

The Corporate Consultation Manager
Canterbury City Council
Military Road
Canterbury
CT1 1YW

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By email: consultations@canterbury.gov.uk

Dear Sir/Madam,

Draft Canterbury District Local Plan to 2045 – Consultation Response

I have reviewed and wish to respond to the Draft Canterbury District Local Plan (DCDLP) Regulation 19 consultation. The representations are presented in my personal capacity rather than my role as a Chartham Parish Councillor.

National planning context

On 27 November 2025, the Government published a Guidance: Plan-making regulations explainer, which details changes to the regulations governing a new plan-making system coming into effect on 25 March 2026, as set out in the Town and Country Planning (Local Planning) (England) Regulations 2026. This would apply to local plans submitted for final examination from 1 January 2027. This makes for a challenging timeline and leaves little room for slippage.

The latest Local Development Scheme (March 2026) targets submission of the Plan towards the third quarter of 2026, which is ambitious. This is noteworthy as the DCDLP must be submitted for final examination by 31 December 2026 to be considered under the current plan-making system. This leaves little room for slippage of the programme, but probably ensures that examination will take place against the existing arrangements.

The Government published the National Planning Policy Framework (NPPF) in December 2024, and in accordance with paragraph 234, the Draft Local Plan ("DCDLP") will be assessed against the policies set out in the current 2024 version of the NPPF.

A draft NPPF was published in December 2025 with consultation concluded in March 2026. The Chief Planner has indicated that the publication of a new NPPF is planned for summer 2026. will be published in the summer of 2026. Local Plans must give appropriate weight to the provisions of that document.

General comments on the Regulation 19 consultation

The consultation DCDLP was published alongside the draft Canterbury District Transportation Strategy and a raft of new and updated evidence base reports.

I include one appendix in the main body of this document with some information about the World Heritage Site.

I also attach a separate document, identifying the recent documents which were presented at the same time as the plan without any information about their existence, their subject matter except for a link, and no encouragement to comment upon them nor opportunity given to comment as was the case of one document alone, the consultation of which ran at the same time as the plan.

The volume of new information (see attached appendix showing latest evidence base additions) is such that it is impossible for respondents to review all of the information and provide meaningful responses within the limited time allotted for the consultation exercise.

The failure to advertise the extent of that evidence base and to consult separately and in advance of the draft local plan makes the sustainability of this Local Plan questionable. This sort of approach is less than ideal when heading into final examination.

This is made particularly problematic given that the focussed consultation carried out in October 2025 included significant amendments to strategic allocation sites without the necessary and corresponding evidence base (e.g. no updated Transport Assessments to set out the impacts of new proposals such as Merton Park – Policy C10. I believe also that there was only a focussed Habitat Regulation Assessment addendum added at this stage).

It is understandable that there may be a compressed timetable in part due to the 31 December 2026 deadline for submission of the local plan for examination under the existing plan-making system. Failure to submit would have significant consequences given the work undertaken thus far. Nevertheless, the Council should have considered pre-publishing more information and/or allowing extra time for review. I sent a copy of the to 2 people in Wincheap a week ago, one being the head of the Wincheap society, the other an interested and informed local. Neither had been aware of the Wincheap document. This seems unfair to me.

I am surprised that you are not applying for mitigating circumstances in order to protect Canterbury against presumption.

These include the NPPF requirement to:

- upgrade existing infrastructure eg. the Chartham sewage works
- make required infrastructure in advance of housing eg :
 - Broadoak reservoir. (SE water has said that they're unable to provide water for the required number of houses.
 - A2 offslip
 - Identification, planning and construction of new sewage treatment works
- Protect heritage assets, including the outstanding universal value of the world heritage site with the NPPF indicating that policy is required at the Local Plan level.
- Take account of impacts upon the catchment area resulting from disparate and increasingly unenforcible sewage treatment package plants. No policy is including source protection zones of the now-more-protected chalk stream, the river Stour and assess

Policies SS3 Development Strategy for the District and R1 Rural Service Centres

The classification of Chartham as a Rural Service Centre is problematic given the low population size and available facilities. The classification appears to rely in part upon the aggregation of two historic and distinct settlements (Chartham and Shalmsford Street, 1 mile

away) . Plus a new development from 2000 providing 1000+ more inhabitants made on the site of a mental asylum Saint Augustines). These settlements are not physically well connected given the lack of pavements and rural character of the lanes.

Although there is a train station, it lacks facilities (e.g. no car park) and with only 2-3 trains per hour, it does not meet the Government's proposed threshold for a "well connected" station where higher density development is supported as identified in Foot note 45 of the draft NPPF.

Chartham scores 44 on the Connectivity Tool and a copy of that result is attached to this response as Appendix 1, which is well below what is considered appropriate for the designation of a Rural Service Centre and demonstrates that Chartham should be downgraded to a lower settlement designation such as a "Local Service Centre" as it is in the current local plan, or "Village." Chartham Hatch, for similar reasons, should be returned to "Hamlet" rather than village.

The DCDLP continues to focus on the Canterbury Urban Area as the "principal focus for development in the district," but plan delivers development through the expansion of the urban area, particularly to the southwest. In doing so, the plan promotes the encroachment of the urban area into the countryside, the erosion of important open spaces to the south and the further degradation of important views of the Canterbury Cathedral and its bell tower from the surrounding area and historic pilgrimage routes. This approach also leads to a failure to use existing central urban land effectively and efficiently.

