

Helen O'Connor

From: Nigel Denney [REDACTED]
Sent: 14 October 2025 08:51
To: Consultations
Cc: [REDACTED]
Subject: Response to Draft Local Plan (2025–2042): Objection to Site N32 (Rattington Street) and support for Site N31 (Chartham Paper Mill)

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Dear Planning Policy Team,

I am writing in response to the Draft Canterbury District Local Plan (2025–2042), currently out for consultation. I wish to register my firm objection to the proposed allocation of site N32 (Rattington Street) for housing, but my qualified support for the redevelopment of site N31 (Chartham Paper Mill), provided that the latter is delivered with proper planning, design quality, and community benefit at its core.

In my view, the Rattington Street proposal represents an unsustainable and inappropriate location for development. For starters it is a greenfield site situated outside the established settlement boundary, lacking any meaningful public transport connections or access to local services such as shops, healthcare, or community facilities. Residents would be totally dependent on private car use, which directly contradicts both the National Planning Policy Framework (NPPF) and Canterbury City Council's own sustainability principles.

Paragraphs 8, 105, 119, and 120 of the NPPF emphasise that new growth should focus on previously developed (brownfield) land, support sustainable transport modes, and minimise greenhouse gas emissions. *Allocating Rattington Street therefore runs counter to national and local planning policy.*

The highway and access implications are also deeply concerning. Rattington Street is mainly an unlit country lane, whilst Shalmsford Street, and Bolts Hill are narrow and already under pressure from commuter and school traffic. At school start/end times, Shalmsford Street is often jammed and it isn't uncommon to find cars driving along the pavement (where children are walking). The addition of roughly 170 dwellings would introduce an estimated 470 extra vehicles to these roads each day. With no pavements or cycle paths connecting the site to the school, station, or village centre, pedestrian and cyclist safety would be seriously compromised. There is no realistic alternative to car use either, as our village bus services are infrequent and laughably unreliable.

In planning terms, *this fails to meet the NPPF test that development should only be refused on transport grounds* if the residual cumulative impacts are severe. A threshold that this proposal easily meets.

Local infrastructure is already stretched to breaking point. Chartham Primary School operates at or near full capacity. Kent County Council has previously deemed walking routes unsafe for children. Our village GP surgeries are oversubscribed with no identified provision for expansion. The sewage and drainage systems in Chartham are known to be fragile in this area, with occasional overflow and groundwater issues. The proposed development would place additional pressure on all utilities and even broadband capacity...none of which appear to have been

properly assessed in the draft allocation. There is also no evidence of deliverable mitigation through Section 106 or Community Infrastructure Levy contributions. Without this, the site cannot be considered sound under the tests of the Town and Country Planning Act, *which requires local plan allocations to be justified, effective, and consistent with national policy.*

Flood risk and environmental sensitivity are further reasons for objection. The site lies within the catchment of the River Nailbourne and the River Stour, both prone to seasonal flooding. Increased hard surfacing would worsen runoff and create downstream risk for other properties. The Council's own flood and drainage policies require development to demonstrate sustainable drainage systems and to pass the sequential and exception tests. No such assessment appears to have been carried out. This omission makes the allocation inconsistent with both the NPPF and the Council's climate resilience objectives.

The visual and environmental impact of the proposed site would also be significant. Rattington Street forms part of the rural approach to Chartham and contributes to the open character of the village. The land is visible from parts of the Kent Downs Area of Outstanding Natural Beauty, and any development here would erode the natural separation between Chartham and the surrounding countryside. The loss of hedgerows, mature trees, and wildlife habitats would have a direct impact on biodiversity. Both national and local policy now require measurable biodiversity net gain; this proposal offers no credible plan to achieve that. In fact, the complete opposite.

There are also material concerns around air quality, noise, and light pollution. A development of this scale would introduce hundreds of extra vehicle journeys each day, increasing emissions and dust levels. The loss of green space and tranquillity would harm local wellbeing and wildlife, while new street and domestic lighting would diminish the rural night-time environment.

This runs contrary to the NPPF's sections on health, wellbeing, and protecting the natural environment, as well as Canterbury's Climate Change Action Plan, which commits the Council to reducing car dependency and promoting sustainable living.

Taken together, these issues show that Rattington Street is neither sustainable nor deliverable under the terms required by planning law. It fails to align with the Local Plan's own strategic objectives, contradicts the evidence base within the Sustainability Appraisal, and conflicts with both the NPPF and Canterbury's declared climate and transport goals. Allocating this site would not only damage the character and infrastructure of Chartham but would also undermine the credibility of the plan's broader sustainability agenda.

By contrast, the Paper Mill site (N31) offers a far more pragmatic, logical, and responsible opportunity for growth. It is brownfield land within walking distance of the railway station, pub, village hall, play park, village shop, bus routes, and the village centre. Development here would make effective use of previously developed land and provide a natural extension to the existing settlement rather than sprawling into the countryside. If planned sensitively with a clear masterplan, (i.e a strong design code, flood-resilient measures, renewable energy integration, and provision for community uses) it could revitalise a neglected area and create a new social and economic heart for Chartham.

For these reasons, I respectfully urge Canterbury City Council to remove site N32 (Rattington Street) from the Local Plan and instead focus growth on sustainable, brownfield locations such as the Paper Mill. I also encourage the Council to work closely with Chartham Parish Council and Chartham residents to ensure that any redevelopment of the Paper Mill site delivers real community benefit and aligns with the emerging Neighbourhood Plan.

Thank you for considering my comments as part of the consultation process. I would appreciate confirmation that this representation has been recorded in full.

Yours sincerely,

Nigel Denney

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