

CHARTHAM PARISH COUNCIL

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Dear Sir / Madam,

RESPONSE TO THE CONSULTATION ON THE DRAFT LOCAL PLAN

Chartham Parish Council (PC) welcome this opportunity to comment on the emerging Canterbury District Local Plan to 2045. This response has been prepared by Parish Councillors, members of the Chartham Neighbourhood Plan Steering Group, and the PC's planning consultants' Squires Planning and is based on local knowledge. and feedback received from the community over the last few years.

Alongside the main consultation on the emerging Local Plan, other consultations are being run concurrently on the Open Spaces Strategy, Canterbury District Tree and Woodland Strategy 2022 to 2045, and the Cycling and Walking Implementation Plan. The PC would like to highlight that running four consultations (three of them part of the evidence base upon which this plan is based) at once hinders the ability of the community and other interested bodies to respond comprehensively, this is compounded when consultations are run over busy periods such as Christmas and the New Year. As a result, this response has been forced to concentrate on key matters affecting Chartham rather than wider points which the PC would have liked to have commented on. We would urge Canterbury City Council (CCC) to review their consultation practices to ensure that this doesn't happen again.

THE DEVELOPMENT PLAN

As you are aware, the PC is preparing a Neighbourhood Development Plan (NP) for the Parish. This document will sit as part of the Development Plan, alongside policy adopted by CCC. It is currently envisaged that the Neighbourhood Plan period will run from 2020 to 2031 to align with the current Local Plan (adopted in July 2017).

Work on the plan has been ongoing since November 2019 when the PC submitted the Neighbourhood Plan Designation Area Application. The Neighbourhood Plan Area was designated in December 2019 and since, a Steering Group has been formed and the evidence base has been built, supported by several consultations, the most recent being the Scoping Consultation which was run in late 2021. The final evidence base documents are currently being prepared and the PC intends to publish a Regulation 14 Neighbourhood Development Plan for consultation soon.

At this moment in time, a great deal of evidence has been prepared which will underpin the neighbourhood plan. These documents are all publicly accessible and available at <https://charthamnp.com>, for ease of reference the evidence/documents currently available is set out below:

- [Landscape and Biodiversity Topic Paper \(September 2021\)](#)
- [Transport & Travel Topic Paper \(August 2021\)](#)
- [Housing Topic Paper \(August 2021\)](#)
- [Health & Wellbeing Topic Paper \(August 2021\)](#)
- [Economy Topic Paper \(August 2021\)](#)
- [Climate Change Topic Paper \(August 2021\)](#)
- [Built Environment & Heritage Topic Paper \(August 2021\)](#)
- [Chartham Housing Needs Assessment \(March 2021\)](#)
- [Landscape Sensitivity to Residential and Solar Development in Chartham Parish \(Nov 2022\)](#)

The emerging local plan should take all available evidence into account when being prepared, and that includes the

above-mentioned documents.

As part of the plan, the PC intends to allocate land to meet its housing requirements figure and the PC recently undertook a Call for Sites to identify available land – these sites are currently being assessed by external consultants. Other work is also ongoing by external consultants and our volunteers to identify appropriate settlement boundaries, prepare Design Codes for our settlements, assess local undesignated heritage assets, and consider whether any of our open spaces should be afforded policy protection.

The PC Steering Group have tried to engage with CCC as the neighbourhood plan has progressed multiple times and are disappointed that the response has been cautious and lacking real collaborative engagement. The PC believe that CCC have to date not fulfilled their duties set out in the Planning Practice Guidance (Paragraph: 022 Reference ID: 41-022-20150209) which requires them to ‘*be proactive in providing information to communities*’ and ‘*constructively engage with the community throughout the process*’. A good example of this being the fact that the PC were not made aware of CCC’s draft proposals in advance of the emerging local plan being published for consultation, there was no discussion or attempt by CCC to inform the PC of the proposed allocations in the neighbourhood plan area – which will have a significant impact on the resulting plan.

The PC would like to work with CCC to create an effective strategy for the Parish that aligns with the aspirations of the emerging Local Plan and emerging Neighbourhood Plan. We urge officers and elected representatives to work with us to deliver this strategy and shared vision.

COMMENTS ON THE EMERGING LOCAL PLAN

Everything within this draft local plan is based on a high housing number which was required by the government.

Because of the changes in their approach to housing targets and the NPPF, we ask CCC to reconsider the review of the Local Plan. Other local planning authorities at a similar stage have now stopped work to take stock of the implications. The fundamental assumptions upon which the plan is based are now outdated.

In addition, in the context of Canterbury and its environs, there are genuine constraints such as areas of landscape importance, heritage restrictions and flood risk. Canterbury city has several universities, and the number of students noticeably impacts the characteristics of the demographics and requires use of an alternative method as indicated by Michael Gove in December 2022.

The sections of the Local Plan that the PC wish to comment on are:

1. Spatial Strategy for the district
2. Canterbury
3. Rural Areas
4. District Wide Strategic Policies
5. Development management policies

We provide our comments below in relation to each policy, as per the consultation response form.

Policy SS1: Environmental strategy for the district

We **Tend to agree** with the proposed approach set out in this policy.

However, the PC believe that without identification of loss of countryside and habitat, the environmental strategy is meaningless (see comments on SS3). Housing, of a quantum disregarding district responses to the options consultation, is now to be mainly centred on greenfield sites around Canterbury itself.

This policy states that “*provision is made for a range of new open spaces and sports and recreation facilities including...*”. It then goes on to list the amount of space provided. We note that this policy is closely linked to the Open Space Strategy currently under consultation, but we have not had time to scrutinise the detail of the proposals.

However, we would comment that the policies map as presented is not easy to read as existing and new “Open Space” is grouped into one colour – meaning it is not clear where these new spaces are to be provided.

