

Head of Planning and Health
Mr Simon Thomas
Canterbury District Council

By Electronic Transmission Only

On the matter of: Regulation 19 Consultation Response to the Draft Canterbury District Local Plan or and on behalf of Chartham Parish Council.

Dear Mr Thomas

Please find, as set out below, the response by Chartham Parish Council (CPC) to the Draft Canterbury District Local Plan. To assist the LPA and for the sake of good order this response has been organised by policy areas considered to be most important to the Parish Council.

Chartham Parish Council (CPC) welcomes the opportunity to comment on the Regulation 19 draft Canterbury District Local Plan (DCDLP) to 2042/43. The comments in this document are provided in the context of other consultations and the preparation of the Chartham Neighbourhood Plan. The Regulation 14 version of the Chartham Neighbourhood Plan was published in May 2025, and the associated consultation took place from 1 August to 12 September 2025.

General Comments in relation to the Regulation 19 Consultation

The DCDLP aims to present a strategic vision and plan for the district as a whole. Although there are many policies that CPC welcome, the policies and information set out in the consultation pose serious challenges to the vision set out in the draft Chartham Neighbourhood Plan, which has the strength of being based on extensive local consultation, and a huge body of expert evidence. The responses to the Neighbourhood Plan's Reg 14 consultation show that local people welcome the framework of the Plan – the aim of which is to promote growth that is sustainable and in keeping with Chartham's rural character.

The Local Plan consultation draft was issued alongside the draft Canterbury District Transportation Strategy and a raft of new/updated evidence base reports. The sheer number of

technical documents and the short timeframe for this consultation have limited the ability of the Parish Council to formulate a detained response to each policy area and therefore this response focuses solely on those areas considered most important and which have an effect on the Draft Neighbourhood Plan.

The parish council has sought advice from technical consultants and has also benefited from some in-house technical. The contribution of Chartham's Neighbourhood Plan Steering Group has also proven useful. However, budget constraints and the time commitments of parish councillors, as volunteers, restrict how comprehensive a response can be.

Hence, given the length of the consultation period, there is insufficient time to allow Chartham Parish Council to review and consider all the information to produce a truly comprehensive and meaningful response.

The consultation process is less productive and useful when respondents are not afforded the opportunity to go through the document and evidence. It is acknowledged that local plan-making is a challenge, particularly as the task is undertaken against a backdrop of shifting national planning policy with three revisions to the NPPF in the space of three years. Moreover, the further pressure to progress a Local Plan to Regulation 19 stage by March 2025 and have the plan ready for final examination by 31 December 2026 to allow assessment under the legacy plan-making system has placed considerable pressure on all concerned within the plan making process.

Given that the Local Plan has exceeded the cut off date of 25 March 2026 under the The Town and Country Planning (Local Planning) (England) Regulations 2026 the Parish Council is mindful that the Local Plan may be required to undergo substantial revisions to make it compatible with, and avoid policy duplication with, the forthcoming NPPF 2026. As such the Parish Council would expect a further consultation and would respond to that accordingly.

It is also confusing that while the new biodiversity strategy was presented for consultation at this time that the list of documents in appendix 1-6 were published without public notice or consultation.

National Planning Policy Context

Following the consultation on the Focused Consultation in October 2025, the Government published a draft National Planning Policy Framework (NPPF) in December 2025, concluding its consultation in March 2026. It has been confirmed by the Chief Planner for England that the NPPF will be published in the summer of this year and that Local Plans being created at present must give appropriate weight to the provisions within that draft. As such it is expected that the Draft Local Plan will be required to go through a further set of revisions as it will not be 'saved' under the legacy system.

Individual Policy Areas for Comment

Policy SS1: Environmental Strategy for the district, Policy DS20: Habitats of international importance, Policy DS21: Habitats and landscapes of national importance, Policy DS22: Habitats, landscapes and sites of local importance

CPC welcomes greater protection of the natural environment and biodiversity in the DCDLP, including the designation of land around the Stour as safeguarded wetlands.

Draft Policy DS20 (as identified in the 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 Parish Council is concerned about the use of the Memorial Field as a strategic wetland. CPC is in the final stages of writing a contract with the Chartham Sports club for paid use of the football pitch.

