



Hillhurst Farm, Stone Street, Westenhanger, Hythe CT21 4HU

Tel: [REDACTED]

[REDACTED] [www.bloomfieldsltd.co.uk](http://www.bloomfieldsltd.co.uk)

**Canterbury Local Plan Focused Consultation Regulation 18  
Chartham Neighbourhood Plan Regulation 14 Consultation**

**Dual Consultation Response**

**Land to the east of Stour Road and Rattington Street, Chartham.**

**On behalf of Mr TR Dickson.**

**Prepared by:**

Ben Young BSc. (Hons) MA MRTPI

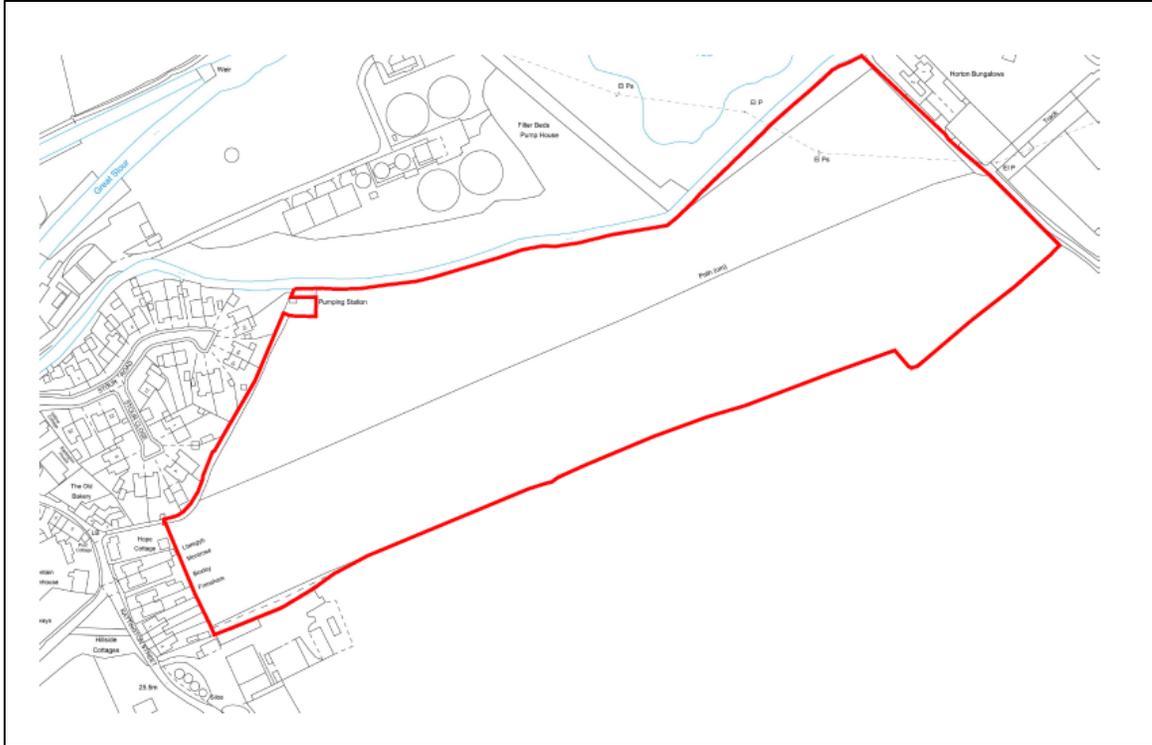
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DRAFTED BY	BY	09/09/2025
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## 1. Introduction

- 1.1. We are writing on behalf of our client, Mr TR Dickson, in response to the Canterbury District Local Plan (CDLP) Focused Consultation Regulation 18 and the Chartham Neighbourhood Plan (CNP) Regulation 14 Consultation. This is a dual response made against both consultations, as both the CDLP and CNP will form the Development Plan for the Chartham settlement.
- 1.2. In accordance with these consultations, this representation promotes the site known as Land to the east of Stour Road and Rattington Street, Chartham, as an omission site from both the CDLP and CNP, in addition to providing specific comments related to the individual consultation development plan documents.
- 1.3. The site is proposed for a residential-led development scheme that could form a natural extension to Chartham in the southern direction. The site provides obvious potential to be built-out alongside, or conjunction, with the Chartham Paper Mill site (*identified as Policy N31 within the Draft CDLP Focused Consultation September 2025*), as the site is not constrained, or it could be built-out independently. The site can provide for onsite Biodiversity Net Gain (BNG) and landscaping, in addition to meeting the requirements of other development management policies.
- 1.4. The site is owned by Mr TR Dickson and has the Land Registry Title Numbers K68020 and K707419. It comprises of a total site area of circa 7.23 hectares.
- 1.5. A plan showing the extent of the land subject to this submission is provided at Appendix 1 and an extract taken from it below.