Other comments in relation to its detail:

- In criteria 1(h)(ii), what allowance is there for the Womenswold area to regularly flood?
- In criteria 3, who are Canterbury City Council’s partners? Sustainability is important to the PC, how will the CCC ensure the funding of life-time maintenance of biodiversity e.g. at Stodmarsh? As written, this is more of an aspiration than a development management policy.
- In criteria 4, Biodiversity Opportunity Areas and Nature Recovery Networks are important to the PC. The inter-connectivity of existing hedgerows and woodland must be maintained. Suggest “will need to” is replaced with “must”. The PC welcome 20% biodiversity net gain but note it is double what is required under the Environment Act 2021. The PC hope this requirement is fully justified.
- In criteria 5, the PC would like to know what the reasoning is for the minimum figure of 300 homes? This seems an arbitrary figure and it would be better for this requirement to be linked to existing thresholds such as major development.
- We believe the criteria 6 is too vague and does not provide clear requirements for developers to adhere to. What does ‘multifunctional’ mean in this context? What does ‘locally influenced ecological potential’ mean and is this comparable to ‘multi-benefit connections’ set out in policy criteria 2? The wording should be revised to provide clarity and set out requirements in plain English.
- In criteria 8, the use of the word ‘Explore’ is too weak an expression. ‘Promote’ would be more appropriate.

In the supporting text, at paragraph 1.8 it needs to be acknowledged that the needs of nature and residents may conflict, especially in areas of open space. The supporting text would also benefit from guidance on how biodiversity net gain can be achieved.

In paragraph 1.9, as this is a Local Plan, the start of the sentence to be reworded to ‘As elsewhere in this country, biodiversity has been declining across our district...’.

In paragraph 1.11, The Green Infrastructure Strategy (2019) is welcomed but the PC are concerned that it not being enforced by the Council. What additional levers are available to improve the District’s green spaces? In addition, the acquiescence to take mitigation money before aiming to maximise biodiversity net gain within new development is considered by the PC to be unacceptable if 20% net gain is to be attained.

Policy SS2: Sustainable design strategy for the district

We **Tend to agree** with the proposed approach set out in this policy.

The PC are broadly content with this policy; however, we wish to note that whilst it is applicable for the whole District, the contribution of the railway to Chartham in promoting sustainable tourism must be considered by CCC when using the policy.

We do have concern over the seemingly arbitrary 300 dwelling threshold used in criteria 5. All new housing should have easy access to “*community hubs to reduce the need to travel for day-today services and facilities*” and the other facilities mentioned in the policy. Similarly, masterplanning, local consultation and design codes need to still be used for larger developments smaller than 300 dwellings.

The policy should make reference to minimum national space standards both for new development and for adaption of existing development so as not to provide inadequate living standards for future occupiers. This is a requirement in other policies such as DM11, however the PC believe that it is worth reiterating the need for the design and provision of adequate standards of living conditions internally and externally in all forms of development.

Policy SS3: Development strategy for the district

We **Strongly disagree** with the proposed approach set out in this policy.

The PC would like to know how CCC intend on controlling industrial development and sprawl along the A28 within

Chartham parish, as there are currently no relevant allocations in the plan or supporting text that refers to it, and as it is contrary to the Chartham Parish Design Statement.

It is also noted that St. Augustine's is not considered as a separate settlement to Chartham. If the site identified in Policy R8 is developed, St. Augustine's will effectively merge with the centre of Chartham which the PC see as regrettable.

Protection for hamlets and villages mentioned in R28 1(a) should afford protection to Chartham Hatch is not included.

What is meant by 'comparison retail use'?

Policy SS4: Movement and transportation strategy for the district

We **Strongly disagree** with the proposed approach set out in this policy.

The PC find the segmenting of the City into zones as difficult to support in criteria 2 and needs significant reconsideration. The zoning of the City is dependent on changing transport practices. One factor that may cause difficulties is an ageing population, with limited ability to use cycling & pedestrian modes of transport. The ONS predicts a greater proportion of the elderly and very elderly. The emerging Local Plan does not appear to cater for this demographic.

In criteria 2(g) the PC are extremely concerned about the impact of the South – West Canterbury Link Road as the proposed road runs through and adjacent to Site C7. This includes an area designated as an ecology mitigation zone. Although site C7 is currently rural arable land, it will be classed as available for housing as Thanington is absorbed within Canterbury city.

In criteria 5, if the transport hierarchy is to be meaningful, 'should' should be changed to 'must'.

Restrictions on movement for everyday journeys, and reduced parking provision, may discourage visitors travelling to Canterbury. This could adversely impact on the local economy.

There is concern that this scheme will impact on rural areas, with an increased number of vehicles trying to avoid ANPR cameras actually increasing, not reducing, traffic movements. Rural "rat runs" will be even more prevalent.

Some residents consider the expense of the Eastern Movement Corridor likely to be unaffordable, even when supported by elevated housing targets.

Policy SS5: Infrastructure strategy for the district

We **Tend to agree** with the proposed approach set out in this policy.

In Paragraph 1.25 of the supporting text, in 2019/20, sewer collapses and rising main bursts in Chartham trebled (and doubled in Canterbury). Chartham also had a high number of internal sewer flooding within properties. Waste water treatment in Chartham currently serves many houses. Drainage & Wastewater Management Plans (DWMP) are essential. The PC agree with the approach of the policy by CCC must ensure that it is sufficient to bring forward the required infrastructure to protect against the above. The PC would like infrastructure to be secured and in place prior to development commencing.

Policy C5: South West Canterbury

We **Tend to disagree** with the proposed approach set out in this policy.

We have concerns with the cumulative impact of these developments of nearly 3000 houses with the existing sites in particular SP1, criteria 11 of SP3 of the 2017 Local Plan as well as 4000 Mountfield Park.

In paragraph 2.9 of the supporting text, the PC support this initiative, but is conscious that the Cockerling Road development currently under construction has damaged green corridors.

Policy C7: Land to the north of Hollow Lane

We **Tend to disagree** with the proposed approach set out in this policy.

In criteria 3(f), this protection has not been achieved by the emerging Local Plan. The area due to be reserved for wildlife mitigation translocation from other sites is to be traversed by the proposed link road.

In criteria 3(g), the PC has concerns that this will be insufficient, in view of the proximity of the proposed development.

Policy C8: Milton Manor House

We **Strongly disagree** with the proposed approach set out in this policy.