South West Canterbury Strategic Development Area (Policies C10, C13 and C14)

The DCDLP continues the pattern set in the adopted Local Plan of support for large scale development of sizeable open parcels of land to the south of Canterbury. Development of land allocated carried forward from existing and previously adopted local plans (namely CF1) has already resulted in the extension of the urban area as defined under Policy SS3 towards Thanington and Chartham.

The DCDLP proposes to continue this erosion of the countryside, termed Canterbury Area due to an arbitrary boundary between Canterbury and smaller rural settlements to the southwest as a result of allocations detailed in policies C10, C13 and C14. There is little further protection of the fields beyond to ensure that these strategic gaps are preserved, giving rise to concerns that Canterbury may continue to sprawl and encroach upon these areas.

A central element of the large-scale development proposed for this area in previous iterations of the Local Plan was the construction of a south west link road to accommodate the extra traffic and provide further connections and linkages. Unfortunately it was proposed upon mitigation area for the Cockerling Road development and so was not a plausible development. It is now of considerable concern that the developments will overwhelm local, rural/country roads

Transport pressures upon Chartham from existing and passed development along Cockerling Road will only increase and yet the impacts weren't assessed at the junction between the Downs and Cockerling lane. I believe that the transport assessment doesn't identify and clarify whether known bottlenecks have been taken into account. Without this, the assumption must be that they haven't which makes the authority of the Transport assessment questionable,

Policy C10 – Land at Merton Park

In addition to the concerns outlined above, I have significant concerns that the policy removes the context of the views from the site and does not consider any protection of views towards the Cathedral from places beyond the site itself which may be lost because of development upon the site.

Vehicular access routes are ill defined and could lead to harm to the rural lanes, in particular to Merton Lane North, a narrow, rural road framed by mature trees giving it a sylvan quality. Potential biodiversity loss and landscape/heritage impacts need to be considered at the earliest stage of planning and yet are seem not to have been taken account of yet.

Has the potential for the Park and Bus acting as a magnet for cars from the East, South

The identification of a new football stadium is unwarranted given existing facilities in other parts of Canterbury. The provision of new, so- called “upgraded” facilities would also lead to additional light pollution to the detriment of this area of Canterbury district.

Having regard to the delays in delivery of the school in Thanington, the supplementary policy may be required to ensure delivery of the 3FE primary school as detailed in 1.b.iii.

Policy C18: Wincheap Commercial Area

There's no time scale for delivery but much focus upon the financial aspect of the development.

What is the timeline for release of properties from leases? Without a timescale for financial returns how do you know if the project is viable?

What potential impacts will the redevelopment of the site have upon the locality?

Should it be done before, after or at the same time as C10? How will it be integrated with the Wincheap gyratory?

Has it been undercosted? There may well be overruns in terms of project changes and cost estimates. Examples are to do with land ownership commented upon with regard to the A2 off-slip. There have been reports that there is contaminated land near to Staples and thus there may be extra costs involved.

Policy R1 : Rural Service Centres

They generally are better suited to being Local Service Centres as they are currently defined in the Local Plan.

They're generally being arbitrarily and inappropriately promoted above their ability.

I support Chartham Parish Council's viewpoint.

The arbitrary elision of Chartham and Shalmsford Street (1 mile away) is problematic. Chartham primary school would have existed between the two. In this case there's the Conservation Area which sits between the 2 of them and Bolts hill. The CA appraisal hasn't been updated by Canterbury. This is a meaningful green gap.

Policy R13 : Local Service Centres

Many of the settlements are too lacking in shops and connectivity to act as meaningful Local Service centres. They have been promoted from being villages to Local Service centres without any increase in amenities. This is nonsensical.

Policy R3: Chartham Paper Mill

I broadly support the allocation of Chartham Paper Mill for mixed use development incorporating green space. The regeneration of this brownfield site on the banks of the Stour offers the opportunity to address local housing need and bring significant improvements to the overall character, appearance and natural environment of the site.

The proposed development mix, including affordable housing and accessible housing is welcome, but I have concerns about the quantum of development suggested in the policy (165 dwellings) and how this may be accommodated given the significant constraints and challenges to development. The flood risk and resilience measures are crucial.

Of particular concern is the potential realignment of Station Road, which may require building over existing playing fields in conflict with the protections of these open spaces in policy DS28. It is unlikely to resolve problems.

Consultation with residents, landowners (Chartham Parish Council) who haven't been consulted) and other stakeholders in a series of design charettes would be a sustainable way to do this but, despite requests from the Neighbourhood Plan's steering group for practical help a few years ago, this has not yet happened. This is unfortunate for the timely sustainable resolution of the many constraints of the development now needed.

There is continued concern about the levels of traffic associated with development of this scale given the existing highway layouts/arrangements and the documents do not provide sufficient indication of how this may be addressed. Parts 4e and 4f of the policy should be reinforced to require site specific transport modelling and a full Highway Impact Assessment rather than a transport appraisal to take into account pressure caused by vehicles waiting at the nearby railway crossing and junction with the A28 and the cumulative impacts of development prior to and within this plan.

In order to make a truly sustainable community would support an exemption from the KCC parking requirements and replacement with a mobility/ cycle and car-share hub to take advantage of the trains and increase the potential income for more bus services which are seriously lacking.

These measures would ensure that the scale of development proposed integrates comfortably within the context of the surrounding historic area (including the conservation area) and the significant natural asset that is the Stour.

Policy R4: Land at Ashford Road (west) and Policy R5: Land at Ashford Road (east)

Policies R4 and R5 in the DCDLP are separate. Yet they're treated as one flanked by existing development to either side.

