and disruption rather than add on at a later date, and
- iv) increase CCC's housing numbers.

Chestfield Parish Council stated in its January 2023 representation to the consultation on the emerging Canterbury District Local Plan that the proposal to have a green gap designation (**The Natural Environment and Open Spaces Topic Paper 2022**, Page 28) that would preclude the provision of two further slip roads is NOT supported. The parish council felt that this proposal appeared to be reactionary to the inclusion of W5 Brooklands Farm allocation rather than as a result of assessment or analysis.

Provision of the slip roads gives an opportunity to address flooding issues that occur at the bottom of Radfall Hill under the underpass.

7.16.23.70

CEMP Comment: 'The key potential access points could include:

'South Street – This road will be the main point of access for the first circa 50% of the scheme. Within the first phase of The Site's delivery, the New South Street will be developed to facilitate access to the development parcels on the western side of the scheme. This will then be the primary access route into this area. Traffic management measures may be required to prevent congestion or disturbance to residents.'

'Chestfield Road – Depending on feasibility and local traffic considerations, this road may serve as a secondary access point after South Street. Given its proximity to residential properties, access may be restricted or limited to specific times to reduce disruption from construction. Traffic calming measures may be introduced where necessary to minimise disturbance to local residents and road users. These physical features provided along a road are used to encourage drivers to reduce speed.'

Parish Council Comment:

Although not within the parish boundary, the adverse effect caused by traffic diverting onto

Chestfield Road due to South Street "being the proposed main point of access for the first circa 50% of the scheme" is of concern, particularly as there is no indication or estimated time frame of the development of the New South Street road. The final statement pointing out that "Traffic management measures may be required to prevent congestion or disturbance to residents" infers that existing traffic flow and highway usage has not been fully considered. We therefore believe that the early construction of the New South Street road should be considered in the first instance – this we feel would serve to alleviate the need for any introduction of additional traffic management measures – such measures that presumably refer to the use of Chestfield Road as the secondary access point after South Street.

In this regard, we therefore suggest that the overriding possibility for road users to divert onto and through Chestfield Road as a 'rat run' is one that is very much a concern to all residents. This therefore further highlights the distinct need for the both the New South Street road and the building of the A299 slip roads to be developed in advance of any site construction or house construction, particularly given the 'unknown or scheduled timeframe'. Such measures would also serve to greatly reduce the potential risk and impact on resident lifestyle.

7.16.23.71

CEMP Comment: 'A Construction Traffic Management Plan (CTMP) will be part of the detailed CEMP provided to Canterbury City Council for approval.'

Parish Council Comment:

At the time of writing of this representation, the CTMP has not yet been documented or made available on the Canterbury City Council planning portal.

7.16.23.71

CEMP Comment: 'This CMTP should be developed to define the primary access points, deliver and enforce the proposed construction routing strategy, and mitigation measures to manage traffic flow, minimise environmental impacts, and ensure safety for both workers and the surrounding community'

Parish Council Comment: Given the inclusive nature of the content of the referred CMTP, this is considered a vital and strategic document, and will serve as informational towards the minimisation and disruption of resident lifestyle.

Given the many topics to be considered (as per the CEMP comments above), we would ask when this document will be made available for comment and further request that the appropriate timeframe is extended to allow a full and measured response.

Chestfield Parish Council is also led to understand that the CTMP will NOT include a logistics movement or delivery plan – a document which one would expect to be part of any legible planning application.

4 Surface Water management and Long-term management of SUDS, WwTW, MUGA, play areas, etc

- A Sustainable Drainage System (SuDS) including swales, attenuation basins, and flow controls is proposed.
- Designed for the 1-in-100-year storm event with 45% climate change allowance.
- Primary discharge is to Swalecliffe Brook, which is already a flood-prone watercourse.
- There is no evidence of long-term storage capacity or inclusion of high-performance green infrastructure.

We comment on the document: Hydrology & Flood Risk – Appendix 11.2 Drainage Strategy 3665907:

Section 4.22: Why are green roofs, proprietary treatment system, attenuation storage tanks and ponds/wetlands not being considered? All of these should be explored and implemented.

Section 5.7: a discharge rate of 4 l/s/ha has been agreed but in table 5.3 the discharge run off rates for a significant number of the catchment areas are considerably higher than 4 l/s/ha?

Section 6.5: Brooklands has completed a Surface Water Model and associated report (10709 FS01 Rv0) but this is not included in the submitted documents - this report needs to be made available before outline planning is granted.

Presumably the long-term maintenance and management of items like the SUDS, MUGA, play areas etc will follow most new-developments "model" nowadays and pass to a management company where all the new occupiers pay a levy for their maintenance.

What are the maintenance requirements and a certainty that these essential assets will be able to be maintained in perpetuity?

The parish council would like a condition of any planning application that the drainage system (including SuDS) for the residential portions of the development be offered up for adoption to Southern Water via a Section 104 agreement.

And that the SuDS comply with Southern Water's standards and criteria ([Sewerage Sector Guidance - approved documents | Water UK](#)) for their design and construction in order that Southern Water will adopt them.

5 Primary school and SEND school

Chestfield Parish Council welcomes the provision of a primary school and SEND school. Primary schools should not be as big as secondary schools – so a new school is preferable, rather than developer contributions to Swalecliffe and/or Briary primary school at Greenhill. A new local school on site to serve the development it sits within will mean many pupils will be able to walk or be walked to school, thus saving car commute, and reducing school drop off and pick up traffic movements.

Whilst the land would Transfer to KCC at commencement of development in Policy W4, the parish council requests that there needs to also be a S106 condition to this effect (if CCC is minded to grant outline permission) – to avoid any future uncertainty of a school not being built after approval of planning – and an undesirable second tranche of housing on this land being applied for instead. The land conditioned for educational purposes only by condition, would secure against any further housing instead.

6 Parking Provision

It is important that the schools, especially the SEND school which will have a high percentage of its pupils being ferried to and from school by KCC-funded drivers have sufficient parking provision.

There is a concern that Chestfield Road will become clogged at school drop off and school pick up times without provision either within the school sites or within the actual development through a reserved matters layout.

Similarly, this situation already arises on match days at Radfall Recreation ground, and it is likely that new playing pitches, sports provision, and the community hub will be used by non-residents so it is imperative that parking provision for these is given proper consideration.

7 A welcoming of the two proposed speed limit reductions

Chestfield Parish Council welcomes the two speed reduction proposals, namely:

- Proposed reduction in Speed Limit from 60mph to 40mph on Molehill Road detailed in the [PROPOSED TRAFFIC CALMING MEASURES ON MOLEHILL ROAD document](#).
- And an extension to the 30mph speed limit at the junction of South Street shown in the [Proposed Access Strategy document](#).

8 Brooklands Farm and the Blean Area of High Landscape Value

Brooklands Farm lies in an Area of High Landscape Value (AHLV), as shown in the map on page 10 of the not-yet superseded Canterbury District Local Plan 2017.

The importance of farmland in the setting of the Blean Woods has been recognised for more than 25 years. Brooklands Farm was included in the Blean Woods Special Landscape Area (SLA) as specified in the Canterbury Local Plan 1998. The SLA was the precursor of the current AHLV.

The AHLV that covers Brooklands Farm is the Blean Woods AHLV. The Local Plan 2017 states this "identifies landscapes important to the character and setting of the Blean Wood Complex. It is an important objective of the Council and other agencies to preserve and enhance this landscape, with long term objectives to meet habitat network potential for woodland and heathland, particularly where it improves habitat connectivity of the Blean woodlands."

The 2017 Local Plan 2017 defines an AHLV as "a designation applied by the Local Planning Authority to define areas of high landscape importance within their administrative boundary. They are often designated for their intrinsic physical, environmental, visual, cultural and historical value in the contemporary landscape, which may be unique, exceptional or distinctive to the local authority area."

Whilst we are aware that a 2021 review of the District Local Landscape Designations proposed a redrawing of the boundaries of the Blean AHLV to remove the Brooklands site, these changes have not been formally adopted by the council and cannot be given planning weight.

Development proposals within the AHLV (2006) are expected to be sensitively designed, landscape-led, and demonstrably necessary - a criterion which this scheme fails to meet.

9 Support for CCC Arboricultural representation and revised access point

The CCC tree officer representation is dated 05 June 2025 on the planning portal for this application.

Chestfield Parish Council supports the call for a revised access.

G5 and G15 are Category A/B trees and it is proposed that partial removal will be necessary to facilitate the construction of access roads. There is little alternative to G5 partial removal and it is limited but the breach of G15 on Chestfield Road could be avoided if H9 is used as the access point.



H9 is a Category C hedgerow whilst G15 is a Category A landscape scale belt of trees some of which are 850mm diameter affording to wider landscape value and scale.

A breach in the feature will significantly reduce their wider value.

An alternative access can be provided as suggested by the CCC officer and as indicated below with significantly less landscape and arboricultural impact.

Chestfield Parish Council supports this recommendation:



We assume Canterbury City Council will seek Kent County Council Highways' comments on this access adjustment.

10 The emerging Chestfield Neighbourhood Plan and Neighbourhood Plan area

We should explain that the Brooklands Farm site is covered in the emerging Chestfield Neighbourhood Plan being developed by some parish councillors and residents:

On 14 January 2025, Chestfield Parish Council submitted an application to Canterbury City Council for the designation of a Neighbourhood Area in line with Regulation 5 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

The parish boundary dissects the Brooklands Farm development site.

The Neighbourhood Area, as submitted by Chestfield Parish Council, therefore includes the existing Chestfield Parish boundary along with additional land to the west of the Parish, that currently sits outside of the parish boundary, to include the full extent of the draft site allocation policy 'W4 - Brooklands Farm' as identified in the Draft Canterbury District Local Plan (Regulation 18) (2024) and now forming this outline application area.

In accordance with Regulation 6 of the Neighbourhood Planning (General) Regulations (2012), Canterbury City Council ran a consultation on this area for 6 weeks from 11 February 2025 to 25 March 2025. Then CCC Cabinet considered responses at its meeting on 23 April 2025.

At the Cabinet meeting Canterbury City councillors unanimously resolved to approve this area.

Therefore, when the Neighbourhood Plan is 'made' in due course, its policies will apply to the whole of the Brooklands Farm site.

11 The 2025 Chestfield Housing Needs Survey information

Chestfield Parish Council has just commissioned a Housing Needs Survey (March 2025). The document may be read at <https://chestfieldparishcouncil.gov.uk/wp-content/uploads/2025/05/Housing-Needs-Report-draft-April-2025.pdf>

A postal and online survey was distributed to 1,430 households in March 2025. 359 responses were received, a 25% response rate.

84.7% are detached houses and 50% of homes have four or more bedrooms.

Chestfield has a significantly older population than district and national averages.

Housing stock is dominated by large, detached, owner-occupied homes.

Very few smaller properties (1- or 2-bedrooms) exist, limiting downsizing opportunities.

Chestfield faces a growing mismatch between its aging population and its existing housing stock.

One of the recommendations is to develop small numbers of affordable 1, 2, and 3-bedroom homes and smaller market housing homes. And focus on affordable home ownership models and accessible housing for people with limited mobility.

There is a clear need for smaller, more affordable, and accessible homes to maintain a balanced, sustainable community. Providing opportunities for younger households to stay and for older residents to downsize will help preserve the social cohesion and vibrancy of the parish into the future.

12 Four-storey build height proposal

The Building Heights Parameter plan proposes development up to four-storeys in height.

Four storeys is completely out of character for Chestfield and is totally unacceptable. There are no four-storey buildings in Chestfield.

A condition if CCC is minded to approve this outline application should set maximum build height at 3.5 storeys.

13 Secured by Design

Chestfield Parish Council is pleased to read that a Security and Crime Prevention Strategy has been developed and informed by Secured by Design (SBD) principles.

Secured by Design (SBD) is the official police security initiative in the UK that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop and visit.

Secured by Design advises on the construction of buildings and development schemes to encourage the [adoption of techniques or designs that are thought to discourage crime](#). SBD recommendations are included in the National Model Design Code and the programme incorporates training police officers as Designing Out Crime Officers, who are referred to in the National Planning Policy Framework.

Chestfield Parish Council would like any subsequent reserved matters application(s) to include full [Secured by Design \(SBD\) Gold accreditation](#). This incorporates the security of the external environment through layout and design with physical security measures; it is based on academic research that shows reductions in crime of up to 87% in new-build housing. Achieving this, helps create safer, more secure environments for cohesive, vibrant communities with lower crime rates that will benefit residents.

Secured by Design (SBD) Gold Accreditation is free of charge for applicants.

14 Transport, Accessibility and Movement

The ES Volume 1 - Chapter 8: Transport, Accessibility and Movement has the following areas we would comment on:

8.13 Severance is the perceived division that can occur within a residential area if it becomes separated by a major traffic artery and is used to describe the factors that separate people from other people and places.

Parish Council Comment:

There is a significant risk of this occurring on Chestfield Road that has no crossings. Plans propose only one new crossing near the proposed new primary school – which is welcomed. However, at least one more should be considered ideally near the current play park area on Chestfield Road.

8.15 Driver delay is assessed in terms of 'driver stress'

Given the age demographic local drivers are likely to be sensitive to the relatively small changes to this.

8.53 Baseline traffic data

This was obtained in June 2024 using a mix of manual surveys covering the weekday peak periods and Automatic Traffic Counters recording 24-hour data over a 1-week period. The

locations of these surveys are identified in the TA (at Appendix 8.1) which included a total of 15 junctions and four Automatic Traffic Counters.

Chestfield Parish Council consider this to be fundamentally flawed in that only 2 x 1 hour slots per day were modelled. There is no reflection of School traffic at approximately 3 pm and this is already known to cause issues. The addition of proposed schools in this and other nearby builds must make this a key consideration. As well as the additional traffic there will be the delays caused to vehicles with school children (and parents) crossing roads.

8.87 Based on the definition, severance can occur when communities become separated by major transport infrastructure. None of the identified roads in the study area are currently considered to act as a barrier that separates communities. For example, the settlement of Chestfield is situated on both sides where footways and crossings support non-motorised users. Chestfield Road is already potentially causing some severance. It is suggested that the increased traffic will tip the scale. It should also be noted that there are no controlled crossings on Chestfield Road - a fact that Chestfield Parish Council find wholly unacceptable now let alone should this build go ahead.

8.89 This indicates that based on the existing layout of these junctions, the detailed junction assessments are forecast to experience increases in the Ratio to Flow Capacity results. This identifies that the development could result in a major environmental impact. It is not clear what will be done to mitigate this.

15 Response to Socioeconomic and Human Health Document (Volumes 7 and 8)

The following is a brief synopsis of randomly selected statements (by index reference) as provided within developer application documents.

7.45 Developer Comment

'At 68.9%, the most common method of travelling to work by residents in the immediate Zone is by private vehicle, which is slightly higher than in the other assessment areas, The proportion of people travelling to work via public transport is slightly below regional and national averages'.

