

14 October 2025

By email to consultations@canterbury.gov.uk

Chestfield Parish Council's response to the focused consultation on CCC's [new Local Plan](#)

Chestfield Parish Council has three main areas of comment in this response:

1. Objection to Policy N20 Land East of Chestfield Road
2. Objection to the proposal for a Park and Ride at the expense and loss of Thanington Recreation Ground
3. Point of clarity re draft housing allocation numbers for Brooklands Farm and Bodkin Farm where the planning applications submitted (and as yet undetermined) differ from those figures in the CCC table.

1. Policy N20 Land East of Chestfield Road

Chestfield Parish Council is opposed to the new Policy N20 Land East of Chestfield Road. So much so that a full parish council meeting scheduled for 08 September 2025 was for the first time in 15 years rearranged to enable the Chairman, Cllr Steve Bailey to speak against it at the CCC Cabinet meeting on that date.

The proposal is for 150 homes – and that's all it is offering - there is nothing else being offered for the current or potential new community of Chestfield. This 'development' will be extremely difficult for our parishioners to accept as anything less than a Brooklands bolt-on; it will not benefit our village in any way.

Our objections focus on:

- Infrastructure
- Traffic and access

There is planning history for part of the N20 site. Three planning applications for a single dwelling have been rejected:

In 2016 CA/16/01409 – for a dwelling – refused

In 2017 CA/17/00817 – for a dwelling - Refused and at appeal, Appeal dismissed

In 2018 CA/18/01518 – two-storey dwelling and garage – Refused and at appeal, Appeal dismissed

And yet now to meet exasperated housing requirements it is now being considered by CCC as suitable for 150 homes.

Infrastructure

Foul drainage capacity is a major concern for the parish council.

This is exacerbated in the area as a whole by two tabled developments and one adjacent development being built out currently – namely:

- (i) CA/25/00779 - Land At Brooklands Farm Whitstable - Outline application for up to 1350 dwellings, including older persons housing; a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub; a primary school and a SEND school, business/employment space; open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

- (ii) CA/24/00224 - the Bodkin Farm Strategic site for a secondary school; up to 300 dwellings; an 80-bed care home; and a Local Centre
- (iii) Both of these would add extreme stress to the local foul network – together with the Oxenden Park emerging development (planning application CA/21/01430) adding a further 450 homes at Greenhill and which is routed and discharging along Maydowns Road - with its new connection at the top of Maydowns Road now completed in 2024.

Swalecliffe Waste Water Treatment Works has three 1000m³ storm storage tanks but once these are full, sewage water is discharged into the sea.

In response to incidents of sewage discharged into the sea, Southern Water did undertake upgrades to the Swalecliffe site. In August 2023, the company completed a £750,000 project to optimise the site, increasing available storage and reducing storm overflows by 36%. This optimisation involved installing new chambers and pipework to redirect stormwater during heavy rainfall, thereby reducing the frequency of discharges into the sea.

However, in 2023 despite the improvements reducing the storm overflows, Southern Water reported that Swalecliffe Waste Water Treatment Works still discharged sewage 11 times over a total of 37.9 hours, accounting for approximately 0.43% of the year. (In 2024, there were 3 discharges over 15 hours, or about 0.17% of the year).

For the outline planning applications for both the Brooklands Farm and Bodkin Farm proposals we requested (and consider it imperative), that CCC imposes a Grampian condition to align the build/phasing/occupancy with capacity in the Southern Water network. We would therefore request the same should any planning application come forward for this Policy N20 site.

We understand and would remind CCC officers that the Grampian condition must be imposed at outline planning application stage (rather than at a discharge of foul drainage condition application). To align the build/phasing/occupancy with capacity should mean that the potential risk of flooding to properties and/or environmental pollution can be mitigated in a timely manner.

Traffic and Access

Traffic Modelling

The KCC response to the Brooklands Farm application dated 07 October 2025 on the CCC Portal is a holding objection to that application due to flawed traffic modelling. It states in Section 7 "... the junction models appear to be significantly overestimating capacity. As it stands the models do not appear to be fit for purpose..." and "the model can significantly over estimate capacity (in some cases the actual capacity could be up to half of the current modelled capacity."

Chestfield Parish Council is pleased to see that revised traffic modelling will now be required for Brooklands Farm – the parish council also picked up and pointed out this flawed modelling in our response to the W4 Brooklands Farm planning application.

We would point out that in the revised traffic modelling there will now be a need to also factor in this N20 site too.

Early engagement

After the Chestfield Parish Council Chairman spoke against Policy N20 at the 08 Cabinet meeting, the parish clerk was contacted the next day by the land promoter of N20 who requested a meeting with the parish council, and this was held on 26 September 2025. We learned that the land promoter is working for the two landowners of the site – one of which is the Whitstable Non-Ecclesiastical Charities – who are the landowners of 6 hectares of land at the front of this N20 site only and not the whole site. There is a second landowner for the rest of the site.

It is the parish council's opinion that two landowners may be considered a complication and could create conflict going forward to finalise the scheme, especially as the Whitstable Non-Ecclesiastical Charities will no doubt have charitable objects and as such will need Charity Commission approval.

