

Land West of Rattington Street, Chartham

Canterbury City Council Regulation 19 Local Plan
Representation

Final Report

14831

May 26



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1 INTRODUCTION

1.1 OVERVIEW

- 1.1.1 This representation has been prepared on behalf of Wedgewood Land & Investments Ltd (hereafter referred to as Wedgewood) in response to the Canterbury City Council (CCC) District Local Plan 2042/43 Regulation 19 Consultation, which runs until Monday 18th May 2026.
- 1.1.2 Land West of Rattington Street, Chatham (hereafter referred to as the site) has previously been promoted by Wedgewood through various consultation exercises and draft allocated by CCC, including the previous Regulation 18 consultations.

1.2 PLAN CONEXT

- 1.2.1 The purpose of these representations is to assess the Draft Plan against the tests of soundness set out in paragraph 36 of the National Planning Policy Framework September 2024 (NPPF), namely:
- a) Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 1.2.2 In terms of legal compliance, the main requirement for the early stages of Local Plan consultation is in relation to:
- a) Planning for community engagement.
 - b) The sustainability appraisal (including consultation with the statutory environment consultation bodies).
 - c) Identifying significant cross boundary and inter-authority issues; and
 - d) Ensuring that the plan rests on a credible evidence base, including meeting the Act’s requirement for keeping matters affecting the development of the area under review.

- 1.2.3 At this point in time, Wedgewood does not raise any substantive concerns in terms of the procedural requirements.
- 1.2.4 CCC will also be aware that the Planning Practice Guidance (PPG) relating to plan-making was updated on the 27th November 2025. The revised guidance distinguishes between Local Plans prepared under the new plan-making system (applying to plans submitted after December 2026) and those prepared under the current, now termed 'legacy', system.
- 1.2.5 According to CCC's Local Development Scheme (LDS), published in March 2026, it is our understanding that the LPA intends to submit the Local Plan on or before 12 December 2026, in advance of the transitional deadline of 31 December 2026. The Plan is therefore intended to be prepared under the legacy system, and the updated PPG is of limited relevance for the purposes of this Regulation 19 consultation. Wedgewood nevertheless reserves the right to provide further comments should CCC's position change or should delays arise.

1.3 SUMMARY OF POSITION

- 1.3.1 This representation specifically promotes Land at Rattington Street (SHELAA 2026 reference SLAA110). We therefore respond to the current consultation as follows:
- Our overarching concerns – these are matters fundamental to the soundness and sustainability of the Plan as a whole.
 - Our detailed comments on newly proposed allocations and policies – these are observations, objections, or supporting comments in respect of specific allocations now included within this draft.
 - Further promotion of Land at Rattington Street (former allocation) – while we recognise that this consultation is not formally seeking further representations on previously consulted policies, we consider it important to update our comments where either the policy context has changed or circumstances on the ground have shifted.
- 1.3.2 Wedgewood therefore does not find the Local Plan currently sound. We would welcome the opportunity to discuss the matters contained within this representation, including the availability, suitability, and deliverability of Land at Rattington Street, in order to support the preparation of a sound Plan.

2 THE SITE

2.1 CASE FOR RE-ALLOCATION

- 2.1.1 Our client continues to promote the site for sustainable development in Chartham, comprising housing and infrastructure, including public open space.
- 2.1.2 The site occupies 10.82ha of Grade 3 arable farmland and sits south of Baker's Lane and west of Rattington Street adjacent to the built confines of Chartham. The site is well located to benefit from the services and amenities of Chartham, including the bus routes on Cockering Road to the south and the train station, which sits 550m to the north. The site is bound by residential properties across its southern, western and northern boundaries. The eastern boundary is adjoined partially by residential properties, farm buildings and open countryside. A grain store sits within the site boundary. The site, therefore, enjoys a strong level of enclosure and is not visually prominent on the landscape. The site is shown in a local context below.