Parish Council Comment

Given that Brooklands Farm lies essentially in a rural area, it is unsurprising that travel by private vehicle is the common method of travel. This is further emphasised by the fact that there is limited public transport in the immediate area, either by bus or train. Although it is understood that improved bus service may be introduced in the future, the ongoing trend of preference for using private vehicular travel is unlikely to decrease given a combination of comparative isolation of the site, lack of infrastructure, and a certain degree of necessity to meet the demands of working life – and associated travel - in general. Private vehicle travel (whether for work or otherwise) has been an accepted factor in rural semi-isolated areas for many years, and through a combination of both personal preference and necessity, one that is highly unlikely to change the basic demographic of village life. Given these restricting factors, the percentage of private vehicle use (already acknowledged as being 'slightly higher than in other assessment areas') WILL without doubt increase by at least 1,000 vehicles, thus adding to increased traffic flow in an already exhausted road network.

7.47 / 7.48 Developer Comment

(7.47) "There are three GP surgeries in the immediate Zone: Chestfield Medical Centre, Whitstable Health Centre and Estuary View Medical Centre. The three surgeries form the Whitstable Medical Practice Group.

(7.48) Based on NHS Healthy Urban Development Model (HUDU Model) population size standards of 1,800 people to justify one General Practitioner, there is an average excess capacity of 13,416 patients in the area, which is equivalent to approximately 7 FTE GP."

Parish Council Comment

This statement serves to confirm that there is currently an excess of patient capacity at high level. Although there is reference to a possible 'community hub' within the proposed development plans – there is no definitive guarantee or assurance that further medical centres will be developed. Based on the provided figures of 2.25 persons per residence, this figure would increase by 3.037 patients – a figure that will be further exacerbated by the introduction of the proposed Bodkin Farm development. Although potential developers may state their confirmation of any 'realms of concern' by providing land for community hubs – this again further exposes the deficiencies in local amenity, and although this is possibly something that the potential developer could be excused from – this remains a major concern for the local community in general, and something that authorities **MUST** consider during any consultation/approval processes.

7.49 Developer Comment

"According to the NHS 'Find a Dentist' tool, there are five dental surgeries in the immediate Zone: Chestfield Dental Practice, Kelvin House Dental Practice, Tankerton Dental Centre and Swalecliffe Dental Centre. Capacity data for dental surgeries is not published in the same way as for GP surgeries. However, according to the practice websites, none of the five surgeries are currently accepting new NHS adult patients, which indicates they are experiencing capacity issues".

Parish Council Comment

Please refer to our previous comment as highlighted in 7.47 & 7.48 above, as we consider that this is similarly relevant in terms of exhausted facilities, particularly given the absence of firm data being available.

7.74 Developer Comment

*"The net additional jobs anticipated to be supported as a result of the Proposed Development within the regional area is **2,339 person years of employment** in construction related jobs across the 11-year build period, or **213 jobs per annum**"*

Parish Council Comment

Whilst it is generally accepted that additional construction jobs will be generated during the development phase, this will further exacerbate and increase traffic flow, particularly during peak morning periods (please refer to our comments and findings in the developers' submitted Construction and Management Plan).

7.83 Developer Comment

*"The Proposed Development is therefore considered to have a **negligible** impact on the receptor. The sensibility of this receptor is considered low, however the transport assessment work will identify the final impact of construction traffic".*

Parish Council Comment

Chestfield Parish Council has approached the developer for more concise and definitive information so as to enable us to comment on potential impact from construction traffic. However, we have been advised by 'Hallam Land' that such a Construction and Logistics will not be published until the award of building contractor. Whilst we would accept that plans may be subject to change during the construction phase, we find it unacceptable that 'outline rules' haven't been established in terms of traffic routing, types of vehicles, weight loading or restrictions at initial planning approval stage (how for example, would a potential contractor be expected to submit their respective bids without such information?). This (we fear), would lead to a certain degree of disorganisation and local conflict. We would therefore seek to request publication and

subsequent local agreement prior to any planning approvals by the City Council. In view of this (rather open) 'agenda' and absence of such crucial information for such a long-term project – we would question how the suggestion of 'negligible impact' has been assumed or derived?

7.148 Developer Comment

"The construction phase is expected to have a limited short-term impact on travel to work methods and distances. In view of the residual Proposed Development is considered to have a negligible impact on travel to work patterns".

Parish Council Comment

Whilst the topic of impact on work travel (particularly when mixed with that associated with traffic flow being affected by the introduction of additional construction traffic, we fail to understand (yet again!) how impact can be considered as either 'short-term' or 'negligible'.

Consequently, we believe that the proposed developer has fallen short in their understanding of local issues or demographics, instead being reliant on outdated traffic modelling rather than actual.

7.149 Developer Comment

'The construction phase of the Proposed Development is not expected to affect existing travel patterns and therefore it is considered to have a negligible impact on the receptor'.

The subject of our protestations regarding the effect on existing travel patterns has been covered within our comments concerning statements 7.83 & 7.148 respectively.

Yet again we would voice our concerns regarding the term 'negligible'.

7.151 Developer Comment

"Overall, the residual impact of the construction phase is considered to have a negligible impact on health and educational facilities".

Parish Council Comment

Having listened to the views of many local residents regarding this proposed development, it is sadly obvious that many of our parishioners are very concerned as to impact on personal health and wellbeing. It has been established within this document that many of the roads and associated walkways are narrow, and by virtue of this there is a probable likelihood of this becoming a concerning factor where 'normal' village life will be affected.

Of particular and key concern is the impact that such a long-term project may have on mental health and wellbeing of individuals – something that our discussions (and also those that the developer would have witnessed first-hand during their open consultation with residents) have proved extremely relevant.

Again, we would strongly object and question how the developer can assume that impact on health is considered 'negligible'.

7.155 Developer Comment

'The Proposed Development will provide up to 1,350 new dwellings, including a range of housing types and sizes. The residual impact is therefore considered to be moderate beneficial'.

Parish Council Comment

We have highlighted our various concerns throughout this document, particularly during actual construction phase (approximate duration 11 years). It is interesting to note that the presumed residual impact is now considered as 'moderate beneficial' upon completion.

Again, we would seek clarification as to how such assumptions can be derived. We do not believe that this development will be of any benefit (moderate or otherwise).

FOR REASONS UNKNOWN, DOCUMENT VOLUME '8', COVERING TRANSPORT, ACCESSIBILITY AND MOVEMENT' IS INCLUDED WITHIN THE SAME DOWNLOADABLE DOCUMENT ENTITLED 'SOCIOECONOMIC AND HUMAN HEALTH' – WE HAVE THEREFORE TAKEN THE DECISION TO 'ANSWER AS LAID OUT' SO AS TO AVOID CONFUSION:

The following is a brief synopsis of randomly selected statements (by index reference) as provided within developer application documents.

TRANSPORT, ACCESSIBILITY AND MOVEMENT

8.5 Developer Comment

"Construction of the Development will result in additional short-term temporary vehicle movements on the local road network to transport general construction materials to the Site in Heavy Goods Vehicles (HGV's). This results in a temporary intensification of HGV traffic on the public road network. The scale of intensification fluctuates depending on the size of the Development and the phase of construction".

Parish Council Comment

Whilst it is fully understood that there may be an element of vehicle movements during any proposed construction phase, we would question how such HGV traffic movements / intensification on the local road network can be considered as 'short-term temporary'.

Whilst such traffic will without doubt have effect on the 'main' road network (namely the A299), the main concern is how such increased volume of traffic movement through existing residential areas (namely Chestfield Road and South Street) will be managed, whether this be through timed deliveries or otherwise.

The existing (residential) road infrastructure is considered neither stable or suitable enough for such heavy loads, not just from a weight-laden point of view, but also in terms of the viability of such and potential of lasting damage to the 'hidden' Victorian infrastructure that lies beneath. It is noted however that there are long-term plans to slip road from the A299 upon completion of 50% of the development.

As current industry average build quota stands at circa 100 houses per year, this would equate to an approximate 7 year period – this duration figure gives cause to further question the developers' continuing assumptions regarding 'negligibility'.

Given this (and also taking into consideration of our previous comments and concerns as highlighted within this document), we would encourage the planned slip road be built at the onset of the project (ie: before actual housing build).

This we see as the most viable and overall acceptable option to ensure that construction efforts can proceed without either disruption to ongoing village life in terms of health and wellbeing, but also to protect a very tired and fragile existing infrastructure.

8.6 Developer Comment

'Operation of the Site will result in an increase in vehicle movements (primarily cars) as the road network associated with residents and visitors travelling to/from the Site. The assessment of traffic and transport effects is structured around consideration of the potential environmental impacts that may arise from the additional vehicles on the local road networks as a result of both the construction and operation of the Site. The environmental impacts considered (where applicable), as identified by the IEMA Guidelines, are as follows:'

- a) Severance of Communities
- b) Road vehicle driver delay
- c) Non-motorised user delay
- d) Non-motorised user amenity
- e) Fear and intimidation
- f) Accidents and safety

Parish Council Comment

Whilst we believe that we have both highlighted and emphasised our thoughts within the context of this document, it is interesting to note that our concerns are somewhat echoed within stated IEMA guidelines. As a consequence to this, we do not feel the need to further comment on this particular statement as highlighted, but merely point out our respective understandings.

8.20/8.21/8.22 Developer Comment

(8.20) 'The assessment of pedestrian delay serves as a proxy for the delay that other modes of non-motorised users may experience when crossing roads'.

(8.21) 'Changes in the volume, composition or speed of traffic may affect the ability of people to cross roads, and therefore increases in traffic levels are likely to lead to greater increases in delay. Delays are dependent upon the general level of pedestrian activity and general physical conditions of the crossing location.'

(8.22) 'Given the range of local factors and conditions which can influence pedestrian delay, the IEMA guidelines do not recommend that thresholds be used as a means to establish the significance of pedestrian delay but recommend that reasoned judgements be made instead. However, The IEMA guidelines do note that, when existing traffic flows are low, increases in traffic of around 30% can double the delay experienced by pedestrians attempting to cross a road'.

Parish Council Comment

The highlighted increase of traffic flow serves to highlight the fact that there are no recognised crossing points on the existing roads. Again, such concerns could be largely eliminated should the developer/KCC chose to build the planned slip roads prior to commencement of site development.

8.23 Developer Comment

'Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic'.

Parish Council Comment

As previously highlighted, the village of Chestfield currently has no formal road crossings. The parish council have lobbied on several occasions over the years to have a pedestrian crossing installed in the village, although on each occasion this has been rejected by KCC/KHS. It is interesting to note that the developer has recognised this in its application, and in fact plans to install a crossing on Chestfield Road, although not within the core village centre. Whilst Chestfield Road itself does have some central islands to aid road crossing, these do not have any direct impact on traffic control.

By its very nature, Chestfield Road (being the only road leading to main areas and bus route) has become increasingly busy in terms of traffic flow, particularly at peak times (the same timings that the developer has cited for construction traffic!).

Chestfield Road does not have adequate walkways/pavement width, and we see the addition of further traffic being introduced during the construction phase as detrimental towards existing village life. Our previous suggestion of considering building the planned slip roads at project

outset (as opposed to when 50% of the build is complete), is a definite and positive solution towards ensuring quality (pleasantness) of the health and wellbeing of village life.

8.24 Developer Comment

Appraisal guidance which sets out guidance on assessing the hindrance of pedestrian movements as indicated below:

- a. None – little or no hindrance to pedestrian movement*
- b. Low – All people wishing to make pedestrian movements will be able to do so, but there will probably be some hindrance to movement.*
- c. Medium – Pedestrian journeys will be longer or less attractive, some people are likely to be dissuaded from making some journeys of foot.*
- d. High – People are likely to be deterred from making pedestrian journeys to an extent sufficient to induce a reorganisation of their activities. In some cases, this could lead to a change in the location of centres of activity or to a permanent loss of access to certain facilities for a particular community. Those who do make journeys on foot will experience considerable hindrance.*

Parish Council Comment

As alluded to in our previous comments (8.23), we feel that the above indicated assessment being quantified as (d) – HIGH, as determined within IEMA guidance procedure.

8.31 Developer Comment

'The scale of fear and intimidation experienced by pedestrians is dependent on the volume of traffic, HGV composition, its proximity to people or the lack of protection caused by such factors as narrow pavement widths as well as factors such as the speed and size of vehicles'.

Parish Council Comment

We would draw attention to our comments against developer statements 8.20 to 8.24 inclusive.

8.44 Developer Comment

'Discussions with KCC regarding the Application Site has been ongoing for a number of years. Initially, these discussions included the use of the Kent wider traffic model to demonstrate the Application Site should be considered as part of the Emerging Local Plan. Following this work, a scoping note was produced (ref:10709 SN01) dated 9 May 2024. The scoping note was assessed by KCC, who subsequently confirmed on 17 May 2024 that the methodology included within the scoping note was appropriate and acceptable'.

Parish Council Comment

Whilst the Parish Council remain fully respectful of developer discussions with KCC, we note that such discussions/agreements were made on 9 May 2024 with confirmation of scoping note assessment obtained on 17 May 2024.

In this regard, we would respectfully point out that all such discussions and/or agreements were made with the previous KCC administration, which was changed following the 01 May 2025 local elections.

We would therefore seek to question the validity of such agreements given this factor, and further in doing so ask whether further discussion and/or agreement has been reached with the new KCC administration team as of 01 May of this year?

- 16 **Bio Diversity plans and the design responses in the DAS document to identify the possible effect the development will have on protected species, their habitats and arboriculture**
Chestfield Parish Council thinks that overall, the design response has adhered to the brief in that potential habitats have mostly been identified and addressed however, there are a few points which we would like to raise:

Bats

Paragraph 220, refers to 'no evidence of Bats roosting' in trees in which they would normally be found. Bats tend to roost June - August and so, our question is, when was this survey carried out? if it is ongoing then this report needs to be updated accordingly.

Curlews

Paragraph 222 The site includes - Wintering birds, 'including a small assemblage of farmland birds, generalist species and limited wetland bird assemblage including linnet, curlew and golden plover.'

Chestfield Parish Council would point out that Curlews are a red listed species and are protected under the Wildlife and Countryside Act 1981. Contravention of this status quo could be construed as a criminal offence.

Curlews are ground nesting birds and so any disturbance or change to their habitats including the draining of wetlands and urbanisation will have a significant effect on their population numbers. It is paramount that these nesting sites are not disturbed.

Please clarify how these endangered birds will be protected? If they are nesting in the wetlands and are disturbed then this could seriously affect their numbers. Landowners should be made aware of this and liaise with relevant agencies before any ground works are undertaken.

Paragraph 216, refers to three ancient oak trees which are described as in 'open field landscape. Paragraph 7.35 explains that 'The existing hedgerows and trees for example will be retained and along with newly-planted trees and hedgerows will form interesting vistas within the development complementing the proposed built form and representing a significant improvement from their current context within an intensely farmed agricultural environment. A variety of different natural and semi-natural landscape character areas are proposed to enhance the existing environment and offer opportunities for habitat creation and biodiversity gain. The resulting landscape will be diverse and distinctive, with interest for all users'.

