

Chestfield Neighbourhood Plan

Consultation Statement

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1. Introduction and Purpose

This document has been prepared to accompany the submission version of the [Chestfield Neighbourhood Plan](#) and is designed to meet the requirements for a Consultation Statement as defined by Regulation 15 of the Neighbourhood Planning Regulations 2015.

“A consultation statement” means a document which—

- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified;
- (b) explains how they were consulted;
- (c) summarises the main issues and concerns raised by the persons consulted; and
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan or neighbourhood development plan as proposed to be modified.

2. Start up and identification of topics of interest

On 04 January 2025 we held a Consultation Event in the WI Hall. Around 60 or so residents attended. This event introduced residents to what a Neighbourhood Plan was, showed examples of some Neighbourhood Plans, invited residents to complete a survey about what area our plan should cover, what they liked and disliked about Chestfield, and their top priorities for the plan to consider developing. We also invited residents to put themselves forward to be part of the Steering Group. The Writeup of responses and ranking was as follows:

Writeup of responses from Consultation Event held 04 January 2025	
The Neighbourhood Plan Area - preferred option:	No of responses:
a) As the current parish boundary	5
b) To extend the Neighbourhood Plan area to include the part of the proposed development site of Brooklands Farm that currently sits outside of the parish boundary	36
Don't know	1
Total responses	42

We asked “What do you like about Chestfield?”

Open spaces and Green spaces	17
Location - and proximity to shops, station, coast, walks	15
Good neighbours/good community	14
Pretty village atmosphere/rural character	13
Safe/Feel safe	5
Character houses/buildings	5
Quietness	5
Walks	4
Support and work of the parish council	4
The Barn	4
Good medical facilities	4
Play park	3
Golf club and golf course/open space	3
Rugby Club	2
The Cricket Club	2
Good mixture of housing and communities	2
Its history/Interesting history	2
Biodiversity	2
Not too much litter/Tidiness	2
Good public transport	2
Village life	
Local farming	
Air quality	
Most things	

We asked “What don’t you like about Chestfield?”

Additional housing developments planned	13
Traffic density	8
Speed of vehicles	4
No small shop(s) in the village	3
Lack of affordable public transport/improved service needed	3
Lack of a central feeling in the village	3
Inadequate sewage disposal via Swalebrook at Longrock as overflow sewer	
Flooding	
Motorbike noise around industrial estates and roads	
Condition of roads, footpaths, pavements	2
Increase in crime	2
Lack of Policing	2
Poor accessibility to Swalecliffe Train station	2
Risk of loss of identity	2
Lack of crossings/ traffic calming	2
Less sense of community with more residents from outside the area moving in	2
The main road through the village.	
The main road through the village feels unwelcoming to pedestrians and cyclists.	
Seeing the gradual loss of natural habitats to unessential development eg coffee shops, pubs, restaurants	
Loss of hedgerows along the Old Thanet Way	
Increase in lawns being paved over causing more flooding and loss of biodiversity	
No 5 bus stops too early	
Distances to amenities encourages car dependency	
No footpaths in Radfall	

Pavements could be wider in certain areas

Grass verges need to be cut more often to tidy the village

Fast food outlets litter

Bungalows being turned into houses

Top Priorities	Priority No 1	Priority No 2	Priority No 3	Priority No 4	Priority No 5	Totals	Weighted Totals (Priority 1 = 5, Priority 2 = 4, Priority 3 = 3, Priority 2 = 2, Priority 1 = 1)
Flooding	3	13	3	2	2	23	82
Drainage and sewerage infrastructure capacity	21	4	4	2	1	32	138
Affordable housing	2		1	4		7	21
A Local connection criteria policy for those wanting to buy First Homes – so that people with a local connection to Chestfield have priority in accessing homes		1	5	4	5	15	32
The streetscene complementing the character of Chestfield	1		4	4	2	11	27
Densities and layout	5	4		2	2	13	47
Bin storage at rear availability						0	0
Landscaping and trees		1	2	1	7	11	19
Allocating and protect green spaces	3	8	8	3	6	28	83
Design guidance, for example for new extensions to be subservient to the existing building	1			4	1	6	14