FIGURE 2.1: SITE LOCATION (COURTESY OF OPENSTREETMAP)

- 2.1.3 The site was previously allocated for 170 dwellings within the previous iteration of the emerging Draft Local Plan under Policy R8. A summary of the draft allocation has been included as part of previous representations made in support of this site.
- 2.1.4 The Chartham Conservation Area and associated listed buildings sit to the north of the site's northern boundary. Given intervening vegetation, highway, dwellings and level changes, any impacts on the Conservation Area and listed buildings can be mitigated against through the course of any submitted application, supported by a Heritage Statement.

Highways and access

- 2.1.5 Two access tracks within the land ownership provide access to the site off Rattington Street to the east, Baker's Lane to the north, or The Crescent to the south. This provides connectivity into the village centre, with additional amenities within walking distance to the south, including bus stops on Cockering Road and Beech Avenue. The site, therefore, falls within a sustainable location.
- 2.1.6 A site access has been designed and has been subject to pre-application discussions with KCC Highways, which has confirmed that access is achievable and that there are no highways reasons to oppose an allocation on the site.
- 2.1.7 Rattington Street takes a general north / south alignment and allows for two-way movements by light vehicles. The road is subject to the national speed limit (60mph) from the junction with Cockering Road, which reduces to 30mph on the north-eastern site boundary.
- 2.1.8 Station Road continues from Rattington Street in a northerly direction through the village centre before reaching the A28 Ashford Road. The A28 provides access to the A2 Trunk Road and Canterbury City Centre to the east and the M20 motorway and Ashford to the west.

Landscape and Visual

- 2.1.9 EDLA has completed a landscape appraisal. The assessment concludes that the site is enclosed to the north, west, and south by residential development and roads to the north and east. Therefore, if developed, it would be perceived as a rational infill within Chartham. The site is sloping and comprises a central area of Ancient Woodland, which would need to be retained and development offset.
- 2.1.10 The assessment demonstrates that the proposal may have some visual effects from roads and properties directly adjoining the site and some across the valley views from the North. However, it states that these effects can be mitigated through proposed landscaping mitigation measures, which involve creating new habitats with the potential to link existing ones.

Ecology

- 2.1.11 As set out above, the central tree area within the site is Ancient Woodland, whilst the site comprises predominantly Grade 3 arable farmland. Combining the 15 m Ancient Woodland buffer, additional landscaped buffers, and other ecological mitigation can provide net gains to biodiversity by creating new habitats.

Sustainability of the site

- 2.1.12 The village of Chartham is recognised as a local centre within the adopted Local Plan settlement hierarchy and as a Rural Service Centre within the emerging Local Plan. It benefits from a range of services, including a train station, bus stops, primary school, nursery, and doctor's surgery, amongst other facilities that are more typical of village locations, such as public houses and local shops.
- 2.1.13 Chartham itself is a dispersed settlement. As with the other villages within the district, it does not currently have a defined settlement boundary. Development sits in three linked clusters, including residential areas to the south and west and the village centre to the north. This site sits between the residential areas and the village centre but behind existing dwellings and, therefore, is out of clear public view.
- 2.1.14 The village has a good range of local services. It has a post office/ convenience store, restaurant, and doctor's surgeries.
- 2.1.15 Key services, such as secondary schools, sixth-form colleges, supermarkets, and hospitals, can be accessed nearby in Canterbury via the A28, or alternatively by train or bus.
- 2.1.16 Within a 15-minute walk of the site is a Community Hall, Primary School, Train station, Bus stop, Place of Worship, Pub, and Recreation Ground.
- 2.1.17 Canterbury, approximately 4.9 km away, provides most of the employment opportunities for many Chartham residents. Canterbury is accessible via public transport, including Bus Route 1A and regular train services.
- 2.1.18 Chartham Railway Station is a great asset to the village. It is 650 m from the site and provides sustainable routes to Canterbury West (5 mins), Ashford International (15 mins), and London St. Pancras (85 mins).
- 2.1.19 An existing footway is available along the length of Baker's Lane to the north of the site and continues along Rattington Street to the village centre. The footway measures approximately 1.5 metres in width and is maintained to a good standard. The following services are available within easy walking distance:

Facility	Walk Distance	Walk Time
Bus Stops	20m	1 minute
Public House	120m	1 minute
Chartham Village Hall	500m	7 minutes

