

Canterbury District Local Plan to 2040 Review (Regulation 18) Consultation

REPRESENTATIONS ON BEHALF OF:

LOCHAILORT INVESTMENTS LIMITED

June 2024

Contents

1.0 Introduction..... 2

2.0 The Chartham Paper Mill site 3

3.0 Proposed Site Allocation 6

4.0 Other policy and plan matters 15

5.0 Conclusion..... 18

1.0 INTRODUCTION

1.1 This representation is submitted by Lochailort Investments Limited (LIL) in response to the Canterbury District Local Plan to 2040 Review (Regulation 18) Submission Plan Draft March 2024 and its Sustainability Appraisal.

1.2 The National Planning Policy Framework (NPPF) (2023) requires that each local planning authority should prepare a Local Plan for its area. The Local Plan must contribute to the achievement of sustainable development and be consistent with the principles and policies in the government's National Planning Policy Framework.

1.3 The NPPF, at paragraph 16, sets out that plans should:

be prepared with the objective of contributing to the achievement of sustainable development;

be prepared positively, in a way that is aspirational but deliverable;

be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

be accessible through the use of digital tools to assist public involvement and policy presentation; and

serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

1.4 LKL wish to put the Chartham Paper Mill site forward as a site allocation within the draft Local Plan. The site is a sustainable previously developed brownfield site which is both suitable and deliverable for a residential led mixed use development.

1.5 This representation also makes comments on the other policies within the Plan.

1.6 The document is set out with the following sections:

- **Section 2:** Sets out the Chartham Paper Mill Site;
- **Section 3:** Proposes the Chartham Paper Mill site as a site allocation;
- **Section 4:** Sets out other policy comments; and
- **Section 5:** Summarises the representation.

2.0 THE CHARTHAM PAPER MILL SITE

2.1 The site is approximately 11.4 ha and is located in the village of Chartham, Kent approximately 3.5 miles north of Canterbury and 9 miles northeast of Ashford. The site is in the administrative boundary of Canterbury City Council. The site is a vacant former papermill.