Design Codes – eg material pallet, scale, distance between buildings		3			4	7	16
Improve sustainable design eg. efficient and insulative materials, renewable energy systems, reduce water consumption		2	2	3	1	8	21
Biodiversity/wildlife habitats protection	3	4	6	4	1	18	58
Identifying possible improvements for walking/cycling paths	2		3	3	3	11	28
More community facilities	1	1	1	1	1	5	15
Protection of community assets		1	1	4	4	10	19
Anything else not suggested above?			1	1	1	3	6

Safety By Design (SBD) to achieved and certified, not just incorporating principles (specified by resident as Priority 3)

Lighting to be approved by qualified lighting engineers (specified by resident as Priority 4)

Whilst not against new building projects as such, any project that involves building more than two or three houses on a plot MUST go hand in hand with money provided towards extending the existing water and sewage facilities but must also provide money towards other public services, GPs, Dentists, Public Transport and roads. The council and other service providers should receive funding as part of any large building project to help support the provision of services to the new building project. (Specified by resident as Priority 5)

Improve the bus service No 5 to Canterbury - especially at evening times (Specified by resident as Priority 3)

Linking and promoting walking routes to provide alternatives to car use

Access to good public transport

Reduce car use

New builds to incorporate bat brick roosts, swift boxes and solar panels as part of planning condition - cheap to do at build stage.

New builds to incorporate bat brick roosts, swift boxes and bee boxes, and sustainable drainage such as rain gardens and water recycling

Ensure biodiversity net gain is within the parish

Native plant species to be used for landscaping in new developments

Reduce lighting at night to benefit nocturnal wildlife and protect dark skies

Restrictions on garden bonfires to reduce air pollution

The biggest demographic shift is the increase in the proportion of elderly people - this needs to be reflected in plans - people don't want to go into care homes - Assisted living accommodation provision is more preferable than provision of care homes.

Variety of housing to meet the needs of local people eg small bungalows/apartments for retired people and assisted living

Housing for older people eg Churchill McCarthy Stone

Guaranteed increased healthcare facilities to serve the population

More public transport routes eg a Chestfield Hopper

Any further building must be in-keeping with the village

Appropriate infrastructure must be in place prior to any further development

I feel that a slip road off the A299 into Chestfield will be devastating for the village

A village hall or similar would be good.

A gardeners club or Walking Group would be nice.

The top five priorities whether you rank just by total number voted for, or by weighting based on 1-5 ranking, are:

- Drainage and Sewerage Infrastructure Capacity
- Allocation and Protection of Green Spaces
- Flooding
- Biodiversity/Wildlife Habitats Protection
- (Joint Fifth) Local Connection Criteria Policy for new homes, and
- (Joint Fifth) Densities and Layout

Setting up of the Steering Group

Following the consultation event, the residents that had volunteered to form the Steering Group with three parish councillors were contacted and the first Steering Group meeting was held on 10 February 2025, when Terms of Reference were agreed.

Submission to CCC

The submission for the Chestfield Neighbourhood Plan area, in accordance with Regulation 5 of the Neighbourhood Planning (General) Regulations (2012) (as amended), was submitted on 14 January 2025.

As the area for the Plan extended beyond the parish CCC had to prepare a CCC Cabinet report for approval at the Cabinet meeting on 10 February 2025. Cabinet resolved, in line with Regulation 6, to start a statutory 6-week consultation on 11 February 2025. The consultation included:

- CCC placing hard copies of the consultation notice, application and map in the council offices and libraries
- CCC posting the information on CCC's website
- CCC contacting various stakeholders directly
- Chestfield Parish Council placed details in the Chestfield WI Hall, village noticeboards and on the parish council's website
- Chestfield Parish Council placed details on local social media groups

Activity Log and forms of advertising activities

In addition to the public events, other forms of engaging with residents and stakeholders, to ensure people were made aware of the activities of the Steering Group and could get more information as and when they wished, included the following methods:

- Articles in the Parish Magazine
- Notices on the six village notice boards
- Social media
- In-person meetings
- Direct letters
- The parish council's dedicated website page
- News Posts through the parish council website.