The site is outside of the urban boundary as marked in the 2017 Local Plan. We repeat a request to identify new additions to the city as this draft fails to do so.

It provides a highly visible wooded link between the River Stour and Larkey Valley Wood at the gateway to Canterbury. The proposed development is likely to have severe landscape, biodiversity and traffic effects which cumulatively will impact upon Chartham parish. There are problems with the CCC constraints map at this location with 2 non-related developments showing up.

In criteria 3(d), the PC would like to know how connectivity will be maintained? This policy supports cycling and walking links to Larkey Valley Wood and between the Public Right of Way & “village green” on Cockerling Road site. It is a concern that additional pedestrian traffic will occur on the SSSI and therefore the PC can't support the policy. There is no explicit policy to protect SSSIs (although SACs are protected).

Policy C9: Land to the North of Cockerling Road

We **Strongly disagree** with the proposed approach set out in this policy.

The PC note that previous application CA/21/01621 for 28 dwellings on the site was made by a promoter who seems to have been actively involved with many sites in South West Canterbury. The PC made a representation on this application, raising concerns about the additional development on the wider Cockerling Farm, particularly as the true impacts following the development of CA/17/00519 for 400 dwellings are not yet known. Application CA/21/01621 was subsequently withdrawn.

This new allocation for 36 dwellings will increase the number to above the allocated number for SP11 as per the 2017 Local Plan

Considering the approval of CA/17/00519 for 400 dwellings on the wider site, the new allocation will take the number of dwellings in the immediate area to 436. Natural England require consultation for developments over 400 dwellings and therefore they must be consulted on any application on the site allocated in Policy C9, as the cumulative impacts must be considered.

Policy C24: Land to the south of Sturry Road

We **Tend to agree** with the proposed approach set out in this policy.

The policy should state the land area of the site for greater clarity.

It is important to note that the site is also allocated for the delivery of a strategic wetland as part of the Canterbury Nutrient Mitigation Strategy. The strategic wetland isn't marked on the strategic objectives map at p7 and is hard to identify on the interactive planning map.

Policy R2: Rural Service Centres

We **Tend to disagree** with the proposed approach set out in this policy.

This should be a district wide policy, not hidden away amongst the site allocations.

Criteria 2(a) is potentially too restrictive and may be best incorporated into Policy DS12.

Policy R7: Chartham

We **Strongly disagree** with the proposed approach set out in this policy.

Within the policy, there is no need to continually refer to other policies within the text as the Development Plan should always be read as a whole. We would make the following comments on the wording of the policy:

- Criterion (1) is too long-winded and confusing. the first part of it is unnecessary and should be removed. It should simply state *“Site R8 is allocated for around 170 homes and Site R9 is allocated for around 1,480sqm of commercial or business space”*.
- Criterion (2) should also be simplified to state *“Between 2020 and 2045 the neighbourhood plan housing requirement figure for Chartham Parish is 50 dwellings.”*
- Criterion (3) sets out key infrastructure requirements. Whilst welcomed the policy as written is aspirational, too vague, and lacks specificity. The policy needs to be amended to specify how and where the infrastructure will come forward.

Chartham residents welcome the notion of green gaps set out in criteria 3(d) to protect the individuality and uniqueness of communities. However, it is queried whether the proposed policy protection will be stronger for these spaces than AONB or SSSI areas, which have gaps in protection allowing development in some instances.

AECOM have prepared a report on settlement boundaries for the PC in the preparation of the Neighbourhood Plan. The PC would like clarity as to why CCC have used the outside of roads as the boundaries to the settlements. This is not conventional, and we urge CCC to use the inside of roads as the boundaries. There are some fundamental differences between CCC’s settlement boundaries and AECOM’s which are discussed below:

- It is unclear why CCC have omitted the dwellings on Hatch Lane just north of Ashford Road as they are part of Chartham village.
- CCC have included the KSB/Tobins Motors, CT4 7HX within the settlement boundaries, however the eastern part of the site is outside of it. This part of the site is in fact outside of the flood zone and could contribute up to 5 houses on previously development land. The PC ask that the boundaries are amended to include it.
- Memorial Field should not be included in the settlement boundaries as it is not surrounded by development on its eastern border. The built-up area ends at Station Road.
- CCC have included the agricultural site on Rattington Street. The PC believe that this should be omitted as it is not surrounded by development to the east, west and south.
- The PC object to the allocation on land west of Rattington Street set out in Policy R8, for the reasons discussed later in this letter. The PC would therefore like allocation R8 to be omitted from the settlement boundaries.
- It is unclear why CCC have included the site on the inside corner of the junction between Cockering Road and The Downs, as it doesn’t form part of a residential curtilage and is instead a footway through a wooded area. This should be omitted from the boundaries.
- The PC would like to see the land to the rear of Chartham Primary School and The Firs Nursery omitted from the settlement boundaries as it is not surrounded by development to the south, east and west.

- CCC’s settlement boundaries have not included the whole of the curtilage of 2 Shalmsford Street on the southern side of Shalmsford Street. The boundary should be extended to include this.
- CCC have included the play area to the east of Kingfisher Place, however it isn’t surrounded by development to the north or east and should be omitted from the boundaries.
- CCC have not included the whole of the curtilages of 41, 43 and 45 Shalmsford Street in the settlement boundaries, this should be updated.
- It is unclear why CCC have included the land to the south of Chartham Paper Mill within the settlement boundaries as it is mainly woodland.

The PC believe that it is important for the LP and NP settlement boundaries to align to enable the development management policies contained within both plans to be used more effectively. The PC requests that CCC utilise the boundaries as set out in the AECOM report which is available on our website here:

<https://charthamnp.com/index.php/documents/category/7-evidence-base>

On the maps, the purple arrows indicating “opportunities to improve cycling/walking access and safety” ignores the highly hazardous route along Rattington Street linking St Augustine’s with the historic centre of Chartham and onwards to the railway station. In addition, one Existing Convenience Retail site is excluded on the map which is The Shop on the Green on Station Road. The PC would like both of these to be included on the map as it is important that the individual settlements are connected.