This is land still designated as countryside which would make an important green gap. Unfortunately the hedging has been removed from the roadside of at least one site, there has been site trashing with one being covered in hardcore before the adoption of this plan and an application has already been submitted.

Unfortunately the green gap proposed by CCC although of some value does not prevent ribbon development along the A28 nor Cockerling Road.

Reducing views through the site to the hillside beyond will be to the detriment of this part of the countryside.

Although the need to make efficient use of land is acknowledged, the DCDLP policies recognise the value of these open views and will hopefully provide some protection of these views through the site.

The inclusion of a clear policy framework is welcomed gives an appropriate baseline for the determination of an application for planning permission.

Transport modelling

The DCDLP is supported by transport modelling work carried out by Jacobs, and in particular the studies published in May 2021 and October 2022 on behalf of Kent County Council. The starting point for the modelling exercise has been a series of five scenarios, described on pages six and seven of the October 2022 Study. The latter develops the “*City with Ghent and relief roads*” scenario with additional versions (including 5 v2 and 5 v3).

The report needs to clarify and also to use up-to date base maps as in places they seem to be based upon erroneous or outdated information.

I have raised significant concerns previously regarding the key definitions and classifications underpinning the KMT modelling exercise. This report doesn't even seem to provide information about it in the document and the information isn't freely available.

As a result it is unacceptable as it fails to provide information about the model used.

In particular, I believe that of rural roads are considered as 2 way roads with a pavement and no parking, which is not what they are.

Furthermore, rural roads very often do not reflect the standards required by Kent County Council. If modelling is based upon inaccurate fundamental assumptions regarding the identification of the character and standards of roads, one must doubt the robustness of the assessment and consequently the soundness of the plan.

Given the scale and concentration of development to the southwest of Canterbury (as identified in Policies C10, R3, R4, R5), which adds to significant development underway from allocations of the current adopted local plan (namely CF1 – land around Cockerling Road), and also others to the East, also within what is currently open countryside, there is a serious risk of adverse transportation impacts upon the local area where residents already experience significant peak-time congestion.

The modelling therefore, does not meaningfully apply the hierarchy of travel, which leads significant pressure from development along rural lanes which are already overburdened and cannot be adapted without significant loss of rural character. The users who walk, cycle and ride horses there will feel less able to do so.

Denser development with agreed improved public transport (or development-provided and managed bus services) required as part of conditions for development is necessary.

These concerns are so important that there are good reasons to question whether these modelling assessments ought to be reconsidered before submission of the Plan.

Although the Draft Transport Strategy and DCDLP seek to encourage a bus-led strategy, there is no guarantee of delivery where bus services are provided by private companies.

Heritage – Policies SS1 Environmental Strategy for the District, DS30 Historic Environment and Archaeology and C10 Merton Park

Policy SS1 4. states, “The council will continue to work with partners to ensure the UNESCO Canterbury World Heritage Site (WHS) is protected and its accessibility and connectivity are improved.” Policy DS30 refers to a buffer zone and protection of the setting of the Cathedral.

It is important to learn from mistakes. See WHS Appendix at the end of this document.

However, the council does not yet seem to have reported damage done to the WHS to UNESCO or ICCROM or asked for advice.

I argue that spatial planning of theoretical visibility of Bell Harry Tower is easy now.

The Conservation Appraisal identifies the countryside setting as relevant to the conservation area and WHS , so consideration of NPPF #220 and surrounding policies need to be considered.

The impacts of a proposed development upon theoretical viewpoints beyond or below it on the line of sight must be considered as well.

I would urge Canterbury to mitigate for the harm done by:

- Contacting ICCROM
- making theoretical visibility available as a layer on the constraints map
- identifying further viewpoints as inferred by the landscape and biodiversity assessment to protect them as mitigation for those viewpoints within a countryside setting already lost.

Chartham’s landscape provides an important setting for the city of Canterbury.

Chartham has part of the National Path and route of Pilgrimage, the North Downs Way. Many other footpaths, rural roads and two railways passing through it. Many of these go towards Canterbury.

Journeys along them, often when going towards Canterbury from Chartham, provide long-distance glimpses and more continual views of the cathedral for locals, tourists and pilgrims. Some of these have been describe in landscape reviews as astonishing. Some of these views are from Chartham parish itself.

There is a general lack of mapping or strategic view allocations towards and from the Cathedral, and this undermines efforts to protect the Universally Important World Heritage Site from harm. The Conservation Area Appraisal includes a section about views of the Cathedral but omits consideration of views from the rural hinterland.

I believe that The 2019 heritage strategy required annual re-definition of action points and assessment of success/ failure. This has failed. How will the current heritage document be more effective?

I personally haven’t had time to look at this document. I am very upset that I’ve been deprived the opportunity to comment. How many comments have you had even mentioning specifically this Heritage strategy document or other unpublicised documents, as mentioned earlier, other than from consultants that you have informed of its existence and/or requested comments?

Existing developments (e.g. Cockering Road, Hollow Lane, Riverside) have already led to the erosion of key views, including along CB464, also the Observatory development monetised views for the developer while removing them from a protected viewing point from Hollow Lane in Wincheap. Indeed, it could be argued that the developments have degraded public access to these wonderful historic views and have profited from providing private views to residents. Policy protection would mitigate against further harm.