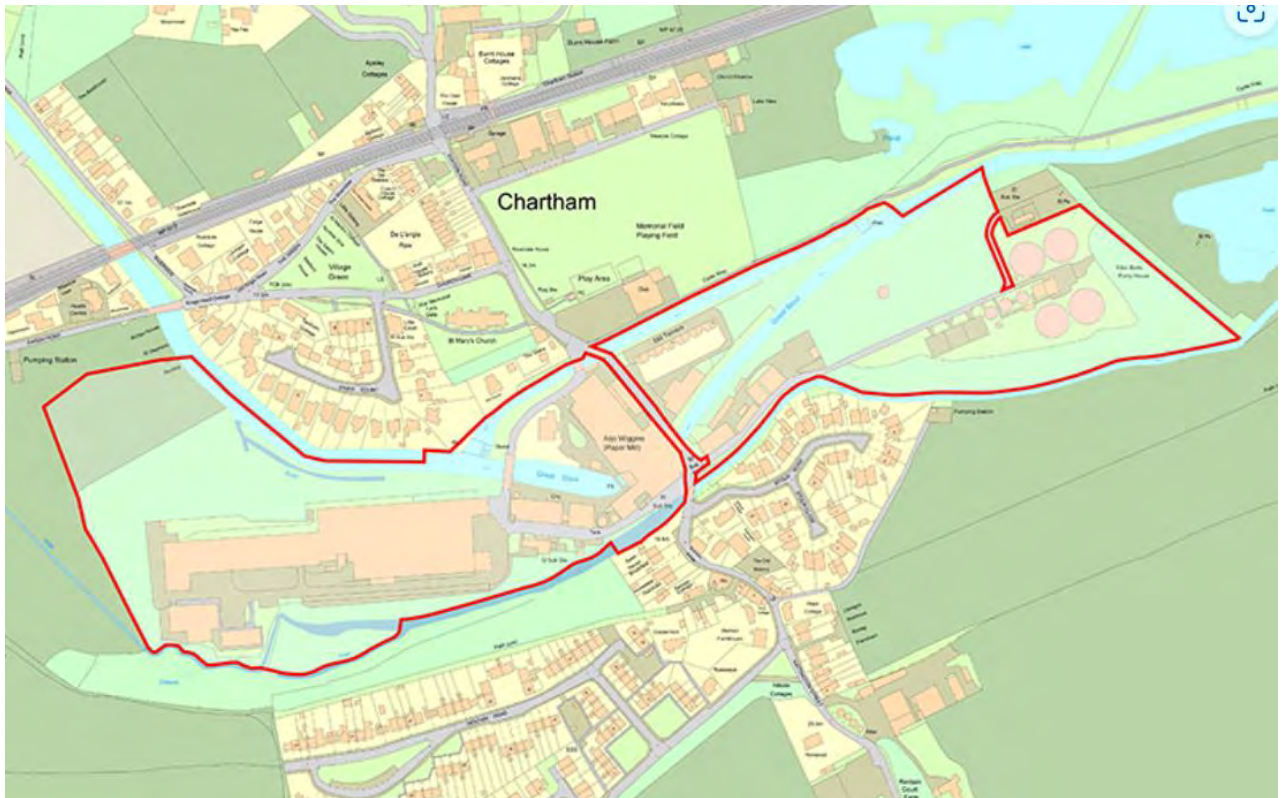


Figure 1: Site Location

- 2.2 The site comprises brownfield land and is sustainably situated within the village of Chartham. As shown in Figure 1 above, the site is divided into two principal parts - the 'western site' (approximately 6.68 ha) and 'eastern site' (approximately 4.72 ha).
- 2.3 Historically, a paper mill was first established in the village of Chartham in the 1730s and the ownership and operations of the mill have evolved over the centuries. The main part of the manufacturing process was situated on the western site and comprises of several partly interlinked industrial warehouse buildings, storage, plant rooms and an office building as well as the former mill owner's residence.
- 2.4 The western site comprises of several partly interlinked industrial warehouse buildings, storage, plant rooms and an office building as well as the former mill owner's residence.

- 2.5 The eastern site comprises a water treatment plant, some open scrub land and several industrial buildings. Within the northern part of the eastern site - overlooking the northern tributary of the Great Stour - is a row of 12 terraced residential units which are locally (but not Statutorily) listed
- 2.6 The site is situated to the south of the main centre of the village, nestled between two tributaries of the Great Stour River and largely surrounded by open land and residential properties.
- 2.7 Chartham is a well-established local centre located adjacent to the Great Stour. The village constitutes 3 parts: Chartham, Shalmsford Street and St Augustine's, which together, include a range of services including Chartham School, local shops, a post office, public house, two doctors surgeries, village hall and railway station. There is also the Church of St Mary, which is located next to the village green and was built in approximately 1294. The primary employers in the area are Chartham Papers (Paper Mill), which sits within the village core and Mansfields at Nickle Farm. There is an industrial/shopping park to the northwest of Chartham, which provides additional employment.
- 2.8 In terms of accessibility, from Chartham Station (under 5-minute walk from site) there are direct trains to Ashford, London Charing Cross, with the fastest train taking 1 hour 36 minutes, or 59 minutes to London St Pancras (changing at Ashford for high-speed connections). The trains also go to Canterbury West (taking 5 minutes).
- 2.9 The Paper Mill stopped operating in November 2022 and the buildings are now vacant. The site was last considered to be in Class E(g) with some ancillary C3 use.
- 2.10 The site has the following designations in the adopted Local Plan:
- Chartham is a 'rural service centre' in the adopted Local Plan.
 - Part of the western site is within the Chartham Conservation Area.
 - The southern part of the site lies within an area of archaeological potential.
 - There are no Statutory Listed Buildings on site, however the Mill House Terrace of houses is locally listed.
 - Large parts of the site are within Flood Zone 3, with elements also within Flood Zones 1 and 2.
 - The river itself is a designated Local Wildlife Site.
 - The site lies within a Kent County Council designation for Sub-Alluvial River Terrace Deposits.
 - The western site has Tree Preservation Orders (refs: A1, G1, G2, G3 and G4).
 - The site is located within the Chartham Wastewater Treatment Works Catchment area.
- 2.11 The site is not within an Air Quality Management Area (AQMA).

Planning History

- 2.12 An application was submitted for the eastern part of the site (ref: CA//17/02633) for *“Proposed 53 no. two-storey dwellings and 11 no. 2.5-storey dwellings following demolition of existing buildings, external alterations to 12 no. cottages in Mill Row, change of use of stables and engine shed to 2 no. dwellings together with access, vehicle bridge, flood mitigation works and hard and soft landscaping”*. The application was withdrawn in 2018.
- 2.13 It is noted that the site was put forward as a draft allocation for residential and employment use in the Strategic Land Availability Assessment February 2024 (site ref: SLAA30). The assessment outcome was that *“The site is located in an area of high flood risk (Flood Zone 3). There are also concerns regarding the ecology and heritage of the site due to its location within priority habitat and a conservation area.”* However, as set out further in the sections below it is considered that this previously developed site should not have been omitted and should be put forward as an allocation in the new Plan.
- 2.14 Prior to this, the site was assessed as part of the Strategic Housing Land Availability Assessment (SHLAA 216) for the now adopted Local Plan 2017 (site ref: SHLAA 2016). The SHLAA considered that the site was suitable for a second stage assessment. The main issues raised in the second stage assessment were the provision of access, traffic impacts and the biodiversity value of the site.