Chartham Village Stores	550m	8 minutes
St Mary's Church	600m	8 minutes
Chartham Railway Station	700m	9 minutes
Chartham Surgery	850m	11 minutes
Chartham Primary School	950m	11 minutes
The Firs Nursery	950m	11 minutes

2.2 THE SITE PROMOTION

- 2.2.1 Wedgewood has prepared an indicative masterplan for the site, informed by professional ecology, landscape, and visual impact advice. An extract from this masterplan is included within Figure 2.2 below and demonstrates how much-needed residential accommodation (circa 170 dwellings) can be provided whilst protecting the central ancient woodland and creating an ecological link between this and the existing woodland to the north-west of Bakers Lane. In doing so, the masterplan establishes a green gap within the proposed development which would be retained in perpetuity as part of the approved landscaping scheme.
- 2.2.2 Wedgewood's proposal will make a positive contribution to local connectivity by introducing new pedestrian and cycle links throughout the site. These improvements would help resolve current connectivity issues between Chartham, Shalmsford Street, and St Augustine's.
- 2.2.3 The masterplan further demonstrates how much-needed residential accommodation can be delivered alongside significant ecological enhancements, including the protection of the central ancient woodland and the creation of a continuous ecological corridor linking to the existing woodland to the north-west of Bakers Lane.
- 2.2.4 Wedgewood's masterplan would also deliver improved connectivity across the site, linking the built-up areas of Shalmsford Street and St Augustine's with the built-up area of Chartham through the provision of new connections.



FIGURE 2.2 PROPOSED MASTERPLAN

3 REVIEW OF THE LOCAL PLAN EVIDENCE BASE

3.1.1 CCC is currently seeking views on the Regulation 19 Draft Local Plan as part of the on-going plan making process. As part of this, CCC has published a number of Evidence Base documents. Comments are provided on the published evidence base documents which are listed below.

- **Strategic Housing Land Availability Assessment (SHELAA) 2026**
- **Development Strategy Paper 2026**
- **Strategic Flood Risk Assessment (SFRA) 2026**

3.2 SHELAA 2026 - COMMENTS

3.2.1 The SHELAA (2026) includes a summary of the assessment of the Site (Land at Rattington Street) but subsequently discounts it as an allocation even though it is **considered entirely suitable**.

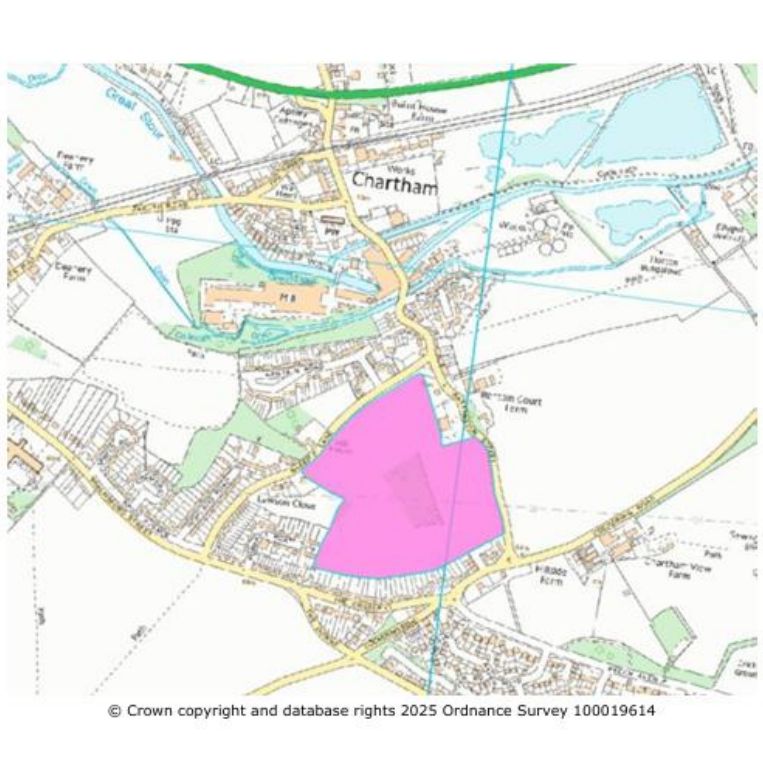
<u>Site Reference:</u>	SLAA110	
<u>Site Name:</u>	Land to the West of Rattington Street	
<u>Site Area:</u>	10.33ha	
<u>Site Address:</u>	Rattington Street, Chartham, CT4 7JG	
<u>Nearest Settlement:</u>	Chartham	
<u>Settlement Hierarchy:</u>	Rural Service Centre	
<u>Greenfield/Brownfield/Mixed:</u>	Greenfield	
<u>Current Use:</u>	Agricultural land.	
<u>Proposed Land Use:</u>	Housing (market & affordable).	

