

Response to the Focused Consultation of the Draft Local Plan

Chartham Parish Council & Chartham Neighbourhood Plan Steering Group

21 October 2025

The Chartham Neighbourhood Plan Steering Group (CNPSG) and Chartham Parish Council (CPC) welcome the opportunity to comment on the focused consultation of the emerging Canterbury District Local Plan to 2045. The comments are provided in the context of other consultations and the preparation of the Chartham Neighbourhood Plan. The Regulation 14 version of the Neighbourhood Plan was published in May 2025, and the associated consultation took place from 1 August 2025 – 12 September 2025.

The policies and information set out in the focused consultation pose serious challenges to the vision set out in the draft Chartham Neighbourhood Plan. Our neighbourhood plan has the strength of being based on local consultation and a huge body of expert evidence. The responses to our Reg 14 consultation show that local people welcome the framework of our plan which is to promote growth that is sustainable and in keeping with our rural character.

Based on what we know, we have concerns about

- The paper mill allocation
- The Rattington St allocation
- The loss of the Thanington green space
- The Merton Park development

General comments regarding the focused consultation

Conflict with the Chartham Neighbourhood Plan

In the case of Chartham, the housing allocations for the parish over the plan period has increased significantly from 14 dwellings to 335 dwellings in this focused consultation. This poses a serious challenge to the emerging neighbourhood plan, for which Regulation 14 consultation has just closed. For example, there appears to be little consideration of the impact of the site allocations upon the character areas identified in the neighbourhood plan.

The steering group has consulted with CCC officers throughout the development of the neighbourhood plan and officers would therefore be aware of the body of evidence that supports the plan vision.

Further, given the challenges to identifying appropriate sites to meet the local housing need, particularly in the context of the December 2024 changes to the NPPF, we are concerned that the focused consultation fails to satisfactorily address this requirement. Although the council has published updated evidence, this is incomplete, as will be highlighted in comments regarding specific allocation policies. However, it must be noted that the lack of updated transport and infrastructure delivery information is a significant shortcoming.

Infrastructure considerations

The focused consultation document provides little insight into the potential wider implications of the additional housing, particularly the transport and infrastructure requirements arising from the proposed allocations. The 2024 draft Local Plan identified Chartham as a rural service centre. We expressed concerns regarding this classification during the previous consultation.

However, previous evidence and proposals for infrastructure set out in the 2024 draft local plan were based upon a considerably lower housing allocation for the parish. There is little evidence or consideration of the infrastructure impact of the new allocation sites in this consultation document. The addition of 335 houses within this rural area would result in significant additional pressure on local services and facilities without local stakeholders and providers having been consulted (e.g. schools and health services).

There is significant concern about the adequacy of educational infrastructure in and around Chartham, particularly in light of recent reports that the proposed Thanington Primary School may not open until 2030 at the earliest. This delay risks placing further strain on existing schools within Chartham and the surrounding villages, many of which are already operating close to capacity. Without timely provision of additional school places, families may face longer travel distances, increased traffic congestion at peak times, and reduced access to local education for new and existing residents.

The focused consultation document states that a new infrastructure delivery plan will be published alongside the Regulation 19 draft local plan. However, the significant additional housing allocation for Chartham Parish and the pressures that this places on local services and the highway network, require greater consideration and detail on these matters. This must go beyond the general reference to the inclusion of local shopping and community facilities and should have been included in the document. In the absence of evidence to support this need, there is a real risk that necessary and appropriate facilities cannot or will not be included in any development scheme coming forward.

Although the inclusion of cycling and pedestrian routes within the allocation sites are welcome, the future occupiers would remain dependent upon private vehicles. As noted in responses to previous consultation documents, there is a lack of pavements in key areas within Chartham, including along the road to the primary school and from the south along station road towards the historic centre of Chartham and the train station.

Bus services are very limited and whilst there is a train station, there is no car parking facility available at that location. These are significant barriers to sustainable transport, leading to dependence on private vehicles for travel to work, schools and local facilities. The LCWIP should be updated and augmented to take into account the specific transport hubs designed into new development at the outset if the bus-centric plan is to be used/developed.