3.0 PROPOSED SITE ALLOCATION

Chartham – A Sustainable Location

- 3.1 Paragraph 12 of the NPPF advises that *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”*
- 3.2 Paragraph 23 states that *“Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non- strategic policies)”*.
- 3.3 Paragraph 125 states that *“Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers”*.
- 3.4 In DLUHC’s announcement published 13 February 2024, *“As part of its long-term plan for housing, the government has announced today (13 February 2024) that every council in England will be told that they will need to prioritise brownfield developments and instructed to be less bureaucratic and more flexible in applying policies that halt housebuilding on brownfield land... The bar for refusing brownfield plans will also be made much higher for those big city councils who are failing to hit their locally agreed housebuilding targets.”*
- 3.5 It is considered that the site has the potential to deliver around 200 residential units. This could be accompanied by a range of commercial and community uses as well as amenity spaces and associated infrastructure.
- 3.6 Delivering housing on brownfield sites is at the heart of the Government’s ambition to boost housing supply and deliver 300,000 homes per year by the mid-2020s and one million homes over this Parliament.
- 3.7 LIL support the draft Plan’s spatial strategy that *“Wherever possible, the council will prioritise the redevelopment of previously developed land.” (para 1.12)*
- 3.8 The Chartham Paper Mill site is a previously developed brownfield and vacant site which is predominantly within the settlement boundary of Chartham. The settlement boundary for Chartham is shown on the draft policy map below (in blue).