Chestfield Neighbourhood Plan - Log of activities:

Target/Activity	Date	Coverage
Articles in the Parish Magazine:		
Introduction to the CNDP - Article in the December 2024 magazine – including invitation to the Consultation event in January 2025	December 2024	All 1385 households
March 2025 magazine – - Details of the Regulation 6 consultation running by CCC on the NHDP area - feedback from 04 January 2025 consultation event: the top 6 priorities from residents. - Steering group of residents and councillors formed. - Link to new dedicated NHDP webpage.	March 2025	All 1385 households
June 2025 magazine - - Confirmation of Plan area - A draft Drainage Policy - Local Green Spaces Audit undertaken - The Housing Needs Survey - Way we are progressing	June 2025	All 1385 households
September 2025 magazine – - Notification of Pre-Submission Consultation (Regulation 14) dates and - Invitation to two Presubmission document Consultation events	September 2025 – on front cover and a fuller article inside also.	All 1400 households (adds Grasmere Gardens new occupants)
Public meetings/events:		
Consultation event 04 January 2025	04 January 2025	Approximately 55 people attended
Chairman's mention of project and invite to consultation event of 04 January 2025	18 December 2024 Christmas Carols event	Approximately 60 people in attendance
Two x Presubmission document Regulation 14 Consultation events	Saturday 06 September between 10am to 1pm; And Tuesday 09 September between 6pm – 8pm.	

Target/Activity	Date	Coverage
Noticeboards		
Poster on all noticeboards to advertise the 04 January 2025 event	31 December 2024	Unknown
Poster with Details of the Regulation 6 consultation running by CCC on the NHDP area	12 February 2025	Unknown
Poster advertising Housing Needs Survey being delivered and encouraging take-up/prize draw incentive	25 February 2025	Unknown
Poster advertising Regulation 14 Pre-submission consultation	30 August 2025	Unknown
Social Media:		
Posted on: - Facebook - Save Brooklands Farmland - Facebook - Chestfield Residents Group - Nextdoor - Chestfield "Date for your diary – Saturday 4th January 2025. Between 10am and 2pm at the Chestfield WI hall. All residents are invited to a consultation event to learn more about the idea of developing a Neighbourhood Plan. See page 10 of the Parish Magazine Edition 137 Dec 24. Can be found on line at: https://chestfieldparishcouncil.gov.uk/the-parish/the-parish-magazine/ This is not something the Parish Council can or wants to do in isolation. It needs resident's engagement. No need to book, just come and see what it is all about."	11 December 2024	Unknown
Reminder/poster posted on Chestfield Residents Group for the 04 January event	02 January 2025 and 04 January 2025	Unknown
Post to the two social media groups with Details of the Regulation 6 consultation running by CCC on the NHDP area	12 February 2025	Unknown
Post to the two social media groups with Details of the Regulation 14 Presubmission draft Plan consultation running and the two consultation events	29 August 2025	Unknown
Post to the two social media groups with Details of the Regulation 14 Presubmission draft Plan consultation running and the two consultation events	09 September 2025	Unknown
Post to Facebook thanking people who came to the consultation events and a reminder that the consultation period is still running until 14 October 2025.	10 September 2025	Unknown
Other:		
To publicise the Regulation 14 six-week consultation period, and the two Presubmission document Consultation events of Saturday 06 September and Tuesday 09 September 2025: - Notices placed on lampposts in South Street and Rayham Road to cover the out of parish boundary area of the Neighbourhood Plan area. - Notices placed on lampposts in John Wilson Industrial Estate. - Poster put on the St John's Church noticeboard	30 August 2025	Unknown