**Figure 1: Site Location Plan (Not to scale)**

## 2. Site Description

- 2.1. Land to the east of Stour Road and Rattington Street, Chartham, herein known as ‘the site’ comprises of circa 7.23ha of arable farmland, located immediately to the south of the settlement boundary of Chartham. It is accessed from Cockering Road and Horton Farm Bungalows, directly to the east. Secondary access is also available from Rattington Street.
- 2.2. The site is located directly to the south of, and adjoining, the Chartham Paper Mill site, allocated for 165 residential units under CLP policy N31, and on the opposite side of the road to a site with a proposed allocation of 170 residential units, located on the west side of Rattington Street under CLP policy N32.

- 2.3. The site is bounded to the west by the existing residential development of Chartham which has formed around Stour Road and Stour Close, to the north by the River Stour and Chartham Paper Mill site, and it is located to the east of the linear development of Rattington Street.
- 2.4. Despite its close proximity to the River Stour, the site is not located in the floodplain and has no other constraints to development.

### **3. Planning History and Previous Local Plan**

- 3.1. The site was not promoted as part of this former SLAA exercise for Canterbury and it was not submitted as part of the call-for-sites undertaken as part of the Chartham Neighbourhood Plan, subsequently, this representation forms the first site promotion through the development plan process.
- 3.2. The site does not have any planning history.

### **4. Justification for the inclusion of the site in the future Development Plan**

- 4.1. In accordance with section 5 of the NPPF, the Local Planning Authority (LPA) is required to resource a land supply in their area to ensure the delivery of enough homes in perpetuity. In accordance with paragraph 61 of the NPPF, it is important that to support the Government's objective of significantly boosting the supply of homes, *'a sufficient amount and variety of land can come forward where it is needed'*.
- 4.2. Paragraph 83 of the NPPF promotes sustainable development in rural areas, by means of locating housing *"where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby"*.

- 4.3. The site is being promoted for residential purposes, and would include both market and affordable homes, with associated BNG and landscaping, and would form a natural extension to the Chartham Paper Mill site, without being in the flood zone.
- 4.4. Whilst indicative capacity is not proposed at this stage, it is envisaged that the site would be able to make an important contribution to the District housing land supply requirements. Due to the location of the site on the eastern edge of the village, development would likely be brought forward at a lower density to the adjoining Paper Mill site, so that a smoothly graded transition to the countryside could be achieved, in contrast to higher densities proposed on the Paper Mill. It would likely be similar to the proposed development site, N32, on the opposing side of Rattington Street which has an approximate density of 20 dwellings per hectare.
- 4.5. Although the final layout for any development would be subject to approval at planning application stage, the relationship with the adjoining Paper Mill site should not be ignored, with the site subject to this submission providing the opportunity for not only a standalone development, but potentially a development in conjunction with the paper mill site, which itself is largely constrained by flood zone.
- 4.6. Built development would likely be focused on the western parcel (title K707419) where it is closest to the existing village. This would likely include provision of affordable housing ensuring greater choice and options for housing for local people can be brought forward.
- 4.7. The size of the site would enable a master planned approach, if it was planned individually or as part of a combined site. For example, development proposals could utilise land outside of the flood zone for the residential dwellings with landscaping and Biodiversity Net Gain opportunities in more constrained areas. As set out in the CNP there is positive community-led support for leaving land immediately adjoining the river free from development, and this site could be the vehicle that helps to achieve this aim.



## 5. Deliverability

- 5.1. The Glossary of the NPPF defines deliverable and developable as following:
- 5.2. *“Deliverable: 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. In particular:*
- sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.*
- 5.3. *“Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”.*

### Availability

- 5.4. Mr TR Dickson, who owns the site, has confirmed that the site could be made available for immediate delivery if it is allocated in the development and definitely within the first 5 years of the Local Plan period. However, there is scope for the site to be bought forward as part of a masterplanned approach to the south of Chartham area, in combination with the existing allocations as proposed, subject to development and land negotiations.
- 5.5. A strategic allocation in the Canterbury Local Plan would seem a suitable vehicle to have a plan-led approach to the site, which acknowledges its relationship with the major adjoining brownfield site of the Chartham Paper Mill and the greenfield site on the opposing side of Rattington Street.