Confirmation is required that these ancient oak trees will be retained!

In conclusion, potential developers need to adhere to all of the stipulations which have been referred to in the DAS document.

Disturbance to habitats, feeding and hunting grounds will be inevitable during the building of the development - What steps will be taken to mitigate this issue?

Suggestions going forward-

Dimmed street lighting will aim to reduce the amount of artificial light spilling over onto habitats and lessen disruption to insects and nocturnal animals.

Developers should consider including brick/air holes in their builds so that swifts, swallows, and house martins can roost safely.

Garden highways should be encouraged for hedgehogs to maintain routes around the area.

Ecology constraints must be in place and monitored infinitum to ensure that buffer zones between designated and recreational open spaces are fit for purpose and to ensure the effective safeguarding of protected species.

Implement wild meadow planting for insects and birds.

17 Conclusion

This application is without doubt the most significant planning application Chestfield has ever experienced – and if granted and built will double the size of the existing village. Chestfield Parish Council urges CCC to refuse this application.

Chestfield Parish Council objects to this outline application on the grounds of:

- Insufficient Foul drainage capacity as acknowledged by Southern Water;
- Lack of a traffic management plan;
- Surface water management;
- It is too much development with only two slip roads;
- The proposal is also unacceptable due to the levels of congestion and delay at the Chestfield Road / Herne Bay Road roundabout, and the Long Reach roundabout which are already close to capacity. The Developers' traffic modelling is flawed and would require it to be fundamentally re-worked before any possible re-submission of an application by the Developers.

Should CCC be minded to grant we would ask:

- That a Grampian condition be imposed to align the build with capacity in the network;
- Consideration of West bound slips;
- Earlier implementation of the slips at either the outset or at 15% build;
- A condition that the drainage system (including SuDS) for the residential portions of the development be offered up for adoption to Southern Water via a Section 104 agreement.
- And that the SuDS comply with Southern Water's standards and criteria ([Sewerage Sector Guidance - approved documents | Water UK](#)) for their design and construction in order that Southern Water will adopt them.
- Whilst the land would Transfer to KCC at commencement of development in Policy W4, the parish council requests that there needs to also be a S106 condition to this effect – to avoid any future uncertainty of a school not being built after approval of planning – and an undesirable second tranche of housing on this land being applied for instead. The land conditioned for educational purposes only by condition, would secure against any further housing instead.

CA/25/00779

Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

Land At Brooklands Farm Whitstable

Hernhill Parish Council at its meeting on the 30th July 2025 voted unanimously to object to the proposal. Hernhill Parish Council would also like to support Chestfield's Parish Council's objection dated 30th June 2025 to the application, with particular support to their request for a Grampian Condition to align the build/phase/occupancy of Brookland Farm with capacity in the Southern Water network.

The Parish Council have grave concerns as to the impact to its parish by such a large development through additional strain and impact on local resources including and not restricted to the following:

- Adverse effect on wildlife habitat on the adjacent Blean Woods on protected species, ponds and hedgerows in an areas classed as having high landscape value.
- Loss of agricultural land including best and most useable.
- Inadequate soil and ecological surveys along with poor suggested mitigation strategies concerning the inadequate biodiversity gain.
- Poor transport assessment and travel plans that do not appear to link up and will cause more congestion on roads.
- Increased flood risk and sewage overload potential is not considered to be adequately addressed.
- Inadequate levels of affordable housing.
- Lack of sustainable design in relation to water efficiency and solar gain and construction.
- Further pressure on local services especially health.
- Further pressure and demand on water supply. Parts of our parish was recently affected by severe water outages.



Dear Sir/Madam

I write to you as the interim Chairman of Reform UK Canterbury Branch and on behalf of our 1000 members in the city of Canterbury.

We would like to strongly voice our opposition to planning application ref CA/25/00779

This development fails the residents of Canterbury, Whitstable and surrounding areas in the following ways:

- 1) **Lack of Infrastructure** – There is already too much traffic congestion in the suggested planning zone and to add such a huge development would make life incredibly difficult for ordinary people to be able to live their lives.

Our Healthcare services are already at breaking point. To attempt to increase the population further with this development with no forethought for the struggling healthcare system is irresponsible.

The sewage network is beyond capacity with many tons of raw sewage being dumped into our sea and contaminating the area. This development does not improve this issue but adds to it with an increased risk of flooding.

- 2) **Building Design** – The design is inappropriate with mostly 2 storey buildings being proposed, it is not in keeping with the surrounding area. It will make a huge negative impact on the residence already living in the area.
- 3) **Biodiversity** – The proposal to destroy yet more farmland will also impact wildlife habitats and existence. As the garden of Kent it is incumbent on the city council to protect this area of high landscape value.
- 4) **Food Security** – The most important point we wish to make is that once these now limited areas of farmland are developed, they are gone forever. This means a loss of productive farmland in a time of increasing global insecurity. This does not demonstrate thoughtful forward planning.

We look forward to hearing that the local Canterbury council has listened to the people for which it serves and reverses the process of permitting this development.

Yours Sincerely,

Colin Spooner
Interim Chairman
Reform UK Canterbury Branch



HOUSE OF COMMONS
LONDON SW1A 0AA

BY EMAIL: Brooklands Farm Development
Your reference: CA/25/00779

Friday 4th July 2025

Dear Sir/Madam,

I write to raise my concerns about the suitability of the site for the proposed development at Brooklands Farm submitted by Hallam Land Management.

You will be aware of severe disruption to water supplies in Whitstable and the surrounding areas over the last couple of weeks. This has left over 4,000 homes without access to water for a significant period of time. South East Water have attributed this disruption to 'unprecedented demand' during hot weather, something that will only increase if 1350 new homes on this site. South East Water has struggled with water outages for a number of years. Such outages have only increased in frequency.

Further housing developments at this location will add further pressure to the already crumbling water infrastructure systems, threatening the resilience of water supplies for existing residents in Whitstable and the surrounding villages.

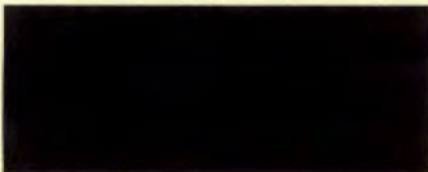
My concerns are not limited to the pressures this will put on our water infrastructure. I have heard from numerous constituents who are concerned about the detrimental impact housing developments on this site will have on our biodiversity, road safety and on demand for local services. I share their concerns.

While I recognise the urgent need for new housing, this must not be at the expense of our local services and the utilities of existing residents.

I would be grateful if you could address each of my points and set out what steps are being taken to ensure constituent's concerns are properly considered before any decision is made.

I look forward to hearing from you.

Yours sincerely,



Rosie Duffield
Member of Parliament for Canterbury, Whitstable and the Villages.

Comments for Planning Application CA/25/00779

Application Summary

Application Number: CA/25/00779

Address: Land At Brooklands Farm Whitstable

Proposal: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

Case Officer: Stevie Andrews

Customer Details

Name: Cllr Stuart Heaver

Address: Not Available

Comment Details

Commenter Type: Councillor

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Objection to Brooklands Farm Outline Planning application: CA/25/00779

From Councillors Clare Turnbull and Stuart Heaver (Green Party)

There are numerous material planning considerations which justify a refusal of this unpopular and environmentally catastrophic outline planning application. This is largely due to its vast scale, inappropriate location and inherently unsustainable design. The application must also be viewed cumulatively with multiple large scale housing development already approved and/or in progress.

However, there are several critical legal areas on which to base an objection based on the NPPF (Dec 2024) Section 2, para 7, Section 9, 116 and Section 15, paras 187e, 193a/b and 198.

1. Unacceptable negative impact on biodiversity at an adjacent SSSI at Long Rock.
2. Inadequate water and wastewater treatment infrastructure.
3. Unacceptable impact on road traffic safety and severe cumulative impacts on the local road network.

As clearly demonstrated below, any approval of this outline application would be in blatant contravention of numerous NPPF guidelines, across three areas of material consideration, and should therefore be refused.

NPPF Section 2 Para 7

The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner.

Having taken advice, we do not believe that this outline application represents sustainable development and that the supporting infrastructure is clearly inadequate and this will cause lasting damage to the natural and local environment.

NPPF Section 15

187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;

There is clear documentary evidence that this proposed development will directly contribute to unacceptable levels of water pollution because of inadequate capacity in the foul network described in detail by Southern Water (SW) in their submission dated 10 June 2025 AND the significant additional load on an already inadequate treatment capacity at Swalecliffe WWTW. This second material planning consideration is not even addressed on the Southern Water (SW) submission for this application which omits any information regarding wastewater treatment capacity or SW's ability to deal with 1,350 new homes and an additional 3,038 people producing 455,700 litres of additional sewage per day.

Legal advice provided to the Environmental Law Foundation in 2023 stated:

LPAs are perfectly entitled to form their own view of likely cumulative impacts on the sewerage system based on the available evidence. Indeed, the revised NPPF (July 2021) explicitly allows for this.

On 13 May 2025, at a SW steering group committee meeting, Green Party councillors were advised by SW staff that the nearby Swalecliffe No1 CSO still spills untreated sewage into local bathing waters 100 times per year (on average) and often for many hours. This CSO is adjacent to the Blue Flag rated beach at Tankerton, the Long Rock SSSI and within 5km of a commercial Oyster fishery at Whitstable. SW also advised Green Party Councillors at the same meeting on 13 May 2025 that it will not have sufficient capacity to deal with a town of 35,000 population until 2029 (currently the population is already over 32,000). This proposed development will directly contribute to unacceptable levels of water pollution which will have devastating environmental, economic and public health implications in contravention of NPPF guidelines. Any approval would be in clear contravention of NPPF guidelines and for this reason this application should be

refused.

NPPF Section 15

193. When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

This proposed development is within very close proximity (<2km) of two designated Sites of Special Scientific Interest (SSSIs) : Long Rock at Swalecliffe and West Blean & West Thornden Woods. The site of this outline application encompasses Swalecliffe Brook, which flows directly into the Long Rock SSSI. Witness statements and photographic evidence provided by residents and local ecology groups clearly demonstrate that water borne pollution in Swalecliffe Brook from new housing developments is already damaging eco systems and biodiversity within the Long Rock SSSI. Discoloured water, frothy scum and algae blooms, dead fish and dead eels are a regular sight. Birds like the Kingfisher once a common sight at Long Rock are now rarely observed.

Significant additional environmental damage will be caused by run off during construction and operational phases, from foul flooding from the sewer network, increased untreated sewage spills from Swalecliffe No 1 CSO and other CSO outfalls plus the general disturbance/pollution associated with the increased human activity generated by more than three thousand new residents. This proposed development presents an existential threat to this important SSSI and nature reserve which is already in a highly vulnerable condition. The second SSSI is only 1km south-east of the proposed development site at West Blean and Thornden Woods. This is part of the Blean Woods Nature Conservation Review site (a Grade I site) and an area of 490 hectares (1,200 acres) is a nature reserve managed by the Kent Wildlife Trust. The woods form one of the largest areas of ancient woodland in the UK and are also vulnerable to environmental damage. Any approval would be in clear contravention of NPPF guidelines and for this reason this application should be refused.

NPPF Section 9

116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

In May, a teenage schoolgirl was hit by a car in the vicinity of Long Reach roundabout and taken to hospital for treatment. Due to technical considerations, mitigation at this danger point is difficult and traffic density is increasing rapidly in pace with increased development - much to the concern of local residents and road safety groups.

There is widespread consensus that this proposed development would place an unacceptable impact on road traffic safety at Long Reach roundabout and the residual cumulative impacts on the road network in general. Any approval would be in clear contravention of NPPF guidelines and for this reason this application should be refused.

Clare Turnbull and Stuart Heaver
Councillors, Whitstable Gorrell Ward
Green Party.



Comments on CA/25/00779 - Outline application for mixed use development of up to 1350 dwellings on land principally accessed from South Street & Chestfield (Brooklands Farm)

Submitted: 20th June 2025

1. Introduction

This document is a principled objection to application CA/25/00779 on behalf of Cllrs Chris Cornell (Gorrell), Cllr Charlotte Cornell (Seasalter) & Cllr Simon Warley (Tankerton). Cllr Naomi Smith (Seasalter) is a member of the council's planning committee and as such is not commenting on this application until the public hearing.

This document outlines our feedback on the application, objections with reference to both the Council's existing Local Plan 2031 and the updated National Planning Framework (NPPF) 2025. Whilst we oppose the application at this time, we acknowledge the considerable effort that has been included in this application; there is clear evidence of iteration of the design based on the feedback of the council, residents and independent design review panel. In recognition of this, and the applicant's acknowledgement that they are 'flexible & open to ideas', we have included a number of outstanding questions and opportunities which we hope the applicant may choose to consider.

Whilst the draft Local Plan is not binding at this juncture, we wish to acknowledge the efforts made to consider its ambition. The application includes many positive features the current administration is seeking to make a standard feature of new housing developments in the area, including:

- a biodiversity net gain on site of 20% and a minimum of 20% on site tree cover (Draft Policy SS1)
- a minimum of 30% affordable housing (Draft Policy DS1)
- the introduction of accessible community hubs, reducing the reliance for daily travel and encouraging 'local living' (Draft Policy SS2)
- Development of a stewardship strategy to ensure a more sustainable long-term plan for the maintenance of open space.

The design includes Integrated public transport infrastructure including dedicated bus lanes, interactive information screens and hopper buses to reduce congestion in our urban areas (an ambition of Canterbury District Bus Strategy (2024) and has a strong focus on placemaking most evident in the inclusion of character areas which reflect the diversity of architectural styles in Whitstable, Chestfield and Tankerton.

The careful planning of green space throughout the site a new major 'LEAP' (Local Equipped Area for Play), a skate park, BMX pump track and 7 playing fields with associated changing facilities is to be applauded. However, it is our opinion that submitting this application before the Draft Local Plan has been submitted to the Secretary of State is premature and unwise. The council has recently announced its intention to vary its Local Development Scheme (the timetable on which the Local Plan is developed) and go out to a further Regulation 18 consultation in the autumn. This consultation suggests that changes to the Draft Local Plan, sites and strategies may be proposed before the Regulation 19 phase.

Specifically, we believe that it fails to allow councillors to consider an application which could have:

- improved affordable housing provision - particularly in the rental sector. The government's new NPPF, published after the draft local plan, legally defines (for the first time) social rents as 60% of market rate and removes the covenant on local authorities to ensure 25% of all affordable housing is delivered through 'First Homes'. We believe it is likely that the Draft 19 will include a more detailed assessment of what tenure affordable housing could and should be locally
- better delivered on our district Sustainable Design Guide which includes stringent targets on water efficiency (90l per person per day), solar gain and zero carbon construction practices which are not met in the applicant's sustainable development strategy
- better integrated with wider discussions about transport provision. The application proposes a hopper bus into town without consideration for how this could benefit the proposed Park and Ride at Bernacre View or contributions from this site and Church Lane could make diversion of Stagecoach routes more viable.

