

Canterbury District Local Plan to 2040

Chestfield Parish Council consultation response

May 2024

By email to consultations@canterbury.gov.uk.

c.c. Victoria Asimaki, Principal Policy Officer (Engagement)

The parish council has the following comments/concerns in no particular order:

1. Insufficient Foul drainage capacity

The parish council has concerns about infrastructure as a whole to support the development planned in the Canterbury District Local Plan and in particular the capacity (or lack of it locally) in the foul drainage network.

Southern Water only review requirements after a permission is in place, and have a five-year programme of work.

A Grampian condition, to phase builds to align with available Foul drainage capacity, *must* be imposed on *all* outline planning permissions, in order to phase occupancy of development to align with the delivery by Southern Water of any sewerage network reinforced required to serve that development.

The Grampian condition should mean that the potential risk of flooding to properties and/or environmental pollution can be mitigated in a timely manner. (As per some key points in Southern Water's Briefing Note for LPAs on infrastructure provision [briefing-note-for-lpas-on-infrastructure-provision.pdf](https://www.southernwater.co.uk/infrastructure/briefing-note-for-lpas-on-infrastructure-provision.pdf) ([southernwater.co.uk](https://www.southernwater.co.uk)) The recommended Southern Water 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.")

The parish council urges CCC planning to impose a Grampian condition such as this on all outline applications for larger sites in order to protect all of the existing district's residents.

2. Lengthening of the Sturry train station platforms

The level crossing at Sturry is closed for 17 minutes in every hour. The regular traffic congestion frequently backs up for over a mile from the crossing. The level crossing 'down time' is made worse as the Sturry station platforms are too short, causing any train of more than four carriages to experience "train overhang", so the barriers cannot be raised. The arrangement of the platforms is such that both up trains and down trains overlap the crossing.

This issue is only going to get worse because of the current, emerging and planned housing developments for more than 2,500 homes at Sturry, Broad Oak and Hersden, and further afield at Herne and Greenhill.

Lengthening the platforms at Sturry will give immediate and long-lasting benefit to a great deal of residents and road users, not just in the local area but from the wider towns around. It would be better for the environment, climate change and air quality.

So, we are delighted and fully support Platform widening of Sturry Train Station to avoid overhanging the level crossing and therefore reduce barrier downtime: relevant references are:

- Page 14 of the Transport Strategy
- Para 9.32 in the Draft Infrastructure Delivery Plan (February 2024) and Schedule B Page 36 in the same document showing a 'medium term' timeframe for delivery.

The Draft Infrastructure Delivery Plan (February 2024) gives an indicative cost of £5m – this is an updated figure provided by Network Rail - and that the funding mechanism will be CIL funding. Chestfield Parish Council would like Canterbury City Council to rank this as a priority in its CIL Priority List, if possible, please.

3. A New site (SLAA310) submitted as part of the 'Call for Sites'

On the district's 'call for sites' at Call for Sites (arcgis.com). Land to the east of Chestfield Road (Reference SLAA310) – a site opposite Brooklands Farm - was a 'late submission' in December 2023 to CCC since the previous consultation draft CDLP.

The parish council would not support the development of this site – especially as it has nothing to offer the village except its proposed circa 150 units of housing.

The parish council consider the 300 homes planned at the strategic Policy sites of Bodkin Farm (Policy W6) and the 1,400 homes planned at Brooklands Farm (Policy W4) will more than double the size of the village alone, and a further site would not be welcomed or supported.

4. S106 Agreements

Section 106 Agreements need to be robust and watertight to ensure that enforcement action may be taken for any non-compliance.

Parish council input before such agreements are finalised would be welcomed.

5. Policy R17 – 440ha Broad Oak reservoir and Country Park

The parish council supports this. We understand this is still a priority for South East Water which should be on track to deliver this in the early 2030's.

Planning for sufficient fresh water supply is essential.

6. Green Gap proposal in the draft CDLP

CCC has retained the proposed green gap at Radfall, Chestfield in this latest Regulation 18 draft Local Plan. This may be found on Page 80 of The CCC "Natural Environment and Open Space Topic Paper (February 2024)"

[Natural Environment and Open Space Topic Paper \(2024\) \(canterbury.gov.uk\)](https://www.canterbury.gov.uk/natural-environment-and-open-space-topic-paper-2024)