Paragraph 5.14 of the supporting text claims that Chartham benefits from good bus connections to both areas. This is incorrect. Chartham, and the settlements within the parish, do not have regular bus connections at all times. Services are infrequent during weekdays and non-existent at weekends. Within Chartham village, there are no services later in the day and none on Sundays. Improved services are much demanded by the residents of Chartham, and the PC would like to see some policy support for this, and paragraph 5.14 and the rural settlement study amended to better reflect the real conditions.

Residents strongly support the extension of footpaths and cycle paths, both within the parish and connecting to the wider district.

Notwithstanding the above, the PC believe that the site for 170 dwellings proposed in R8, is not suitable for allocation within the Local Plan. The PC commissioned AECOM to undertake a review of sites that could be brought forward in the Neighbourhood Plan and they determined that the site was not be suitable.

Policy R8: Land to the west of Rattington Street

We **Strongly disagree** with the proposed approach set out in this policy.

Regarding policy itself:

- Criteria 1(a), the proposed 170 houses is too many for the area of the site. Constructing 170 houses would require a very different, “town house” design style & configuration if green space is to be preserved. The number of dwellings proposed should be reviewed.
- Criteria 1(a)(i), there are instances elsewhere of lower affordable housing numbers being accepted by CCC. How will CCC ensure that developments provide a minimum of 30% affordable housing?
- Criteria 1(b) The PC are concerned that the site is not suitable for the provision of local shopping facilities given that they would be set away from existing development in Shalmsford Street, Chartham and St Augustine’s.
- Criteria 1(c)(ii) Fresh water & sewerage infrastructure across the district all need to be improved and in place prior to occupation of new houses. The Broad Oak Reservoir scheme for freshwater provision should be operational prior to proposed housing developments – but this has an extended timeframe. St Augustine’s nearby continues to have intermittent problems with fresh water due to pump failures.
- Criteria 4(b) the transport assessment must also take account of increased pollution from slow-moving vehicles. The PC has concerned that traffic implications and site access points have not been properly thought through.

- The site is not within 400m of a bus stop with more than two buses per hour.

The narrowness of country lanes (such as Rattington Street) is a cause for concern. Most of Rattington Street has no footpath or cycle path and is already a frequently used, but hazardous, route for pedestrians & cyclists linking St. Augustine's to the older part of the village and the railway station. Extensive construction of housing on site R8 would hinder a safe pedestrian route from St Augustine's to the railway station being constructed. Any proposed access to the R8 site from Bakers Lane would be inadequate and potentially dangerous to users – motor vehicles, pedestrians and cyclists due to its location on a hill and close to a bend.

The existing bottlenecks within the village (such as the lower part of Rattington Street and the level crossing) restrict traffic movements and any additional traffic from this development would further aggravate this. Furthermore, Shalmsford Street already has major issues with congestion – made significantly worse by limited parking – and additional traffic movements would increase the load. This is particularly problematic due to the location of the primary school, and the frequent excessive speed of vehicles along this road. Any traffic related to the proposed site using Cockering Road will link up to Milton Manor Road and the access to the Cockering Farm development.

The proposed development for around 170 dwellings will likely generate many vehicles movements in each of the peak hour periods, mainly through the village to the A28 (either along Shalmsford Street or Station Road), along roads of substandard width and reduced forward visibility. Shalmsford road is a locally know accident spot and Crashmap data shows 7 recorded incidents in 5 years. As locals we would suggest this is related to the poor westerly visibility which is restricted by third party ownership and cannot easily be resolved.

The proposed commercial/community use could in itself be a generator of significant traffic depending upon the final occupier further exacerbating the issue. Existing footways are of substandard width and the risk of vehicle/pedestrian conflict would be increased as a result of these proposals. Although bus stops are relatively close by the infrequency of the service, which is less than hourly in all Chartham parish settlements (and stop before 6pm towards Canterbury and before 7pm towards Ashford), which is not sufficient to be an attractive alternative to the use of a car.

There are fundamental safety issues relating to the allocation which must be addressed before the Parish can lend its support. It is essential these matters are fully considered as we cannot afford to have a site allocated without a clear understanding as to how matters of safety can be overcome, if this is even possible, especially at the A28 junctions. Without such information the Parish has no option but to object to this draft allocation as these matters cannot be left until application stage.

Improvements to bus services would be necessary to reduce the number of car journeys required for shopping etc.

Any developer would need to demonstrate a net gain for biodiversity, but such commitments may be of little worth in the context of unavoidable harm to the Ancient Woodland and wildlife corridors. Habitat loss may be unavoidable, and it would be challenging to ensure that a green corridor is provided that links the site with other green spaces. The PC are also concerned that occupants of the development would use the Ancient Woodland for leisure and recreation, furthering the harm to ecology, which is an unacceptable impact that would likely be unaccounted for in the determination of an application. It is essential that a full wildlife & biodiversity survey is undertaken as part of any application on the site, and this should be included as a policy requirement.

Developing R8 would put increased pressure on the local primary schools which are already close to capacity. There is concern as to how the school needs of the families within this development will be catered for. Whilst provision of new primary schools is to be welcomed, the phased introduction of these (such as those planned in the current Thanington development) adds pressure to surrounding schools such as Chartham, which is already having to take pupils from Thanington.

The provision of a “District SEND school” in Whitstable clearly increases provision of a needed service, but this is at odds with the current best practice of SEND provision mostly within mainstream schools. Currently SEND schools in Canterbury have discrete specialisms and this proposal appears to be at odds with that provision requiring a significant restructuring of the SEND provision. See: “South Whitstable – strategic development area, s3.9” There would also be increased pressure on local doctor surgeries which are already at (or beyond) capacity. This has been exacerbated by the closure of the Chilham Surgery. Provision for the new residents of proposed site R8 is a major concern, and development cannot result in any further pressure on infrastructure. The existing facilities would not support the proposed development and therefore there is no capacity to support the proposed

development.

Should the allocation proceed, there is an imperative that all infrastructure be provided &/or its capacity increased prior to the occupation of new houses, and the policy criteria 1(c)(iii) should be amended to reflect this.