2. Environmental Objections

- 2.1. Residents are rightly concerned about the loss of agricultural land in and around Whitstable changing the character of the town in what they believe is an unplanned and unmanaged way. Typically, the character of an area would be established by determining the urban area and not allowing development outside of it, however the council has been unable to consistently do this since 2002 when the government sanctioned it, historically failing to deliver its Affordable

Housing Targets. The council's ability to rectify this has since been hampered by Natural England's advice that building in the Stodmarsh catchment cannot be sanctioned unless mitigation is in place to prevent rising nitrogen and phosphate levels which cause eutrophication in the lakes and damage the wildlife.

The government sanction means that the local planning authority (LPA) is expected to grant permission for schemes unless it can be proved that the application breaches the NPPF. Local policies are not given weight in decision making.

Developments which would not traditionally be granted permission including land at Church Lane (CA/25/00867), Montpelier Avenue (CA/22/02650/VAR), Harrier Lodge (CA/21/01696/FUL), Bernacre View (CA/22/02586) and the Paddock (CA/23/01125) have been granted either by committee or on appeal to the Planning Inspectorate. It has led to building in the area between the New and Old Thanet Way which was not expected in the current Local Plan when it was drafted.

We welcome the narrative in this application that the plans show it not entirely reliant on the infrastructure available within Whitstable town centre alone but still have grounds to object on.

2.2. Countryside Protection

- 2.2.1. Brooklands Farm lies outside the defined settlement boundary and is designated as Countryside under Policy SP4 of the Local Plan. The policy clearly states that development in the countryside will not be permitted unless it is necessary to meet an essential local rural need or justified by national policy. The current adopted local plan (to 2031) has sufficient sites to deliver on the current housing need data as used for the generation of the document.
- 2.2.2. Whilst the settlement boundary remains in Whitstable, policy TCL6 stipulates that the applicant must prepare an impact assessment based on the sequential test established in the NPPF to ensure out of town developments over 2,500sq m do not compromise the town centre economy. The first step of this test is to look at alternative locations for new industrial sites, regardless of the residential element of any application.

The Town Centre Land Uses Statement provided by Nexus Planning (March 2025) includes evidence of the search for alternative sites but, in our opinion, fails to adequately explain why the parcel of land East of Whitstable Harbour (proposed as Draft Policy W2) would not be both available and viable. The statement makes vague references to development potentially conflicting with the demands of the Harbour without defining what these are and requires more scrutiny.

- 2.2.3. The proposed development site lies within the Blean Woods Area of High Landscape Value (AHLV) as designated in Kent and Medway Structure Plan (2006) and recognised in the Canterbury District Local Plan (2017). The adopted Local Plan includes Landscape Character and Biodiversity Appraisal (Jacobs, 2012) which defines the strategic habitat network of the district. This site is listed as part of Section 10 - 'Chestfield Wooded Farmland' and with guidance that the area should be 'conserved' and good habitat conditions 'reinforced'.

Whilst we are aware that a 2021 review of the District Local Landscape Designations proposed a redrawing of the boundaries of the Blean AHLV to remove the Brooklands site, these changes have not been formally adopted by the council and cannot be given planning weight.

Development proposals within the AHLV (2006) are expected to be sensitively designed, landscape-led, and demonstrably necessary - a criteria which this scheme fails to meet. The applicant has, to date, provided no detail on how they would mitigate this loss.

Cross section plans for the site which show how taller, higher density housing will sit in relation to the brow of the hill (affecting sight lines) have not been provided.

2.3. Potential loss of Best and Most Versatile Agricultural Land

- 2.3.1. Under the National Planning Policy Framework (NPPF), Grade 3a land is considered Best and Most Versatile (BMV) agricultural land and is afforded protection. Paragraphs 001 and 002 of the Planning Practice Guidance for Natural Environment stipulate how land should be tested and graded through an Agricultural Land Classification.

232. Appendix 5 of the Agricultural Land Classification prepared by Arnet presents the site as entirely Grade 3b or 4. However the auger test pit data does show samples 52 and 53 as graded 3A and adjoining sites ((66, 51) and 71)) close to the 3A classification. All these samples are located in land siting/dilling South Street, east of Longtye Wood and not subject to more detailed firm deep test pits ((dug at 118, 119, 300, 800)).

233. We believe that until it can be independently assessed that sections of this land are not 3A and that permission can't be granted elsewhere on poorer quality land, the authority is in breach of EWP12, its adopted policy on agricultural land. Planning Practice Guidance suggests that dip pits should be sunk where there is a change in main soil type of ALIC grade to provide a fair depiction of the site. This has not been followed.

24. Unacceptable Ecological Impacts

24.11. The applicant's Environmental Statement ((Nexus April 2025)) identifies potential impacts on priority habitats and European Protected Species, including bats, slow worms and great crested newts ((the latter within the vicinity, although 113.51) says more specifically that Great crested newts 'were found in certain locations')), which are reported within the locality of the site ((p.25)). Under Regulation 62 of the Conservation of Habitats and Species Regulations 2017, planning permission must not be granted unless: no satisfactory alternative exists; the development is in the overriding public interest; mitigation is secured. None of these legal tests are satisfied. The proposed mitigation is vague, heavily reliant on post-permission conditions, and lacks enforceable implementation mechanisms. This contravenes the principles established in *Champion v North Norfolk DC* [2015] UKSC 52.

Regarding the slow worm population, the applicant is inconsistent; at one point ((113.113)) discussing a 'good population of slow worms' and later ((113.51)) a 'small population'. The survey results appear to be vague here. The applicant suggests that the slow worms are reliant on 'off-site garden habitats' and so the impact would be a not significant, minor adverse effect. We would dispute this, the applicant does not consider the nesting habitats of the species in these potential harms and offers no concrete translocation plans, prior to works. Slow worms like rough grassland,

intensely managed grassland, and scrub. Slow worms are a priority species in the UK post-2010 biodiversity framework. The reptile retention plan delivered by the applicant ((13.36)) is insubstantial and not fit-for-purpose to be reassured that harms will be minimal.

- 2.4.2. The proposed development would result in the loss of at least two established ponds within the 250m site buffer that would be functionally lost. This is a significant ecological concern, particularly given the acknowledged potential presence of great crested newts ((see above)) and other amphibians, which rely on such aquatic habitats for breeding and foraging. These ponds also contribute to the landscape's natural drainage function, supporting water retention and reducing surface runoff.

The applicant's own ecological assessment, as detailed in the Environmental Statement – Great Crested Newt ((EN/25/00779-23)), acknowledges the presence of suitable habitats for great crested newts within the site. This protection of the habitat needed by this species is listed under NPPF Paragraphs 1174 and 1180, and Canterbury Local Plan Policy LE2.

The loss of these ponds would have a detrimental impact on local newts whilst the applicant is willing to pay a committed sum to relocate them elsewhere, there is no detail as to where the alternative ponds would be located, as these would be provided ((a2)) by Natural England in the wider landscape, meaning the likely ecological loss of the newt and other animals to the Chestfield area.

Given the applicant does not have a full GCN survey and is reliant on Natural England's modelled 'No-Survey' option, we argue this is insufficient. The planning authority, given the acknowledged presence of newts ((see 2.4.1)) should require a detailed field survey to ensure there is not a high population density, and thus a potential red reclassification.

2.5. Risk of Flooding

- 2.5.1. The applicant's Flood Risk Assessment acknowledges that the site includes land classified by the Environment Agency as in either Flood Zone 2 (with a medium probability of flood 11 in every 100 years) or Flood Zone 3 (with a high probability of flood 11 in every 100 years). This risk is

fluvial and minimised by the applicant's decision to not build on the flood plain, however Policy CC5 states that a sequential test for any infrastructure should be applied on sites including such zones. By deciding to develop any site with a flood plain, paragraph 167 of the NPPF says it is abundant on the applicant to use 'opportunities provided by new development and improvement in green and other infrastructure to reduce the causes and impacts of flooding' on or off site.

We argue that there has been little evidence by the applicant of how pluvial flooding infrastructure (sustainable urban drainage system) could be used to prevent fluvial flooding particularly between the site and Swalecliffe Wastewater Treatment plant where there is evidence of homes already built in Flood Zone 2.

- 2.5.2. The historic flood map shows evidence of historic, surface water flooding at both the bridge over the Swalecliffe Brook on South Street and underneath the Thanet Way on Radfall Hill. There is as yet no evidence of how the development will counter either, despite the latter being acknowledged in the Transport Assessment as a risk to the efficiency of the A299 slip.

- 2.5.3. A major concern of local residents is pluvial flooding and the risk it poses to the capacity of the WasteWater Treatment Centre at Swalecliffe. A Baseline Risk and Vulnerability Assessment (BRAVA) carried out by Southern Water in 2023 acknowledges that there are significant risks of both hydraulic overload at the plant and an over reliance on the use of combined storm overflows(CSO's) to reduce capacity within the system during periods of intense rainfall.

The diagram below shows spills data for the 8 operational CSO's across Whitstable between 2021 and 2024. It shows the total duration of all spills (TD) and the number of 12-hour periods in which a spill occurred across the year (S).

Table 2.5.3.1 Spill data from Storm Overflows across Whitstable 2021-2024

	2024		2023		2022		2021	
	TD	S	TD	S	TD	S	TD	S
Brook Road CEO							4.86	3

Chestfield Storm Tanks	4.50	1	10.89	2				
Swalecliffe WWTW CSO	685.14	73	923.21	118	528.30	87	874.16	110
Swalecliffe WWTW SSO	15.04	3	37.93	11	28.67	4	56.01	8
Diamond Soad CEO	86.36	23	81.64	34	41.39	18	93.98	26
Northwood Road CSO 1	4.57	7	7.21	10	8.45	7	26.67	16
Northwood Road CSO 2	7.34	11	16.54	25	22.91	10	12.56	10
Tankerton Circus CSO	12.13	24	10.32	22	9.94	18	16.67	19

In 2024, Southern Water CSO's at the Swalecliffe Water Treatment Plan were used 76 times, discharging a mix of raw sewage and rainwater into our seas over 704 hours.

86% of the pollution incidents noted in the Drainage and Wastewater Management Plan (2023) of the site, are due to pumping station or treatment capacity. Between 2017 and 2019 the Dry Weather Flow Compliant rate was between 80% and 100% of the EA permitted rate.

Whilst the new Southern Water Business Plan for AMP6 (2025-2030) includes £75m investment at Swalecliffe Water Treatment Plan to increase the capacity of the plant to 650l/s (currently 205l/s) the lack of evidenced early engagement by Southern Water on this application site is concerning to local residents. The opinion of Southern Water as to whether they have the capacity to deal with this new estate should carry great weight.

The plans for a sustainable urban drainage system (SUD) on this site are currently incomplete. Whilst the application does acknowledge the location and stress capacity of SUDS in different parts of the site (41,344m²) there is no mapping which shows what combination of swales, soak away trenches and underground tanks will be used, how they will flow into one another and whether they will be discharged into the Brook or allow for ground infiltration. We are shown a vague hierarchy which suggests water will be retained over ground and can't adequately

assess the suitability of this plan in different parts of the site until it is revealed.

Paragraph 1622 of the NPPF stipulates that plans should set appropriate proposed minimum operational standards and detail of maintenance arrangements to ensure an acceptable standard of operation for the lifetimes of their development. The SUDS guidance attached to the Kent Design guide recommends an outline drainage strategy be submitted alongside any planning application showing design calculations for peak flow, volume control, permeability of services and access/egress routes.

The outline application unacceptably delays this to the reserved matters stage.

3. Transport Objections

- 3.1. Residents are concerned about the impact that any new housebuilding will have on the A299 and traffic around Whitstable. Whilst we welcome the eastbound slip roads on the A299 which substantially mitigate the effect of flows (particularly eastbound on the Thanet Way) we consider it short sighted that westbound slips onto the A299 were also not considered as a means of reducing flows westbound on the A299.

3.2. The accuracy of transport modelling

- 3.2.1. Paragraph 1115 of the NPPF stipulates the need for an applicant to submit a transport plan and places a responsibility on planning authorities to ensure that any 'significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable view'. An applicant's scheme may have greatest impact on queues of traffic some distance from its boundary and as such the network has to be reviewed as a whole.

To this end, the Transport Assessment authored by Brooklands includes information on the total number of trips generated by the building out of the site and adds this to data on the current use of the road. The total

number of trips through the site is used to evaluate the capacity of junctions, average wait times at roundabout and, in this case, provide evidence of modelling how a proposed A299 slip road will also change behaviour.

This modelling is only possible by making assumptions on the destination of external trips made by adult residents from the site, but this data is weak. The modelling relies on the 2011 census and results given by residents in the Middle Layer Super Output Area (MSOA) about their principal destination of travel. It doesn't use 2021 census data as the survey was compromised by COVID.

Their model's only rationale for making assumptions on the destination of external trips by school children is that they go to local comprehensives - despite evidence that many of our children travel into Canterbury for Simon Langton Boys' and Girls' Grammar Schools, Barton Court Grammar School, and Canterbury Academy Sixth Form. These journeys are a significant component of peak-hour traffic.

We believe the application is currently in breach of paragraph 115 because the Transport Assessment:

- does not consider the new homes granted at Benacre View and the impact of the Park and Ride Scheme on flow. The Transport Assessment does not list which schemes it has committed into its modelling (Benacre View was agreed on the 21st March 2025, a mere three weeks before the paper was finalised). The table below contrasts the ratio of flow (RFC) to capacity presented for the Millstrood Road/Thanet Way Roundabout as part of the modelling presented DTA in support of application CA/23/00379 (Bernacre View) up to 2035 and in Scenario 1 by Brookbanks which should include all agreed schemes in 2040.

Whilst the two figures are not directly comparable, the Department for Transport's Road Traffic Projections (2022) predict a growth of traffic on A roads of 20% between 2025 and 2060, meaning that we can reasonably expect the Brookbanks data (modelled for 2040) to be higher, if it were accurate. We do not believe it currently is.

Table 3.1.1.1 AM Peak RFC Calculation

	Thanet Way (East)	Millstrood Road	Thanet Way (West)	Millstrood Road

		(North)		(South)
DTA	0.86	0.91	0.98	0.99
Brookbanks	0.64	0.61	0.55	0.69

Table 3.1.1.2 PM Peak RFC Calculation

	Thanet Way (East)	Millstrood Road (North)	Thanet Way (West)	Millstrood Road (South)
DTA	0.68	0.86	0.89	0.54
Brookbanks	0.65	0.92	0.67	0.34

- fails to include the trips generated by the SEND school on site, despite evidence that students at this facility may be more likely to travel to the site at morning and afternoon peak. Furthermore, the fact that most SEND arrivals / departures are by KCC-funded minibus, the parking for this school (for 10+ waiting minibuses and some collecting cars) needs to be sufficient.
- gives no consideration for whether the amount of social housing on site will affect the multiplier used to calculate the number of primary school children on site. Census data from 2021 shows a relationship between tenure type and family composition. If the number of children living on site is not adequately modelled, assumptions on the number of internal and external trips at peak times will be wrong.
- fails to include the capacity of each junction used in its modelling of the Level of Service. Footnote 1 on page 16 of the Jacobs Traffic Modelling Paper acknowledges that this local junction modelling has not been explicitly added to the technical note.
- Fails to present a key to the Appendix 16 & Appendix 8.1 of the Transport, Accessibility and Movement Paper making it impossible for the authority to identify which streams of traffic at each junction are most affected by wait times. Without this information it is impossible to calculate whether the length of queuing, measured at over 120m within some 5-minute windows at peak, adversely affects the flow of other junctions.