Target/Activity	Date:
In-person meetings:	
Chestfield Cricket Club re Local Green Space designation	In-person meeting with manager 14 May 2025.
The Leas and Fairlawn Residents Association re Local Green Space designation	In-person meeting with four committee members 12 May 2025.
Churchwood Park Management Ltd re Local Green Space designations	In-person meeting with a director 16 May 2025.
The Fairways (Molehill Road) Management Company re Local Green Space designation	In-person meeting with two directors on 15 May 2025.
Direct letters:	
To the village's Residents Associations re reminder for 04 January 2025 event: - Broomfield Gate and Radfall Hill - The Drive and The Drove	02 January 2024 Circa 50 households
To Canterbury City Council re Local Green Space designations of Radfall Recreation Ground; Chestfield Road Play Area and Park; Whitstable Rugby Football Club	Letters and LGS Audit sent by email 18 May 2025
To Whitstable Rugby Football Club as Leaseholder re Local Green Space designation	Letter and LGS Audit sent by email 18 May 2025
To Chestfield Cricket Club re Local Green Space designation	Letter and LGS Audit sent by email 18 May 2025
To St Joseph's Catholic Church re Local Green Space designation	Letter and LGS Audit sent by registered post to registered landowner on 19 May 2025. Letter and LGS Audit sent by email 18 May 2025 to local Canon.
To The Leas and Fairlawn Residents Association re Local Green Space designation	Letter and LGS Audit sent by email 18 May 2025
To Kitewood Estates Ltd re Local Green Space designation	Letter and LGS Audit sent by email 18 May 2025
To George Wimpey re Local Green Space designations	Letter and LGS Audit sent by registered post to registered landowner on 19 May 2025.
To Churchwood Park Management Ltd re Local Green Space designations	Letter and LGS Audit sent by email 18 May 2025
To The Fairways (Molehill Road) Management Company re Local Green Space designation	Letter and LGS Audit sent by email 18 May 2025

Target/Activity	Date	Coverage
Website:		
Web page created	04 January 2024	Unknown
Web page updates	11 February 2025 28 April 2025	Unknown
Newspost through website:	11 December 2024 – invite to 04 January 2025 Consultation event.	Unknown
Newspost through website:	04 January 2025 – to publish 04 January consultation event information documents and to offer chance to complete survey.	Unknown
Newspost through website:	11 January 2025 - Post with Details of the Regulation 6 consultation running by CCC on the NHDP area application	Unknown
Newspost through website:	28 February 2025 – to promote completion of Housing Needs Survey now being delivered	Unknown
Newspost through website:	29 August 2025 – to invite comments for Regulation 14 consultation running to 14 October 2025.	

Housing Needs Survey

Chestfield Parish Council commissioned CNB Housing Insights to undertake a new Housing Needs Survey in January 2025. A virtual meeting with the consultants was held to make the survey specific for Chestfield. A postal and online Housing Needs Survey was delivered to all 1,430 households with closing date of 31 March. 359 responses were received, a strong 25% response rate.

The full Housing Needs document may be read on the dedicated Neighbourhood Plan page on the parish council's website at <https://chestfieldparishcouncil.gov.uk/neighbourhood-plan/>.

The report was delivered on 26 April 2025 and the recommendations used to inform the **Policy H1: Future Housing**

Pre-consultation communications with Canterbury City Council

The Steering Group Chairman and the Clerk worked constructively with Canterbury City Council officers to shape the development of the Neighbourhood Plan. We would thank them for their advice and co-operation.

An in-person workshop was hosted by CCC on 10 January 2025 and 05 February, and virtual meetings held on 04 February, 22 April, 08 July, and 28 August 2025. There was also an in-person meeting held at the CCC offices on 13 January 2026.

This was in addition to correspondence and communication with Canterbury City Council as part of the formal pre-submission process.