FIGURE 3.1 SHELAA 2026 MAP

3.2.2 The LPA concludes:

Following responses to the Regulation 18 draft Local Plan (2022) consultation, concerns regarding the suitability of the site for allocation were raised. Kent County Council (KCC) raised concerns around the suitability of the proposed access point to the site and the wider impacts on the local highway network. The developer was unable to receive

confirmation from KCC that the highway impacts of the development could be mitigated and therefore the site was no longer proposed for allocation. The site was not proposed as a draft allocation in the Regulation 18 draft Local Plan (2024).

Additional evidence was provided as part of the 2024 consultation, which included confirmation from KCC that their previous concerns regarding access and impacts on the local highway network had been addressed and the site was subsequently included as a draft allocation in the Focused Regulation 18 draft Local Plan (2025). Following responses to the Focused Regulation 18 draft Local Plan consultation (2025), the site is no longer proposed for as a draft allocation in the Regulation 19 draft Local Plan (2026).

The brownfield site at Chartham Paper Mill (SLAA355) has been prioritised and SLAA110 is no longer needed to meet the identified housing need. For further information please refer to the Development Strategy Topic Paper.

- 3.2.3 Whilst Wedgewood are supportive of the approach of utilising brownfield development, the SHELAA clearly states that sites found to be suitable, available and achievable will be taken forward for further consideration in the new Local Plan. Whilst we understand this does not mean that all sites will ultimately be allocated, sites not identified as suitable **should not be taken forward for allocation**. There is currently limited justification provided by the LPA as to why it has deviated from this approach given the significant constraints identified with the Chartham Paper Mill site. A comparison summary of the site's constraints is set out below.

Topic	SLAA110 – Land West of Rattington Street	SLAA355 – Chartham Paper Mill
Site Type	Greenfield agricultural land	Previously developed brownfield paper mill site
Site Area	10.33ha	11.42ha
Current Use	Agricultural land	Disused commercial paper mill
Proposed Use	Housing (market & affordable)	Mixed-use: Housing / Retail / Community / E(b)
Overall SHELAA Conclusion	Suitable, available and achievable	Technically unsuitable due to Flood Zone 3
SHELAA Conclusions		
Housing Yield	Approx. 169 dwellings mixture of Market and affordable.	No indicative yield stated
Brownfield Priority	Greenfield release required	Strong brownfield regeneration opportunity
Flood Risk	No major flood issue identified	Significant constraint – Flood Zone 3
Landscape Impact	Requires woodland buffers and parcel-based layout	Existing developed character reduces landscape sensitivity

Highways / Access	KCC concerns addressed through previous Local Plan representations.	Infrastructure and mitigation likely required.
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- 3.2.4 As demonstrated above, SLAA110 is clearly the most suitable site from a development and deliverability perspective because it was assessed by the LPA as “suitable, available and achievable” for residential development, with capacity for approximately 169 dwellings and no overriding environmental constraints such as Flood Zone 3 flood risk affecting the whole site.
- 3.2.5 While the site is greenfield, the assessment identified that impacts relating to woodland, landscape and the nearby conservation area could be appropriately mitigated through buffers, parcel-led design and green infrastructure connections. Importantly, earlier highway concerns raised by Kent County Council (KCC) were subsequently addressed through additional evidence submitted during the 2024 consultation process, leading to the site’s inclusion in the Focused Regulation 18 draft Local Plan (2025).
- 3.2.6 In contrast to SLAA355, which remains fundamentally constrained by significant flood risk and reliance on the Exception Test, SLAA110 presents a less constrained residential development opportunity with greater certainty around deliverability and viability.
- 3.2.7 Wedgewood therefore considers there to be insufficient evidence available to justify why the LPA has deviated from the approach set out in the SHELAA methodology.**