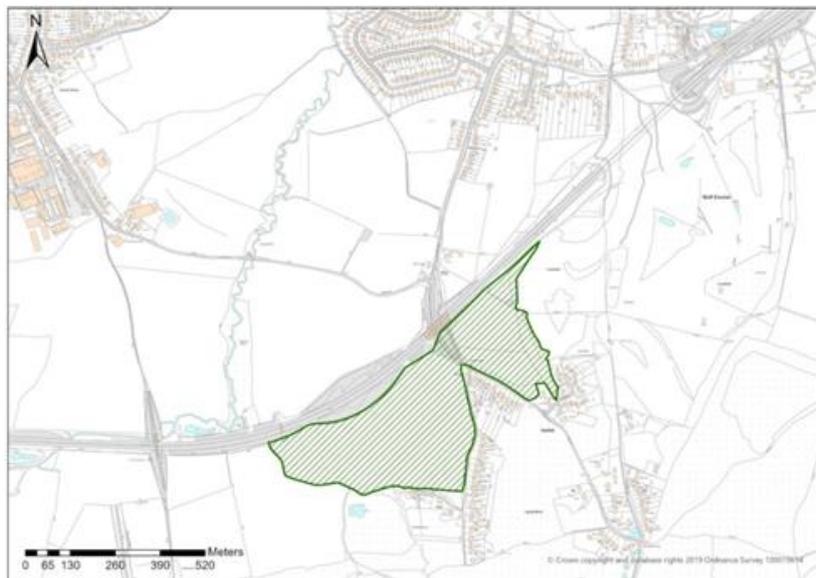


Figure C.9: Proposed Green Gap between Radfall and Whitstable

Chestfield Parish Council did not previously support this green gap proposal in the previous administration's draft Regulation 18 CDLP, and asked for its removal.

Chestfield Parish Council did write directly on 02 February 2023 to Cllr Fitter-Harding as the ward councillor and Leader of Canterbury City Council with a specific request to remove this proposal from the Regulation 19 draft to be presented to the Inspector. There has since been a change of council administration and a revised Regulation 18 draft Local Plan has been put out for consultation.

The parish council continues to feel that this proposal appears to be reactionary to the inclusion of W4 Brooklands Farm allocation rather than as a result of assessment or analysis. The parish council does not support it.

If designated as green gap this would alienate Radfall from the main Chestfield village.

It may also preclude deliverability of two more future slip roads on to the A299: The two new Eastern slip roads proposed to help mitigate Policy W4 Land at Brooklands Farm for 1,400 homes are welcomed. It would be good to go further and extend this site with additional homes in order to build a further two slip roads and have both East and West access and egress to completely future-proof this junction/development.

Is there any scope for negotiating further land and providing a further two more West-bound slip roads to 'future-proof' the whole development; benefit the existing Chestfield village and wider region, and bring cost economies of scale in both the planning and build process and disruption rather than add on at a later date.

Chestfield Parish Council feel it is a missed opportunity not to have both East and West access and egress.

Even if there is no current highways need at present to provide a further two more West-bound slip roads, the need could come in the future.

Provision of the slip roads gives an opportunity to address flooding issues that occur at the bottom of Radfall Hill under the underpass.

The parish council has reached out to Broomfield Gate/Radfall Hill residents via a resident contact, and those who answered confirmed that they agreed that the gap is meaningless and that residents of Radfall and Broomfield Gate in their opinion do feel part of Chestfield, albeit as a hamlet of Chestfield. The green gap is considered by them as useless and serves no useful purpose to give a division between the proposed Brooklands Farm Estate and their 'hamlet'.

It was RESOLVED therefore at the 13 May 2024 parish council meeting that the parish council remains unsupportive of the proposed green gap and requests its removal going forward from the Regulation 19 draft.

7. Strategic site Policy W6, and Outline application CA/24/02224, now submitted for Bodkin Farm, Chestfield

Allocation for Development of this site overrides the green gap designation in the last adopted Canterbury District Local Plan – which the parish council feels is only acceptable if the secondary school happens – the site should not be allowed for development of dwellings only – refusal of CA/14/01319 for housing refers – the inspector upheld the refusal at Appeal primarily on green gap grounds.

The Outline planning application is now in and awaiting determination – CA/24/02224.

[Chestfield Parish Council has submitted a representation.](#)

The parish council's representation includes the following call for key conditions on this outline application if CCC is minded to grant permission:

- Chestfield Parish Council is happy with the positioning of the school to the east to respect the green gap.
However, the parish council wouldn't want just housing at Bodkin Farm – the parish council has said from the outset it supports housing here only if alongside a school provision, to strategically outweigh the land's importance as a green gap. Whilst the land would Transfer to KCC at commencement of development in Policy W6, 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.
- A Grampian condition in order to phase occupancy of development to align with the delivery by Southern Water of any sewerage network reinforced required to serve that development.
- Because of the Unadopted status of Maydowns Road, No vehicular connection is proposed to Maydowns Road – which we welcome – Maydowns Road is an unadopted road, maintained at residents' own expense – and a dead end road. And there is existing difficulty in vehicles exiting Maydowns Road now. We feel that there will, inevitably, be school drop off

traffic in this unadopted and privately maintained Maydowns Road which in places is single track. This will result in additional wear and tear on the road surface and as a result increased cost of repairs/maintenance for residents. It needs a suitably worded Condition so that access to the school is not possible via Maydowns Road.