There is insufficient consideration of this and other transport matters in this focused consultation document. A full updated transport assessment should have been provided as part of this consultation to ensure that the transport impacts can be fully understood and planned for. The absence of transport modelling given significant changes to road proposals (e.g. the removal of the southwest link road) is a significant shortcoming.

Concerns regarding the evidence base

Where updated evidence is available, these refer to information which is not in the public domain. For example, the Focused Regulation 18 Topic Paper refers to a flood risk assessment and transportation details for the two sites proposed in Chartham that have been submitted to the council by the promotor/developer. It is clear from the Topic Paper that this information has been critical in the decision to bring forward these sites as proposed allocations. However, as this information does not appear to be in the public domain, it is not possible to make fully informed comments.

The allocations are also not supported by housing need for the parish. As noted, the housing allocation for the parish has been significantly increased. Whilst this may reflect a wider need of the district, there has been no evidence to support the need for the parish itself.

Similarly, there is little information as to how the revised strategic allocations, following the deletion of two significant strategic sites (land at University of Kent and Land north of Hollow Lane), fit into a wider vision and strategy for the district as a whole. Although housing need may be satisfied, the wider transport, infrastructure and environmental impact of pepper potting the housing allocations across the district is not adequately addressed. Although the Topic Paper suggests that KCC may be satisfied that the development at Rattington Street would not lead to adverse impact on the local highway network, it is not clear that KCC would come to a similar conclusion regarding the cumulative impact of the Paper Mill and Rattington Street sites on the network. This level of local and strategic information is absent.

Lack of clear vision/master planning

In light of the above points, the document gives the impression of a lack of an overall strategic plan. It appears to focus primarily on plugging the gap in housing supply arising from the removal of two strategic sites and the revised NPPF. This leads to development which is not fully supported by the evidence and concerns that the impacts of the development are not fully understood and adequately mitigated to avoid future harm.

Need for development briefs

The production of development briefs, possibly through design charettes, will ideally engage local people in a constructive manner. St Augustine's, in Chartham, was an example of the success which can be achieved. This also worked for the Kings Cross redevelopment. (<https://www.camden.gov.uk/planning-frameworks-and-briefs1>). The NPPF highlights that local planning authorities should prepare design guides or codes consistent with the principles in the National Design Guide. Local communities would benefit from being engaged with the production of these documents (potentially as supplementary planning documents) on a district or local level.

Policy N31 – Paper Mill site

This site has potential, and following a public meeting in Chartham, it is clear that development is welcome if done right. We want a development that brings high quality homes to meet the needs of Chartham parishioners along with much needed services and amenities.

We believe this site needs to be developed through collaboration between the local authority, the local community and developers. The award-winning Phoenix development in Lewes is located on a site with many similarities to the paper mill site and its success is based on collaboration.

We urge CCC to be proactive with this site and, with Chartham residents and business owners, develop a masterplan that meets local needs rather than wait for the developers to take the initiative.

Flood risk

We are concerned that this site has come forward as part of this consultation despite the submission of a site-specific flood risk assessment which concludes that a greater part of the site is outside flood zone 3B, but this information is not in the public domain. The updated Strategic Flood Risk Assessment does not appear to reflect this information. As such, it is not clear from the consultation document and updated evidence base as to how the council has concluded that the allocation of 165 homes may be successfully accommodated on the site. It is likely that there will be some requirement to manage flood waters across the site, and there is little to identify how this may be achieved. It is noted that improper management of water management facilities within the existing site has led to flooding of neighbouring land.

In the absence of this information, the shape and character of development to provide this quantum of housing development is far from clear as is the potential impact upon flood risk within the site and surrounding area.

Traffic impact

We have specific concerns about references to widening Station Road in Chartham. It is unclear as to how and where the road could be usefully widened to accommodate traffic generated by the development and the proposed housing at Rattington Street.