As land owners, CPC has not been consulted, does not understand the intentions of CCC for this land, and are not necessarily willing for it to be used as mitigation. CPC is further confused

that 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.

CPC has a programme for planting trees within the parish. Consequently, it is in favour of the requirement that new developments of over 300 homes should incorporate a minimum of 20% tree cover across the site. It supports 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.

CPC welcomes the environmental objectives in the draft Local Plan's "Vision for the District to 2042/43" listed under "A thriving environment". Thus, CPC fully endorses the strategic objective in the draft Local Plan 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.

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.

It is noted that Biodiversity has been declining across the country. Concern has been raised about the cumulative loss of habitat from development 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. CPC asks that S106 Land be mapped and developments using that land as mitigation be clearly identified.

As a parish council, CPC 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 in the parish. 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

Policy SS4: Economic Strategy for the district

CPC supports the approach taken at SS4 and would have no further comment to add in this respect.

Policy SS5: Movement and Transportation Strategy for the district, Policy DS16: Movement Hierarchy, Policy DS17: Active and sustainable travel, Policy DS18: Highways and parking

CPC considers that further work is required in relation to movement strategy and movement hierarchy within the district. In particular the strategy does not have regard to the Connectivity Tool which classifies the connectivity score for settlements in the district and is therefore missing this key piece of evidence.

At DS16 and DS18 the draft plan is silent on the issues surrounding rural lanes, specifically those that are a single vehicle width and the need to accommodate horse riding within the movement hierarchy to conform to the updated national road user hierarchy under the Highway Code.

As with previous drafts of the Local Plan, the DCDLP is supported by transport modelling work carried out by Jacobs on behalf of Kent County Council with initial consideration of five scenarios, narrowing to further consideration of the “City with Ghent and relief roads” scenario.

CPC raises concern on the basis of the modelling assessments, namely the key definitions and classifications underpinning the modelling exercise. A key concern is that the modelling appears to identify small country lanes as roads of a more suburban character. This incorrect

identification of the character and nature of roads raises doubts as to the robustness of the modelling given the concerns about flaws in the fundamental assumptions upon which the modelling is based. This raises serious questions about the soundness of the plan overall, and the soundness of Policies R3, R4, R5 and C10 amongst others. Given the scale of development to the southwest of Canterbury, there is the possibility of significant adverse harm in the traffic and transport impacts upon the local communities.

Changes linked to the wider Local Plan are likely to increase traffic through and around Chartham. Residents already experience peak-time congestion, and modelling to date has not convincingly demonstrated that the proposed bus-led strategy will offset additional vehicle movements. There is also scepticism about the degree of influence that the local authority can impose on the local privately-operated bus service.

Given the historic and rural nature of the road network in Chartham, it is not clear how this is taken into account in the transport modelling for development in the area.

In particular, the roads currently do not reflect the standards required for roads under Kent County Council. If, therefore, these local roads are included in the modelling with implications on their standard which may not be as they currently exist. Therefore, there may be implicit effects with which the residents will object.

Policy SS6: Infrastructure Strategy for the district, Policy DS15: Infrastructure delivery

CPC support the development of larger sewerage infrastructure but have concerns that the joint company being made will not have the powers to enforce maintenance.

CPC are very concerned about the ability of existing utility infrastructure, such as mains water and sewerage, being able to cope with any additional demand. There should be technical solutions to this. However, again, such utility services must be implemented in advance of any demand.

Policy DS15 provides for infrastructure delivery across the district it is vague in respect of the individual needs of Chartham and leaves the matter to a case by case judgement. 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. This should be in the form of a list within the policy itself or within the supporting text and should include Chartham Parish as a whole.

The increase in the number of private package treatment plants, particularly in light of nutrient neutrality concerns, have potentially significant impacts upon the local environment. Although licensed by the Environment Agency, there is an environmental risk associated with these facilities. This warrants specific policy text, akin to that of draft Policy DS24, to require proposals to have detailed management/maintenance programmes for these facilities.

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

Policy C10: Land at Merton Park, Policy C13: Land to North of Cockering Road, Policy C14: Milton Manor House

The DCDLP continues the pattern set in the adopted Local Plan of support for large scale development of sizable 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 green gap 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.