In fact, the whole assessment relies on Traffic count data with different patterns to these Traffic Counts presented in support of Bernacre View. The table below shows two-way flow rates along the Thanet Way collected by DTA (July 2022) in support of Benacrew View and by Brookbanks (June 2024) in support of Brooklands Farm. The Brookbanks data shows a higher flow rate PM unlike that presented by DTA.

Table 3.1.1.3 Average Weekly Traffic Data comparison

	Thanet Way AM	Thanet Way PM
DTA	1634	1607
Brookbanks	1613	1753

- 3.2.2. The applicant's Transport Assessment fails to adequately consider the impact of additional traffic leaving the site via Radfall Hill towards Canterbury and via Tyler Hill. It lists how many more cars will turning right out of the site in 2045 onto Radfall Hill (697 in AM Peak, 809 in PM peak) but not how many will utilise the A299 slip eastbound and how many will be funneled through an already congested woodland road with no pedestrian infrastructure and increasing cyclist use.

In the last 5 years indicates that there have been 15 accidents on the roads leading up to University Hill (Radfall Road, Hackington Road and Canterbury Road) including one serious. Tyler Hill has persistent on-street parking which makes pedestrian crossing difficult and a bottleneck effect which makes vehicles erratic. The transport assessment fails to meet the requirements of NPPF Paragraph 111 and Local Plan Policy T2 without consideration of the impact on all routes leaving the site.

- 3.2.3. The applicant's Transport Assessment does not list the roundabout by Chestfield & Swalecliffe Station (Thanet Way/ Herne Bay Road/ St Johns Road) as one of the 13 junctions it presents flow data and mitigation proposals for. Figures 7.5-7.8 do not model flow from Chestfield Road onto the Herne Bay Road despite this being a common way in which residents from Chestfield travel into Whitstable avoiding the traffic on Borstal Hill. This roundabout has a substantially smaller capacity than the one at Thanet Way/Chestfield Road but delays on this roundabout do affect its flow. In the last 5 years there have been 2 serious accidents on the smaller roundabout, making it equal to the most dangerous junctions modelled elsewhere on the Thanet Way. Traffic flows at an AM Peak are expected to increase 5.3% with the building of the development. The

transport assessment fails to meet the requirements of NPPF Paragraph 111 and Local Plan Policy T2 without consideration of the impact on all routes leaving the site.

3.2.4. In the last 5 years there have been 12 accidents on the roundabouts at Thanet Way/Chestfield Road and Thanet Way/Herne Bay Road/St Johns Road which

3.2.5. The Jacobs transport assessment very usefully includes a number of scenarios which show the impact of the development with and without the A299 slips at various different stages of occupation. It shows the necessity for an A299 slipway and how this will reduce eastbound flow on the Thanet Way but increase flow westbound as people travel via Clapham Hill to Canterbury.

It is our opinion that planning permission should only be granted with conditions relating to the building of the A299 slip. At present the evidence suggests that if 50% of the homes are occupied without the A299 slip being built the capacity of the road between Estuary View and Clapham Hill will be reached. We believe that the assessment needs to consider a further scenario of 25% and 15% occupancy so that the phasing of any infrastructure can be adequately conditioned.

Paragraph 116 of the NPPF stipulates authorities should be able to judge whether the plan will have an unacceptable impact on highway safety or severe impact on the road network. We don't believe this is possible until the LPA can be confident that its own phasing won't compromise the traffic network during the build and an assessment of the impact on Radfall Road has been made.

3.3. Road safety

3.3.1. The Personal Injury Collision Map (Figure 2.2) included in the Transport Assessment clearly shows the most dangerous junction in terms of accidents being the Clapham Hill Roundabout with 14 slight or serious injuries between 2018-2023. Despite these improvements are only recommended to junctions on the site boundary, despite evidence that an

additional 300 cars will flow westbound toward this roundabout in the PM peak.

During the consideration of the Benacre View applications councillors expressed concern about the safety of this junction, particularly given the granting of residential properties on the south of the Thanet Way and the increase in schoolchildren using the cycle path to walk to Whitstable School. A school child was recently hit by a passing car crossing westbound where the road is three lanes wide. Proposals for traffic lights at the junction were put forward by Chartway but rejected by Kent County Council in 2023. KCC have privately admitted concerns about this junction but not presented proposals to improve the safety of this junction despite being asked to regularly since 2022.

Whilst we acknowledge that the A299 slip is likely to reduce traffic on the Thanet Way Eastbound and offset the largest delays (>98.56 seconds) identified when DTA modelled the queues at the Borstal Hill/Clapham Hill junction - Brooklands Farm is likely to put additional pressure on the Clapham Hill/Wraik Hill junction. The DTA calculated that by 2031 delays on the southern section of Clapham Hill (toward Blean) would be upwards of 111.15 seconds at Peak PM. There is no queue time data for how the development will affect this roundabout and subsequently the flow of traffic at the Borstal Hill/Clapham hill junction.

The space between the two roundabouts at Clapham Hill serves an important role in the provision of public transport south of Whitstable. It is drop off location for National Express routes and public bus stops on both carriageways narrow both in a way which jeopardizes pedestrian safety.

Not defining how this junction will operate at the outline planning stage is unwise.

We would be interested how the modelling of a westbound on-slip, rather than an eastbound on-slip would improve traffic pressures for this area.

- 3.3.2. Paragraph 117 suggests that new applicants should seek to minimize the scope for conflicts between pedestrians, cyclists and vehicles and they the proposed quiet lane is a shared space which lacks detail on how this will be done safely. Whilst Rule 218 of the Highway Code suggests drivers should pay extra care and slow down on designated lanes shared with pedestrians - there is no statutory demand to reduce the speed limit

and as such the 40mph speed limit could still apply and the road still be used as a 'rat run' particularly when roads are blocked elsewhere.

Given that South Street has poor footways, limited visibility and in the proposed plan will have more pedestrian entry and exit points - the applicant should present plans on what additional traffic calming or prevention measures used. There should be evidence of why the road hasn't been redesignated as 'no through access'.

The lack of detail and absence of safety analysis or tracking diagrams (particularly given that the road is likely to remain used by tractors at Brooklands Farm) raises serious concerns that the scheme will exacerbate existing dangers, in contradiction to NPPF Paragraph 110(d), which requires that new development must ensure safe and suitable access for all road users.

3.4. Public Rights of Way

- 3.4.1. The development site intersects several designated Public Rights of Way (PRoWs), including CW21, CW22, CW27, CW28 and bridleway CW27A, all listed on the Kent County Council Definitive Map and visible on OS Explorer Map 150. These rural paths link Chestfield to Radfall Road, Molehill Road, and Clowes Wood, and form part of circular walking and riding routes used regularly by residents and visitors.

Whilst there is evidence of mitigation to protect many of these on site, there is no evidence of how CW28 will be affected by the proposed on-slip to the A299. The PROW is not listed on junction maps for South Street/Chestfield Road.

Without detail, the applications contravene NPPF Paragraph 100, Local Plan Policy OS11, and Rights of Way Circular 1/09, all of which protect the public's legal right to rural access and recreation.

4. Infrastructure Objections

- 4.11. Phasing of infrastructure is key to ensuring public confidence in any new development and we would welcome the committee establishing clear triggers for any of the following in the way suggested in the Draft Local Plan.

4.2 Foul Drainage

- 4.2.11. There are no foul water sewers within the boundaries of the site and whilst the applicant is correct in stating that there is a statutory duty on water companies to provide the capital investment needed to provide development growth, Crampian Regional Council W Secretary of State for Scotland (1983) says that a planning authority has the power, which the sewerage undertaker lacks, to prevent a developer from overloading the sewerage system before upgrades are made.

- 4.2.2. The Drainage Strategy indicates that the site may have a peak domestic flow rate of 62.50 l/s which is equal to 30% of Swalecliffe Wastewater Treatment's capacity of 205 l/s and whilst we understand that a project has started to upgrade the flow rate at the treatment facility we believe the planning authority would be in breach of NPPF Paragraph 220 which demands that a plan set out a pattern, scale and design of places with sufficient provision for wastewater unless they were to grant the application with conditions that this capacity was realised before habitation.

We believe that such a condition would be lawful 'fair and reasonable' given evidence that the sewage network is operating well over capacity, and nothing less than a system wide update is necessary (Newbury DC W Secretary of State for the Environment 1973/1981).

4.3 On-site parking

- 4.3.11. Policy T9 of the Adopted Local Plan provides clear parking standards for buildings with clear land classifications such as residential dwellings and shops. However it lacks an exhaustive link of the parking required for

non-residential institutions and as such, unless detail is provided at an outline stage, there remains a risk that adequate parking will not be provided for the Mobility Hub and Playing Pitches in particular.

Whilst we understand that the applicant is expecting the open space will largely be used by its residents, we believe it is reasonable to assume that these new 'honeypot' open space facilities will also attract *significant* other local car visits and it will need more specific parking designation.

Chestfield Road is already risky with inadequate car parking at the Radfall Recreation Ground forcing cars to park on both sides of the road on the weekend, especially on match mornings. With the expansion of the football provision and the transporting to/fro of children's BMX bikes for use on the track, the parking for these destination sites needs to match realistic projected use. Perhaps a combined parking area to service both the schools and the sports facilities could be an alternative (even in lieu of a small 5:5 pitch or more); allowing the road onto which the schools both face to become a Kent County Council 'School Street' with *limited* car access (minibus or blue badge only for the SEND school) during peak hours.

5. Outstanding issues

Whilst we understand that this application is an outline application, it remains the right of the planning authority to refuse consideration of certain aspects of a development under reserved matters and ensure that they are conditions of the outline application. This is particularly important in situations where a site may be sold by a land agent and reserve matters applications submitted by another developer.

As such there are a number of outstanding issues which we believe the planning committee may want to take particular consideration to - these are not necessarily planning objections, but they could, if considered important, be added as conditions.

5.1. Public Transport

- 5.1.1. The applicant's Transport, Accessibility & Movement assessment makes it clear that their first preference to redirect the No 5 bus to serve the site was refused by Stagecoach. This solution would have improved the frequency of the service but also supported people getting the bus to Canterbury.

The proposed alternative, a loop bus service connecting the proposed development with Whitstable railway station, Tesco Extra, and other key local amenities could provide valuable connectivity but remains a conceptual proposal without firm commitments regarding frequency (although every 30 minutes is mentioned, this is just a proposal), funding, long-term viability, or coordination with rail timetables.

We believe that the route should be extended to include Estuary View Medical Centre, the council's proposed Park and Ride on the Thanet Way and Clapham Hill, thereby improving the onward travel to Canterbury - particularly for school children. The capacity of existing school buses into Canterbury should be listed.

For such a scheme to deliver meaningful modal shift and accessibility benefits, it must be secured through enforceable planning obligations or conditions, with clear timetables and performance monitoring. Without this, the proposed loop bus risks becoming an unimplemented aspiration rather than a deliverable component of a sustainable transport strategy.

5.2. Sports Facilities

- 5.2.1. Whilst we generally welcome the provision of new sports pitches to serve the site and the wider Whitstable population, it is important to better establish the scope and mix of pitches if this is to serve the community well. The design does reflect many aspirations within the Council's Playing Pitch Strategy (i.e more cricket pitches, a multi use court for netball) but anecdotal evidence suggests a huge increase in the demand for children's football which isn't currently evident.

In order to serve this anecdotal demand, we should reflect on whether targeted investment in floodlights and 3G pitches would prevent overplaying of these surfaces and allow for additional training facilities for young people during the week. At present, Rising Stars, a Whitstable based club with over 400 youth players train in Herne Bay, Faversham and Canterbury because of the lack of good quality 3G pitches locally and challenges overplaying 11 v 11 grass pitches particularly in waterlogged sites like this one.

- 5.2.2. Whilst there is some evidence of orientating the facilities attached to the playing fields to also serve the council's Radfall Road recreation ground, the same provision is not made for the adjacent Chestfield Cricket Club

and management agreements for the ownership and stewardship of the site (perhaps including the adjoining council asset) should be considered at outline phase. The model in which a developer transfers the assets or leases the facilities to local clubs should not only be pursued but listed as a condition (alongside a specification of the provision) to ensure the level of ambition in this new Sports Hub is not lost if ownership of the site changes.

- 5.2.3. On the 16th June 2025 the Council agreed its new Open Spaces Strategy. Breach of the Strategy by developers is a material planning concern as the NPPF stipulates that Local Plans should reflect needs and priorities within a local community based on robust and current assessment. The strategy is the best reflection of local need. It stipulates that applications including sports facilities should be “supported by evidence of a management scheme which details the future ownership, management and maintenance of the site” (Objective 1h) which this application currently does not.

5.3. Biodiversity Features

- 5.3.1. Opportunity for Green Roof Bus Shelters to Support Biodiversity Net Gain. The Travel Plan (Section 2.6.16) outlines an intention to provide new or improved bus shelters within the proposed development. To enhance the site’s sustainability credentials and contribute toward biodiversity net gain, it is strongly recommended that all new bus shelters incorporate green roofs. These living roofs can help reduce urban heat, absorb rainwater, support pollinators, and provide visual greening within built areas. They represent a low-cost, high-value intervention consistent with the goals of NPPF Paragraph 174(b) and Canterbury Local Plan Policy LB2, which promote integration of ecological enhancements into urban design. Incorporating this measure would also set a precedent for best practice in aligning sustainable transport infrastructure with environmental stewardship.
- 5.3.2. Positive Biodiversity Contribution Through Hedgerow Gain. The Biodiversity Survey and Report indicates a projected 20% net gain in hedgerows as part of the proposed development. This is a positive element that aligns well with the principles of biodiversity net gain as

required under the Environment Act 2021 and supported by NPPF Paragraph 179(b). Hedgerows are a high-value habitat, especially in rural and edge-of-settlement contexts like Chestfield, offering vital ecological connectivity, supporting pollinators, nesting birds, and bats, and acting as important landscape features. If delivered as part of a detailed and enforceable landscape and biodiversity management plan, this element of the scheme could make a meaningful contribution to the site's overall ecological value.