Local Green Spaces Audit consultation and responses

Site ID	Location	Landowner(s)	Beauty	Historic Value	Recreational Value	Tranquility	Wildlife/ Ecology	
LGS1	Molehill Road Village Green	Canterbury City Council		Y		Y	Y	Not required for designation as its Village Green status affords it sufficient protection from any development.
LGS2	Radfall Recreation Ground	Canterbury City Council Letters and LGS Audit sent by email 18 May 2025			Y			Recommended for Local Green Space designation
LGS3	Chestfield Road Play Area and Park	Canterbury City Council Letters and LGS Audit sent by email 18 May 2025			Y			Recommended for Local Green Space designation
LGS4	Whitstable Rugby Football Club	Letter and report sent to Canterbury City Council as the landowner and also copied to the Rugby Club Chairman as Leaseholder on 18 May 2025.			Y			Recommended for Local Green Space designation
LGS5	Chestfield Cricket Club	Chestfield Cricket Club. In-person meeting with manager 14 May 2025. Letter and LGS Audit sent 18 May 2025.			Y			NOT Recommended for Local Green Space designation
LGS6	St. Joseph's Catholic Church lawns (front ¾ only)	The Roman Catholic Archdiocese of Southwark - Letter and LGS Audit sent by registered post to registered landowner on 19 May 2025. Letter and LGS Audit sent by email 18 May 2025 to local Canon Glandfield.					Y	Designation for ¾ of the front lawn only from the road – leaving land in front of the Church and behind the neighbouring building line undesignated.

Site ID	Location	Landowner(s)	Beauty	Historic Value	Recreational Value	Tranquillity	Wildlife/ Ecology	
LGS7	Fairlawn green	The land is unregistered. In-person meeting with four directors of The Leas And Fairlawn Residents Association who manage the area on 12 May 2025. Letter and LGS Audit sent by email 18 May 2025.			Y	Y	Y	Recommended for Local Green Space designation
LGS8	Green Leas green	Canterbury City Council.		Y	Y	Y	Y	Not required for designation as its Village Green status affords it sufficient protection from any development.
LGS9	Swalecliffe Brook Floodplain / rear of Shepherds Walk	Brooklands Farm. Letter and LGS Audit sent on 29 May 2025 to both the Brooklands Farm landowner and the land promoter (Hallam Land Management).			Y	Y	Y	Landowner objection. As the landowner does not support the designation, NOT recommended for designation.
LGS10	Kitewood Grasmere Gardens	Kitewood Estates Ltd. Letter and LGS Audit sent by email 18 May 2025.	Y		Y		Y	Landowner objection. As the landowner does not support the designation, NOT recommended for designation.
LGS11	Churchwood Park, Kendal Meadow Toddler Play Area	Landowner George Wimpey SE Ltd. Leased to Churchwood Park Management Ltd. Letter and report sent 19 May 2025 by post to George Wimpey SE Ltd as the landowner. Further reminder letter, copy of first letter and LGS Audit sent by registered post on 03 July 2025.			Y			Recommended for Local Green Space designation

		In-person meeting with a director of Churchwood Park Management Ltd held 16 May 2025. Letter and report sent by email to that director on 17 May 2025 for any comments. No landowner response at 12 August 2025. The directors of Churchwood Park Management Ltd held a directors meeting on 18 May 2025 and whole heartedly support the designation of this and the Junior play area as a LGS.						
LGS12	Churchwood Park, Kendal Meadow Junior Play Area	Landowner George Wimpey SE Ltd. Leased to Churchwood Park Management Ltd. Consultation undertaken as for the Churchwood Park Toddler play area above.			Y			Recommended for Local Green Space designation
LGS13	Birkdale Close and Carnoustie Close community Orchard area	The Fairways (Molehill Road) Management Company. In-person meeting with two directors on 15 May 2025. Letter and report sent by email to two directors of The Fairways (Molehill Road) Management Company on 18 May 2025.	Y		Y	Y	Y	Recommended for Local Green Space designation

Regulation 14 Consultation- Statutory Bodies and interested groups consulted

The Regulation 14 Neighbourhood Plan may be viewed at <https://chestfieldparishcouncil.gov.uk/neighbourhood-plan/>

This Regulation 14 pre-submission consultation ran for a period of six weeks from 01 September 2025 to 14 October 2025.

