

**From:** [REDACTED]  
**Sent:** 20 October 2025 17:36  
**To:** Consultations  
**Subject:** Objection - Proposed development N32, Land at Rattington Street, Chartham

**--Email From External Account--**

**Re: Objection – Proposed development N32, Land at Rattington Street, Chartham (c.170 dwellings)**

Dear Sir/Madam,

I am writing to object to the proposed development of approximately 170 dwellings on site **N32 (Rattington Street, Chartham)**. For clarity, I do **not** object in principle to the redevelopment of the **brownfield** Chartham Paper Mill site (N31/N32 Paper Mill), and I support a brownfield-first approach. My objection here concerns the **greenfield** Rattington Street site (N32) only.

**Summary of objection**

A substantially similar proposal with fewer homes was refused within the last two years. The reasons remain valid and, if anything, are now more compelling given the continued deterioration of local highways capacity and condition, the absence of safe walking/cycling infrastructure, the constraints of public transport, the pressure on local services, the setting of heritage assets and conservation areas, flood risk and nutrient neutrality concerns, the high landscape sensitivity of the Stour Valley slopes, the likelihood of settlement coalescence, and the loss of best and most versatile (BMV) agricultural land. The scheme is neither **sustainable** nor **deliverable** and conflicts with the development plan when read as a whole and the National Planning Policy Framework (NPPF).

**1) Highways and transport – severe residual cumulative impacts**

- **Rattington Street** is a narrow rural lane from Cockering Road to Station Road, with sharp bends, pinch points, **no pedestrian or cycle paths**, and a section reduced to **single track** over one bridge.
- **Station Road** has intermittent, narrow footways in places that are incapable of practical widening.
- **Shalmsford Street** (on the opposite side of N32) already operates under severe stress at school pick-up/drop-off. Vehicles routinely mount narrow pavements to pass, endangering pedestrians.
- Community **Speed Watch** evidence over the last two years (20 sessions; **136 speeding vehicles** recorded between **35–58 mph**, most frequently **7:00–11:00**) corroborates that Shalmsford Street is used as a **rat-run**.
- **Public transport** is constrained: the station has **no dedicated car park** and the **bus service is poor and unreliable**, leading to high car dependency.
- On current trip rates, c.170 new homes—alongside ~160 at the Paper Mill (N31)—would add in the order of **~470 additional vehicles** onto lanes already operating at or beyond safe capacity.
- The **last traffic and road survey is 7 years old** and no longer reflects present patterns or safety conditions. A **new, independent, multi-modal Transport Assessment and Road Safety Audit (Stages 1–2)** are essential before any determination.
- **Access/deliverability:** the latest concept plan shows no clear vehicular access. Suggested pedestrian/cycle links include land at **The Crescent** where access is **in joint private ownership**; those owners will **not** permit its use. Without secured rights or adoptable access, the scheme is **not deliverable**.

**Conclusion on highways:** The proposal fails to demonstrate safe and suitable access for all users or that impacts are acceptable. It would result in **unacceptable highway safety risks** and **severe residual cumulative impacts**, contrary to the NPPF and local transport policies.

**2) Public health and wellbeing**

- The traffic growth outlined above would materially **increase noise and air pollution**, with a particular impact on children walking to/from the village school on **Shalmsford Street**.

- Canterbury’s air-quality efforts (focused on the city centre) risk being undermined by **diverted emissions** through outlying settlements like Chartham if overdevelopment proceeds without credible non-car alternatives.
- Local **GP provision** is already under pressure and the **primary school** is often at or near capacity. No robust mitigation is offered.

### 3) Heritage, landscape and settlement pattern

- The site lies close to **listed buildings** and the **Chartham Conservation Area**, on the **rising eastern slopes** of the River Stour Valley. Its **elevated, steep** character makes it **widely visible** from **Bakers Lane, Summer Peace Grove, The Crescent, Rattington Street**, and through gaps from **Beech Avenue**; it is also perceived from nearby **AONB** viewpoints.
- Development here would **transform** the rural character of Rattington Street and erode the **valley landscape** contrary to the **Canterbury Landscape Character Assessment**, which seeks to maintain village separation.
- The scheme would promote **coalescence** between Chartham and **St Augustine’s**, where separation currently relies on this open field.