- Bungalows are planned for adjacent to the left hand side of Maydowns Road properties, which Chestfield Parish Council welcomes to mitigate the impact of new building to the boundary with Maydowns Road. We note that in the current Regulation 18 Canterbury District Local Plan that the policy wording for this site (on W6 rather than the previous W8) no longer stipulates 10% bungalow provision criteria. For this reason – and additionally, as this is not a hybrid application with Phase 1 housing detailed, we have requested that this bungalows element be made a condition to be retained in the reserved matters follow-on application(s).

8. Strategic site Policy W4 – and EIA application CA/24/00788 just submitted - for Land at Brooklands Farm - Brooklands Farm, Chestfield

Although only part of this site falls within Chestfield Parish, the parish council will make a representation at the next Local Boundary Review to extend the parish boundary to have the whole site in the parish.

We do not support the Brooklands Farm development as part of the Local Plan in support of the concerns and weight of opinion in our parishioners.

There is tidal, fluvial and surface water outfall to contend with – dual events have caused previous issues in 2019 and 2020 and 2023. The impact of the Brooklands Farm development on the rest of the village will be important to mitigate – development will create more surface water – this will be built in to surface water attenuation basins and outfalls and velocity scheme details and possibly require underground attenuation basins too. Other reinforcement works may also be required.

Chestfield Parish Council has grave concerns re Foul drainage capacity – Chestfield Parish Council will ask CCC to impose a Grampian condition in the outline application permission, that phasing/occupancy of the new dwellings must align to capacity in Southern Water's network.

Two new Eastern slip roads are welcomed – if the build goes ahead. It would be good to go further and extend this site and have both East and West access and egress. Is there any scope for negotiating further land and providing a further two more West-bound slip roads to 'future-proof' the whole development; benefit the existing Chestfield village and wider region and bring cost economies of scale in both the planning and build process and disruption rather than add on at a later date.

The main Chestfield Road is the only designated highway that runs through the village and it provides direct links into Canterbury and also to the main Thanet Way.

Previous past traffic surveys have shown that this road is in constant use, with traffic becoming more prevalent at peak times.

The introduction/addition of further housing development sites would in effect turn Chestfield Road into a 'rat-run' from both directions, whether from site 'W6 Bodkin Farm' towards Canterbury, or 'W4 Brooklands Farm' towards the Thanet Way.

Many vehicles currently park on Chestfield Road denying 'free-flow' of traffic, and our previous requests to KCC/Kent Highways Services for safer road crossings or traffic islands to be considered, these are deemed as not deliverable by KCC. The introduction of increased traffic flow as a result of new development through the village of Chestfield will only serve to increase the need for improved road safety.

As explained above, CCC's proposal to have a green gap designation (**The Natural Environment and Open Spaces Topic Paper (February 2024. Page 80)** that would preclude the provision of two further slip roads is NOT supported.

Provision of the slip roads gives an opportunity to address flooding issues that occur at the bottom of Radfall Hill under the underpass.

The draft CDLP states the slip roads should be delivered at an early stage of the development and in any case prior to occupation of 50% of the total dwellings. The parish council would like early/earlier delivery – we don't want construction vehicles through the village – which is essentially one road. A new primary school and SEND school are welcomed.

Policy W4 states handover of the land to KCC for both schools prior to the occupation of 100 dwellings. KCC will likely outsource the build. The parish council would like more cohesion in the development of the schools alongside the housing – and don't want the land sat there in a key location – and with extra construction traffic. A school is surely a selling point for house sales.

The parish council will also seek a condition to retain the land gifted for the primary school and SEND school to remain as land for educational use in perpetuity rather than have a future tranche of housing.

9. Secondary school(s) for the Coast

Chestfield Parish Council agrees that there is a recognised need for a coastal secondary school or schools for various reasons – including that buses and other forms of to-and-from transport to Canterbury schools may be avoided, and that school places numbers and need will increase in future in Canterbury given all the planned Canterbury development in the latest draft Canterbury District Local Plan.

The parish council notes that there are two strategic sites proposing a secondary school - both the strategic site W6 Bodkin Farm, Chestfield and Policy HB4 Land at Thornden Wood Road, Greenhill both have provision for a secondary school.

The parish council notes that in the CCC Draft Infrastructure Delivery Plan (February 2024) – for Education, the Schedule B, page 38, gives indicative timeframes for:

- Secondary School with 6th Form at Bodkin Farm (Policy W6) - timescale for delivery: Long term (years 11-15)
- Secondary School with 6th Form at Land to the West of Thornden Wood Road (Policy HB4) - timescale for delivery: Medium term (years 6-10)

Therefore, the planned school at Bodkin Farm would be delivered after the new school at site HB4. CCC therefore anticipate Thornden Wood in 2030 and Bodkin in 2035.

Chestfield Parish Council would like the order reversed and the Bodkin Farm one built first because:

- the Outline planning application for Bodkin Farm has already now been submitted:
- The Bodkin Farm, Chestfield school would serve several other new Policy development sites with each contributing S106 contributions towards education.
- This is a good location for a secondary school, between Whitstable and Herne Bay, with good access routes and nearby train station.
- Of the two proposed coastal schools the Bodkin Farm, Chestfield one is the only one of the two near a rail station.