Chartham is beginning to experience significant transport pressures from existing development along Cockering Road. 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. However, this does not appear to be going ahead, and it is of considerable concern that the development will overwhelm local, rural/country roads.

Policy SS3: Development Strategy for the district, Policy R1: Rural Service Centres

The draft Local Plan identifies Chartham as a “Rural Service Centre” and Chartham Hatch as a “Village”, as defined in the Rural Settlement Study. Chartham Parish Council has expressed concerns regarding this classification during the previous consultations and continue to maintain that Chartham should be classed as a “Local Service Centre” or “Village”.

Although Chartham benefits from a train station, it is a minor station with no facilities and provides between 2 to 3 trains per hour which is below the Government’s proposed threshold for being a ‘well connected’ station where a higher density development is expected. Furthermore Chartham scores 44 on the Connectivity Tool and a copy of that result is attached to this response as Appendix 1. This 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.

Chartham Hatch is a settlement with minimal facilities lacking most if not all of the amenities required for the settlement to provide for itself. This settlement scores 31 on the Connectivity Tool and a copy of that response is attached to this response as Appendix 2. It is therefore considered that this settlement should also be downgraded within the settlement hierarchy.

Policy R3: Chartham Paper Mill

Chartham Parish Council broadly supports the allocation of Chartham Paper Mill under Policy R3 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 needs and bring significant improvements to the overall character, appearance and natural environment of the site.

It is positive that several of these considerations align with the issues raised and recommendations in Chartham’s draft Neighbourhood Plan. Specific note should be taken of the proposals for this site given in the draft Neighbourhood Plan which reflect the views of local residents.

CPC welcomes the proposed development mix including affordable housing and accessible housing.

CPC also supports non-residential development including new local shopping and community facilities/infrastructure. The provision of open space and access to the river within the site are important to local residents.

The proposal that the design; site layout provide a high-quality environment reflects the proposed requirements of the draft Neighbourhood Plan.

The parish council notes the other policy points in respect of heritage, flood risk and resilience measures. As such the Parish Council trusts that those matters will be strictly controlled within the determination of any forthcoming planning application in the normal way.

Of particular note is the realignment of Station Road which would appear at face value to require building over existing playing fields. This would appear to conflict with policy DS28 which seeks to protect these important public spaces.

Finally under parts 4e and 4f of the policy CPC requests further reinforcement of the need for 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.

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

Policies R4 and R5 in the DCDLP relate to land flanked by existing development to either side within the countryside. The position of the two sites along the A28 does lend itself to infill development. However, the sites currently feature limited existing development, reducing views through the site to the hillside beyond. Although the need to make efficient use of land is acknowledged, the DCDLP policies recognise the value of these open views and provide some protection of these views through the site. The inclusion of a clear policy framework is welcomed by the Parish Council and gives an appropriate baseline for the determination of an application for such planning permission.

Policy R20: Countryside

CPC supports the broad thrust of this policy and requests the inclusion of an additional policy point at 1(f) that seeks to prevent rural settlements coalescing with other rural settlements through development sprawl.

Policy DS1: Affordable housing

CPC supports the broad thrust of this policy with the following recommended amendments:

1. Alter the 100% brownfield land requirement to read 'within Canterbury City'.
2. Alter the second requirement to read 'all other sites and settlements'.

Policy DS2: Housing mix

CPC supports the broad thrust of this policy with a specific amendment at paragraph 7 that allows for flexibility for starter homes for those purchasing their first new home and homes for persons over the age of 55 who are downsizing from larger properties. Both of which secured by an appropriately worded S106 agreement.

Policy DS6: Gypsy and Traveller Accommodation

The identification and allocation of sites is broadly supported as the CPC acknowledges the need to provide adequate pitches to meet local demand. The Gypsy and Traveller Accommodation Assessment (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 use of land and enforcement issues.

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 and Mystole Lane abuts Mystole Park Conservation Area.

Three Oak and Land at New House Lane abuts Iffin Wood and Little Iffin Wood local wildlife sites.

