

**FROM: MICHAEL BAX DL FRICS**

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Sent by email only to [consultations@canterbury.gov.uk](mailto:consultations@canterbury.gov.uk)

Canterbury Planning Authority  
Canterbury City Council  
Military Road  
Canterbury  
CT1 1YW

Dear Canterbury Planning Authority

I am chairman of the Stour Fishery & Conservation Association and our Association has recently been made aware of the Canterbury Draft Local Plan Consultation and proposals in Chartham Village. The Association owns parts of the river, together with fishing rights upstream and downstream of Chartham Papermill and we let most of this water to the Tonford Fly Fishing Club who put considerable efforts into management of the river environment. We also manage the majority of the river between Wye and Shalmsford Street.

I have been made aware of the Chartham Neighbourhood Plan, published in May 2025 in which Chapter 9 is devoted to the potential for development around Chartham Papermill and encapsulated in Policy CNP21.

I have also been made aware that the Regulation 18 Consultation document for the emerging Canterbury Local Plan considers Chartham as a location for future development at Section 5.9, but there is no reference to Chartham Papermill or the River Stour around Chartham Village. We are surprised that the River Stour is not addressed in greater detail throughout the Draft Plan. We would be pleased to be consulted.

Nevertheless, we are also led to understand that a possible scheme has been considered for housing development at the Chartham Mill site, which is addressed in the Neighbourhood Plan as mentioned above.

Structures in the river, associated with Chartham Mill have been impounding and obstructing the natural flow of the river for many years. Funding from development adjacent to the river in Chartham could provide a vital river restoration project opportunity for the Kentish Stour, which should be prioritised.

Whilst the Water Framework Directive contains legislation that should ensure that no further deterioration to the river can be caused by works, that would be nowhere near enough where there is scope to remove manmade structures, soften the riverbanks and enhance the immediate river environment, which has been damaged by the operation of mills at Chartham for several hundred years.

The Kentish Stour supports an important population of Wild Brown Trout and Sea Trout. Salmon are also encountered. These fish populations are primary indicators of the health of the river and have been under pressure and reducing for many years.

Both migratory and non-migratory fish need to achieve passage up the river to spawning grounds in suitable upstream sections of the river and its tributaries. Obstructions in the Stour mean that fish passage can only be achieved at certain locations in high water conditions. Chartham Mill is one of those locations. It is often assumed that trout do not travel far unless they are Sea Trout, but resident Brown Trout also migrate upstream to spawn and disperse in order to find suitable habitat as they mature and establish new territories.

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At normal river heights, weirs and culverts cut off access to habitat for all trout. Trout of different ages grow and require different types of habitat, or water can simply become overcrowded. The fragmented and degraded habitats resulting from barriers, lead to isolated populations of fish, which become more vulnerable to problems such as pollution or climate change. A fully connected river habitat is much more resilient as it allows natural recovery and recruitment by migration from trout populations upstream, from tributaries, or from the sea.

The affect of impoundment upstream from Chartham Mill is very evident with habitat effectively “drowned” by deeper, slower water and a silty riverbed. Such habitat is poor for the flora and fauna which should naturally occupy the river.

Barrier removal restores nature’s ability to heal itself. The River Stour is a jewel in the crown of Canterbury’s biodiversity features and developer led contributions within the City Council area would go a long way to restoration of one of England’s degrading chalk streams.

Whilst the Stodmarsh nutrient problem has brought the problems of pollution into sharp focus so far as the River Stour is concerned, there are other massive issues to address along the course of the river which require as much, if not more, attention than Stodmarsh. Development provides the opportunity for funding from the private sector and the Local Plan should encourage opportunities to be rigorously pursued.

Yours faithfully



Michael Bax