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Sent: 20 October 2025 12:28
To: Consultations
Cc: [REDACTED]
Subject: Draft local plan consultation response

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Dear Canterbury City Council

I am writing in response to the consultation invitation regarding the draft local plan.

I am a Chartham resident and a member of the steering group that has drafted the Chartham Neighbourhood Plan. I am focusing on the issues that affect Chartham.

I have both general and specific concerns.

General concerns

The revised local plan takes no account of the draft Chartham Neighbourhood Plan and the huge body of expert evidence on which it is based. There is also no acknowledgement of the support which the neighbourhood plan has received from local people who welcome the framework of a plan which promotes growth that is sustainable and in keeping with the rural character of the village.

There is a lack of analysis regarding the cumulative impact of policies, particularly on traffic. For example, development on both the paper mill site and the Rattington Street field will add further pressure and danger to travel along the Chartham lanes. It will make even more hazardous what is already a dangerous journey (so dangerous that even now parents do not allow their children to cycle or walk to school). The delays that will occur as a result of the proposed Thanington car park will bring even more cars through Chartham.

A detailed transport assessment for the area is required and should include a reassessment of Local Cycling and Walking Infrastructure Plans (LCWIP). The assessment should also consider the lack of parking near Chartham railway station: if the plan depends on residents using the station it must consider whether this will be practicable.

The sustainability policies in the NPPF and CCC's own policies for sustainable development do not appear to have been observed.

The proposals require a detailed flood risk assessment and surface water management plan that consider the cumulative impact of development on both sites.

The Paper Mill site (N31)

This site offers the opportunity to create a community hub that will benefit the village for generations to come.

Local people want the site to be developed but within a framework that brings high quality homes to meet the needs of Chartham parishioners along with much needed services and amenities.

The current owners have stated in a meeting with myself and local councillors that they expect the costs of clearing the site will mean they will not be required to build social housing. Without the requirement, they will not do so. 165 'luxury' homes will not address the local housing needs (identified in the neighbourhood plan) for first time buyers and older people who wish to downsize.

It is important that the site is not parcelled into smaller development sites. This would risk failing to ensure infrastructure/flood mitigation requirements are met for the whole site and that the opportunities for a coherent mixed development would be lost.

This site should be developed through collaboration between the local authority, the local community and developers. I urge CCC to be proactive with this site, developing a masterplan that genuinely meets local needs.

Material consideration re traffic

The draft local plan proposes improvements to the junction of Station Rd with the A28. This is welcome but the significant increase in traffic turning into Chartham would lead inevitably to congestion and long queues on the A28 when cars are held for several minutes at the level crossing. The delay at the level crossing is often extended as buses wait for an opportunity to turn next to the level crossing.

Despite access to hourly trains and (unreliable) hourly buses, residents are bound to also rely on cars for transport. Buses do not run on Sundays or after 6.30pm. Rattington Street is already a dangerous road with an inappropriate 60mph speed limit.

KCC has previously deemed it unsafe to arrange walking buses to the school because of the danger posed by traffic.

Rattington Street site (N32)

A previous planning proposal for 111 dwellings was rejected largely in response to serious valid concerns from local residents and others. Even the neighbourhood plan's cautious allocation of 13 dwellings has drawn concerned comments.

The loss of this beautiful agricultural land will be forever and there is no evidence of the any local need that requires CCC to ignore sustainability policies.

Traffic / previous planning decision

One of the principal reasons for the previous rejection of this site was concerns about traffic. The draft local plan states that these issues have now been addressed satisfactorily by the developers. It appears that the proposed traffic mitigation is to provide footpaths through the site to enable safer pedestrian travel. These footpaths would of course be welcome but they cannot resolve the impact of possibly 300 cars or more (from this site alone) on the local lanes which are already so dangerous. Also, the proposed siting of the routes will not meet local needs.

Any assessment of increased traffic must include the cumulative impact of the paper mill site and additional traffic that will run through the village as a result of the proposals for Thanington and Merton Park.

The draft transport strategy states that it is CCC's intention to make public transport, walking and cycling the first choice for the district's residents. This is not feasible when buses are limited and unreliable and the already dangerous roads will become so much more dangerous.

The accompanying masterplan of the site does not appear to show how access for cars will be managed. This is particularly important for managing the access of emergency vehicles.

Sustainability, visual impact and landscape character

This site is on a green field site that is currently agricultural land. The allocation conflicts with sustainable development principles in the National Planning Policy Framework (NPPF).

By extending the boundaries to current settlements, building on this field would significantly damage the rural character of Chartham and merge three of its five distinct settlements. This contradicts the Canterbury Landscape Character Assessment, which seeks to preserve village separation. The neighbourhood plan proposes green gaps to secure the distinct character of each of the five settlements, a proposal that is supported by the local community.

Designated wildlife sites / nature conservation

The ancient woodland habitat would be threatened, even if the trees are retained. Surrounding this protected habitat with people, buildings, cars, lights and, notably, cats can only reduce its viability as a habitat.

Increased light pollution and noise in a currently rural, dark sky area will adversely harm local wildlife.

The topography of the site means that the woodland will be subject to surface water run-off.

Environmental considerations / climate change / surface water

This is a site where the steep slope has been noted in a previous application and local residents are already concerned about the impact of heavy rainfall in this area as surface water rushes down the hill. I have seen videos of surface water gushing down Rattington St, no doubt these videos have been made available to you.

If 170 houses are built, not only will the problem with surface water be exacerbated but that water will carry with it pollution from the concrete. This water will run straight down into the Stour chalk stream.

The required assessment of the flood risk must include groundwater and drainage capacity and the risk of soil contamination to nearby watercourses.

Local infrastructure

Schools

- Chartham Primary School is already at or near capacity.
- Secondary education is based in Canterbury; it would increase traffic from school runs.

GP surgeries are already stretched with no plans for expansion or additional healthcare provision.

Sewage and drainage systems in Chartham are already fragile, with frequent sewage leaks in the Shalmsford Street area.

There are no evident proposals to upgrade utilities and broadband capacity to meet increased demand.

Design and layout concerns

The allocation will propose high-density housing which is out of keeping with the existing rural character. Requirements to build in the local vernacular will not ensure that the design has a genuine architectural relationship to Chartham. Throughout Kent there are broadly identical box houses with lookalike clapboard that have been built as cheaply as possible in the 'local vernacular'.

There is no apparent requirement for sustainable drainage or energy-efficient building standards.

Planning policy conflicts

This allocation

- contradicts the Canterbury Local Plan's strategic goal to focus on sustainable and accessible growth
- ignores the neighbourhood plan objectives to *maintain village character and protect green space*
- is inconsistent with the National Planning Policy Framework (NPPF) sections on sustainable development, protecting the natural environment, managing flood risk, and promoting sustainable transport.
- fails to deliver net community benefit, which is required for major developments.

With kind regards

Sally Hawkins