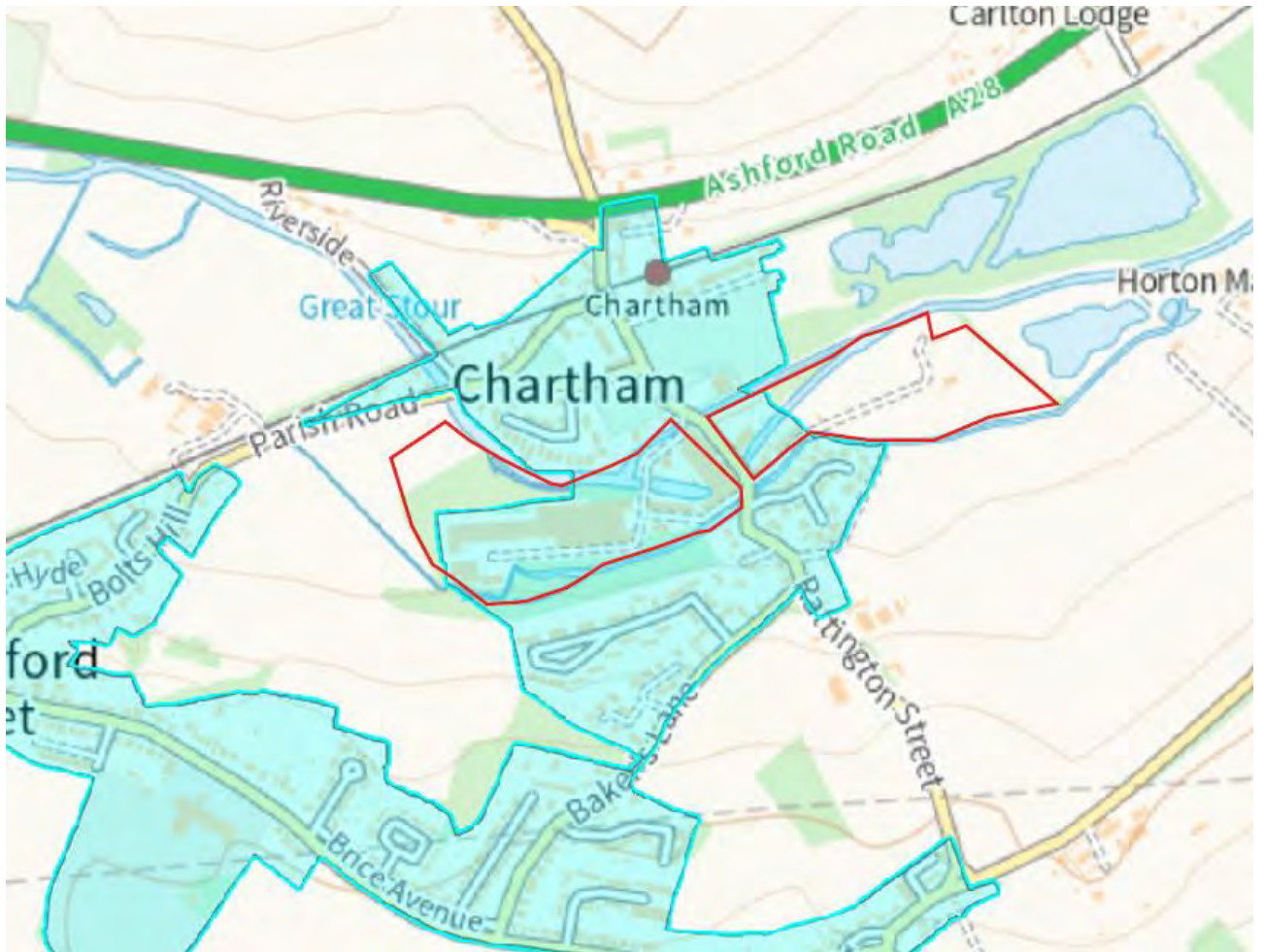


Figure 2: Extract from the draft Local Plan Policy Map showing the development boundary of Chartham

- 3.9 The site is considered to be undoubtedly a sustainable location for new development with Chartham being one of the most well served rural settlements in the district. It comprises a brownfield site in close proximity to a number of existing facilities and services. There are several facilities and amenities accessible by foot and/or cycle from the site, with Chartham Primary School located to the west of the village centre in Shalmsford Street and the two doctor's surgeries and community hall adjacent to the site and the village centre has a shop and pubs. A number of shops and services are also available on the A28.
- 3.10 In respect of the site itself, according to the Chartered Institution of Highways and Transport (CIHT), walking neighbourhoods are characterised as having a range of facilities within 10 minutes walking distance around 800m. The IHG 'Guidelines for Providing Journeys on Foot', provides a more nuanced approach stating up to 2000m walking distance for schools and commuting, and up to 1200m walking distance for other facilities.
- 3.11 The site is highly accessible being well located for pedestrian connectivity. A train station and bus stop with regular services to main centres are located within easy (under 400m) walking distance of the site and good pedestrian and cycle links into Canterbury along the Stour Valley Walk.

3.12 The table below shows the number of services, facilities in the local are as follows:

Facility	Approximate Distance from site
Community facilities	
Chartham Primary School	1.3km
Canterbury Steiner School – Private	3 km
Snowflakes Day Nursery	1.6km
The Firs Nursery	1.2km
St Mary’s Church	250m
Chartham Village Hall	140m
Playground and playing fields	150m
Chartham Doctor Surgery	500m
Old School Surgery	1km
Under 1 Roof Canterbury	1.5m
Riding For The Disabled	2km
Transport	
Chartham rail station	280m
Nearest bus stop	300m
Cycle Way to Canterbury	75m
Retail	
Shop on the Green Chartham	200m
Tobin Motos	300m
Pub (The Artichoke)	130m
Pub (The Local)	850m
AUM Newsagents	1.3km
Post Office and Premier Shop at Shalmsford St	1.5km
Canterbury Garden Centre and Café and pet shop	1.5km
Blackbird Caterers	850m
Divine Hair And Beauty	1.5km
Canterbury Nail Tech	1.1 km
Forager Natural Foods Shop	800m
Premier Natural Food Store	1.3km

3.13 The draft Local Plan recognises this stating at paragraph 5.9 that: *“Chartham is located to the south west of Canterbury, adjacent to the Kent Downs AONB. The Rural Service Centre is located on the main route between Canterbury and Ashford, and benefits from good bus connections to both areas while Chartham train station provides good connection to Canterbury West, Ashford, Maidstone, as well as London St Pancras. The Great Stour Way also provides a popular walking and cycling route to Canterbury city centre. Chartham benefits from good access to community facilities and services including two GP surgeries, a number of local shops, a primary school and community hall.”*

3.14 Furthermore, the Rural Settlements Study (2023) that supports the draft Plan’s evidence base sets out a scoring system on the key services provided in rural areas (being Primary school, Convenience store, Community Hall, GP surgery, and Nursery or pre-school). This is summarised in the table below. It only further supports the fact that the site is located in one of the best serviced villages in the District.

3.15 A Rural Service Centre is defined as “Residents living there can meet most of their day to day needs within the settlement. The level of service provision in a Rural Service Centre means that the settlement plays an important role in the wider area, providing access to key services for residents living in smaller settlements nearby.”