3.3 DEVELOPMENT STRATEGY PAPER 2016 - OBJECT WITH COMMENTS

- 3.3.1 Wedgewood strongly objects to the LPA’s approach to omitting Land West of Rattington Street, Chartham from the draft Local Plan allocation process. The justification provided within the Development Strategy Topic Paper is considered insufficiently evidenced and inconsistent with the LPA’s SHELAA findings. The LPA merely state that:

“the site is not proposed for allocation in the Regulation 19 draft Local Plan (2026) as it is no longer needed to meet the identified housing need in the district for this Local Plan period. The brownfield site at Chartham Paper Mill (SLAA355) has been prioritised as an allocation in line with the council’s ‘brownfield first’ approach to site selection”.

- 3.3.2 The LPA has therefore allocated new site’s despite acknowledging significant environmental constraints, including sites requiring substantial flood mitigation improvements (please see SHELAA summary above). This raises concerns regarding the site selection methodology.
- 3.3.3 The LPA’s evidence identifies Chartham as a Rural Service Centre and confirms that such settlements are considered sustainable locations capable of accommodating growth to support their function and vitality. The removal of the Rattington Street site within Chartham therefore appears inconsistent with the LPA’s own spatial strategy, particularly where no clear

evidence has been produced to demonstrate that the identified constraints are so fundamental to warrant its removal as an allocation.

- 3.3.4 The LPA's evidence repeatedly refers to housing supply pressures and the difficulty in meeting identified housing needs across the district. Against that context, the removal of a site capable of delivering approximately 170 dwellings requires clear and robust evidence. Smaller and medium-sized sites are particularly important in contributing to early and flexible delivery, especially where larger strategic sites are subject to long lead in times and infrastructure dependencies.
- 3.3.5 Wedgwood finds the LPA's methodology to site selection currently unsound.**

3.4 SFRA 2026 – OBJECT WITH COMMENTS

- 3.4.1 Wedgwood objects to both the methodology and conclusions of the Strategic Flood Risk Assessment 2026 (SFRA), particularly the process by which constrained and flood-affected sites have been identified as suitable for allocation. The assessment appears to rely upon assumptions, future investigations and speculative mitigation measures rather than robust, site-specific technical evidence capable of demonstrating that development can safely proceed.
- 3.4.2 Paragraph 172 of the NPPF requires all plans to apply a sequential, risk-based approach to the location of development, through application of the Sequential Test and, where necessary, the Exception Test. The overarching purpose of national policy is clear development should be steered towards areas at lowest risk of flooding from all sources.
- 3.4.3 Notwithstanding the above, the SFRA appears to conclude that no Sequential Test is required where a site lies within Flood Zone 1 or where flood-prone areas could theoretically be avoided through future layout and mitigation measures. The LPA has therefore sought to accord with paragraph 027 of the NPPG, however, the evidence base does not robustly demonstrate that these sites can in fact safely avoid flood risk through layout or mitigation. The SFRA therefore adopts a mitigation-first approach contrary to the NPPF's clear requirement to apply a sequential avoidance-first approach to site selection.
- 3.4.4 Further to the above, the SFRA fails to demonstrate that reasonably available alternative sites have been identified, assessed and discounted through a district-wide Sequential Test exercise. There is little evidence of any assessment of lower-risk sites, nor any clear explanation as to why alternative available sites were rejected. The absence of a district-wide sequential assessment is particularly concerning given that Land at Rattington Street was previously identified as a draft allocation and clearly represents a reasonably available alternative site. The evidence base contains no clear justification for its omission from the comparative exercise.
- 3.4.5 In relation to the draft allocated Chartham Paper Mill site, the SFRA 2026 confirms that substantial proportions of the site fall within Flood Zones 3a and 3b, with only a limited area remaining within Flood Zone 1. The extent of functional floodplain identified within the assessment gives rise to serious concerns regarding the suitability of the site for residential and mixed-use development, particularly having regard to the flood vulnerability classifications set out within national planning policy and guidance.