### Suitability for Residential Use

- 5.6. There are no known constraints or limitations on the site which could make the site undesirable or unsuitable for a change of use to residential uses.
- 5.7. As outlined, the site is located within a sustainable location, near to local facilities and the public transport and road network, which includes a mainline train station. The site itself is not constrained by access arrangements, as it benefits from its own existing site access. Or, an alternative access through the Paper Mill subject to engineering works could be achieved.
- 5.8. Finally, the site is not located in the countryside in the truest terms as it is located immediately adjoining the built form of Chartham. Any concern relating to landscape impact could be successfully mitigated against by way of additional planting and screening, that could form part of a BNG and landscaping scheme for the wider south Chartham area.

### Achievability

- 5.9. At this stage, there is no indication to suggest that there will be any viability issues for the delivery of the site for residential development. The market for residential dwellings in Chartham has been buoyant in recent years and there is no reason to expect this demand for property to decline.

## **6. Regulation 18 Canterbury Local Plan Specific Comments**

- 6.1. In accordance with the Regulation 18 CLP the Chartham Paper Mill is proposed for residential development under policy N31 with an indicative capacity of 165. The redevelopment of this site to residential uses is **supported**.
- 6.2. However, due to our submission of the site known as Land to the east of Stour Road and Rattington Street, Chartham, as an **omission**, Policy N31 should be reconsidered to enable the provision of a greater number of residential dwellings towards the districts' housing requirement with a new red line boundary, or acknowledgment of the adjoining site.

- 6.3. Notwithstanding that the omission site subject to this representation could come forward as standalone development. We also consider that the provision of additional land to the south of the existing N31 allocation would allow for additional housing through a wider extension /phase II/masterplan of the N31 Chartham Mill policy.
- 6.4. When utilised together, the Paper Mill site and the site subject to this submission, would provide greater resilience. Any potential delivery issues relating to any constraints associated with the Paper Mill site, could also be alleviated across the adjoining land parcel.
- 6.5. We therefore, object to the wording of the policy, specifically landscaping the southern boundary, when the adjoining site hasn't been considered and it may be that there are alternative options available for landscaping across the parcels in combination which provide the opportunity to strengthen the eastern edge of Chartham.
- 6.6. It is important that Policy N31 is written in a way which futureproofs access and infrastructure to allow for development for future phases.

## 7. Regulation 14 Chartham Neighbourhood Plan Specific Comments

- 7.1. The CNP has a dedicated policy for the Chartham Paper Mill site, CNP21, however it does not allocate it specifically for development, leaving this approach to the overarching Canterbury Local Plan. This is considered to be a positive position, and is **supported**, due to the strategic implications of developing such a large strategic brownfield site, it is considered that this is better dealt with at the District rather than Parish level.
- 7.2. However, the CNP has considered the Chartham Paper Mill Site and has been written as a set of design principles under Policy CNP21. These design codes will guide any future development proposals for the site, and they will ensure that there is adequate consultation between the local community and developers. This is considered to be an acceptable and not unreasonable position to be taken by the Parish Council.
- 7.3. However, these design guidelines do not include reference to the setting of the Paper Mill Site and how this development could be phased with the use of neighbouring land parcels and how this relates to the other site in the south of Chartham. The setting and adjoining land parcels should be considered and included in policy CNP21.

- 7.4. Further to this, the site subject to this representation falls within an area that is subject to allocation within the Rural Tranquil Zone (RTZ), under policy CNP17. The provision of an RTZ on land surrounding the Paper Mill site creates some tension when delivering a major brownfield site.
- 7.5. We **object** to policy CNP17 because it is not based on a sound evidence base and could stifle development or the delivery of development sites including the Chartham Paper Mill brownfield site.
- 7.6. Policy CNP17 responds to the impact of development on nearby residential amenities, specifically noise and light. However, the policy hasn't considered nearby noise or light sources as part of the assessment of where the RTZ should be drawn. It also hasn't considered sites that would have created their own noise, namely the former Chartham Paper Mill. The blanket approach of drawing an RTZ zone around the built-up boundary is unsound and has no basis or reasoning behind it.
- 7.7. Furthermore, the impacts of residential amenity are already considered when utilising the existing adopted development management policies of Canterbury, and therefore there is no strategic need to replicate this existing policy position.
- 7.8. We kindly request that these comments are considered when finalising the CNP for submission to Canterbury City Council at Regulation 15 stage.

## 8. Conclusion

- 8.1. This representation promotes Land to the east of Stour Road and Rattington Street, Chartham, for inclusion in the future Canterbury Local Plan, as a potential residential site allocation which would form a natural extension to the Chartham Paper Mill Site and part of the wider development proposed to the south of Chartham.
- 8.2. The site is considered to represent a sustainable and strategic scale scheme, which will result in a positive contribution to the wider housing requirement of the Canterbury district and to the plan-led approach to the growth of Chartham to the south.

### Appendix 1 – Site Location Plan