5.4. Stewardship of Open Space

- 5.4.1. The council's Draft Local Plan shows a preference for negotiating stewardship arrangements with developers on a case-by-case basis and an interest in the council taking an endowment from the developer to adopt a site early and secure revenue against its general upkeep. In order to do this the council needs to have a clear understanding of the assets available. At present the site plans lack detail, particularly in relation to 72 local areas of play (LAP's) which dot the site.

There is no clear understanding of who the open space would be owned by and whether residents, the council or parish council (in whose boundary half of the site lies) would be expected to contribute to its upkeep. The stewardship of this site should be established at the outline planing stage.

5.5. Construction Management

- 5.5.1. The applicants Construction Environmental Management Plan(CEMP) lists risks associated with the practical building out of the site and how these will be managed and reported on. It lists a number of risks building on the floodplain but nothing specific to the risk that depositing soil into the Swalecliffe Brook could affect the capacity of the river to deal with fluvial flooding events.

Our understanding is that an Environment Permit will be needed as construction will take place within 8 metres of a riverbank and on a floodplain. The planning authority should ensure the applicants CEMP complies with any conditions on this permit.

5.6. Health Facilities

- 5.6.1. Healthcare facilities across Whitstable are generally good and commuted sums from developments have seen the expansion of Estuary View locally. The outline application has 'healthcare' facilities but fails to explain what sort of service this will provide and whether any discussions have been had about it serving as an extension of Chestfield Medical Centre.

It is currently unclear whether the facility will be manned by local GP's or a commercial healthcare offer (i.e. a pharmacy, or dentist).

6. Summary

- 6.1. At this point we welcome the opportunity to comment on the proposed allocation but believe this initial iteration still has a number of outstanding issues and questions which need to be resolved before planning can be granted. We believe that an application submitted before the Local Plan is finalised is unwise and risks seeing the area developed without many of the safeguards for development enshrined in the Draft Local Plan.

We understand the need to deliver more affordable housing across the district but currently believe that the application breaches several parts of the NPPF and should be dismissed as such.

Objection to Outline Planning Application CA/25/00779 - Brooklands Farm

Cllrs James Flanagan and Peter Old, Chestfield Ward

Executive Summary

As Canterbury City Councillors for Chestfield Ward, we are writing to object to the Outline Planning Application for Brooklands Farm, CA/25/00779.

We have provided a number of comments and objections to support our call for Canterbury City Council to refuse this application. In doing so, we have highlighted key areas of the outline application that do not meet the requirements of Canterbury's Local Plan 2017, and where relevant the Draft Local Plan 2040 and National Planning Policy Framework (NPPF).

We have summarised our objections as follows:

Transport and traffic management - the outline planning application does not adequately address the road safety and accessibility concerns identified below and therefore does not meet the requirements of Policies T1, T4 and DBE3 under Canterbury's Local Plan 2017. Results from the applicant's traffic modelling for junctions are questionable, and there is also no cumulative impact analysis, essential to understanding how other proposed developments will affect overall traffic numbers and road safety. In addition, the impact on air quality through increased traffic generation has not been adequately assessed.

Flooding and Sewage - the outline planning application does not provide sufficient evidence to demonstrate how it will meet the requirements and aims of the NPPF, Canterbury City Council's Local Plan 2017, or Canterbury City Council's Draft Local Plan 2040, to reduce the impact of flooding elsewhere, or indeed that the proposal will not exacerbate flooding elsewhere. The outline application does not meet paragraph 181 of the NPPF, nor does it meet the aims of the Council's Local Plan 2017 under items 7.35 and 7.36, policy C11, or policy DS20 under the Draft Local Plan 2040.

Local environment, ecology and amenity - the application fails to address concerns regarding the ecological and biodiversity impacts of the development of the site. One of the Council's objectives set out in Canterbury's Local Plan 2017 is to protect and enhance the countryside but there are failures to recognise the cumulative impact of the development as well as shortcomings in the applicant's Biodiversity Net Gain (BNG) report. The application does not fully meet the requirements of the 'Habitats and biodiversity' section of the NPPF, paragraph 193c of the NPPF, nor does it meet requirements under Policies LB2 and DBE3 of the Local Plan 2017.

Further considerations – the outline application must be assessed against Policies EMP12 (Agricultural Land) and CC12 (Water Quality) within the Local Plan 2017. The policies call for, *"the City Council to protect the best and most versatile farmland for the longer term,"* and *"any new development should not compromise Water Framework Directive objectives"* respectively. Plans in the application for a new health centre are also vague.

Cumulative impact of this and other developments – it is imperative that the application should be considered in the context of other planned and proposed developments in the vicinity. All the above factors (transport and traffic management; flooding and sewage; ecology and the environment; impact on local services) will have a much greater cumulative impact than the summative impact of each site.

1. Transport and traffic management

We have compared the transport proposals from the applicants outline planning application to the transport policies in the Canterbury District Local Plan 2017 (“Local Plan 2017”), and Canterbury’s Draft Local Plan to 2040 (“Draft Local Plan 2040”).

Traffic Modelling

- 1.1 The Local Plan 2017 requires that developments conduct a thorough traffic impact assessment to understand the impact on the local transport network (Policy TR1).
- 1.2 It is not clear from the outline application whether other new and proposed developments have been taken into account in the traffic modelling. For example, Land South of the Thanet Way (220 houses plus a Park and Bus facility), Bodkin Farm (300 houses plus a new secondary school) or plans for 2,000 houses at Blean. Each would have an impact on the future traffic modelling conducted for this application – it should be made clear whether additional sites have been included and, if so, the impact they have on traffic modelling and management.
- 1.3 A cumulative impact analysis is essential to understand how the proposed developments will affect overall traffic conditions, road safety and traffic congestion, particularly as the outline application of 1,350 houses will mean at least 2,000¹ extra vehicles on local roads before accounting for traffic generation from slips roads on the A299, and vehicle journeys to schools and community hub on the site. It is important to understand this analysis and the implications for road capacity.
- 1.4 We question the timings provided by the applicant’s traffic modelling in terms of baseline data for maximum delays of vehicles at key junctions and roundabouts. The timings do not appear to truly represent the experience of residents and drivers on local, congested roads. For example:

¹ Based upon gov.uk assessment of average car ownership in the Southeast of 1.42 cars per household in 2022 (NTS9902).

11.4.1.1 Thames Way – Chestfield Road roundabout: the data presented²⁹ suggests that the maximum delay at this roundabout for vehicles travelling westbound along the A2990 from Herne Bay is 4.444 seconds in the morning peak, and 3.977 seconds in the afternoon peak. Furthermore, the data suggests the maximum delay for vehicles travelling eastbound at the same roundabout is 2.611 seconds at morning peak, 3.355 seconds in the afternoon. This certainly does not reflect the experience of drivers and commuters who use this approach at peak times and where delays waiting to enter the roundabout are often longer. Indeed, increased delays and congestion are often experienced in evenings and at weekends when vehicles queue to access or leave services nearby including the Esso garage, Costa Coffee, McDonalds and KFC.

In addition to this, the transport documentation submitted for the Brooklands Farm planning application (C24/24/00224) sees a significant difference in delay time for vehicles at the same roundabout, albeit the modelling is based on 2025 traffic flow. Whilst there is a three-year difference compared to the baseline data submitted under this application, the Brooklands Farm analysis suggests a 115 second delay for morning peaks, and 117 seconds for afternoon peak flows.³⁰ Clearly the difference in delay timings between both applications should raise questions about the basis of the traffic modelling.

11.4.2 Similar timings are also questionable at other junctions presented in the modelling, including (a) the Thames Way – Fongrove Road junction, where the modelling suggests a 17.34 second delay for traffic exiting Fongrove Road to travel Westwards on the A2990, and (b) the Thames Way – Millstead Road roundabout, where the modelling suggests a delay of 7.34 seconds exiting Millstead Road (East) in the morning peak. As per 11.4.1, these timings do not reflect the delays that drivers already face on weekdays, particularly the morning peak. Again, the modelling undertaken for the Brooklands Farm application sees greater delay times – for example, 18 seconds at morning peak, and 13 seconds at afternoon peak for the Thames Way/Millstead Road roundabout.

11.5 On the traffic modelling, the data presented by the applicant in tables 6.2 and 6.9 of the ES Volume 11 – Chapter 6: Transport, Accessibility and Movement raises a number of questions, in particular the flow of traffic in Radhill Road and adjoining roads. The data suggests that between Scenario 2 (with slips on the A299) and Scenario 5 (without slips on the A299) at both morning and afternoon peak times, Radhill Road South of South Street will see a significant increase in traffic generation (presumably from vehicles exiting the slip roads), but with Chestfield Road South of the Thames Way and South Street South of Millstead showing much lower changes in traffic volumes between both scenarios. This raises the question – where does the increased traffic on Radhill Road go? Some of the increased traffic flow appears to be heading towards Chestfield Road North of South Street, and some to South Street West of Chestfield Road. This would, at first sight, seem to suggest that a portion of the traffic makes its way instead towards Canterbury close to Brookfields Gate and on towards Tyler Hill. This needs to be explained by the applicant – in particular, have roads to the south of the A299 also been modelled and, if so, does this account for the difference in generation between Radhill Road and Chestfield Road? This is not at all clear in the application.

²⁹ ES Transport/Accessibility and Movement, Appendix 6.11

³⁰ C24/24/00224 – Chapter 6 – Traffic Access – table 6.9, page 6.118.

Traffic Impact – air quality

1.6 The applicant's modelling data suggests a significant increase in traffic generation in local roads at both morning and peak hours, in scenarios with and without slip roads on the A299. Roads most affected include:

Applicants modelling data, traffic generation, ES Volume 1 - Chapter 8: Transport, Accessibility and Movement, pages 73-74 – traffic movements in AM and PM peaks, with % change between 'No development' and each scenario (data re-presented below from original format).

Road	Scenario 2 – with slips		Scenario 5 – without slips	
	AM Peak	PM Peak	AM Peak	PM Peak
Radfall S of South Street	111% (from 626 to 1323)	142% (571 to 1380)	17% (602 to 706)	27% (501 to 635)
Chestfield Road North of South Street	59% (598 to 952)	71% (484 to 829)	37% (501 to 685)	40% (410 to 574)
South Street, South of Millstrood	128% (438 to 999)	146% (380 to 934)	163% (363 to 955)	150% (348 to 871)
South Street, West of Chestfield Road	96% (402 to 788)	132% (349 to 809)	61% (314 to 504)	63% (292 to 475)

However, there appears to be little commentary in the outline application on the impact this traffic increase will have in these roads on air quality. This is particularly important in South Street where there are existing dwellings and where the Crab and Winkle cycle path runs through, and in Chestfield Road where there are also existing dwellings and where children would be expected to walk towards the proposed school. The lack of any commentary or plan to mitigate any increase in pollution particularly in these roads is contrary to Local Plan 2017 Policy DBE3, namely, *“That the proposed development does not have a detrimental effect on the highway network in terms of congestion, road safety and air quality.”*⁴

Traffic Impact – construction traffic

1.7 The application states that, *“...on the basis of a negligible magnitude of impact and high sensitivity of receptor, the temporary direct effect from construction traffic is likely to be Negligible.”*⁵

We challenge this conclusion in that construction traffic would have to approach the site primarily along either Chestfield Road or South Street (particularly as the applicant states the slip roads on the A2990 will not be delivered until at least 50% of the proposed development has been built). There are in excess of 200 houses along both roads and the impact of construction traffic volumes will have a direct impact on residents in terms of noise, accessibility, traffic volumes and pollution. The outline application does not provide a detailed plan for construction traffic but instead refers to a Construction Environmental Management Plan (CEMP) that will need to be produced⁶. This should have been made a priority. Furthermore, it should be noted that the construction phase of the proposed development is expected to last approximately 11 years⁷. During this period, proposed

⁴ Canterbury District Local Plan 2017, page 186

⁵ ES Volume 1 - Chapter 8: Transport, Accessibility and Movement, page 73, 8.81.

⁶ ES Chapter 8, Transport, Accessibility and Movement, page 26.

⁷ Hallam Land Environmental statement s5.15

mitigations will not be fully in place, further impacting the quality of life for local residents and endangering local wildlife and biodiversity.

Traffic Impact – school access and commuting

1.8 The outline application states: *“... Two out of every three personal trips are less than five miles in length (8km) - an achievable distance to cycle for most people, with many shorter journeys also suitable for walking. For Schoolchildren the opportunities are even greater: three quarters of children live within a 15-minute cycle ride of a secondary school, while more than 90% live within a 15-minute walk of a primary school.”*⁸

Furthermore, the transport documentation states: *“The new school will therefore assist in reducing car trips associated with peak hour school journeys from both new and existing residents.”*⁹

Whilst the aim to increase journeys by foot is within the aim of both the Local Plan 2017, and Draft Local Plan 2040, the applicant’s documentation does not provide any seasonal evidence to support this paragraph. It is highly unlikely that two out of three personal trips of less than five miles in length would be cycled or walked on wet, cold, winter days. Conversely, it is likely that in such conditions residents would travel by car rather than cycle, hence further adding to congestion on local roads.

1.9 The transport documentation states: *“Part of the site is within a 5min walk of the existing bus services and within a 20min walk of the existing railway stations. For commuting, distances greater than 2km will typically be made by walking although the existing stations are also within easy cycling distance, although a new bus service will be provided to ensure all residents will be within 400m of a bus stop.”*¹⁰

Again, this statement does not take into account seasonal factors, when commuters may decide to drive to Whitstable station on cold, dark winter mornings, rather than walk or cycle. It is unlikely that many commuters travelling to London via the High-Speed service will walk to the Chestfield & Swalecliffe station as only one direct service stops there, at 5.45am on weekdays, before the main peak commuting time. In addition, the documentation is incorrect in its assertion that one service per hour runs between Chestfield and St Pancras and that “some journeys require change at Faversham”¹¹. This should read that all services, with the exception of the 5.45am service, require change at Faversham. There is also no commitment that a new bus service would begin between the hours of 6am and 7am on weekdays when most commuters begin their travel to London.

Road safety

1.10 The Local Plan 2017 requires that developments must ensure safe access and egress for vehicles, pedestrians, and cyclists (Policy TR4), and that *“the proposed development does not have a detrimental effect on the highway network in terms of congestion, road safety and air quality”* (Policy DBE3).