Settlement	Ranking	Score	Services
Sturry	Rural Hub	40	All
Blean	Rural Service Centre	21	5 key services
Bridge	Rural Service Centre	25	5 key services
Chartham	Rural Service Centre	39	5 key services
Hersden	Rural Service Centre	23	5 key services
Littlebourne	Rural Service Centre	25	5 key services
Barham including Derringstone	Local Service Centre	16	4 key services
Hoath	Local Service Centre	10	3 key services
Adisham	Local Service Centre	9	2 key services
Harbledown	Local Service Centre	12	2 key services
Lower Hardres	Local Service Centre	9	2 key services
Petham	Local Service Centre	9	2 key services
Rough Common	Local Service Centre	9	2 key services
Thanington Without	Local Service Centre	6	2 key services
Westbere	Local Service Centre	9	2 key services
Wickhambreaux	Local Service Centre	10	2 key services
Broad Oak	Local Service Centre	9	2 key service
Fordwich	Village	10	1 key service
Bishopsbourne	Village	7	1 key service
Bekesbourne	Village	4	1 key service
Bossingham	Village	7	1 key service
Chartham Hatch	Village	5	1 key service
Chislet	Village	4	1 key service
Ickham	Village	5	1 key service
Kingston	Village	5	1 key service
Tyler Hill	Village	7	1 key service
Upper Harbledown	Village	6	1 key service
Upstreet including Grove Ferry	Village	5	1 key service
Waltham	Village	5	1 key service
Patixsbourne	Village	3	3 services
Stodmarsh	Village	2	2 services
Woolage Green	Village	2	2 services
Bullockstone	Village	2	2 services
Boyden Gate	Village	2	2 services
Bramling	Village	1	1 service
Herne Common	Village	1	1 service

Maypole	Village	1	1 service
Pett Bottom	Village	1	1 service
Upper Hardres	Village	1	1 service
Womenswold	Village	1	1 service
Anvil Green	Hamlet	0	No services
Blooden	Hamlet	0	No services
Breach	Hamlet	0	No services
Cooting	Hamlet	0	No services
Garlinge Green	Hamlet	0	No services
Highstead	Hamlet	0	No services
Ileden	Hamlet	0	No services
Marshside	Hamlet	0	No services
Out Elmstead	Hamlet	0	No services
Radfall	Hamlet	0	No services
Woodlands	Hamlet	0	No services
Woolage Village	Hamlet	0	No services
Wraik Hill	Hamlet	0	No services
Yorkletts	Hamlet	0	No services

- 3.16 It is considered that the provision of new housing and employment uses would not undermine the viability of the existing provision in the village, but rather enhance the sustainability of the village in line with draft Policy R1. Redeveloping the site will back a large vacant site back into use for the village of Chartham.

Housing

- 3.17 Canterbury City Council does not have a five-year housing land supply or an up-to-date Local Plan (therefore, the tilted balance applies to the site). Utilising brownfield sites to deliver up to around 200 units would go some way to meet this need and this should clearly be prioritised over other greenfield sites in accordance with the spatial strategy of the draft Plan.
- 3.18 The map below shows the site in relation to the surrounding existing built development. The developed part of the site is located centrally within the development boundary of Chartham (see Figure 2 above) and is surrounded by residential development to the north and south.

