

**Tom Hawkes**

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**From:** Paul Bourdillon [REDACTED]  
**Sent:** 20 October 2025 16:03  
**To:** Consultations  
**Subject:** Fwd: Canterbury District Local Plan - Rattington Street Feedback (Objection)  
**Attachments:** Formal Objection- Proposed Development N32 (Rattington Street, Chartham).docx

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**From:** Paul Bourdillon [REDACTED]  
**Date:** Mon, 20 Oct 2025, 10:11 am  
**Subject:** Canterbury District Local Plan - Rattington Street Feedback (Objection)  
**To:** [REDACTED]

To whom it may concern,

Please consider the following feedback on the proposed Policy 32 LAND AT RATTINGTON STREET - CHARTHAM:

(I have attached the text below as a document as well)

## **Formal Objection: Proposed Development N32 (Rattington Street, Chartham)**

**To:** Canterbury City Council Planning Department  
**From:** Paul Bourdillon, Resident of Chartham, Canterbury  
**Date:** 19 October 2025  
**Application / Policy:** Draft Canterbury District Local Plan — Policy N32: Land at Rattington Street, Chartham

## **Introduction**

I strongly object to Policy N32 (Rattington Street — approximately 170 dwellings). The site is Greenfield agricultural land outside the existing settlement boundary.

The proposal would cause significant and demonstrable harm to highway safety, flood risk management, biodiversity, landscape and heritage, and local services (schools, GP provision, and public transport).

These harms are material planning considerations that outweigh any claimed benefits of the proposal in my considered and researched opinion.

## Material Considerations (expanded with evidence)

### 1. Flooding — existing and escalating local problem

Local flood risk designation: The Great Stour around Shalmsford Street and Chartham (which includes Rattington Street catchment) is a designated Flood Warning Area — the Environment Agency actively issues warnings for this reach of the river. This shows the area is vulnerable to river flooding and surface-water events.

Local history and location-specific risk: Rattington Street lies on the slope running down into the Stour valley; residents report flooding “at the bottom of the hill” and repeated surface-water problems on the A28 and Shalmsford Street during heavy rain (local reports and parish submissions in the Local Plan consultation corroborate frequent local flooding). Increasing hard-surfaced area from 170 homes would increase runoff and exacerbate local flooding unless exceptional SUDS (sustainable drainage systems) are provided and proven effective. (See Canterbury Local Plan consultation documents for flood-risk considerations.)

Please see [this recent video of Rattington street \(below the proposed site\)](#), as proof that flood risk is already high and will only get worse with this proposed development. These are the houses next to the Artichoke public house.

Nutrient / water quality implications: The River Stour catchment and Stodmarsh are subject to nutrient-pressure constraints; Kent and Canterbury authorities have produced nutrient mitigation strategies because additional wastewater / surface runoff can worsen nitrogen and phosphorus loading downstream, harming protected habitats. The

Stodmarsh Nutrient Mitigation Strategy explicitly highlights that new housing must not worsen nutrient pollution. Any proposal on N32 must therefore demonstrate nutrient neutrality — which has not been credibly evidenced in the draft allocation.

Planning implication: NPPF requires that development in areas at risk of flooding be avoided where possible and, where it proceeds, that flood risk is satisfactorily mitigated. Given the existing flood warnings and the proximity to the Stour/Nailbourne, the Council must require robust, site-specific flood risk assessment and time-proven SUDS coupled with a nutrient neutrality solution before the site can be considered deliverable. The absence of publicly available, detailed mitigation evidence for N32 is a material reason to oppose the allocation.

2. Shortage of amenities & capacity constraints (schools, medical, transport)

## Education

Primary school capacity: Chartham Primary School currently has around 386 pupils with a published capacity of 420 — indicating limited headroom for large-scale population increase from an extra 170 houses (which could generate ~50–100 primary-age pupils depending on household mix). The school's location on Shalmsford Street already creates local traffic/route-safety concerns flagged by KCC.

## Health care

GP capacity: Local GP surgeries in Chartham and the immediate area are reported as operating near capacity. The Local Plan and consultation responses note pressures on local GP practices; the draft Local Plan process itself recognises the need to evidence health-care capacity before new allocations proceed (and any uplift should be demonstrably mitigated / funded through developer contributions). (See Canterbury Local Plan consultation material.)

Public transport and parking

Train station parking: Chartham Railway Station is documented as having no official station car park (National Rail / station information lists “No parking spaces”) — meaning the station cannot be reliably relied upon to absorb additional commuter car demand from a major new estate without creating displacement parking in local streets or village hall car park pressures. This increases car dependency for new residents.

Bus service & frequency: Local consultation responses and parish records show that the bus service is infrequent (limited evening service and no Sunday service on some routes), so sustainable travel by public transport is limited for new residents. The draft Local Plan acknowledges the need to evidence accessibility to services for new allocations.