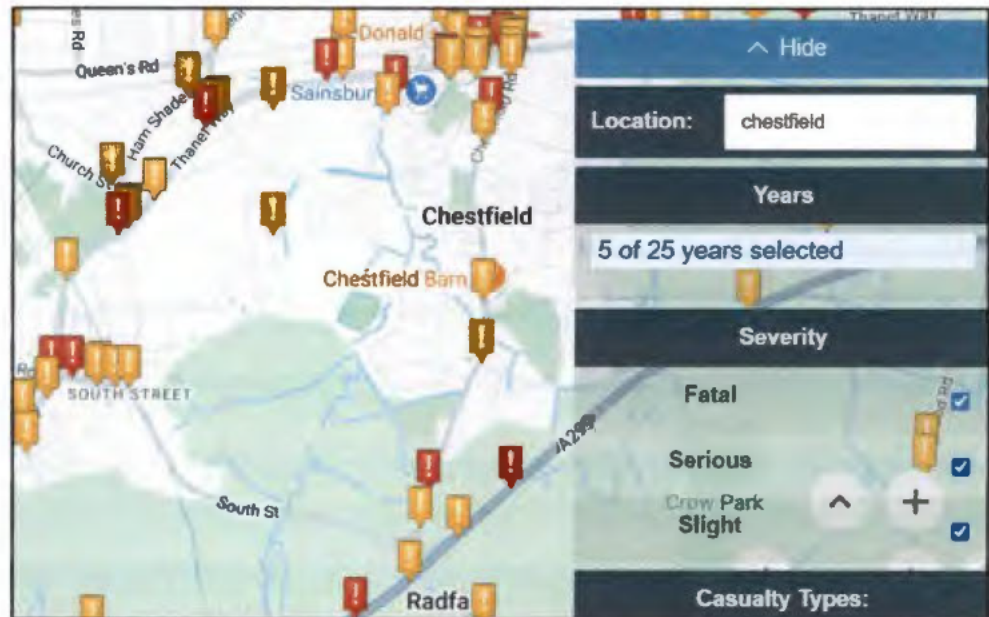
⁸ ES Volume 1 - Chapter 8: Transport, Accessibility and Movement, page 69.

⁹ Transport Accessibility Movement, page 17, 3.5.24.10

¹⁰ ES Volume 1 - Chapter 8: Transport, Accessibility and Movement, page 70, 8.66

¹¹ ES Volume 1 - Chapter 8: Transport, Accessibility and Movement, page 72, 8.78

1.11 The applicant's documentation states that, *"The number of incidents that have occurred within the study area and at junctions over a 5-year period is not considered to be high and would be fairly typical for the volume of traffic that uses these routes"* and



continues, *"In respect of the roads adjacent to the site there have been a total of five collisions, four of which occurred along Chestfield Road and one at the South Street/Millstrood Road junction."*¹² Whilst the study looks at roads adjacent to the site, the number of incidents is higher than that stated by the applicant when considering all roads used for traffic modelling and generation impact. Including the roundabout at the mouth of Chestfield Road on the A2990, the number of incidents in the last 5 years – as sourced from Crashmap – across all roads listed in table 8.8 of the same document is 50 slight, 18 serious, 1 fatal over the last five years¹³. The screenshot included here, sourced from Crashmap, shows the distribution of these incidents on roads included in the traffic generation modelling. The application must take these roads into account when judging safety, particularly if traffic generation will rise on a number of these roads as discussed above.

1.12 The applicant's transport documentation states: *"The provision of the new Primary School will not only facilitate new residents on the site but will also benefit existing residents who are currently located more than a 10min walk from the existing Primary Schools which are primarily located to the north of Thanet Way. The new school will therefore assist in reducing car trips associated with peak hour school journeys from both new and existing residents."*¹⁴

We assume this refers to children in the Swalecliffe and Tankerton area of Whitstable. To access the proposed Primary School by foot means that children, and parents, would need to walk across the bridge at Ham Shades Lane (between Bennells Avenue and Foxgrove Road) which is already constrained by the width of the pathway there, or more likely under the Chestfield and Swalecliffe railway bridge on the opposite side of the roundabout at the mouth of Chestfield Road. On this latter point, should the building of a new Secondary School at Bodkin Farm also go ahead then this will lead to a significant increase in footfall of children and parents on this route, using a very narrow pathway under the railway bridge, and then having to cross the busy A2990. The applicant has not provided any significant details on how this safety concern would be addressed, or indeed any conversations with KCC or Network Rail in addressing the safety concerns regarding the width of the pathways.

¹² ES Volume 1 - Chapter 8: Transport, Accessibility and Movement, page 69, 8.56 and 8.57.

¹³ www.crashmap.co.uk

¹⁴ ES Volume 1 - Chapter 8: Transport, Accessibility and Movement, page 70, 8.64.

- 1.13 The traffic flow data shows a considerable increase in traffic generation in both Scenarios 2 and 5 on South Street, South of Millstrood Road. In Scenario 2, the increase between AM and PM peak flow is 128% and 146% respectively, whilst in Scenario 5 the increase between AM and PM peak flow is 163% and 150% respectively (please note, the % data shown for Scenario 5 in the transport documentation is incorrect). It should be noted that this stretch of road is also part of the Crab and Winkle Way for cyclists and pedestrians – yet there is little discussion in the documentation regarding safety for cyclists with such an increase in traffic flow. Whilst the Brookbanks report refers to, *“The width of South Street and available highway land along this short section of road limits the opportunity to provide an off-road cycle way, therefore on-road cycle symbols will be provided to advise motorists of the presence of a cycle route and assist in maintaining low vehicle speeds”*¹⁵, this does not provide sufficient reassurance for the safety of cyclists on a stretch of road where the expected traffic generation increase is significant. In addition, the mitigation measure for increased traffic flow in this road is for a mini roundabout to be built at the junction between Millstrood Road and South Street – yet there is no discussion about safety for cyclists seeking to cross at Millstrood Road in close proximity to the proposed roundabout.

Summary: the outline planning application does not adequately address the road safety and accessibility concerns identified above and therefore does not meet the requirements of Policies T1, T4 and DBE3 under Canterbury’s Local Plan 2017. Results from the applicant’s traffic modelling for junctions are questionable, and there is also no cumulative impact analysis, essential to understanding how other proposed developments will affect overall traffic numbers and road safety. In addition, the impact on air quality through increased traffic generation has not been adequately assessed.

2. Flooding and Sewage

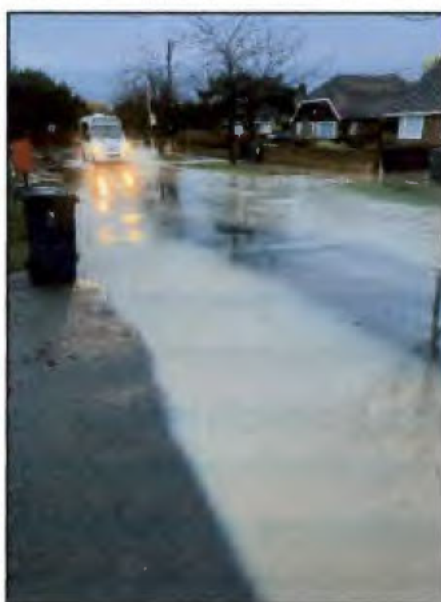
- 2 The Brooklands farm site runs alongside the Swalecliffe Brook, with the Brook itself running through Chestfield and on to the coast at Swalecliffe. It has often been a source of flooding in low-lying London clay areas, through which it runs to the sea.
- 2.1 The applicant’s Hydrology and Flood Risk document (March 2025) states that, *“In accordance with this mapping the Site has experienced flooding along the Swalecliffe Brook in the north of the Site and in the centre of the Site, where the watercourse flows under South Street.”* Furthermore, the document states, *“Flooding has also been identified at the South Street/Rayham Road junction, along South Street around the existing properties and at the Chestfield Road and Thanet Way intersection”* and *“The mapping on Figure 4-3 illustrates areas of very low risk across the majority of the Site with a low to high risk surrounding the Swalecliffe Brook and the identified drainage ditches.”*¹⁶

¹⁵ ES Chapter 8: Transport, Accessibility and Movement, page 37, 5.4.13

¹⁶ Chapter 11, Hydrology and Flood Risk, pages 7 and 8 (March 2025): https://pa.canterbury.gov.uk/online-applications/files/C9B9FBF042BAFE6E4551E0D9E8DD4F20/pdf/CA_25_00779-ES_-_HYDROLOGY___FLOOD_RISK-3665906.pdf

2.2 On 'Avoiding Increased Flood Risk', the NPPF states in paragraph 181 that, when determining planning applications, local authorities should ensure that, *"flood risk is not increased elsewhere."*¹⁷ Furthermore, the Local Plan 2017 states, *".....development within a floodplain, is not only in itself at risk of flooding but, by reducing the amount of land available for flood water storage, or by impeding flows, can increase the risk of flooding elsewhere"* and *"...allied to this objective is the need to ensure that new development is not at risk itself from flooding and does not exacerbate flooding elsewhere."*¹⁸ Furthermore, policy DS20 of the Draft Local Plan 2040 states, *"Proposals for development that would increase the risk of flooding on or off the development site, or would compromise the performance of flood defences will be refused."*¹⁹

Flooding in recent years has become an acute issue for properties and roads adjacent to and neighbouring the proposed site. This is particularly the case given the Swalecliffe Brook, and its tributaries, have been known to flood in Chestfield, as well as flooding on Radfall Road underneath the nearby A299 overpass during periods of heavy rainfall. Particular examples include heavy rainfall



causing the Brook to burst its banks leading to significant flooding in gardens along Shepherds Walk and Longtye Drive in 2021, and in December 2023, when heavy rainfall, in part running off nearby farmland, caused localised flooding in Radfall Road underneath the A299 overpass and along Chestfield Road (see photos to the left).

2.3 This is further evidenced in the map provided by the applicant (Figure 4-1) showing the flood risk zones on the site, with Flood Zone 3 extending beyond the border of the proposed site into existing roads to the North-East of the site; and in the map showing the risk of flooding (Figure 4-3) in the local area, which shows a high risk of flooding in areas including South Street, the A299 overpass, Chestfield Road and streets close to and adjoining Cherry Orchard (the areas shown as high risk account for approximately 500 properties). Both maps are shown below:

¹⁷ National Planning Policy Framework, page 51, paragraph 181:

https://assets.publishing.service.gov.uk/media/67aaf8f3b41f783cca46251/NPPF_December_2024.pdf

¹⁸ Canterbury City Council Local Plan 2017, page 165 (Fluvial Flooding), 7.35 and 7.36: <https://www.canterbury.gov.uk/sites/default/files/2022-10/Adopted%20Local%20Plan.pdf>

¹⁹ Draft Canterbury District Local Plan 2040, p193, Policy DS20, point 1.

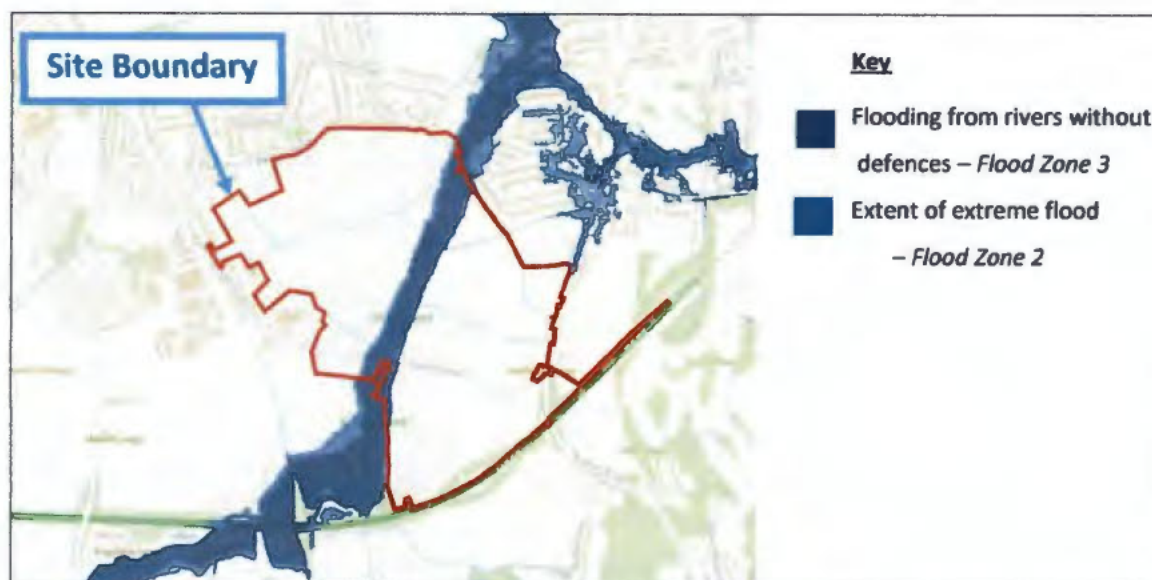


Figure 4-1: EA Flood Map for Planning (2025)



Figure 4-3: EA Long Term Flood Risk Maps – 2040 and 2060 (2025)

2.4 However, there is little by way of detail in the applicant's hydrology documentation that outlines how the risk of flooding outside the Brooklands boundary will be addressed, particularly in Flood Zone 3 areas. Given that much of the existing site retains rainwater due to its high clay content, there is the risk that without proper measures the construction and operational phases of the development could heighten flooding risk to nearby properties and roads. This risk is acknowledged by the applicant in its Hydrology and Flood Risk assessment.²⁰

²⁰ ES Volume 1 – Chapter 11: Hydrology and Flood Risk, 11.60 and 11.83.

2.5 Whilst the applicant refers to the use of Sustainable Urban Drainage (SUDS) to address concerns of flooding, the plans are vague and do not offer a detailed explanation of how the system will work, how it will be interlinked, and whether it will require discharge of water into the nearby Brook. Nor is there significant detail on how the maintenance of SUDS long-term would be assured. Instead, the outline application states, "A SUDS design will be provided, incorporating all of the four pillars described above..."²² Without such detail, the plans put forward do not meet the requirements of Policy CMT1 in the 2017 Local Plan, Sustainable Drainage Systems.²³ Furthermore, the application is short on explaining how the replacement of 'natural' drainage on the site with SUDS will enhance and protect existing wildlife and habitats. The applicant has also provided little evidence to demonstrate how it plans to meet the requirements of the NPPF and to ensure that fluvial flooding is prevented between the site and nearby existing houses and roads.

2.6 The applicant states that, "a discharge rate of 4l/s/ha has been used within the drainage calculations, which has been agreed with the WFA in the pre-application meeting."²⁴ This discharge rate is key to the applicants SUDS and drainage plan and appears to be based upon the rate quoted for Drainage Zone 11 areas in Canterbury City Council's 2019 Surface Water Drainage Pro-forma.²⁵ However, what is not clear is how this rate applies specifically to the Brooklands Farm site, and if it is representative of the drainage/surface features of the land there. For example, the Hydrology report shows a higher discharge rate, above 4l/s/ha, for certain areas of the site.²⁶ It is not clear how these areas will be managed and how they will be linked on the site.

2.7 We note that KCC Flood and Water Management have responded to this consultation to say that the applicant has used a 45% climate change uplift applied to 1% Annual Exceedance Probability (AEP) rainfall event but expects the 'upper end' allowance to be designed for both the 3.3% and 1% year storm scenarios. In addition, KCC have said they would expect 100800-minute storms to be considered as part of the detailed design, not only up to a 14400-minute storm event.

With this response, we are very concerned that the hydrology assessment provided by the applicant as part of this outline application is inadequate to meet the impact of future increased storm activity, on the ability to adequately deal with surface water and avoid localised flooding.