- 3.4.6 Despite the extent of mapped flood risk, the SFRA suggests that the Environment Agency's modelling may "significantly overestimate" flood risk across parts of the district. However, critically, no updated site-specific hydraulic modelling has been undertaken by the LPA to substantiate that. Instead, the conclusions appear to rely upon sensitivity testing undertaken elsewhere in the district. The SFRA acknowledges, at page 74, that such testing does not specifically apply to the Paper Mill site. The Council therefore seeks to cast doubt upon the Environment Agency's mapped flood extents without producing any technical evidence capable of justifying departure from the mapping.
- 3.4.7 Significant concern also arises from the treatment of climate change within the assessment. The SFRA expressly acknowledges that aspects of the climate change modelling are partially out of date and that accurate district-wide climate change allowances cannot presently be applied. In those circumstances, the Council cannot reasonably conclude that highly constrained allocations such as the Chartham Paper Mill site would remain safe for their lifetime, particularly given the long-term vulnerability of the site to fluvial flooding.

4 LOCAL PLAN POLICY REPRESENTATIONS

4.1 POLICY SS3- DEVELOPMENT STRATEGY

- 4.1.1 Draft Policy SS3 proposes to secure a minimum level of housing delivery sufficient to meet the borough's identified need, as calculated using the Standard Method. The annual level of growth is proposed to occur over a series of stepped increases over the 19-year Local Plan period from 2024 to 2042, resulting in a minimum housing requirement of 23,085 homes across the Local Plan period.
- 4.1.2 While it is welcomed that CCC is seeking to plan positively to meet its housing needs in full at this early stage of plan preparation, CCC should be proactively planning for a **minimum** of 15-year plan period (2024–2044), in accordance with the expectations of the NPPF.
- 4.1.3 Notwithstanding the above, concerns remain regarding both the quantum and composition of sites identified to deliver this requirement, and whether the anticipated level of delivery can realistically be achieved.
- 4.1.4 Although it is supported that CCC intends to meet its housing requirement in full, the current approach does not include a contingency or buffer to account for delivery slippage or unforeseen delays. To ensure flexibility, resilience, and market choice, a minimum buffer of 20% should be applied.
- 4.1.5 Applying a 20% buffer would necessitate the identification of additional land capable of delivering further dwellings over the plan period.
- 4.1.6 In addition to the above, Wedgwood considers that the emerging Spatial Strategy places disproportionate reliance on constrained brownfield regeneration opportunities and fails to provide sufficient flexibility or support for sustainable greenfield development opportunities. In particular, the strategy appears to favour certain brownfield allocations despite significant technical and environmental constraints, including flood risk, remediation requirements, viability pressures and infrastructure uncertainty. This approach risks undermining the effectiveness and deliverability of the Local Plan.
- 4.1.7 Overall, National planning policy does not require brownfield development to be prioritised at the expense of sustainable development principles, soundness or deliverability. Rather, plans should promote sustainable patterns of growth which are justified, effective and capable of being delivered over the plan period.

4.2 POLICY SS7 – SUPPORT WITH COMMENTS

- 4.2.1 Wedgwood recognises the need for ongoing monitoring and review of the Local Plan. Draft Policy SS7 acknowledges that:
- housing needs may change significantly over the plan period;
 - housing delivery may fall below required levels;
 - infrastructure delivery may fail to keep pace with development; and
 - the transport strategy assumptions may not be achieved.

- 4.2.2 The inclusion of these review triggers is welcomed. However, the policy is fundamentally reactive and risks delaying the identification and allocation of additional housing land until substantial delivery failures have already occurred.
- 4.2.3 In these circumstances, the LPA should adopt a more flexible and responsive approach to ensuring that sufficient housing land supply is identified through the current Local Plan process.