This is also very relevant to Policy C10 – Land at Merton Park, development which may well impinge on views of the Canterbury Cathedral from the open countryside and existing rights of way, many of which are linked to routes of historic pilgrimage. This detracts from the pilgrimage experience and the overall setting and views of the UNESCO world heritage site. Although the indicative plan shows corridors (corresponding to an existing right of way), there would nevertheless be a significant material reduction in views, and the policy lacks sufficient direction on this matter. If the DCDLP does not re-introduce specified protection of these views, this policy should include greater direction on this matter. I attach a screenshot of the area in the base map for NBN atlas as appendix XX

Policies SS6 Infrastructure Strategy for the District and DS15 Infrastructure Delivery

Generally, policy wording is insufficient given concerns about the capacity of infrastructure to cope with additional demand, particularly in relation to fresh water and foul drainage. Southeast Water has already identified insufficient water resources within the local area,. As such, policies should more positively identify specific areas of need and possible solutions. Or request for a reduction of housing numbers due to the unsustainable nature of the plan.

Policy DS15 provides for infrastructure delivery across the district, but it is vague and leaves matters to be considered on a case by case basis rather than a genuinely strategic level. It is also noted that the provision of a challenge to delivery on the basis of viability is included at section 7.

It is suggested that this policy includes a list of specific settlements that are experiencing pressure on existing public infrastructure in order to give all users of the plan certainty on which settlements would be most affected by further development. Add st Augustine's for water active transport and traffic impacts.

DS20

The significant increase in the number of private package treatment plants, driven by lack of capacity of public sewers and nutrient neutrality concerns, increases the potential for harm to the local environment.

DS 20 2 requires an Appropriate Assessment in line with Habitats Regulation 2017. It has only just been presented at the same time as the plan. Has the "competent authority been consulted and given a response?" Is a consultant a competent authority in this context? Or is it just the Environment Agency or similar bodies that rightly carry such a title?

Although licensed by the Environment Agency, the likely continuation of the proliferation of these facilities warrants specific policy text, akin to that of draft Policy DS24, to require proposals to have detailed management/maintenance programmes for these facilities and a functioning enforcement regime

The funding both of the maintenance regime and enforcement need to be updated in the Canterbury District Viability Study Update (February 2025).

The wording detailed in Policy DS20 8.b. relates only to minimising levels of Phosphorous and Nitrogen. Omission of Rural Lanes policy

The DCDLP does not carry through an existing policy that seeks to preserve the character and appearance of rural lanes. Although character and visual amenity may be addressed in other policies, rural lanes have a very special character contributing to the beauty of rural countryside. This should have the added protection of a separate policy to preserve these or should be added within **Policy DS26 Landscape Character**.

Green gaps

The proposed green gaps extending northeast and southwest of Chartham are welcome, offering an additional means of protecting the Stour and its ecologically significant banks/habitat.

Yet, unfortunately, they fail to prevent the coalescence of settlements due to their failure to touch the edge of the roads which run through the area. Unconstrained ribbon development seems to be occurring at an increasing pace, often in breach. Examples of R4 and R5 are given elsewhere as examples. The car wash by Burnt farmhouse on ex-advertising land is another as well as a recent hardcored caravan pitch on the A28. Chartham Parish council has been in contact with Canterbury about these developments, generally with varied concerns. o

They do not prevent coalescence of settlements to the detriment of the historic character of Chartham. The extension of the sprawling, business area is an unnecessary extension. The garage site next door to the Volvo garage being given planning permission for a paddle business reflects the general reduction in space needed for car showrooms. R5 and R6 are similar but one has been site-trashed. This is misrepresented in the **Appendix I: Appraisal of Area Policies – Rural Area I(d)**. I have further concerns about the document which I've expressed elsewhere.

The protection measures are identified in **Policy D22 part 5** and these measures are broadly supported.

Environmental issues – Policies SS1: Environmental Strategy, DS20 Habitats of International Importance, DS21 Habitats and landscapes of national importance, Policy DS22: Habitats, landscapes and sites of local importance

The environmental objectives in the draft Local Plan's "Vision for the District to 2042/43" listed under "A thriving environment" are broadly supported, but planning for the economy when the way that people work is changing makes it hard.

I believe that it would be better to focus on making people want to live and work within the beauty of this part of the country which helps to define the Garden of England rather than covering it with concrete.

The sentiment behind the strategy to protect and enhance our rich environment and valued landscapes, creating a network of green spaces, protecting and enhancing green gaps between settlements, supporting nature's recovery and biodiversity and improving the health and wellbeing of our communities is supported. But the council needs to use spatial planning to ensure that it happens.

I commend the newly consulted upon Canterbury District Biodiversity Strategy A Nature Recovery Plan January 2026 flaws and errors which need to be resolved.

I The collaborative contributions and proposed regularity of monitoring show the power of engaging the community . Sharing of responsibility has the potential to engage local people as exemplified by the Riverfest over the past 3 years events and subsequent discussions about a Charter for the River Stour and the development of a Stour Regional Park.

I do have concerns about outdated base maps which fail to take account of, for example, the altered urban envelope. Other mistakes such as Plan 13 being the plan 11 mentioned in the text need to be resolved.

The Environmental Strategy recognises that the district of Canterbury benefits from a range of important habitats and landscapes which provide an invaluable network of green and blue infrastructure for wildlife, establishes the high-quality rural character of the district and contributes significantly to the quality of life for residents, as set out in the Canterbury District Landscape Character Assessment and Biodiversity Appraisal (2020), Kent Downs National Landscape (AONB) Landscape Character assessments and the South East Marine Plan Seascape assessment.