2.8 Closely associated with these concerns is periodic flooding underneath the A299 overpass. This area of Redhill Road lies below surrounding ground level and often floods during periods of heavy rainfall, when surface water runs off nearby farmland and gathers beneath the overpass. In December 2023, occupants of one vehicle needed to be rescued by emergency services due to the flooding of the road near the overpass in Chesfield Road.²⁷ Yet, there is little evidence in the application to show that this area has been considered, or any plans to mitigate the risk of increased flooding on the road following development on the site. Instead, the application refers to, "KCC/Highways have been contacted to discuss the A299 drainage moves."²⁸ Following a meeting on July 3rd 2024 - but what was the outcome

²² Hydrology and Flood Risk Appendix 11.22, Drainage Strategy, page 415

²³ Canterbury Diocesan Local Plan, page 1723, Policy CMT1.

²⁴ Hydrology and Flood Risk Appendix 11.22 Drainage Strategy, page 557

²⁵ Canterbury City Council - 2019 Surface Water Drainage Pro-forma, page 41

²⁶ Hydrology and Flood Risk Appendix 11.22, table 5.3

²⁷ <https://www.kentonline.co.uk/redhill/news/one-stopped-in-water-as-kent-highway-essential-run-200456/>

²⁸ Hydrology and Flood Risk Appendix 11.22, page 1322

of these discussions and why is it not presented in the outline application? We argue that this important issue has not been sufficiently considered.

2.9 In terms of the local sewage network, it should be noted that both are already at or close to capacity before any further development is made. In 2024, Southern Water distributed a letter to the majority of households in Chestfield regarding work to regulate flows from the nearby Oxenden Park development in Herne Bay. The letter stated that, *"The public sewer at Swalecliffe in Herne Bay does not have the capacity to allow any further uncontrolled foul connections from developments in the area."* As local councillors, we contacted Southern Water for further details, and in July 2024 we received a reply that included, *"Policy W4: Land at Brooklands Farm....the assessment reveals that local sewerage infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development"* and that, *"Proposals for up to 1,400 dwellings at this site will generate a need for reinforcement of the wastewater network."* Yet, there is little evidence in the application to evidence conversations with Southern Water to address the capacity issue across the local network should the application proceed.

2.10 Linked closely to the above point are considerations for capacity at the nearby WasteWater Treatment Centre at Swalecliffe. Whilst Southern Water have indicated that further investment will be made to increase the capacity of the plant as part of its 2025-2030 business plan, current capacity means that discharges of sewage are still made into the sea at Swalecliffe, adding to concerns for the capacity of the existing network to meet demand from the proposed Brooklands development. We would expect the applicant to have entered early discussion with Southern Water on this point, although the evidence to show if this has happened is vague in the application.

Summary – the outline planning application does not provide sufficient evidence to demonstrate how it will meet the requirements and aims of the NPPF, Canterbury City Council's Local Plan 2017, or Canterbury City Council's Draft Local Plan 2040, to reduce the impact of flooding elsewhere, or indeed that the proposal will not exacerbate flooding elsewhere.

The outline application does not meet paragraph 181 of the NPPF, nor does it meet the aims of the Council's Local Plan 2017 under items 7.35 and 7.36, policy C11, or policy DS20 under the Draft Local Plan 2040.

3. Local environment, ecology and amenity

Cumulative impact

3.1 We wish to emphasise that this outline application should be considered in the context of other planned and proposed developments in the vicinity. These include, but are not limited to, Grasmere Gardens (300 new dwellings) and Whitstable Heights (400 new dwellings) - both under construction; Bodkin Farm (proposal is for 300 new dwellings) and Land South of the Thanet Way (220 dwellings). We submit that the cumulative impact of these developments will have more than the summative

impact of the individual sites and the multiplicative effect could result in serious and permanent ecological damage. This should be considered as part of the scenario analysis under this outline application.

Biodiversity Net Gain

3.2 The Applicant's ecology and biodiversity reports contain a number of omissions, particularly when deriving biodiversity net gain figures (BNG). This has also been raised in representations submitted by residents who have studied the site, and we support their findings. For example, the BNG figures do not take into account *Mousetail Myosurus*, a species of flowering plant, currently classified as 'vulnerable' in England. Its presence has been confirmed by observations and photos from 2023 and 2025. There are no known records of it growing anywhere else in east Kent - this plant is not referred to in the outline application. In addition, the applicant's BNG does not reference insects within cattle meadows on the site, nor certain bird species that have been seen in the fields (including skylarks, herons and redwings).

3.3 Mitigation against the impact on habitats appears quite limited in the application. In particular, there appears to be little in the way of enhancing habitats where natural features are removed, such as hedgerows, which are sources of considerable biodiversity and wildlife. Table D1 in the Local Plan 2017 calls for the *"conservation and retention of high-quality natural features (trees, hedgerows, watercourses, water bodies etc) and the contribution made to increasing and enhancing biodiversity."*²⁸ This also forms part of Policy DBE3 in the Local Plan. Furthermore, the Local Plan states, *"Proposals should retain important trees, hedgerows and landscape features and should not disturb wildlife corridors"*²⁹, and, *"The loss of healthy mature areas of established planting, including trees and hedgerows which have a general amenity value, will be resisted where it is considered that these form an intrinsic part of the area's character and appeal."*³⁰ Finally, Policy LB8 of the Local Plan 2017 calls for new development to, *"retain, protect and enhance notable ecological features of conservation value such as ancient woodland, neutral grassland, hedgerows, trees, wetlands, river corridors and other water bodies, and habitats that offer breeding or feeding sites of local importance to populations of protected or targeted species."*

However, the applicant states that the proposals require the removal of 1900m of hedgerows on the site, and creation of 619m of hedgerow. This seems to counter the applicant's assumption that enhancing hedgerows will lead to a 41.07% BNG for hedgerows. Can 'enhancing' hedgerows – with a 'net loss' of 67% of existing hedgerow length – really deliver this significant increase? Will 619m of new hedgerow be able to support species that have been moved from 1900m of hedgerow? We argue these are important questions that need answering here and that the approach put forward by the applicant jeopardises the Local Plan policies outlined above.

3.4 Regarding ancient woodland on the site, NPPF paragraph 193 c states, *"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation*

²⁸ Canterbury District Local Plan 2017, page 181

²⁹ Canterbury District Local Plan 2017, page 192, 8.44

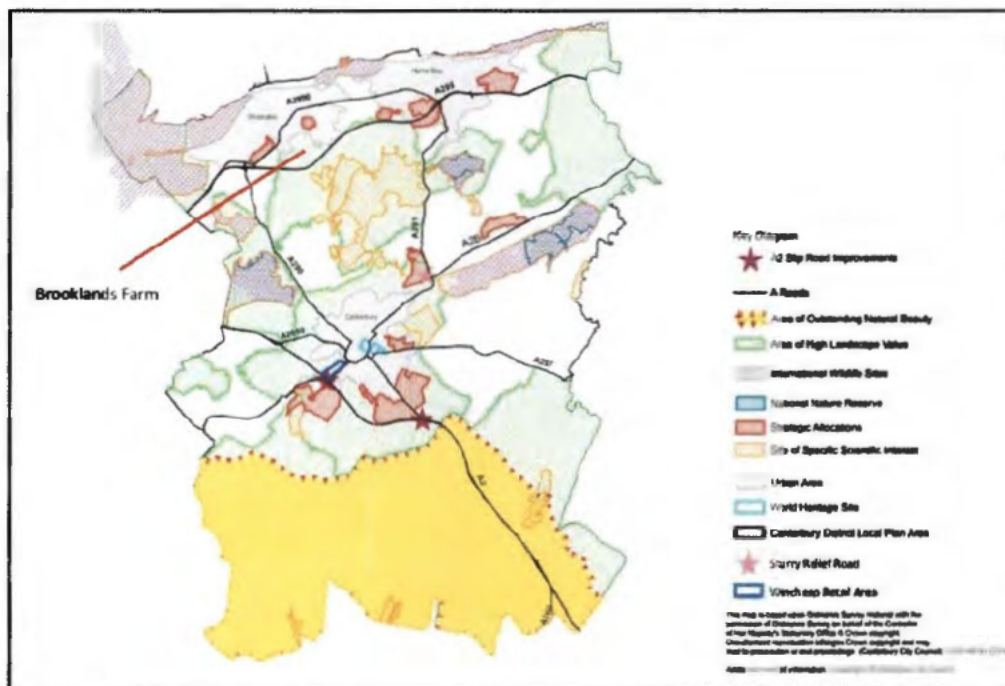
³⁰ Canterbury District Local Plan 2017, page 192, 8.47

strategy exists.³¹ The application does not sufficiently outline how existing ancient woodland would be protected, either at construction or operational stage, particularly given the size of the proposed development, increase in footfall and traffic generation through the site. Nor is there sufficient explanation as to how existing wildlife and habitats, either part of or near to the woodland, would be protected or enhanced.

Area of High Landscape Value (AHLV)

3.5 The Local Plan 2017 remains the adopted plan for Canterbury District, and as such the application should be considered against the policies affecting AHLVs as designated in the Plan, namely 'Policy LB2 – Areas of High Landscape Value'.

3.6 Brooklands farm lies in an Area of High Landscape Value (AHLV)



as designated under the Local Plan 2017³². The map from the Plan showing this is included above. The Local Plan 2017 remains the adopted plan for Canterbury District, and as such the application should be considered against the policies affecting AHLVs as designated in the Plan, namely 'Policy LB2 – Areas of High Landscape Value' which states, "Within these areas, development will be considered in relation to the extent to which its location, scale, design and materials would impact on or protect the local landscape character and enhance the future appearance of the designated landscape and its heritage and nature conservation interest." Clearly the outline application will alter the local landscape character, including views across the landscape from Blean Woods towards the northern edge of Brooklands Farm, and vice versa. We would argue that the layout, scale and height of buildings in the outline application is contrary to this policy, in particular the requirement to "enhance the future appearance of the designated landscape."

Building heights and proximity

3.7 Closely connected to this is the size and height of some of the proposed buildings in the outline application. We would argue that the inclusion of four storey buildings as part of the application does not meet the requirement set out above (there are no other four storey buildings within the village of Chestfield or nearby roads) and therefore contradicts the requirement to consider how the scale and design impacts upon the local landscape area. In addition, the inclusion of four storey buildings contradicts Policy DBE3 of the Local Plan 2017, in particular points (a) and (c) concerning the

³¹ National Planning Policy Framework (NPPF), December 2024, page 56.

³² Canterbury District Local Plan 2017, page 10.

“character, setting and context of the site and the way the development is integrated into the landscape,” and “the visual impact including the impact on the local townscape character and landscape and the skyline.”

3.8 Policy DBE3 of the Local Plan 2017 also states that consideration should be given to, *“the privacy and amenity of neighbouring buildings and future occupiers (including overshadowing, outlook and light)”*³³ However, the close proximity of proposed dwellings to existing houses in Rayham Road, Lismore Road and Blackberry Way (labelled close to A on the map here) and South Street (labelled B) calls this into question. Properties in Rayham Road would look out southwards onto dwellings up to 12.45 metres (3 storeys) in



height, whilst those in South Street would be close to dwellings of up to 2.5 storeys. Green buffer zones, between existing and proposed dwellings, and previously considered by the applicant, have not been included in this application. As such, this contradicts Policy DBE3. Furthermore, the height of proposed dwellings could result in direct lines of sight into gardens and windows of existing homes. The application does not adequately address how this would be mitigated, such as through the use of landscaping or design features that limit visibility.

Summary - the application fails to address concerns regarding the ecological and biodiversity impacts of the development of the site. One of the Council's objectives set out in the Local Plan 2017 is to protect and enhance the countryside but there are failures to recognise the cumulative impact of the development as well as shortcomings in the applicant's Biodiversity Net Gain (BNG) report. We therefore argue it does not fully meet the requirements of the 'Habitats and biodiversity' section of the NPPF, paragraph 193c of the NPPF, nor does it meet requirements under Policies LB2 and DBE3 of the Local Plan 2017.

³³ Canterbury Local Plan Policy DBE3, point g, page 186.

4. Further important considerations

Healthcare provision

- 4.1 The outline application makes reference to a new health centre, but the plans are vague. Given the size of the outline application and proposed development we would expect to see further details on the type of provision and early thinking on who will provide it.
- 4.2 We question the comment made in the application that there is excess patient capacity of 13,416 across Whitstable Medical Practice³⁴ – this requires further clarification and understanding of the assumptions used in reaching this figure.

Agricultural land

- 4.3 Given that the outline application is to develop 1,350 houses on Grade 3a agricultural land, the City Council will need to carefully consider the requirements of Policy EMP12 - Agricultural Land – under the Local Plan 2017. The policy states, *“The City Council will seek to protect the best and most versatile farmland for the longer term. Where significant development of unallocated agricultural land is demonstrated to be necessary to meet a housing, business or community need, planning permission may be granted on best and most versatile land if a suitable site within the urban area or on poorer quality land cannot be identified.”*³⁵

Water supply

- 4.4 It is important that the outline application is considered against Policy CC12 (Water Quality) in the Local Plan 2017, in particular, *“Any new development should not compromise Water Framework Directive objectives.”*³⁶ In line with this policy, the Local Plan 2017 states, *“The Council must ensure that it does not create adverse pressures on the water environment that could compromise ability to meet Water Framework Directive objectives (7.62).”* and *“Kent, including the Canterbury District, is currently water stressed in terms of overall water resources and the public water supply, much of which is sourced from groundwater (7.63).”* South East Water have published the table here which shows average daily water use by household size. Assuming an average household occupancy of 2.4 people, and a medium use household, it is reasonable to assume an average daily use of at least 400 litres of water. This equates to approximately 146,000 litres of water per year. With 1,350 household in this outline application,

	Low	Medium	High
1 person	93 litres	220 litres	385 litres
2 people	203 litres	341 litres	522 litres
3 people	275 litres	440 litres	632 litres
4 people	330 litres	505 litres	714 litres
5 people	384 litres	615 litres	769 litres
6 people	478 litres	670 litres	835 litres

1 person Household size Average daily usage by household size

³⁴ Environmental Statement Volume 1, page 42, 7.48.

³⁵ Canterbury District Local Plan 2017, page 90, Policy EMP12

³⁶ Canterbury District Local Plan 2017, page 174.

this would mean almost 200 million litres of additional water required for the full development every year.

At the time of writing, parts of Whitstable are experiencing a loss of supply which South East Water has stated is through “*increased demand in the hot weather*”³⁷ and requested residents to reduce water usage³⁸. It is therefore critical that this outline application is considered against the requirements of Policy CC12 and the potential stress it could cause on existing and future water resources and public water supply.

Cllr James Flanagan, Cllr Peter Old, July 2025

³⁷ <https://www.bbc.co.uk/news/articles/c5yklq14g08o>

³⁸ <https://www.bbc.co.uk/news/articles/clyxmkg0rko>