Access

At this early engagement meeting we asked about the proposed access for N20. It was explained to us that this was proposed to tie in with the Brooklands Farm site access.

The KCC response to the Brooklands Farm application dated 07 October 2025 on the CCC Portal also in Section 7.5 states that it KCC's view that the provision of a mini-roundabout at the junction of South Street/Chestfield Road/Radfall Hill junction is unacceptable for a variety of reasons including capacity, and asks that the applicant investigate an alternative arrangement at this junction that will provide more capacity.

There is a need to remember the instances of flooding at the current South Street and Chestfield Road junction at the bottom of Radfall hill – which has seen several emergency road closures here in recent years – with one vehicle unable to get through and having to be rescued by the fire service from the deep water.

Interdependency on Brooklands Farm

The N20 Policy wording shows clear interdependency on the Brooklands Farm application –

- 2a) design and layout to coordinate with Site W4 Brooklands Farm;
- 4 (a)(ii) creation of new and improved route connections to Site W4, and
- 4 (d) proportionate contributions to the east facing A299 slips contained within Site W4.

We would therefore suggest that given the above issues around traffic modelling and a suitable junction access we are bound to suggest that Policy N20 is somewhat in doubt as it stands because of this interdependency.

At the engagement meeting we also questioned why no community facilities are being provided and it was explained that the site would utilise those provided at the Brooklands Farm site. We would respectively ask that this be explored in light of the delays or even potential withdrawal now given at the Brooklands Farm site, and if N20 proceeds there should be something tangible provided for the community.

Push for earlier A299 on/off slips

The KCC response to the Brooklands Farm application dated 07 October 2025 on the CCC Portal on page 8 states “A significant amount of the junction capacity issues will be resolved by the provision of the A299 slips at a fairly early stage in the proposed development as per the current requirement in the Draft Local Plan which requires the slips to be provided no later than 50% occupation.”

Chestfield Parish Council believes that the assessment needs to consider a further scenario of 25% and 15% occupancy so that the phasing of any infrastructure can be adequately conditioned. Paragraph 116 of the NPPF stipulates authorities should be able to judge whether the plan will have an unacceptable impact on highway safety or severe impact on the road network. We don't believe this is possible until the LPA can be confident that its own phasing won't compromise the traffic network during the build and an assessment of the impact on Radfall Road has been made.

We would encourage the planned slip roads be built at the onset of the project (ie: before actual housing build) or at 25% occupancy.

This we see as the most viable and overall acceptable option to ensure that construction impacts can proceed without either disruption to ongoing village life in terms of health and wellbeing, but also to protect a very tired and fragile existing infrastructure.

With the developer of Policy N20 also now being expected to contribute to the slip roads then this may facilitate this earlier phasing.

Housing Needs Survey

In April this year Chestfield Parish Council commissioned a [Housing Needs Survey](#). We would urge any application for N20 to take account of the findings in that and respond to this evidence. There is a current mismatch between the current demographic profile and current housing stock. Our survey demonstrates a clear need for smaller, affordable, and accessible homes.

We would want to see 30% Affordable housing provided should any application come forward. Of these affordable homes, Canterbury City Council's Housing Needs Assessment identifies that the tenures delivered should be rented accommodation and home ownership products such as shared ownership and discounted market housing. For Chestfield our survey's findings show that most of Chestfield's affordable housing need is for affordable home ownership options (e.g. shared ownership, discounted sale), not social rent.

2. Loss of the Thanington Recreation Ground

Whilst not in our parish we are compelled to comment on the potential loss of the Thanington Recreation ground (Policy N3) to be given over to a 900 space Park and Ride site. This would be irreversible and mean the loss of a well-used and enjoyed amenity. The alternative provision is not suitable as it is too far away and involves crossing a major road – and we believe there would be an increase in anti-social behaviour, and the future viability of the Thanington Neighbourhood Centre would be jeopardised. Whilst provision of a new fourth slip would result in the loss of some capacity at the existing Park and Ride site surely leaving parking provision there and creating a multi-storey car park to increase capacity should be explored as an alternative.

Furthermore, we are not supporters of the building on the inner-city car parks and losing parking provision in the City. Not everybody wants to, or is able to, or has the time to take the Park and Ride as an alternative, particularly if they just want to pop into town for a single errand. Loss of parking in town will surely have a negative impact on businesses. An alternative might be to build over car parks but keep parking provision below and build over this instead.

3. Housing allocations on Page 12 have the wrong figures for the two Chestfield sites:

As a final point of clarity, the draft housing allocations on Page 12 of the new local plan document (September 2025) have the wrong figures for the two Chestfield sites:

- Policy W4 Land at Brooklands Farm states 1400 units, however planning application CA/25/00779 has been submitted for 1350 in total. And
- Policy W6 Bodkin Farm states 250 units, however the planning application submitted CA/24/00224 is for 300 units.

To conclude, Chestfield Parish Council respectfully asks for Policy N20 to be removed from the latest draft local plan proposals.