### 4) Conservation area setting, flooding/drainage, and nutrient neutrality

- Under the **Planning (Listed Buildings and Conservation Areas) Act 1990**, the Council must pay **special attention** to preserving or enhancing conservation area character or appearance. Extending dense built form onto the valley slope would **harm the setting** and fail this statutory duty.
- Proximity to the **Nailbourne** and **River Stour** systems brings **seasonal flooding** risk. Additional hard surfacing will **increase runoff**; groundwater and drainage capacity have **not been adequately assessed or mitigated**.
- The Stour catchment’s connection to **Stodmarsh International Nature Reserve** triggers **nutrient neutrality** concerns (nitrates/phosphates). New housing has previously been **restricted** until schemes can prove **no adverse effect**. The application provides **no credible, secured mitigation**.

### 5) Loss of BMV agricultural land and food security

- The site is **productive arable land** and, to the best of local knowledge, likely within **BMV (Grades 1, 2 or 3a)**. The **NPPF** requires authorities to **protect** BMV land and, where development is necessary, to prefer **lower quality** land.
- With recent volatility in cereal and oilseed supply and climate impacts, further erosion of active farmland is **contrary** to national aims (e.g., the **UK Food Security Report 2024** and Natural England’s 25-year plan objectives to protect soils, BMV land, and peat).

### 6) Ecology and ancient woodland

- **Ancient woodland** occupies a large area in the centre of N32. While nominal retention is shown, the scheme would still cause **fragmentation**, edge effects, lighting/noise disturbance, and barriers to movement, undermining habitat integrity.
- The site supports **bats** (protected species), **tawny owls** (protected habitat), **badgers, foxes**, and diverse birdlife. Concerns have been raised with the **Woodland Trust** and **Kent Wildlife Trust**. A precautionary approach is warranted.

### 7) Brownfield first – reasonable alternatives exist

- National policy and recent public statements reinforce a **brownfield-first** strategy, focusing on **disused car parks, old petrol stations, and industrial sites**, not open countryside. The **Paper Mill** brownfield offers the logical focus for new homes, subject to design, access, flood, and nutrient solutions.

### 8) Evidence gaps and necessary next steps (without prejudice)

Should the Council continue to consider any form of development here, the following are prerequisite (and, in my view, unlikely to be satisfied):

1. Up-to-date **Transport Assessment** with origin-destination data, junction modelling, school-time audits, Walking/Cycling Level of Service, and **RSA Stages 1–2**.
2. A **deliverable access strategy** with proven legal rights and adoptable standards.
3. Full **Flood Risk Assessment** and **Drainage Strategy** (greenfield runoff rates, infiltration testing, exceedance routing) plus **Nutrient Neutrality** mitigation that is **secured, funded, and monitored**.
4. **Heritage impact assessment** addressing conservation area **setting**, key views, and townscape effects, with verified photomontages.
5. **Landscape and Visual Impact Assessment** demonstrating no significant harm (including AONB viewpoints and settlement coalescence tests).

6. **Agricultural Land Classification** survey to confirm BMV status and sequential analysis of **reasonable alternatives**.
7. **Ecological Impact Assessment** meeting current guidance (ancient woodland buffers, dark corridors, species surveys across seasons, and enforceable management plans).

**Conclusion**

For the reasons above, the proposal at **N32 Rattington Street** fails to constitute sustainable development and conflicts with the development plan and the NPPF (transport safety and cumulative impacts; healthy/safe communities; conserving/enhancing the historic environment; protecting and enhancing valued landscapes; avoiding harm to designated sites; and protecting BMV land). The application should therefore be **refused**. Housing growth should be directed to **brownfield** locations such as the **Paper Mill** site, where impacts can be better contained and mitigated.

Kind Regards,

Graeme Crossland