
Consultation on draft local plan

From Roy Searle [REDACTED]
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To Consultations <Consultations@canterbury.gov.uk>

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Dear Sir/Madam

My name is Roy Searle and I am a resident of [REDACTED]

I have strong objections to the current "draft local plan" and the impact it will have on the area.

Please see below objections:

1. NPPF Paragraphs 16(b) and 36(c) state that Plans should be deliverable.

CCC require the developers of Brooklands Farm (Policy W4) to construct a new intersection between the A299 New Thanet Way and the Chestfield – Canterbury Road (Radfall Hill), to be delivered prior to occupation of 50% of the total new homes. The new junction is required to relieve congestion on the local road network, especially the A2990 Old Thanet Way.

However, there is a real risk that the developers will not construct the new junction, citing lack of money, and consequently they may never complete more than half the proposed 1,400 new homes. (Developers have a reputation of failing to deliver mitigation works, for example there is still no new bus service for the 400 new homes at the Whitstable Heights Development (planning application CA/15/01296) even almost 10 years after planning permission was granted).

There is also a risk that subsidence problems on the A299 New Thanet Way could cause its closure, as reported by Kent Online on 6th May 2026.

Consequently, there is a real risk that Policy W4 Brooklands Farm may never be more than half delivered.

We are already suffering with heavily increased traffic following the numerous recent developments in the area such as Whitstable Heights. These developments plus the 50 mph speed limit on the A299 are forcing lots of extra traffic through Whitstable.

It is clearly not sustainable to potentially add so many more cars to the roads in the area which are already in a bad state.

2. The draft Local Plan does not comply with NPPF paragraph 20, which states that Strategic policies should set out an overall strategy, and make sufficient provision for infrastructure including for water supply.

Southeast Water told Canterbury City Council Scrutiny Committee on 4th March 2026 that it would struggle to provide water for the increased number of new homes in the draft Canterbury Local Plan. As reported by Kent Online March 14th 2026.

Whitstable and the surrounding areas have suffered numerous water shortages in the last 18 months as the current system struggles to supply the huge amount of new homes that have already been built.

Surely adding more homes before these infrastructure issues have been address is going to make the situation even worse and clearly should not be allowed.

Policy R24 of the draft Local Plan proposes to build a new reservoir at Broad Oak in order to try to provide water for as much as possible of the proposed growth. However, the new reservoir would use polluted water pumped from the rivers Great Stour and Little Stour. Southeast Water have declined to answer questions about how they propose to remove chemical pollutants (in particular hazardous PFAS chemicals) from the river water to make it safe to drink.

It should be noted also that Southeast Water told a meeting of Canterbury Society on 22nd January 2026 that they do not have money to actually build the reservoir.

There is therefore some doubt whether the reservoir is actually deliverable.

3. Policies W3 (Whitstable Urban Area), W4 (Brooklands Farm) and W7 (Bodkin Farm) do not comply with NPPF Paragraph 32, which states that all policies should be underpinned by relevant and up to-date evidence.

There is a lack of clear evidence why the Council has decided to include Policy W4 Brooklands Farm in the draft Local Plan, but excluded an alternative site for 2000 houses that the University of Kent wants to build on its land immediately to the north of the university. (This was Policy C12 in draft Local Plan 2024). That location would score very highly as a sustainable location, given its proximity to the District's largest employment site and excellent public transport links.

Why would it be preferable to use the Brooklands Farm site that will require significantly more infrastructure to be built?

The University site is far closer to Canterbury city centre and therefore has many more employment opportunities (Whitstable it should be noted has very limited opportunity for employment due to its size in comparison to Canterbury).

It also has far more public transport options and will not required numerous additional link roads to be built in the area.

4. The draft Local Plan does not comply with NPPF Policy 39 which requires Local planning authorities to work "to secure developments that will improve the social....conditions of the area."

a. Health service.

The relentless pressure from new housing developments in East Kent is causing East Kent Hospitals Trust to struggle to cope with demand.

A Critical incident was declared at the QEQM Hospital in Margate in January 2026 due to the high demand, and from April the East Kent Hospitals Trust is placed on an Intensive Recovery Programme to attempt to tackle the ongoing challenges.

The high level of Government-imposed housing targets for East Kent do not provide any new hospitals or significant increase in hospital capacity in this area. In this respect, social conditions are worsening.

With existing hospitals and GP surgery's already seriously struggling with the recently increased population how are they supposed to provide adequate services to so many more people of these developments go ahead?

b. Sewage effluent on beaches, in bathing waters, in seafood

All development proposals for Whitstable would inevitably increase sewage effluent pollution on local beaches, in bathing waters and in local seafood. Although Southern Water may be working to increase treatment capacity at Swalecliffe Wastewater Treatment Works, the overall volume of effluent deposited in the local environment (including the marine SSSI) is likely to increase.

Over recent years Whitstable has seen numerous sewage spillages on our beaches and into our sea.

As a town that relies heavily on its tourism and seafood industry it's unthinkable that so many extra homes will be added to a network that is already not fit for purpose.

I am aware that there are likely a number of other significant issues surrounding the draft local plan in its current form, all of which I'm sure you will have been made aware of by many local residents.

I'd just like to finish by saying I strongly object to the building of so many more homes in an area that is already struggling to cope without the supporting infrastructure being BEFORE any additional homes are approved.

Many thanks

Roy Searle