Although it is noted that the area of existing ancient woodland is earmarked to be protected, the Ancient Woodland would be significantly compromised by the erection of houses on this site, even if protected during the construction phase. Any open space buffer would be insufficient to protect the wildlife in the woodland from incursion by humans, domestic animals etc. Wildlife corridors with adjacent areas would be destroyed. There would be inevitable light, noise & dust pollution from the housing & traffic movements, in addition to disruption during the construction phase.

There is concern that hedgerows & trees across the district could be lost if not protected, especially the ones bordering Rattington Street should the R8 development go ahead. The use of Tree Preservation Orders has been suggested.

As it is in a source protection zone, the development proposed in policy R8 would reduce the ability for Chartham to soak up surface-water run-off, increasing the amount of pollutants entering the river network to Stodmarsh Nature Reserve.

Paragraph 1.15 states that “Land to the West of Rattington Street (Policy R8) will provide a development in a central area of Chartham”. Referring to the Rattington Street site as a “central area of Chartham” arises from the merging in the Local Plan of the historic part of Chartham with St Augustine’s. This is not how this site is considered by local residents, who value this rural green buffer between the two settlements. Site R8 would have a significant impact on the individuality of distinct areas that currently exist in the parish.

The north eastern section of the site abuts the Chartham Conservation Area. One of its key characteristics is the proximity of that built development within the conservation area to open countryside in that part of the conservation area which is located on the south side of the River Stour. The conservation area is currently drawn tightly around the historic nucleus of the village. The development of the site for housing would impact adversely upon the setting of the conservation area and would fail to meet the statutory requirement of preserving or enhancing the character and appearance of the conservation area.

There is concern regarding the proposed development of onsite water treatment sites in “large” developments, such as the site within Policy R8, with the risk of disease carrying mosquitos in the warming climate of East Kent. Proper investment in sewage management is needed in advance of further housing development.

The Local Plan does not make any reference to the quality of the agricultural land that will be lost by the proposed development in Policy R8. Much farmland in the Canterbury area has been lost to development already, including high grade agricultural land. There is concern as to how the general population will be fed in the future, with greater reliance on imported food which is not sustainable or compatible with carbon targets.

The PC has a preferred policy to support development in brownfield sites. The emerging Local Plan has been drawn up prior to the Chartham Paper Mill going into administration. The Paper Mill site should now be considered as a potential brownfield site for allocation in the Local Plan. The Chartham Neighbourhood Plan Steering Group, with its professional consultants, are assessing this site. However, whilst it is recognised that the site has some development constraints, it is well located within the existing settlement boundary and existing public transport links and community facilities. The PC would welcome a closer working relationship with CCC to bring the brownfield site back into sympathetic and well-designed uses which would be supported by the local community, consistent with the LP objectives set out in para 5.17. Many parishioners would prefer mixed commercial and housing redevelopment on this brownfield site in preference to developing upon greenfield sites within the village and avoid the prominent site becoming derelict and an eyesore, playing no productive use in the future of Chartham. CCC informed the PC in their Briefing Session on the 2nd November 2022 that the district has limited brownfield opportunities, however the Paper Mill would provide an ideal option to deliver commercial and residential development on a sustainable site.

The site is located within the River Stour catchment area. We are aware of the constraints imposed by the impact of nutrients from inadequately treated human waste upon the Stodmarsh International Nature Reserve. That has resulted in an embargo upon housing development which is unable to achieve nutrient neutrality.

The PC are unable to support the proposed allocation at Land West of Rattington Street and would urge CCC to engage with the PC so that a comprehensive strategy can be prepared to effectively plan for the area through the emerging local and neighbourhood plan with a focus on the use of brownfield development.

Policy R9: Land at Ashford Road

We **Tend to disagree** with the proposed approach set out in this policy.

This is a small site proposed within Chartham near to an area where there are available business units for rent. There is no planning history for this site, yet it has been advertised for a while as a commercial development site by a promoter who has been active in this area. It is not strategically important enough to be introduced as Policy within the Local Plan and should go through the normal planning processes of a developed plan.

It is in the countryside outside a defined settlement. It extends a non-allocated business area (see DS8) with high light pollution, poor screening and inadequate active transport connectivity to the majority of our settlements.

This type of development has been of concern to our parishioners since the writing of the Chartham Parish Design Statement 2005 and is contrary to development management guidance for both H1 and F7 (which it abuts and affects). On initial consideration it seems to fall short of the requirements of Policy R28 - Countryside.

Policy R10: Land at Ashford Road

We **Strongly disagree** with the proposed approach set out in this policy.

The site is within the countryside, outside of a defined settlement. It is within a flood plain and on a mineral extraction site with conditions to be restored in the original state. It is also near a non-designated employment area with units for rent.

Several applications have been made on the site, including CA/77/00981 which was a landscaping scheme associated with the approval of CA/81/1063, which specifically relates to an extension of time for the concrete plant which had a condition:

'vi) the development hereby permitted including foundations, bases and hardstandings shall be completely removed and the site deep cultivated, top soiled and sown with grass to the satisfaction of the County Planning Authority by 31st December 2004 or the cessation of the production of aggregates from Chartham quarry consent CA// 89/798 whichever the sooner unless otherwise approved by the county planning authority and the planning permission in respect of see a 811036 shall be read accordingly. The grounds for the imposition of the conditions iii) and iv) remain unchanged'

CA/11/001479 was also approved for the retention of concrete batching plant and extension of landscape bund granted 2011. The requirements to reinstate the site continued. This has considerable information and constraints which are relevant to why the site should not be converted to employment space.

Kent County Council (minerals) commented on CA/17/01519 for the retention of concrete batching plant according to CA/11/001479, which was withdrawn. They state:

'Whilst the vast majority of the land at Milton / Chartham Quarry has been restored, the concrete batching plant and former plant site areas and an area of land used for waste storage have not.'

KCC Planning Applications Group is encouraging the Brett Group to complete the restoration of the former plant site area (excluding the batching plant site which is now subject to its own restoration requirements under planning permission CA/11/01479 and is a matter for CCC) as soon as reasonably possible.