4.3 POLICY R3 CHARTHAM PAPER MILL ALLOCATION – OBJECT WITH COMMENTS

- 4.3.1 As set out within Section 3 of this Representation, Wedgewood does not currently consider the Local Plan to be sound due to issues with the site selection process for allocations.
- 4.3.2 For Chartham, which has been identified as a Rural Service Centre, the LPA is proposing to allocate approximately 165 dwellings together with mixed-use development on the former Chartham Paper Mill site. Wedgewood raises concern that the Paper Mill site is subject to significant environmental constraints, most notably flood risk, which have not been adequately addressed through the Local Plan evidence base. As such, serious concerns remain regarding the site's ability to deliver the requirements of the allocation in a safe, viable and sustainable manner.
- 4.3.3 Most significantly, the LPA's own SHELAA 2026 concludes that SLAA355 is "unsuitable for the land use proposed" due to the site's location within Flood Zone 3, an area identified as being at high risk of flooding. The SHELAA confirms that the allocation has nevertheless been progressed on the assumption that flooding constraints can be mitigated through design measures and the application of the Exception Test.
- 4.3.4 Allocations of this nature rely heavily on future mitigation measures rather than demonstrating that development has been appropriately directed away from areas at highest risk of flooding, in accordance with the sequential approach required by national policy. This clearly demonstrates that flood risk is not a minor or incidental matter, but a fundamental constraint affecting the suitability and developability of the site. In these circumstances, a further village-wide sequential test is considered necessary, particularly where other potentially more suitable sites, such as Land at Rattington Street, have been omitted without any sufficient justification.
- 4.3.5 Further to the above, emerging allocation R3 has remained a draft allocation since the Regulation 18 consultation in 2025. However, there appears to have been no meaningful progress towards the submission of a planning application for the site, despite policy support for the re-use of brownfield land and the site having been actively marketed. Accordingly, concerns remain regarding both the deliverability of the site and its ability to meet the requirements of the proposed allocation in a safe, viable, and sustainable manner.

Sustainability Appraisal Evidence

- 4.3.6 The LPA's published evidence base, including the Sustainability Appraisal (SA), further reinforces the concerns noted above. The methodology underpinning the SA is therefore considered flawed, as it places undue reliance on uncertain future mitigation rather than properly assessing the significance of the identified constraints.
- 4.3.7 Furthermore, the SA raises concerns regarding the compatibility of the proposed residential use with the site's existing and surrounding commercial context. The allocation sits adjacent to established employment and commercial activity, and the SA identifies the potential for adverse effects arising from neighbouring uses, including noise, servicing activity, traffic generation and highway pressures.
- 4.3.8 Whilst the LPA appears to place considerable weight on the brownfield status of the site, the evidence base fails to adequately justify why this highly constrained allocation has been prioritised over alternative sites with materially lower flood risk. It would be more appropriate for residential development to be directed towards less constrained sites, such as Land at Rattington Street, whilst commercial and community uses could instead be accommodated at the Paper Mill site in areas less affected by flood risk. The LPA's own evidence confirms that SLAA110 (Land West of Rattington Street) was assessed as suitable, available and achievable for residential development, with an anticipated yield of approximately 169 dwellings.
- 4.3.9 Overall, Wedgewood considers that the SA fails to robustly justify the approach to the Local Plan allocations. Footnote 49 within Paragraph 124 of the NPPF does not require brownfield development to be prioritised where doing so would conflict with other policies in the NPPF.
- 4.3.10 The Council should therefore re-consider the allocation of Land at Rattington Street to meet the identified housing needs (former site allocation R8).**

5 CONCLUSIONS

- 5.1.1 This submission is made on behalf of Wedgewood in relation to Land at Rattington Street. Wedgewood has an interest in the land and therefore wishes to register an objection to its omission. They also have wider concerns regarding matters of soundness that need to be remedied through the inclusion of additional housing sites.
- 5.1.2 Should the LPA wish to remedy the concerns, land at Rattington Street is suitable for inclusion within the local plan and would represent a valuable component for housing.
- 5.1.3 Finally, there are no physical limitations or problems such as access, infrastructure, flood risk, or ecology related.
- 5.1.4 We trust these comments are of assistance and look forward to seeing the progress of the plan in its final stages.