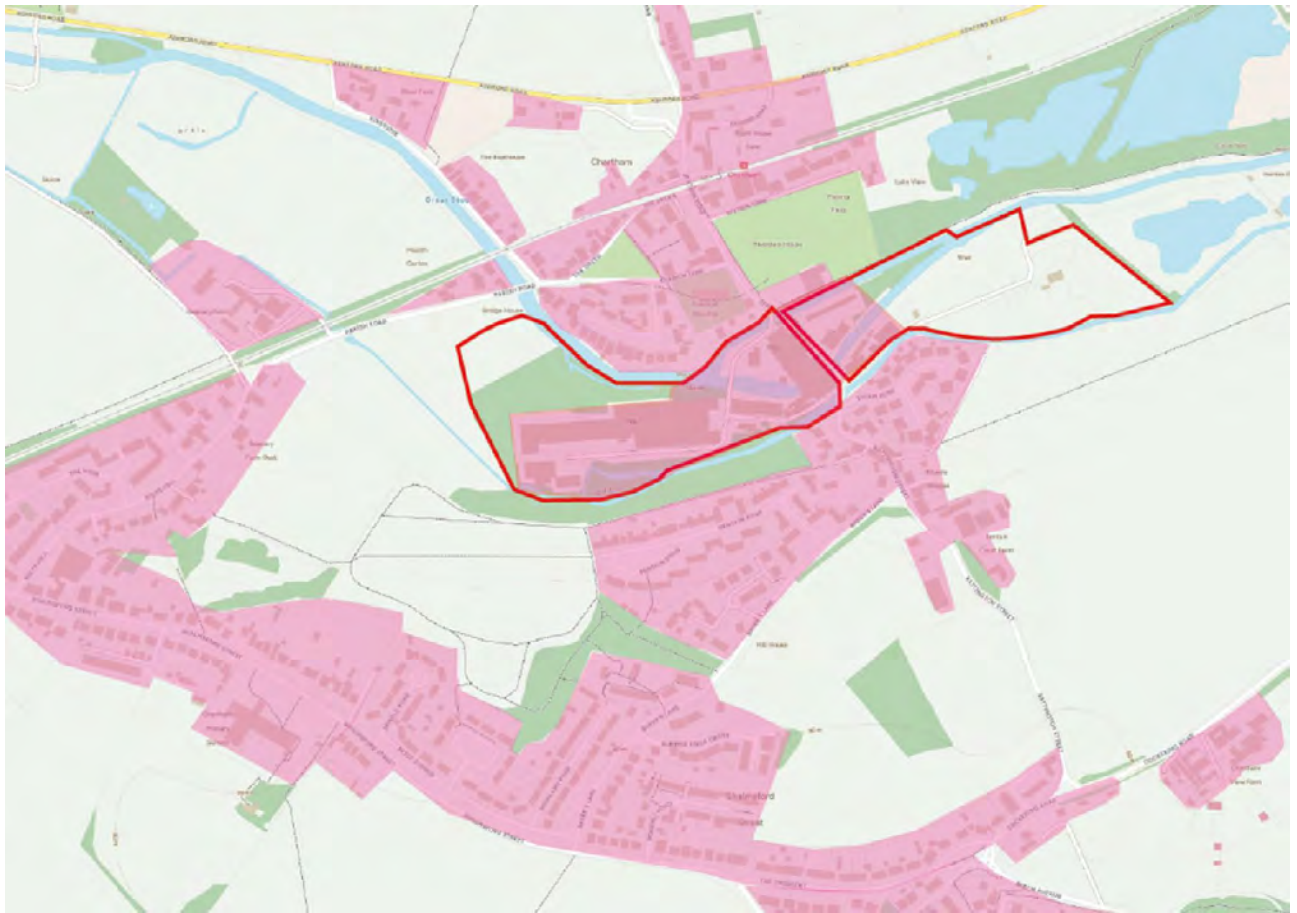


Figure 3: Map showing the site in the context of surrounding built up development (pink). Part of the site shown within the settlement boundary

- 3.19 It is noted that the draft Plan designates green gaps which includes one between Canterbury and Chartham. Draft policy R19 states that *“The council will protect the network of valued open spaces, green infrastructure and sports and recreation opportunities that exist within the countryside and will resist development which affects the openness of designated green gaps which would erode the separation between, or the character or setting of, individual settlements.”* Similarly draft paragraph 5.36 states that *“Designated green gaps which prevent coalescence between settlements will be protected from development which would harm the openness of these areas.”*
- 3.20 As shown on the figure below, the site is located within the development boundary (in majority and will not impact on the designated green gaps highlighted in figure 4 below (green gap being the dotted overlay).



Figure 4: Map showing site in relation to the draft designated green gap (dotted overlay)

- 3.21 The exact unit mix would be determined during planning application stage to ensure it would comply with draft Policy DS2 (Housing mix).
- 3.22 Furthermore, as aforementioned the draft Plan supports residential development on previously developed land and in settlement boundaries including Local Service Centres.

Employment use

THE SITE IS NOT A DESIGNATED EMPLOYMENT AREA AND HAS BEEN VACANT SINCE NOVEMBER 2022. THE BACKGROUND FOR THE CLOSURE OF THE PAPER MILL IS SET OUT IN THE CONSULTATION RESPONSE FROM THE ECONOMIC DEVELOPMENT TEAM AT CANTERBURY COUNCIL. THE 2017 (REF: CA//17/02633) RESPONSE SET OUT THE FOLLOWING:

This application would see the redevelopment of part of the Paper Mill’s current site for residential use. In this event, some 1,890m2 of predominantly mixed industrial floorspace would be demolished, while all commercial operations would be consolidated into the remaining buildings.