List of Statutory Consultees invited to take part in the Regulation 14 Consultation and record of responses received or not:

Statutory Consultee asked to take part in the Regulation 14 consultation:		Response received?
Canterbury City Council: - CCC Policy officers - CCC Environment Team - CCC Heritage Team	Emailed 29 August 2025	Response received 13/10/2025
Kent County Council: - KCC Highways - KCC Minerals and Waste - KCC Education - KCC Sustainable Drainage - KCC Strategic Planning	Emailed 29 August 2025	Response received 03/11/2025
Parish Councils in the area of the local planning authority: - Adisham Parish Council - Barham Parish Council - Bekesbourne with Patricxbourne Parish Council - Bishopsbourne Parish Council - Blean Parish Council - Bridge Parish Council - Chartham Parish Council - Chislet Parish Council - Fordwich Town Council - Hackington Parish Council - Harbledown and Rough Common Parish Council - Herne and Broomfield Parish Council - Hersden Parish Council - Hoath Parish Council	Emailed 29 August 2025 to all parish clerks	Y (HA PC) Y (H&RC PC)

- Ickham Parish Council - Kingston Parish Council - Littlebourne Parish Council - Lower Hardres Parish Council - Petham Parish Council - Sturry Parish Council - Thanington Parish Council - Upper Hardres Parish Council - Waltham Parish Council - Westbere Parish Council - Wickhambreaux Parish Council - Womenswold Parish Council		
Statutory Consultee asked to take part in the Regulation 14 consultation:		Response received?
Canterbury City Councillors: Cllr James Flanagan and Cllr Peter Old	Emailed 29 August 2025	
Kent County Councillor, Cllr Alex Ricketts	Emailed 29 August 2025	
The Coal Authority (now called Mining Remediation Authority) https://www.gov.uk/government/organisations/mining-remediation-authority	Letter posted 29 August 2025	Response received 17/09/2025
Campaign to Protect Rural England	Letter posted 29 August 2025	
Natural England	Emailed 29 August 2025	Response received 14/10/2025
The Environment Agency	Emailed 29 August 2025	Response received 06/10/2025
Kent Countryside Access Forum	Emailed 29/08/2025	
Kent Wildlife Trust	Emailed 29 August 2025	
RSPB	Emailed 29/08/2025	

Statutory Consultee asked to take part in the Regulation 14 consultation:		Response received?
Kent Nature Partnership	Emailed 29/08/2025	
Historic England	Emailed 29 August 2025	Response received 29/09/2025
Kent Housing Group	Emailed 29 August 2025	
National Highways	Emailed 29 August 2025	
Network Rail	Emailed 29 August 2025	
National Grid National Gas	Emailed 29 August 2025	
UK Power Network	Emailed 29 August 2025	
Southern Gas Networks	Emailed 29 August 2025	
NHS Canterbury and Coastal CCG	Emailed 29 August 2025	
Kent Police	Emailed 29 August 2025	
Kent Fire and Rescue	Emailed 29 August 2025	
Southern Water	Emailed 29 August 2025	Response received 10/10/2025
South East Water	Emailed 29 August 2025	
Sport England	Emailed 29 August 2025	Response received 19/09/2025.
Swalecliffe Library	Letter posted 29 August 2025	

Statutory Consultee asked to take part in the Regulation 14 consultation:		Response received?
Gypsy Cooperative/Gypsy Council	Emailed 29 August 2025	
Traveller Movement	Emailed 29 August 2025	Email bounced back but their website shows same email address
KCC Gypsy and Traveller Unit	Emailed 29 August 2025	
Riverside Church	Letter posted 29 August 2025	
St John's Church Swalecliffe	Emailed 29 August 2025	Yes.
St Joseph's Church	Emailed as a LGS nomination 29 August 2025	
Ethnic Minority Independence Council	Emailed 29 August 2025	
Canterbury Inter-Faith Association	Emailed 29 August 2025	
Disability Advisory Panel	Emailed 29 August 2025.	Added to the 17 September 2025 DAP meeting Agenda.
Canterbury Disability Living Forum	Emailed 29 August 2025	
Chestfield Golf Club	Letter posted 29 August 2025	
Chestfield Rotary Club	Emailed 29 August 2025	