The application site should not be regarded as a brownfield site as the extant mineral permissions require both the concrete batching plant and former plant site areas to be restored to grassland.

The impact of the proposed development should be assessed against the required final restored landform and not the current (unrestored) one.

It appears that the applicant has not complied with condition 6 of planning permission CA/11/01479 which required tree / shrub planting to screen parts of the site to be carried out in the planting season after the planning permission was issued.'

In these circumstances, the PC firmly believe that the site should not be allocated. Chartham residents have shown concern about the loss of the countryside between Thanington, which is now defined as urban and Chartham.

In the policy, there is no definition of the exact area of employment space to be developed.

Policy R21: Local Service Centres

We **Strongly disagree** with the proposed approach set out in this policy.

Although Chartham is not a Local Service Centre, the PC are not satisfied by the way the policy is presented.

It should be put as a district-wide policy not hidden amongst site allocations.

In addition, the PC ask that for completeness, the Council provides a policy for villages and hamlets.

Policy R22: Land west of Cooting Lane and south of Station Road

We **Strongly disagree** with the proposed approach set out in this policy.

Although a beautifully designed, sustainable new city might provide an efficient way to reduce piecemeal environmental impacts on the entire district, Chartham residents question the number of dwellings chosen for this local plan which is close to the numbers of the least preferred option in initial consultation. They have also commented that "the strategy to build houses at Cooting Farm is clearly flawed and ill conceived". It is understood that a large proportion of the area is not available for development. The PC therefore question whether it should be included in the Local Plan.

Policy R28: Countryside protection

We **Tend to agree** with the proposed approach set out in this policy.

The PC welcome this approach to development within the countryside, particularly given their preference for development on brownfield sites.

However, there is no policy for villages and hamlets.

We believe that this should be put into section 6. District-Wide policies but ask that the protection for rural lanes be added either here or in Rural lanes which are of landscape amenity, nature conservation, historic or archaeological importance will be protected from changes and management practises which would damage their character, and where possible be enhanced.

CCC have made constraints in C6, C12, C13 to protect the nature of rural lanes

Policy DS4: Rural housing

We **Tend to agree** with the proposed approach set out in this policy.

The PC would like to see an additional policy criterion which states that:

'Proposals for development involving the loss of rural worker accommodation will only be permitted where:

(a) There is clear evidence to demonstrate that the existing accommodation is no longer needed; and

- (b) *The use is no longer viable and has been actively marketed as 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 rural accommodation'*

If a change of use to normal 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.

The policy should also include consideration given to landscape character area guidance, AONB, biodiversity, conflict with other policy, landscape management etc.

Care needs to be taken when reading criteria (a) – (g) in relation to rural exception sites. Sites previously considered unsuitable could potentially be considered suitable if they comply with the criteria. The wording is loose and in (f), careful consideration would need to be given to whether it is possible to form an appropriate mechanism for on-going management.

Policy DS6: Sustainable design

We **Tend to disagree** with the proposed approach set out in this policy.

The PC would like to see additional criteria with the following headings:

- 'To ensure 20% biodiversity net gain...'
- 'To prioritise active transport above vehicular...'
- 'To ensure that development integrates with the locality and provides benefits to existing residents...'

What justifies the decision to allow low density development within urban areas and rural service centres. With the amount of development in the countryside, the PC are concerned that the character and rural nature of the countryside will be diminished.

The PC are concerned that individual design codes and/or guides do not have sufficient power to ensure that development reflects local character. We are concerned that this avoids proper masterplanning or sustainability.

For criteria 5, there needs to be a demonstration of how the site is proposed to function at the outset. With access, infrastructure and layering of spatial plans. Specifically, how will footpaths and wildlife corridors be designed? What compromise will be made to ensure safety without destroying nocturnal species due to light pollution?

The PC believe that criteria 5(b) avoids requirements for baseline assessments, identification of whether the land requires an EIA, and local consultation to understand the locality. There should be a requirement for definition of access, identification of existing wildlife corridors and wishlines for active transport. There should be an expectation of definition of constraints of the site and cumulative impacts with other development. There should also be a consideration of transport, source protection zones, floodplains, topography, designing in biodiversity net gain and climate resilience from the outset. There should also be a requirement for the design of SuDS, location of sewage treatment plants and electricity substations.

Policy DS8: Business and employment areas

We **Tend to agree** with the proposed approach set out in this policy.

The PC would like to see another criteria that supports the creation and operation of home-based businesses where there is no unacceptable impact on the amenities of the occupants of nearby properties.

The PC would also like to see criteria 6 extended so that 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.

Proposals involving the loss of high quality office space in the district should normally be refused.

Policy DS9: Education and associated development

We **Tend to disagree** with the proposed approach set out in this policy.

Chartham parish has three schools including two independent schools (one being a SEN school). The policy fails to take account of the viability of non-urban locations for education and is overly prescriptive.

Policy DS10: Town centres and community facilities

We **Tend to disagree** with the proposed approach set out in this policy.

Chartham is categorised as a 'Rural Service Centre' in the settlement hierarchy (page 13) but is designated as a 'Village Centre' in the hierarchy outlined in DS10. It should not be designated as both.

For criteria 5, the PC would like to see a requirement for consultation, local need, and assessments of landscape, heritage assets and conservation area impacts. It should also require development to accord with other policies within the plan.

Criteria 5 also states that development should "contribute positively to the street scene with active frontages and high quality public realm". Due to the topography of the area, without careful planning this insensitive approach has the potential to destroy the sense of place of Chartham.

Criteria 6 has the potential to go against market forces, preventing an organic evolution of services and community facilities over the parish in places that they are wanted and which are truly viable which locals and visitors will make a detour for.

Policy DS11: Tourism development

We **Tend to agree** with the proposed approach set out in this policy.

Pilgrimage is a part of the history of Canterbury District and yet the word is not mentioned once. This needs addressing.