Biodiversity has been declining across the country, and I am concerned about development leading to the cumulative loss of habitat across the A28 corridor, as well as increased flood-risk pressures on the river valley.

CPC recognises the requirements of the Environment Act 2021 and the requirements of the Biodiversity Net Gain Regulations and is satisfied that these will be followed with a particular preference to delivery onsite within the mitigation hierarchy. Yet many species of fish in the Stour are only to be found as mature specimens during electric fishing which provides a very effective way of monitoring fish. Their progeny are unable to survive which is a bellwether for the damage to the chalk stream.

Chartham Parish Council has declared a climate emergency, so maximising opportunities for nature-based responses to climate change and other environmental challenges is strongly supported.

The Great Stour River, its tributaries and fishing lakes are a major asset to the local national environment. As a chalk stream, the Levelling Up and Regeneration Act 2023 added specific protections. Ongoing, significant investment in our water environment and infrastructure to improve river water quality, provide a resilient water supply, and minimise flood risk is essential.

Therefore, greater protection of the natural environment and biodiversity in the DCDLP, including the designation of land around the Stour as safeguarded wetlands, is welcome. However, **Policy DS20** (as identified in the Council's accompanying policy map) makes no reference to safeguarded wetlands, which are not shown on the Environment Agency Magic Map as an SPA, SAC or Ramsar site to which numerous references are made in the policy. This may lead to confusion over whether the policy applies to these important habitats and whether Given the environmental and landscape damage to the Stour Valley from previous proposed developments, this should be rectified.

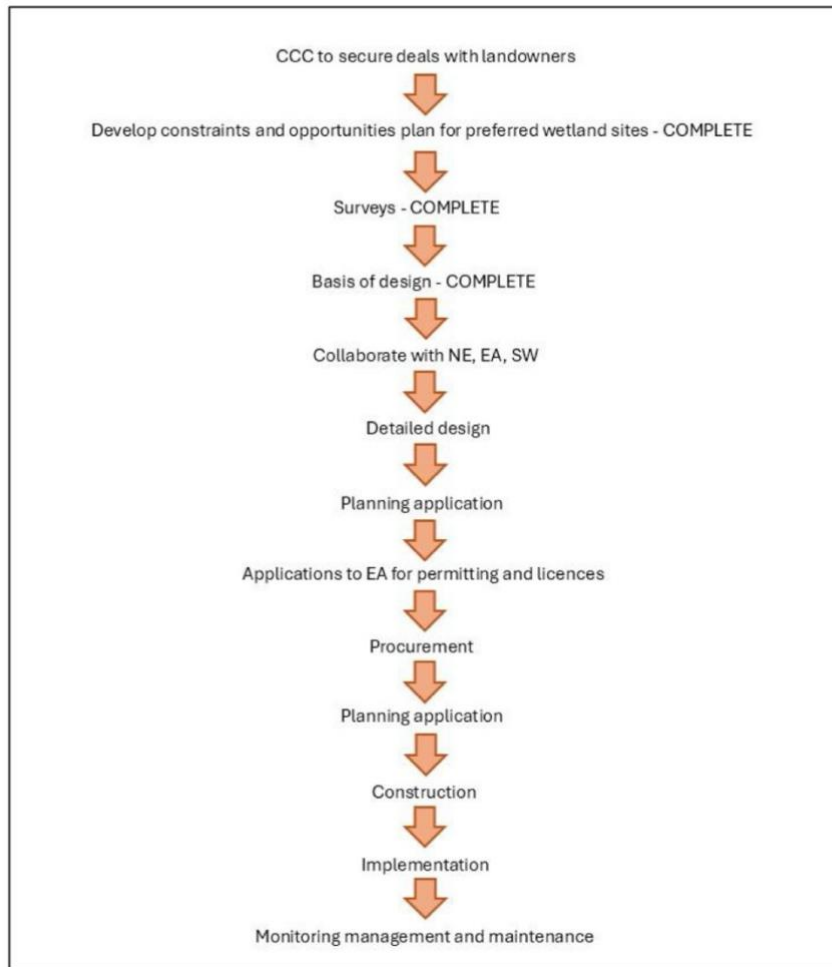
Given the identified role of wetlands as mitigation for achieving nutrient neutrality, a scheme to monitor the effect of wetlands on nutrient neutrality should be required.

- The classification of the Memorial Field in Chartham as a strategic wetland is a concern as the Parish Council is in the final stages of writing a contract with the Chartham Sports club for paid use of the football pitch. There is no policy explaining which pieces of land are earmarked and what constraints are imposed upon land allocated as strategic wetland other than within policy R28. This also brings to question the reality of use of strategic wetlands as landowners haven't yet been approached so the sale

of environmental credits should not yet be made according to the flowchart at # 7.2 of the latest Draft Canterbury District Nutrient Mitigation Strategy (February 2026)

The requirement that new developments of over 300 homes should incorporate a minimum of 20% tree cover across the site is welcome as is the more general requirement that all developments should incorporate new trees and hedgerows in areas of appropriate landscape character: to help restore and enhance degraded landscapes, screen noise and pollution, provide recreational opportunities, help mitigate climate change and contribute to floodplain management.

7.2 Figure 4 below is a flowchart describing the process to secure wetlands as a mitigation measure.



Policy CF3 Pedestrian and cycle route

The proposed cycle route running northwest from Chartham offers an exciting link to Canterbury. However, to truly promote sustainable travel, policies should seek to provide:

- better coordination with County Highways to ensure appropriate measures to ensure road safety for all users (i.e. lower speed limits where cycling routes are shared with vehicles along country lanes, pedestrian crossings) and
- appropriate bicycle docking/parking provision at commercial, community and transport hubs.