In terms of context we have been aware of the difficult business environment Chartham Paper Mill has been operating in the last 6 or so years. The printing trade press has previously reported on the structural and financial changes carried out at both parent group level (i.e. Sequana) and at the branch level (e.g. Arjowiggins and Chartham Paper Mill). To summarise this there has been decline and overcapacity in the paper market which has led Arjowiggins to reportedly decrease capacity in line with falling demand resulting in a major operational restructure largely centred on its European sites. As such a few sites have been closed and sold elsewhere in Europe or plants have been refocused on other markets. In turn this has reduced capacity and shifts at plants like the Chartham Paper Mill. Despite these issues the Chartham site delivers a unique business activity – one of only a few plants producing and exporting high quality translucent paper in the country and uses high end production skills and technical expertise. This activity continues at Chartham despite a great deal of modern, specialised paper production being moved to China. Moreover the site provides important local jobs and economic activity together with an important contribution to the area’s industrial heritage. The proposed loss of industrial floorspace (-1.890m²) is substantial in local terms but other considerations need to be taken into account in this instance. The location does not form part of a Local Plan employment cluster or other designation. The proposal also importantly does not appear to be leading to a corresponding contraction in employee jobs, which as a result minimizes potential adverse economic development impacts associated with this redevelopment. Neither does the occupier seek to relocate away from this site. Consequently there is at least as part of the application a clear and coherent aim which seeks to preserve the company’s presence in this location. From what we have seen the industrial buildings set to be demolished are also largely vacant. These have no doubt been intensively used over many decades and are at a stage where they either need to be completely replaced or activity that would have previously taken place in these buildings is relocated elsewhere. Therefore these premises are not in a condition conducive to sub-letting or selling to other users and no doubt represent a significant liability for the company and impediment to much needed reinvestment in order to remain competitive in a global business activity.

We understand that the proposal will enable Arjowiggins to reinvest in Chartham Mill including the acquisition of new equipment needed to replace a water treatment plant (parts of which date back to the 1960s) and a paper production machine from the 1970s. Therefore, if the proposed consolidation of activity helps to strategically secure business operations from this site for the foreseeable future then in principle, we are comfortable with the application as it stands.”

- 3.23 These comments were made in 2017. In 2019 Arjowiggins went into administration but was saved by a management buyout. Unfortunately, this was relatively short lived and in 2022, following the difficult trading conditions resulting from the pandemic and energy crisis, Arjowiggins was again placed into administration, and the Chartham Paper Mill closed in November of that year, with the loss of some 67 jobs. The site has now been vacant for circa 19 months.

- 3.24 As acknowledged as part of the comments made by the Economic Development Team, the Paper Mill site would not be able to be sub-let or re-used for the same use. Furthermore, the site employed relatively few people given its size. This again supports the redevelopment of the site for alternative uses.

Technical Matters

- 3.25 There are a number of technical matters that would be required to be addressed as part of any planning submission, particularly with heritage, ecology and flood risk.
- 3.26 Most of the west site is located within Flood Zone 3 as per the Environment Agency Flood Map for Planning. However, the site has never suffered from flooding. The Flood Risk Assessment submitted with the previous planning application for the eastern part of the site states that *“During correspondence with the EA regarding the historic flood map provided, the EA initially suggested that the historic flood extents may have not been recorded at the peak of events and therefore, may not depict the true extent of flooding at this location... Further correspondence with the Local Authority Engineers (as an independent source), has enabled the recorded extent of flooding to be verified.”* The FRA for the eastern site states that *“The EA’s Flood Zone mapping classifies the development site is located within Flood Zones 2 and 3, however, more detailed analysis undertaken as part of this FRA has demonstrated that the majority of the site is located in an area shown to be at low risk from all sources.”*
- 3.27 As part of any future application, a refined model of the Great Stour can be developed at a site-specific scale to more accurately quantify the extent of flooding at the site. It is considered that flooding should not be a reason for omitting the site from the Plan as a draft site allocation.
- 3.28 Any impact on neighbouring residential amenity would be mitigated through suitable design and infrastructure improvements. Any planning application that would come forward would also suitably engage with the local community.
- 3.29 Any proposed development would be required to address biodiversity on site and mitigate against any potential harm. The site provides significant opportunity for enhancement, particularly given the extent of the ownership beyond the built coverage of the site. This also provides opportunities for publicly accessible open space.

Deliverability

- 3.30 The NPPF defines deliverable sites as *“(e) To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.”* The site is in single ownership and is therefore deliverable.
- 3.31 Overall, for the reasons set out above, it is considered that the Chartham Paper Mill Site should be allocated within the draft Local Plan and be included as a site allocation as per policy SS3 (Development strategy for the District and draft Policy CF1 (Strategic Site Allocations).

4.0 OTHER POLICY AND PLAN MATTERS

- 4.1 Further to the comments outlined in the sections above, further comments relating to other plan matters are as follows.

Countryside Development

- 4.2 LIK consider that draft Policy R19 (Countryside) should include wording that supports *change of use* of buildings to residential in the countryside if it can be demonstrated that it complies with other policies in the plan.

Affordable Housing

- 4.3 Paragraph 66 of the NPPF states that *“Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership.”* It doesn’t set out the maximum number of clusters for affordable homes. Draft Policy DS1 (Affordable Housing) states that *“Affordable housing should be dispersed throughout the site, avoiding large clusters of affordable homes and integrated with the market housing. Affordable homes should accord with Policy DS6 so that quality and design is of an equally high standard to that of the private units on site.”*
- 4.4 Having groups or clusters of 15 or no more than 15 homes would not normally be acceptable to a Housing Association. Management would be difficult and having this maximum requirement is not practical for delivery. Therefore, it is requested that this part of the policy is removed.