Statutory Consultee asked to take part in the Regulation 14 consultation:		Response received?
The CT5 Forum	Emailed 29 August 2025	
Whitstable Town Centre Residents Association	Emailed 29 August 2025	
The Whitstable Society	Emailed 29 August 2025	
The Canterbury Society	Emailed 29 August 2025	
The Women's Institute	Emailed 29 August 2025	
The Oyster Bed	Letter posted 29 August 2025	
KFC	Letter posted 29 August 2025	
McDonalds	Letter posted 29 August 2025	
The Chestfield Barn	Letter posted 29 August 2025	
The Chestfield Dental Practice	Letter posted 29 August 2025	
Scissor Sisters Hairdressers	Letter posted 29 August 2025	
John Wilson Business Park	Notices posted on 30 August 2025	
George Wilson	Letter posted 29 August 2025	
Sainsbury Superstore	Letter posted 29 August 2025	
B&Q	Letter posted 29 August 2025	
Esso Garage	Letter posted 29 August 2025	

Statutory Consultee asked to take part in the Regulation 14 consultation:		Response received?
Costa Coffee	Letter posted 29 August 2025	
Radfall & Broomfield Gate Amenity Society	Email 29 August 2025	
Radfall Ride Road Association	Email 29 August 2025	Yes
Maydowns Road Residents Association	Email 29 August 2025	Yes
The Drive, The Drove, Meadow Drive and The Leas Residents Road Association	Email 29 August 2025	Yes
Turleys (for the Bodkin Farm strategic site - on behalf of Parker Strategic Land)	Email 29 August 2025	Y received 14/10/2025

And Landowners and Leaseholders of the Local Green Space nominations:

LGS1 – Molehill Road Village Green - Not required for designation as its Village Green status affords it sufficient protection from any development.		No consultation required.	N/A
LGS2 - Radfall Recreation Ground - Recommended for LGS designation LGS3 - Chestfield Road Play Area and Park - Recommended for LGS designation	Canterbury City Council Head of Property, and Head of Culture, Leisure and External Development, Canterbury City Council, 14 Rose Lane, Canterbury CT1 2UR.	Email 30 August 2025	
LGS 4 - Whitstable Rugby Football Club - Recommended for LGS designation	Landowner is CCC. Head of Property, and Head of Culture, Leisure and External Development, Canterbury City Council, 14 Rose Lane, Canterbury CT1 2UR. And Leaseholders: Whitstable Rugby Football Club c/o WRFC Chairman	Email 30 August 2025 Email 30 August 2025	