Policy DM15 Light pollution and dark skies

The policy is broadly supported in its aims to minimise light pollution arising from development. There is already an increase in light pollution to the detriment of dark skies and the National Landscapes. Although the National Landscape Management Plans include consideration of the impact of light pollution, this should be reinforced in the new Local Plan.

The provisions in relation to disturbance of wildlife in **part 3.g** should be strengthened given the incontrovertible decline in moths and harm to bats.

Kent Ecology has previously requested that the impacts of highway lighting be balanced to mitigate biodiversity impacts upon sensitive areas and species habitats. Policy DM15(d) should be modified so that this can be taken into account.

Gypsy and Traveller accommodation – Policies DS6, W6 and W9

The identification and allocation of sites is broadly supported as there is a genuine need to provide adequate pitches to meet local demand. The GTAA identified a need for 43 pitches across the period of the Local Plan. **Policies W6 and W9** would provide some 21 pitches whilst the proposed intensification/regularisation of existing pitches identified under **Policy DS6** would provide further pitches. However, there remains a shortfall in provision, which should be addressed in order to minimise the continued pressure which leads to unauthorised sites.

The proposed regularisation/intensification of sites around Chartham as detailed in **Policy DS6** are of concern given the proximity of these sites to other very important areas. Orchard Nursery, Underdown, Mystole Lane abuts the Iffin Wood and Little Iffin Wood local wildlife site. Three Oak, Land at New House Lane abuts and possibly extends into the Mystole Park Conservation Area, into which it is understood that a further incursion may have recently taken place.

Although regularisation and intensification may appear a sustainable option given the existing use, the sites identified in this policy should be subject to further consideration given the potential impact upon natural environment and heritage assets.

Policy C18 + – Wincheap Commercial Area and C32 Wincheap offslip

While a well-consulted, properly masterplanned pair of developments has the

Policy C18 and C18 poorly identifies the land use particularly as development may have potentially significant adverse consequences on protective wildlife sites and views of the Cathedral from Tonford Lane, some of which are breathtaking views coming from the southwest (including on trains).

The passed off-slip application continues to be challenged legally due to environmental concerns but still the land-use for this area, including around the proposed footpath/cyclepath and Whitehall meadows is still not fully resolved. Indeed it seems that sensitive, previously unpublicised land for carparking compared to the scenario discussed by councillors when they indicated that they preferred use of the CANENCO compound for extended carparking has crept unannounced into this plan.

Land is double-counted for different uses which makes appraisal of potential environmental and sustainability impacts less accurate than which is really planned – the uncertainties can be identified on a master plan but this one, as with many avoid indicating information about what is already planned by developers such as the owners of :

- To the east of the identified opportunity for walking/cycling connectivity over the river, the southwest-most part of the Whitehill Meadows LNR seems to be indicated for carparking.
- The off-slip as currently planned is not drawn correctly and goes through land identified as having openspace/biodiversity potential. This avoids positive planning.
- The connections between the different parcels of land of C32 to the northeast of site C18 where Staples and Pets at Home are/were aren't shown. Indeed there seems to be a ditch and possibly unregistered or ransom-strip land between them. This has the potential to radically affect the viability of the site which should be taken into account in sustainability, environmental and viability assessments at this stage of planning.
- The opportunity to masterplan correctly according to the Hierarchy of travel is missed.
 - Where is mitigation for the still-absent connection for cycles arriving in Canterbury from London via the A2?
 - Why is a footpath/cycle path not planned between the 2 parcels of land?
 - Why are other possible foot and cycle paths not identified to ensure planning at an earlier stage than vehicular accesses only indicative?
 - Why
 - With a bus-centred plan why is the location of a bus-connectivity hub not indicated?

Even though some uncertainty exists,

space/biodiversity opportunities

Other allocated sites

A2 Eastbound off-slip

Site boundary

Opportunities for walking/cycling connectivity

Vehicle access - indicative location

Policy R22 Barham Layby

The general need to provide adequate lorry parking and to prevent lorry fly-parking is acknowledged. However, this site, would require the loss of existing woodland to hard surfacing and lighting to the detriment of the rural character and landscape along this stretch of the A2. Being within a National Landscape, it seems inappropriate to extend it.

There is a general missed opportunity to promote the use of existing commercial and agro-industrial sites for paid Tacho break lorry parking.

Housing provision – Policies DS1 Affordable Housing and Policy DS2 Housing mix

I broadly support the policies. Due to the need that housing developments within the countryside, which are generally much more financially viable, I believe that the plan should require affordable housing at a much lower level, say 1 every 10 houses where there is an identified need.

Policy R20: Countryside

I generally support the broad thrust of this policy but request an added provision at 1(f) which seeks to prevent rural settlements coalescing with other rural settlements through sprawl.

Policy DS8: Education and associated development

Policy DS8 provides for the provision of and protection of existing education establishments however this is solely focused on the existing University Campuses. This should include a provision for the payment of commuted sums for development that would increase demands on education provision generally within the district. Although within the domain of Kent County Council as the authority responsible for education delivery, a policy requirement in this regard for development of 10 residential units or more linked to the general provisions for delivery of S106 agreements within the present NPPF would be welcome.

Policy DS9: Town centres and community facilities

The policy is broadly supported but with two observations:

1. There appears to be conflict in the designation of Chartham as a village in DS9 and a service centre in R1.
2. The policy should seek to make clear that locally important shops and services are designated a Class F2 use using the definition within The Town and Country Planning (Use Classes) Order 1987 for which greater protection is provided.