Vehicle ownership baseline

Car dependence context: Nationally, household car ownership remains high: around 78% of households in Great Britain had access to one or more cars in recent years, and two-car households have grown over decades — so a greenfield development with poor public transport connectivity is very likely to generate high levels of additional car trips (DfT car-ownership evidence review). Using DfT averages, 170 dwellings could reasonably be expected to add several hundred vehicle movements daily, consistent with local resident estimates of ~470 extra cars.

Planning implication: The local education, health and public-transport systems lack the spare capacity required to sustainably service residents of a 170-home estate without clear, funded mitigation (s106/CIL measures). The draft allocation has not demonstrated adequate provision; therefore the allocation is unsound in infrastructure terms.

### 3. Highways, road safety and access (summary)

Rattington Street and connecting lanes are narrow, unsurfaced/unlit in places, and include single-carriageway bridges and sharp bends. Documented local SpeedWatch findings (136 speeding vehicles across

20 sessions) and KCC's refusal for a walking-bus route demonstrate real safety concerns. Increasing daily vehicle movements by hundreds will materially increase danger to pedestrians (including school children), cyclists, and residents. The Local Plan consultation requests up-to-date traffic surveys; the last formal traffic surveys are outdated and do not reflect current conditions.

Planning implication: Highway safety and inability to provide safe and suitable access can justify refusal under NPPF and local plan tests.

#### 4. Landscape, heritage and coalescence

The site is visible from multiple local vantage points (Bakers Lane, The Crescent, Beech Avenue) and lies close to Chartham Conservation Area; the allocation would erode the gap between Chartham and St Augustine's, contrary to the Canterbury Landscape Character Assessment and Chartham Neighbourhood Plan objectives to protect village separation and local character. The statutory duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 requires "special attention" to conserving such settings; the draft allocation does not convincingly demonstrate that harm can be avoided or satisfactorily mitigated.

#### 5. Biodiversity and nutrient neutrality

The site contains areas of ancient woodland and mature hedgerow habitat supporting protected species (e.g., bats, tawny owls, badgers). Fragmenting this habitat would reduce connectivity and resilience.

The Stodmarsh / Stour catchment is under active nutrient scrutiny: local authorities and Kent County Council have a published Stodmarsh Nutrient Mitigation Strategy (January 2025) noting that new housing must not increase nitrogen/phosphorus loadings to protected habitats. Until a credible nutrient mitigation solution (and evidence of its

availability for N32) is presented, the allocation risks breaching both national habitat conservation law and local strategy.

Planning implication: Without clear biodiversity net-gain strategies and nutrient neutrality mitigation (with secured funding and deliverability), N32 would likely be unsupportable.

## 6. Loss of Best and Most Versatile (BMV) agricultural land

The site has been used for productive arable cropping for decades and includes areas of higher-grade agricultural land. The NPPF directs that BMV land (grades 1, 2, 3a) should be protected from development where possible, and councils should prefer poorer quality land if development is necessary. Given recent UK food-security pressures (national reports highlighting reduced cereal production and the importance of protecting soils and farmland), the loss of good-quality farmland must weigh heavily against urbanising this Greenfield. (See NPPF and DEFRA / Natural England policy direction and national food-supply reporting.)

## Conclusion & Requested Action

1. Reject the allocation of N32 (Rattington Street) within the Draft Canterbury District Local Plan unless and until the following robust evidence and mitigation are publicly presented and independently assessed:
2. A site-specific, up-to-date flood risk assessment with practicable, deliverable SUDS proposals and long-term maintenance guarantees; and a clear plan to avoid increasing flood risk elsewhere.
3. A credible nutrient neutrality solution for the Stour / Stodmarsh catchment with secured mitigation credits or measures demonstrably available to serve this allocation.
4. Demonstrable education and healthcare capacity (or secured funding / S106 contributions) to ensure the development will not

overload local services (Chartham Primary currently close to capacity).

5. A robust transport assessment (current traffic data) showing safe access arrangements, adequate parking strategy, and clear measures to avoid rat-running and unacceptable road-safety impacts.

6. Comprehensive biodiversity mitigation & net gain proposals that avoid harm to ancient woodland and protected species, and that demonstrate deliverability.

## Annex: Most important evidence sources relied upon

Draft Canterbury District Local Plan — Focused consultation & policy pages (N32 referenced).

Environment Agency / Flood Warnings — Shalmsford Street, Chartham and Thanington flood warning area.

Stodmarsh Nutrient Mitigation Strategy / Kent County papers (January 2025).

Chartham Primary School — Ofsted / Gov.uk school details (pupil numbers and capacity).