Housing

- 4.5 The NPPF states that *“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.”*
- 4.6 At present, the Council do not have a five-year housing land supply. The current draft Plan policy SS3 seeks an average of 1,149 new homes a year between 2020/21 and 2040/41. This level of housing is not considered to be ambitious enough given the historic underdelivery across the borough. The latest housing delivery Test sets out that the total number of homes required between 2019-22 was 2323 and what was delivered was 1753 (75%) putting it in the buffer category. The Council’s Delivery Test Action Plan (2020/21) also sets out the historic under delivery prior to 2022:

Table 2: HDT last three years housing requirement and completion figures

HDT	2018/19	2019/20	2020/21	Total
Housing requirement	900	824 ¹	599 ²	2,323
Total completions	444	602	463	1,509

- 4.7 The council should increase the housing target and allow additional site allocations such as Chartham Paper Mill to help meet the housing need (locally and nationally) and place favour in the presumption of sustainable development.
- 4.8 Draft Policy DS2 (Housing Mix) is supported, however, clarity should be provided for the different categories (Canterbury, Coastal Towns, Rural North, Rural South). It is suggested that a coded map is provided to denote these areas.
- 4.9 The policy wording should also be amended to allow for variations to the housing mix of 50 + units on a site to reflect viability and/or demonstrable need for the local area.
- 4.10 Part 3 of the policy should also include “subject to viability” when referring to the requirement of providing on-site affordable housing.

Sustainability

- 4.11 Policy DS6 (Sustainable Design) part 3 should specify the minimum non-residential area threshold required to meet BREEAM Excellent.
- 4.12 It is not clear what a “Crime Impact Assessment” in this draft Policy would involve. If required, flexibility should be allowed for this to go into a Planning Statement or Design and Access Statement as part of a planning application.
- 4.13 Part 11 of the policy states that *“Proposals for major development across the district will be required to submit an assessment of the accessibility and quality of mobile data networks affecting the site and, where appropriate, examine opportunities to improve mobile data networks affecting the site.”* This is considered to be too onerous at planning application stage and should be removed.

Employment

- 4.14 Draft Policy DS8 (Business and employment areas) states that *“Outside of the designated Business and Employment Areas, proposals for development involving the loss of existing E(g), B2 or B8 floorspace will only be permitted where:*
 - (a) There is clear evidence to demonstrate that the existing floorspace is no longer needed; and*
 - (b) The use is no longer viable and the business has been actively marketed at a reasonable rate for a period of at least two years; or*

(c) The change of use is the only practical way to conserve a listed building; or

(d) The building is no longer fit for purpose as business or employment uses.

If a change of use to residential accommodation is proposed then, in addition to the above, the applicant must also demonstrate that every reasonable effort has been made to first secure other appropriate cultural, tourism, economic or community uses for the building.

- 4.15 LIL object to policy DS8 in relation to the last paragraph above on change of use. The requirement is considered too onerous, and it is not a requirement of the NPPF. It is requested that this part of the policy is deleted.
- 4.16 Draft Policy DS17 (Habitats of international Importance) states that *“Proposals for between 150 and 300 homes must examine all available opportunities for integrating high quality on-site regulated wastewater treatment facilities within the site to minimise the levels of P and N associated with foul water from the site.”* This policy is considered to be onerous and should be subject to feasibility and site constraints.

Lighting

- 4.17 LIL supports draft Policy DM18 which seeks to ensure that all development should be designed to minimise light pollution. However, it is considered that “proposals for external lighting schemes” should be more clearly defined. Illuminance contour diagrams should be considered acceptable as a planning condition which is often acceptable to demonstrate that there is no detrimental impact. This flexibility should be included in the policy wording.

Sustainability Appraisal Report Regulation 18

- 4.18 LIL contend that the Sustainability Appraisal should include the Charlton Paper Mill Site.

5.0 CONCLUSION

- 5.1 This representation is submitted by Lochailort Investments Limited (LIL) in response to the Canterbury District Local Plan to 2040 Review (Regulation 18) Submission Plan Draft March 2024 and its Sustainability Appraisal.
- 5.2 The Chartham Paper Mill site is considered a highly sustainable site for future redevelopment and would allow for the delivery of a significant number of new homes in the Local Plan. It would meet the Government and NPPF's objectives of prioritising brownfield sites to deliver new homes and go some way to addressing the housing shortfall.
- 5.3 In addition to the above, the comments and objections made in respect of other policies, and other policy matters, should all be considered in preparing the next version of the Local Plan for Regulation 19.