Policy DS10: Tourism development

I broadly support this policy but note that a specific reference should be given to rural villages by inserting a paragraph at F(iii) to allow for a separate assessment to be made to ensure that villages such as Chartham are not overburdened with tourist accommodation.

Policy DS11: Rural economy

I broadly support this policy with the observation that a specific reference be given to section 4 and the need for rural diversification to be sensitive to site and surroundings.

Policy DS12: Net zero carbon ready and water efficiency

The policy is wholly supported.

Policy DS23: Flood risk

Policy DS23 provides a framework for assessment of flood risk issues which broadly duplicates the present NPPF. This is supported as there is a need for a policy led approach to flood risk.

Policy DS24: Sustainable Drainage and Water Quality

Policy DS24 takes a site-by-site approach to the need for Sustainable Drainage Systems. This is supported but should be informed by the published Critical Drainage Areas, Strategic Flood Risk Assessment and Environment.

Account should be taken of the importance of the importance of source protection zones upon the quality of water wondering the catchment of the river. Developing upon them is unlikely to help.

An example is the failure to take account of the impacts of the mass re-profiling of the land at Cockering Road for the spine road upon the quality of water.

What is the result of the sanctioned re-use as fertiliser upon the land of a farm where solids were required to be extracted from farm waste going into the river? Surely a percentage of the nitrates and phosphates will be reintroduced into the river as they've been put upon the source protection zone.

With the recent reports of Southern Water spills into the river on 9th May, there is concern that there is a major problem.

Policy DS28: Publicly accessible open space and sports

As a rural parish, Chartham residents and visitors benefit hugely from accessible, high quality open space. Its protection and enhancement is paramount. This land includes recreation grounds, the village green, woodland, and public rights of way. The promised restoration and enhancement of Chartham's important habitats and landscapes is a high priority, supporting the recovery of nature, improving environmental resilience and providing significant increases in biodiversity.

It is unclear which DCDLP policies prevent double-counting of the mitigation sites used by several developers.

The proposals map should be reviewed in order to clearly designate open space from other areas of open space on the plan. This is in order to prevent confusion in identifying individual policy constraints.

Policy DS29: Renewable and low carbon energy

I broadly support the aims of this policy with the observation that due consideration should be given to direct large scale solar farms requiring planning permission to be supported by a Landscape Impact Assessment and sensitively designed to harmonise with the surrounding rural area.

Policy DM2: Residential garden land

Whilst the broad thrust of this policy is understood, it is more focused on larger towns rather than smaller settlements, within which it would be appropriate for such development to be discouraged.

Policy DM7: Health and Crime Impact Assessments

Policy DM7(1) includes provision for a Health Impact Assessment for developments of 100 dwellings or more. This policy appears focused towards the larger settlements and does not take into account the range of settlements or services within the district. It is considered that a lower threshold should be used for developments outside of the major towns or for settlements with a standing population (based on Census data) of 2000 residents or more. This would enable detained assessment of harm associated with population growth within the smaller settlements.

Policy DM11: Residential design

The approach taken in respect of DM11 is broadly supported with the observation that a provision ensuring that development complies with the advice outlined within the National Design Guide and Model Design Code together with any updated district or parish design code should be included.

Policy DM14: Noise, odour and dust pollution

The approach taken within DM14 is wholly welcomed.

Absence of an Enforcement policy

Government guidance, specifically the National Planning Policy Framework (NPPF) 2024, advises that local planning authorities should consider publishing a local enforcement plan to manage enforcement proactively and in a way that is appropriate to their area. It is noted that there have been significant issues within the district relating to the operation of the Council's Planning Enforcement functions.

The Draft NPPF 2025 includes policy DM8 which sets out, in somewhat vague terms, the national approach to planning enforcement. As this is a particular issue within the district, it is considered reasonable for the DCDLP to include a specific policy on the approach taken to planning enforcement within the district that takes a local view over the national approach at DM8.

Absence of Environmental mitigation Information - mapping

It is unclear which DCDLP policies prevent double-counting of the mitigation sites used by several developers.

The proposals map should be reviewed in order to clearly designate open space from other areas of open space on the plan. This is in order to prevent confusion in identifying individual policy constraints.

Policies of the DCDLP would be more enforceable if, the Council's interactive policies map and its operation gives rise to a comment about the accessibility of relevant environmental information. Modern GIS-based technologies should mean that there is no reason why the fullest range of environmental and community space information is not available in a single location.

One issue that I have encountered within the district concerns the identification of existing Planning Obligations under planning agreements and in particular those which seek to protect and maintain areas of open space etc. This information is not readily accessible.

While not planning designations as such, the existence of these legal undertakings which run with the title to land (and which can cover extensive areas), are not available in one location, or in mapped form. The areas of land so affected is inevitably increasing rather than decreasing, and the present trend of using rural land as a means of mitigating for various development impacts (for example, in connection with water quality, biodiversity net gain, offsetting impacts on protected habitats etc.), similarly involve legal undertakings over extensive areas of land for long periods of time. Again, these are not "visible" in the same way as public policy protections, even though in some cases, they may have similar effects.

I would encourage the planning authority to extend the scope of its accessible online environmental information to encompass these increasingly important pieces of environmental information, which can better help planners in the decision-making process.