The PC would like a new criterion to be included which states:

"The council will seek to protect the best and most versatile agricultural land for the longer term. Any development on agricultural land will need to be supported by an Agricultural Land Classification Assessment. Development on unallocated agricultural land that would result in the significant loss of Grades 1, 2 and 3a agricultural land will only be permitted where it can be demonstrated to be necessary to meet a local housing, business or community need and a suitable site within urban areas and settlement boundaries or on poorer quality land cannot be identified".

Criteria 5 mentions that new sites will be subject to a legal agreement or similar mechanism to ensure the site remains in tourism use. However, it fails to require a demonstration of need or business potential.

The PC ask CCC to consider whether Policy DS11 can be linked with Policy R28. Criteria 6 also needs further consideration.

Policy DS12: Rural Economy

We **Tend to disagree** with the proposed approach set out in this policy.

Although there are constraints for agricultural development there are not for the other industries mentioned.

Criteria 2(a) is contrary to landscape management guidance for some areas in the Canterbury Landscape Character Assessment and Biodiversity Appraisal Oct 2020. One example of relevance to Chartham is for H1:

- Seek to enhance the setting of Chartham Hatch and areas of larger farm building, including opportunities for further woodland planting to help integrate these areas within the landscape.
- Conserve and respect the character of historic built form and their association with traditional farming practices by resisting further agricultural intensification.

Policy DS13: Movement hierarchy

We **Tend to agree** with the proposed approach set out in this policy.

We have identified a typo in criteria 1 which states that “Proposals for new development shall explain how they are...”. This should be amended to read “Proposals for new development must explain how they are...”.

Policy DS14: Active and sustainable travel

We **Tend to disagree** with the proposed approach set out in this policy.

Although much of this policy is of merit, we believe that there are changes that need to be made.

Electric vehicle (including cycles) charging points should be designed into all new development. Cycle parking should also be provided at public transport stations and community hubs.

To encourage modal shift and true active connectivity, highway safety audits 2 and 3 should be carried out for the access points as part of the masterplan for all allocated sites.

New developments must help mitigate against identified existing problems. In Chartham parish, for example, no safe route for walking has been identified from St Augustine’s settlement to Chartham school.

Policy DS15: Highways and parking

We **Tend to disagree** with the proposed approach set out in this policy.

In criteria 3, a “significant volume of traffic” should be explained further to provide greater clarity for developers.

Criteria 3 should also include requirements for safe access for pedestrians and cyclists to new development on rural primary network roads such as the A28, and even Milton Manor road. The policy should also provide standards for safe access to the site for HGVs such as waste, delivery and construction vehicles for the lifetime of the site including the construction phase.

Parking for bicycles and electric bicycles (including charging provision for electric bicycles) should be included in the policy.

The PC ask that Policy T16 in the adopted Local Plan is repeated in this policy. We also ask that the ‘Kent Downs AONB Rural Street and Lanes: A Design Handbook’ is adopted for rural roads and streets as an SPD as it fills a gap that is not covered elsewhere.

Policy DS16: Air quality

We **Tend to disagree** with the proposed approach set out in this policy.

The PC would like to see sensitive receptors incorporated into the policy.

Policy DS18: Habitats and landscapes of national importance

We **Tend to agree** with the proposed approach set out in this policy.

- Criteria 6, the text needs a minor amendment. A comma needs to be inserted after “newts” to provide greater clarity.
- Criteria 7(b) is a high priority. Appropriate mechanisms must indicate which areas are being mitigated for within a particular site (to avoid double-counting). e.g. reptiles from Stanley House in area for Saxon Fields with proposed road through the centre”. In addition, how long will the mitigation be required to last? Compensation measures such as providing a warden for a few years, would not last the lifetime of the development and would be inadequate.

Policy DS19: Habitats, landscapes and sites of local importance

We **Tend to agree** with the proposed approach set out in this policy.

- Criteria 3 - we ask that the Stour Valley Local Landscape designation, as defined on the policies map, be extended to include Character Area F7 (see Canterbury Landscape Character Assessment and Biodiversity Appraisal October 2020). This area is not included in the Canterbury City AHLV Local Landscape review nor the Canterbury District Local Landscape Designations Review and Recommendations, but nevertheless justifies protection. This would be in accordance with the findings of the landscape LCA desk review which requires, “*conservation of the local distinctiveness of historic building and their rural floodplain setting, particularly within the Chartham Conservation Area...conserve the undeveloped character of the landscape, ensuring it continues to play a role in providing a setting to Chartham and an approach to Canterbury City*”.
- Criteria 4(d), the operations need a more specific definition as it could currently be widely interpreted to include roads and bridges.
- Criteria 6, it would be helpful if all existing sites which this apply to are indicated on the policies map. For example, there is concern about the mitigation site on Cockerling Road affected by the Southwest Link Road.

Policy DS20: Flood risk and sustainable drainage

We **Tend to agree** with the proposed approach set out in this policy.

- Criteria 2 is now relevant to the Chartham Paper Mill site, where manufacturing operations ceased after the publication of the draft Local Plan. For Criteria 3, it is possible that the Chartham Paper Mill site could make use of the Exception Test (demonstrating that the benefits of the development to the community outweigh the flood risk) but flood mitigation works would be necessary.
- Criteria 4, it is debatable whether SuDS are suitable in a flood plain area. This should be revisited by CCC to ensure that they are satisfied with this.
- Criteria 5, source protection zones need to be identified on the Constraints Map as development, SuDs & local water treatment plants have the potential to pollute drinking water either through run-off to the River Stour or into aquifers.

Policy DS21: Supporting biodiversity recovery

We **Strongly disagree** with the proposed approach set out in this policy.

- Criteria 1(a), elements of this policy are confusing. Why is the 20% minimum restricted to developments over 300 homes? What is the rationale for this number of homes? The PC believe that this should also be a requirement for smaller development proposals. A more suitable trigger would be all major development.

For example, the proposed 170 homes on site R8 would have a major impact. It should take into account the cumulative impact of numerous “windfall sites”. We ask that the policy is amended to be a requirement for smaller proposals.