National Rail / Southeastern station information — Chartham Station (documented as having no official parking spaces).

DfT / [GOV.UK](https://www.gov.uk) car-ownership evidence review & vehicle licensing statistics (context on likely car ownership and transport demand).

## Summary of Material Planning Considerations Flooding, Drainage & Water Quality

- Rattington Street lies on a downward slope into the River Stour floodplain — an area with a recorded history of flooding at the bottom of the hill and on the A28/Shalmsford Street.
- The site drains towards the Nailbourne and Stour river systems, both of which experience seasonal flooding.

- Increased hard surfacing from 170 dwellings would exacerbate surface-water run-off and downstream flooding.
- The area forms part of the Stodmarsh catchment, already under nutrient-neutrality restrictions; the proposal fails to show how it would avoid adding to nitrate and phosphate pollution.
- Relevant policies breached: NPPF 159–169, 174(e); Canterbury Local Plan CC1; Stodmarsh Nutrient Mitigation Strategy (2025).

### Highways, Transport & Road Safety

- Rattington Street is a narrow, unlit lane with several single-track bridges and no pavements or cycle paths.
- Additional 470+ vehicles would significantly worsen congestion and safety risk on Rattington Street, Shalmsford Street, and the A28.
- KCC has previously ruled the walking route to Chartham Primary 'unsafe', with pavement-mounting incidents reported.
- The village is car-dependent: limited bus service (none on Sundays, early evening finish) and no parking at Chartham Station.
- Relevant policies breached: NPPF 104–111; Canterbury Local Plan SP5, T1, T3; Chartham Neighbourhood Plan (walkable village routes).

### Shortage of Amenities & Infrastructure Capacity

- Chartham Primary School at ~92% of capacity (386 pupils / 420 capacity). 170 homes would overwhelm existing provision.
- Local GP surgeries are already full; no identified funding or expansion to meet new demand.
- Local drainage and broadband networks are near capacity; sewage leaks already documented on A28 and Shalmsford Street.
- Poor public transport and lack of Sunday service mean increased car dependency.
- Relevant policies breached: NPPF 34 & 92; Canterbury Local Plan INF1 & SP2.

### Landscape, Heritage & Rural Character

- The site is visible from Bakers Lane, The Crescent, Beech Avenue, and nearby AONB viewpoints.
- Development would merge Chartham with St Augustine's, erasing village separation.
- Lies adjacent to Chartham Conservation Area, altering its historic setting.

- Relevant policies breached: NPPF 130–135, 199–208; Canterbury Landscape Character Assessment; Planning Act 1990 66 & 72.

### **Biodiversity & Ecology**

- Contains ancient woodland and established hedgerows supporting bats, tawny owls, badgers, and songbirds.
- Development would cause habitat fragmentation and light pollution, reducing biodiversity.
- Risks nutrient loading into Stodmarsh SAC/Ramsar.
- Relevant policies breached: NPPF 179–182; Environment Act 2021; Canterbury Local Plan SP4 & LB2.

### **Loss of Best & Most Versatile Agricultural Land**

- The site includes Grade 2–3a farmland cultivated for over 30 years.
- NPPF 174(b) requires protection of high-quality soils and farmland.
- DEFRA’s 2024 Food Security Report shows a 22% fall in cereal production; farmland loss worsens national food insecurity.
- Relevant policies breached: NPPF 174(b), 175; Natural England 25-Year Plan.

### **Sustainability & Policy Conflict**

- Site lies outside Chartham’s settlement boundary, breaching Local and Neighbourhood Plan principles.
- Conflicts with national 'Brownfield First' policy and sustainable development goals.
- Relevant policies breached: NPPF 11; Canterbury Local Plan SP1; Chartham Neighbourhood Plan ENV1 & H1.

### **Social & Community Wellbeing**

- Increased traffic, air, and noise pollution will harm public health, especially near the primary school.
- Loss of open green space reduces mental wellbeing and recreation opportunities.
- Contradicts NPPF 92 on creating healthy, inclusive, and safe places.

### **Conclusion & Summary Position**

The proposed N32 (Rattington Street) allocation fails on multiple material planning grounds:

1. Proven flood and drainage risk.
2. Unsafe, inadequate road network and lack of sustainable transport.

3. Insufficient local infrastructure (schools, healthcare, utilities).
4. Loss of high-quality farmland and ecological assets.
5. Significant visual and heritage harm to the Stour Valley and Conservation Area.
6. Conflict with NPPF, Local Plan, and Neighbourhood Plan policies on sustainability, character, and biodiversity.

I respectfully request that Canterbury City Council remove Site N32 from the Local Plan and instead direct housing growth towards brownfield, accessible, and sustainable locations such as the Paper Mill site (N31).

Kind regards,  
Paul Bourdillon