Mapping them will help to cross reference the developments and policies using them for mitigation. A process which fails to monitor and enforce will make your biodiversity net gain meaningless. I am aware of the Saxon fields' mitigation area recently proposed for the Southwest link road, having also been used as a reptile relocation site for a development in Chartham.

Section 106 mapping as used by Ashford should be used to avoid the disastrous effects of sale of the Public open space (POS) land being resold in tiny portions at St Augustine's Chartham. Multiple applications, several retrospective, are likely to result. If you mapped the S106 sites indicating a POS use that protection would be more clear and enforceable.

Concluding Remarks

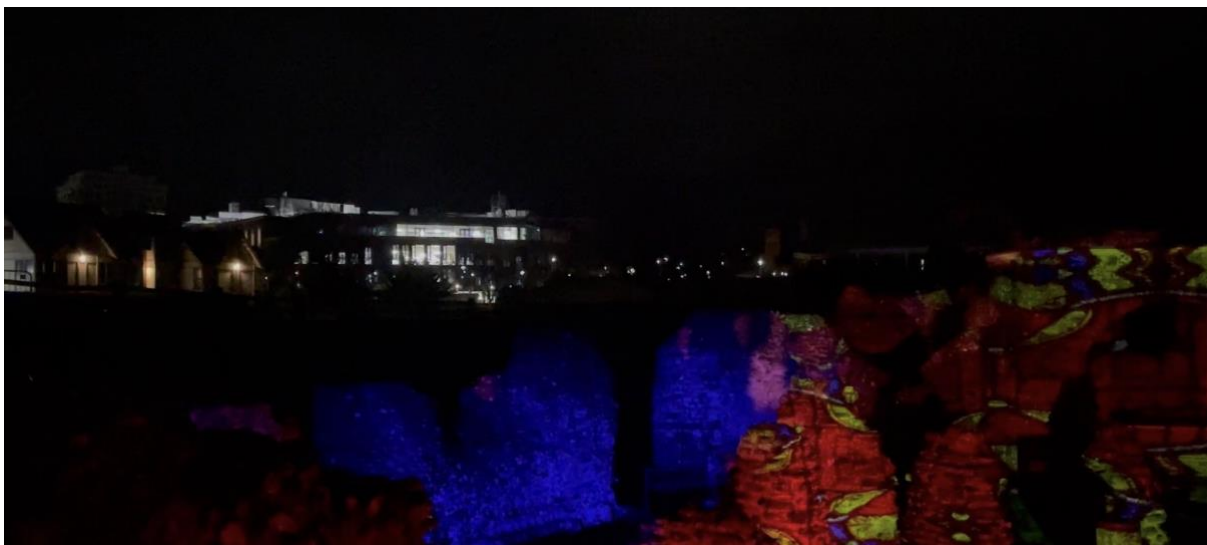
Overall, the DCDLP is an important step forward in guiding development within the wider district. I trust that due consideration will be given to the comments and observations made within this response.

Yours faithfully,
Camilla Swire

WHS Appendix

Damage to the the OUV by CCC due to:

- Failure to enforce breach of planning as the CCU Medical centre building of the air conditioning units damaging rather reinforcing the integration of the Cathedral, St Augustine's and St Martins.
- acceptance of light pollution from:
 - highways, roads and new development impacting the dark sky views from the cathedral at night time.
 - The Marlowe theatre's uplit towers
 - from unmasked internal lighting from Christchurch buildings as shown overpowering a son et lumiere event at 6pm at St Augustine's December 2024.



- The omission of Local Plan protection of strategic views from surrounding rural areas including celebrated ones along routes of pilgrimage towards the Cathedral undermines this stance and demonstrated a general lack of consideration of UNESCO obligations to protect the Outstanding Universal Value of the World Heritage site. The designation of the WHS by Unesco¹ states:

“The vast Cathedral, and particularly its Bell Harry Tower, still dominates the city as it has done for five hundred years. The tower is the highest building in the city and its location in the valley floor means that it can be seen from surrounding higher land and extensively along the valley. Maintaining views to and from the Cathedral is crucial to sustain this visual dominance.”
(emphasis added)

It further notes that the Canterbury Conservation Area Appraisal includes an analysis of strategic views into and within the city. Although the CAA has omitted views from the rural hinterlands, given the specificity of the CAA, the update in 2022 it referred to the importance

of “the green landscape setting to the south, east and west of the city and conservation area, a defining feature of the special interest of the conservation area.”

I strongly advocate for the re-introduction of protection of strategic views of Canterbury Cathedral from the surrounding area and rural hinterland as exemplified in the plan prior to the current one. The losses of them passed in this current plan, such as at Cockering Road are a material consideration.



The general location of others are identified in the 2020 Landscape Character Assessment and Biodiversity Appraisal by LUC.

Zones of theoretical visibility are easily identified as shown on p53 of an assessment for a recent application for maintaining the Christchurch medical school for an alteration to the roof structure.

https://pa.canterbury.gov.uk/online-applications/files/1B5CF93F43C4EDE36C4A5A45A06396C0/pdf/CA_23_02263-07_TOWNSCAPE_AND_VISUAL_IMPACT_COMPRESSED-PART_1-3480014.pdf

Canterbury has an interactive map and should map these zones as viewed from Bell Harry Tower. Historic England accepted these despite the harm due to the building already existing.

This indicates the responsibility that the Council has to protect the sense of place of Canterbury. The approach that they take in C10 is inadequate. A recognised panoramic view of countryside and the Cathedral is indicated on the National Biodiversity Atlas basemap below the development site.

ENC – Appendix 1 – Connectivity Tool results for Chartham