- Criteria 1(d) uses very broad terms and needs further explanation. The PC would like the terms to be described in greater detail.
- Criteria 1(g) a distinction is required between green corridors and pedestrian routes (including Public Rights of Way). How would “multifunctional” use work? For example, active transport corridors may require adequate lighting (to boost social confidence) which would be destructive to pre-existing native species.
- Criteria 1(h) Biodiversity Opportunity Areas need to take into account that nature must be “designed in” from the outset of development proposals.
- Criteria 2 rather than stating “non-major development” the PC believe that it should just refer to being proportionate to the development. Retaining tree cover and hedgerows for example, should take into account of the history of the site, and the pre-existing blue and green infrastructure.
- Criteria 3 is welcomed by the PC but should be given greater prominence in the Local Plan as it needs to be considered at the outset of any development. Criteria 3(g) would be better being linked to (b)(iii) off-site net gain provision within the district, for greater clarity.
- Criteria 3(c) excessively weakens the policy. It needs to be satisfied that the National Design Codes are satisfied as a minimum.
- Criteria 3(e), the National Design Codes and Design Guide should be included.

This section lacks important reference documents, such as the National Design Guide & Codes. Nature must be planned into any development at the outset to achieve biodiversity net gain. This requires more than the measures listed in the draft Local Plan.

A baseline review conducted several times per year will identify flora & fauna which might not be considered otherwise. A baseline assessment should be required for all development.

The PC believes that ideally biodiversity net gain is introduced into masterplanning and viability assessments. CCC should produce a biodiversity net gain paper explaining the approach to using the policy to ensure net gain. This document should form part of the evidence base for the emerging Local Plan.

The PC would like to know what use CCC will make of Natural Capital in viability assessments to assess harm.

Policy DS24: Publicly accessible open space and sports

We **Tend to disagree** with the proposed approach set out in this policy.

The PC are concerned that criteria 8 is too restrictive and misses all sorts of public open space secured by condition and section 106 agreements. We are also concerned that the policy undermines paragraph 6.58.

Criteria 9 seeks to refuse the loss of publicly accessible open spaces. How are these open spaces identified?

Policy DM1: Conversion of existing rural buildings

We **Tend to agree** with the proposed approach set out in this policy.

The PC would like relevant policies that refer to constraints and other material considerations to be cross referenced, stating that development proposals must accord with them.

Policy DM3: Housing in multiple occupation (HMOs)

We **Tend to disagree** with the proposed approach set out in this policy.

The policy fails to reflect the reality that many family homes are becoming multigenerational HMOs. This needs to be taken into account within rural settlements such as Chartham where parking is becoming an issue as a result.

With criteria 2, the PC disagree that just because an area has a high proportion of HMOs, that further HMOs should be allowed in these locations. The PC believe that clusters of HMOs could be detrimental to the character of certain areas. If CCC cannot justify this, the criteria should be removed.

This policy, as worded, fails to require HMOs to provide accommodation which is suitable for occupation and meets the national space standards.

Policy DM4: Reducing waste and supporting the circular economy

We **Tend to agree** with the proposed approach set out in this policy.

The PC would like to know how this management will be funded.

Policy DM5: Parking design

We **Tend to agree** with the proposed approach set out in this policy.

The PC agree that in criteria (i) “consider” is an inadequate term. The PC would like to see this amended to “identify initial parking controls as part of an estate management document, including ensuring that visitor parking spaces do not become overflow parking spaces for residents. Provide potential for flexibility and change of use of these areas as modes of transport change”.

Policy DM7: Health and crime impact assessments

We **Tend to agree** with the proposed approach set out in this policy.

How will CCC identify the risk associated with crime or security? The PC would like to see this be part of a consultative scoping mechanism. Avoidance of crime, ill health and danger needs to be designed in at an early stage and needs to be designed into development at the masterplanning stage.

Policy DM9: Advertisements

We **Strongly disagree** with the proposed approach set out in this policy.

The PC are concerned that the policy does not refer to advertisements in rural settings. There are consistent problems within Chartham on rural roads and some impacting on the AONB. The policy should be extended to meet the special needs of rural environments.

The PC ask that the ‘Kent Downs AONB Rural Street and Lanes: A Design Handbook’ is adopted for rural roads and streets as a supplementary planning document as it fills a gap that is not covered elsewhere.

Policy DM10: Residential annexes and ancillary accommodation

We **Tend to agree** with the proposed approach set out in this policy.

The PC would like to see the policy contain criteria relating to parking and waste requirements.

Policy DM11: Residential design

We **Tend to agree** with the proposed approach set out in this policy.

The one concern that the PC share is that they recently highlighted an application that was approved by CCC despite a failure to satisfy building regs. The PC would like CCC to consider whether it would be helpful to include a criterion which requires the developer to provide evidence that the proposed development has the capacity to satisfy building regs.

Policy DM12: Non-residential design

We **Tend to agree** with the proposed approach set out in this policy.

The PC would like to see a criterion that requires safe access of combined vehicles and active transport, including cycles.

Policy DM14: Flood risk

We **Tend to agree** with the proposed approach set out in this policy.

The PC are concerned that the policy does not read well. We would like to see criteria (e) split into two separate criteria.

Policy DM15: Sustainable drainage

We **Tend to agree** with the proposed approach set out in the policy.

The PC note that the policy needs to take account the problems of discharge into the ground in a source protection zone and currently needs to gain permission from the environment agency due problems of contamination of the eutrophic river Stour with nitrates and phosphates.

Policy DM17: Noise pollution and tranquillity

We **Tend to agree** with the proposed approach set out in the policy.

The PC would like to see some commentary on what the trigger is for a noise pollution assessment to be considered “appropriate”? How will noise pollution be mitigated for in the construction phase of a development? What levels of noise will require the developer to provide alternative accommodation for existing residents?

Policy DM18: Light pollution and dark skies

We **Tend to agree** with the proposed approach set out in the policy.

Because of the potential for biodiversity net loss due to lighting, lighting schemes should be designed into the development from the outset.

FINAL REMARKS

Should CCC have any queries about the content of this letter please do not hesitate to contact myself (details are at the top of this letter).

Yours sincerely,



Chenice Howard-Sparkes
Clerk to Chartham Parish Council