

Stour Fishery & Conservation Association

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10th April 2026

Sent by Email only to: consultations@canterbury.gov.uk

Dear Sirs

Draft Canterbury District Local Plan (2042/43) Regulation 19

This email makes submissions on behalf of the Stour Fishery & Conservation Association (SFCA) as part of the Regulation 19 Consultation.

The SFCA owns stretches of the River Stour and also controls the fishing rights on other stretches outside the Association's ownership, together comprising much of the River Stour between the villages of Wye and Chartham and downstream from Chartham Papermill to the outskirts of Canterbury. Part of the SFCA water is let to the Tonford Fly Fishing Club (TFFC).

The SFCA was formed over 150 years ago, and its principal focus is on protection and improvement of the River Stour for its population of migratory salmonid species. Eels also use the river – another species in serious decline. Members fish the river between April and September.

Despite the pressures of pollution, water abstraction and rising temperatures, the River Stour contains a viable population of Wild Brown Trout, Sea Trout and, even to this day, occasional Salmon in relation to which there is still evidence of breeding.

The River Great Stour carries the characteristics of a chalk stream from Wye to the tidal water downstream of Fordwich and this results from being replenished by water from chalk aquifers below the North Downs on either side of the Stour Valley.

This rare chalk stream habitat is represented in only 200 rivers approx, mainly in the south and east of England. Such habitats are declining, and relatively unique to England and the Channel coast of France.

The chalk stream habitat supports its own ecosystem and biodiversity, a vital part of which relates to the river's aquatic life including the Salmonids and other wild fish, the populations of which live off the remarkable food chain arising from the invertebrate population of the river, the Mayfly being a famous part of that feature.

The SFCA monitors the invertebrate population with detailed surveys in the spring and autumn of every year. These surveys indicate the health of the river and the changes that arise from human activity in the Stour Valley.

At the same time the SFCA seeks to carry out work wherever possible to restore the natural flow of the river which has been altered during the last 200 years or more by the introduction of various types of obstruction such as weirs and sluices, which historically were constructed to serve milling activities up and down the Stour Valley. Many of these weirs and other obstructions are still in place, nowadays simply providing visual amenity and no benefit.

However, fragmentation of the river by obstructions is one of the most significant pressures on wild fish populations today. The removal of redundant barriers is one of the most effective actions that can be taken to restore healthy freshwater ecosystems. The River Stour is and has great potential to be improved as a lifeline for wildlife – providing a dynamic and connected system allowing fish to move freely between the habitats they need to survive. It is therefore essential to remove redundant structures that interrupt natural flows and block fish movement.

The SFCA has noted Policy R1 in the Draft Local Plan, relating to Rural Service Centres and understands the reasons for designation of Chartham as one of these - in particular the allocation of 165 dwellings in Policy R3 – Chartham Papermill between 2024/25 and 2042/43.

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The Chartham Papermill Policy R3 is dealt with at paragraph 5.8 of this section of the Draft Local Plan and discusses the proposal for regeneration to provide residential development and other facilities to reflect the heritage of the site and the character of Chartham Conservation Area.

In particular it is stated that ***“Development will also provide an opportunity for improvement and enhancement of the adjacent River Stour”***.

The SFCA would welcome consultation on how the river improvements might be achieved and we are keen to stress that the housing development as proposed will fall short of the objectives of soundness and justification if the improvement and enhancement works are not sufficient to enable the free passage of fish up and down the river at this point.

All fish species need to move within river systems at different stages of their life – to spawn, feed, find shelter and maintain healthy populations. When rivers are fragmented by barriers, fish populations become isolated reducing genetic vigour and increasing the risk of local extinction.

For the migratory species of the Great Stour (including Eels) – Sea Trout in particular (an iconic species) and also the remnant population of Atlantic Salmon, the consequences are even more severe. An unobstructed route through the river between freshwater and the sea is vital for the completion of life cycles, and European Eels are also a Stour species in serious decline. The obstructions associated with Chartham Papermill are probably the most serious obstructions on the Great Stour and there will have been reducing breeding success over many decades, limiting the vital access which is required to high-quality habitat, as well as increasing stress and mortality.

River barriers affect far more than fish movement. They alter the natural flow patterns, trapping sediment upstream and starving downstream habitats of nutrients. This disrupts invertebrate communities and degrades spawning habitat. Barriers also trap pollutants, which accumulate in sediments behind structures and these contaminants can remain in place for decades, degrading water quality and posing long-term risk to wildlife.

Barriers also influence river temperature which is another serious threat on the River Stour, with treated sewage effluent entering the river at temperatures well above the norm. Barriers hold this warm water back, reducing the chances of survival for cold water species like Salmon and Trout, increasing disease risk and worsening the impact of climate change.

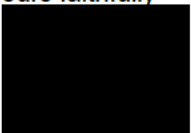
In river restoration projects, the evidence has been clear for many years that barrier removal is the most effective solution. It is invariably demonstrated that removal of redundant or obsolete structures restores natural flows, reconnecting habitat from source to sea and delivering measurable ecological recovery. Fish populations respond quickly, sediment movement improves, water quality stabilises and biodiversity increases, all within a short period of time. All of that enables spawning habitat to be utilised more effectively.

There are fish passes at Chartham Mill but it is recognised that these are relatively ineffective. Many species and life stages struggle to use them. Complete removal of obstructions restores the river for all species.

Furthermore, barrier removal dispenses with the need for ongoing management of ageing infrastructure and/or complex mitigation measures, thereby providing the long-term benefit of minimal future cost as well as reversing decades of damage to natural habitats.

The criteria of soundness, effectiveness and justification which have to be addressed in the Regulation 19 Consultation are all met by objectives to secure a healthy river with abundant wildlife and restoration for future generations. The SFCA will hope to be consulted in relation to these matters.

Yours faithfully



Michael Bax DL FRICS FAAV
(Chairman, Stour Fishery & Conservation Association)