Although improvements to the junction of Station Rd with the A28 are welcomed, the increase in traffic turning into Chartham would inevitably lead to congestion and queues on the A28 when cars are held at the level crossing. As noted above, there is considerable uncertainty as to whether the cumulative impact of the 165 dwellings with the 170 dwellings at Rattington Street has been adequately considered.

Green space

The policy shows large areas of green space which is welcomed. The integration of this green space with existing open spaces to the north of the River Stour and with flood mitigation measures is of importance.

Policy N32 – Rattington Street site

The Rattington Street site remains one of the most contentious in our community. A previous planning proposal for 111 dwellings was rejected largely in response to serious and valid concerns from local residents and others. Even the neighbourhood plan's cautious allocation of 13 dwellings for a smaller portion of this site has drawn concerned comments.

Traffic / previous planning decision

One of the principal reasons for the previous rejection was concerns about traffic. This focused consultation draft and supporting evidence states that these issues have 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, but there is very little information available to the public on this matter. Footpaths would of course be welcome, but they are limited to the area within the site and do not address the wider lack of pavements in the local area. Therefore, it cannot resolve the impact of possibly 300 cars or more on the local lanes which are already so dangerous. There is no information about vehicular access to the site: all potential access points present safety challenges and there is no information about how these would be overcome.

Visual impact and landscape character

The Chartham Neighbourhood Plan identifies five character areas within the parish, corresponding to the settlements, and proposes green gaps to secure the distinct character of each area. This is supported by the local community. Placing 170 dwellings on the Rattington St site would significantly damage the rural character of Chartham and lead to the coalescence of three of our five distinct settlements (Chartham, Shalmsford Street and St Augustine's). The scattered settlement pattern is a key characteristic feature of Chartham and its historic development. The merging of these areas would undermine this character and lead to the appearance of a much larger, single settlement to the detriment of the pattern of development in Chartham, which has been the subject of much consideration in the neighbourhood plan.

Designated wildlife sites / nature conservation

The ancient woodland is set at the centre of the identified site. This irreplaceable habitat would inevitably be threatened by development of this scale even if the development is laid out to maintain the 15m buffer zone and retain the trees. Although green space is shown around the ancient woodland, this is likely to take the form of more urbanised/managed green space with paths and lights in order to address secure by design standards and external amenity standards.

More generally, surrounding this protected habitat with residential development and the associated lights, activities, and pets (including cats) would result in adverse impacts and reduce its viability as a habitat. In addition, the topography of the site means that the woodland will be subject to surface water run-off.

The sustainability assessment of the site shows potential significant negative effect in relation to biodiversity, and the above points are areas of particular concern.

Environmental considerations / climate change / surface water

This is a site where the steep slope has been noted in a previous planning application, and local residents are already concerned about the impact of heavy rainfall in this area as surface water rushes down the hill. 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.

Construction Traffic and Access

There are also serious concerns about how construction traffic will access the proposed development sites in Chartham. A KCC report from several years ago indicated that only one bridge in the village is currently rated as safe for heavy goods vehicles (HGVs). This limitation raises questions about the safety and practicality of routing large volumes of construction traffic through residential areas and narrow village roads.

Policy N3 - Thanington Park & Ride

We appreciate the need to reduce traffic in Canterbury. However, the loss of the sports and recreation field to provide park & ride facilities will inevitably place greater pressure on Chartham's recreational facilities.

In addition, the extra traffic at this busy junction will prompt people to avoid this section of road and use instead the lanes around Chartham and Chartham Hatch. This does not appear to have been adequately considered. Given the lack of the new southwest link road at Cockerling Road, the traffic implications for both the local highway and strategic highway networks are of concern.

Policy N1 - Merton Park

This allocation attempts to address the omission of land at Hollow Lane. Although large, it does not appear to score well in the updated sustainability assessment prepared by WSP. Potential negative effects have been identified in relation to air quality, biodiversity, geology, landscape, water, flood risk and heritage.

Traffic

Given the scale of the proposal, an updated transport assessment should be presented alongside this proposal. As mentioned above, there is no longer a southwest link road and the impact upon the junction with the A2 is unclear. The policy wording does not give enough of an indication as to what would be required in this regard.