Although it is recognised that intensification of existing sites is the most sustainable route to deliver for the needs of this specific group this needs to be balanced against wider landscape and heritage impacts which must be reinforced within this policy.

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. It is considered that this policy should include a provision for the payment of commuted sums for planning applications within the district that would increase demands on education provision generally. This should be focused on development of 10 residential units or more linked to the general provisions for delivery of S106 agreements within the present NPPF.

Policy DS9: Town centres and community facilities

CPC are in broad support of this policy 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

CPC is in broad support of this policy with the observation that a specific reference 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

CPC is in broad support of 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

CPC is wholly in support of policy DS12.

Policy DS23: Flood risk

Chartham Parish is subject to flood risk issues with part of the parish within Zones 2 and 3. Policy DS23 provides a framework for assessment of flood risk issues which broadly duplicates the present NPPF. The Parish Council supports this approach and reinforces the 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 welcomed by the Parish and Should be informed by the published Critical Drainage Areas, Strategic Flood Risk Assessment and Environment Agency Flood Map for Planning.

Policy DS26: Landscape Character

CPC notes a minor discrepancy in the need to address the former Areas of Outstanding Natural Beauty as National Landscapes.

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 inclusion within the landscape policy.

The importance of the retention of “green gaps” – or similar – between the various settlements within the parish has repeatedly been raised by CPC on behalf of local residents. The proposed green gaps extending northeast and southwest of Chartham are welcome as a means of preventing coalescence of settlements to the detriment of the historic character of Chartham.

The protection measures are identified in Policy D22 part 5 and these measures are broadly supported. This is compatible with the Canterbury District Open Spaces Strategy (2025) and the district’s Green Infrastructure Strategy (2018), which set out a series of priorities for improving the quality, quantity and functionality of our green spaces. They also offer an additional means of protecting the River Stour and its ecologically significant banks/habitat.

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 biodiversity-mitigating 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

CPC is in support of the thrust 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 DS30: Historic environment and archaeology

Chartham has part of the North Downs Way, and many other footpaths, roads and the railways passing through it. Journeys along them, and rural roads going towards Canterbury from Chartham, provide views of the cathedral for locals, tourists and pilgrims. Some of these views are from Chartham parish itself. CPC are concerned that a lack of mapping or strategic view allocations towards and from the cathedral will lead to harm to the outstanding universal value of the World Heritage Site.

Due to the erosion of views from CB464 and from Hollow Lane in Wincheap, CPC would recommend that strategic protected views be used to mitigate against further harm.

This is particularly pertinent in respect of Policy C10 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. As the DCDLP removes specified protection of these views which are included in the current adopted Local Plan, the draft policy should include greater direction on this matter.

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 and therefore CPC consider it appropriate for such development to be discouraged in smaller settlements such as those within Chartham Parish.

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

CPC supports the approach taken in respect of DM11 with the observation that a provision should be inserted 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.

Policy DM14: Noise, odour and dust pollution

CPC wholly welcomes the approach taken within DM14.

Policy DM15: Light pollution and dark skies

Chartham currently has much land with dark skies; yet unnecessary light pollution is increasing on the horizon and locally. Similarly, many of the rural roads between Wincheap and Chartham are dark. The DCDLP policy is broadly supported in its aims to minimise light pollution arising

from development. However, the provisions in relation to disturbance of wildlife in part 3(g) should be strengthened given the recognised decline in moths and harm to other night animals.

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

Impacts upon National Landscapes, not specified within this policy, should be considered.

Absence of an Enforcement Policy

CPC notes that there have been significant issues within the district relating to the operation of the Council's Planning Enforcement functions.

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.

CPC is mindful that the NPPF Draft Text for Consultation 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 Draft Local Plan 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.

Concluding Remarks

Overall CPC observes that the Draft Local Plan marks an important step forward in guiding development within the wider district. CPC trusts that due consideration will be given to the comments and observations made within this response. Where concerns have been raised CPC welcomes the opportunity to discuss those issues with the LPA or with the Inspector at the Inquiry stage.

Yours Faithfully,

[Redacted Signature]

Jonathan McDermott
BSc MA MRTPI FRGS
Principal Town Planner
Town Planning Expert

For and on behalf of Chartham Parish Council