LGS5 - Chestfield Cricket Club - NOT Recommended for LGS designation	Chairman, Chestfield Cricket Club, The Pavilion, Grasmere Road, Chestfield, Whitstable CT5 3LX	Email 30 August 2025	
LGS6 - For St Joseph's Church front lawn (in part): - Recommended for LGS designation	Registered Landowner: The Roman Catholic Archdiocese of Southwark, 59 Westminster Bridge Road, London SE1 7JE And Canon Philip Glandfield, St Joseph's Catholic Church, Roman Catholic Parish of Our Lady Immaculate, Whitstable, c/o Parish Office, Social Centre, 15a Castle Road, Whitstable CT5 2DY. Email: whitstable@rcaos.org.uk	Letter posted 30 August 2025 Email sent 30 August 2025	
LGS7 - Fairlawn Green - Recommended for LGS designation	The Leas and Fairlawn residents' association By email to: Chairman, Treasurer, Green Leas Liaison and Secretary	Email sent 30 August 2025	
LGS8 – Green Leas Green Not required for designation as its Village Green status affords it sufficient protection from any development.	Green Leas Road Fund association <i>By email to two Road Fund members</i>	No consultation required.	N/A
LGS9 - Swalecliffe Brook Floodplain / rear of Shepherds Walk	Mrs A Bartlett, Brooklands Farm, South Street Whitstable CT5 3EL	Letter posted 30 August 2025	
LGS9 - Swalecliffe Brook Floodplain / rear of Shepherds Walk	And c.c. by email on 29 May 2025 to Tom Wilsher, Senior Land and Planning Manager, Hallam Land Management, 1-3 Mortimer Street, London W1T 3JA	Email sent 30 August 2025	
LGS10 – Grasmere Gardens	Susan Nicklen, Sales and Marketing Manager, Company Secretary Kitewood Estates Ltd, 7 Dacre Street London SW1H 0DJ <i>S.Nicklen@kitewood.co.uk</i>	Email sent 30 August 2025	
LGS11 - Churchwood Park Kendal Meadow Toddler Play Area And LGS12 - Churchwood Park Kendal Meadow Junior Play Area	Churchwood Park Management Ltd, c/o director by email c.c. Landowner - George Wimpey SE Ltd, Gate House, Turnpike Road, High Wycombe HP12 3NR	Email sent 30 August 2025 And Letter posted 30 August 2025	
LGS13 - Birkdale Close and Carnoustie Close community Orchard area	The Fairways (Molehill Road) Management Company - <i>By email to 3 directors</i>	Email sent 30 August 2025	

Record of consultation responses under Regulation 14:

Item No.	From:	Plan Element Ref.	Comment:	Steering Group response:
1.	Chairman of Radfall Ride Road Association	General and Policy U1, U2 – Unadopted Roads	On behalf of the Radfall Ride Road Association I must say that this is an excellent document, I can't see that you have missed anything here and I am very pleased that you have managed to highlight the needs for unadopted roads into which Radfall Ride fits being a privately owned, public bridleway, footpath and cycle route, the various housing developments along its route continue to create surface maintenance problems as you well know and your suggested policies will significantly help with this. Once finalised I hope that this comprehensive document will result in it being adopted by Canterbury City Council, however I cannot help feeling that the overall need for additional housing as directed by the current government will override any local Neighbourhood plans as such, regardless of their strength, quality and detail and that this will ultimately have little or no influence on how the village of Chestfield is allowed to develop in the future. The only hope is that with a change of government, this housing need might change which makes the importance and registration of your Neighbourhood plan of vital importance and a clear statement of local needs and wishes, void from any political or commercial influence. As a further aside, I am working with UK Power Networks who are in the process of upgrading the power supply to Chestfield, the earliest that this will be finished is 2040 so any prior developments will only add to the already unreliable service in Chestfield.	Support Noted. However, it is not always clear who owns an unadopted road or who maintains it, and the planning authority cannot make those legally responsible do things, and likewise for a developer, so the condition requested in the Regulation 14 Plan is not enforceable. Policy U1 has therefore been deleted. The wording of Policy U2 has been changed. Noted. Noted.

Item No.	From:	Plan Element Ref.	Comment:	Steering Group response:
2.	Children and Families Minister, St John's Swalecliffe and Chestfield Church	General	Have had a read and all looks good to me, for once I have no further comments / thoughts!	Support Noted.
3.	Resident at 06 September Consultation Event	Policy D1 – Drainage and Sewerage Infrastructure and Policy D3 – Foul drainage	Fully support all of the proposals set out in D1. In particular the Grampian condition set out in D3 is critical especially in light of the issues resulting from the Oxenden Park development and the connection to Maydowns Road.	Support Noted.
4.	Resident at 06 September Consultation Event	Policy H1 – Future Housing	Fully support all of the proposals set out in H1. Additionally, all developments should make adequate provision for car parking as it is essential for everyone's needs.	Parking standards are set by the higher authority/authorities. Our Policy H2 has: "Good design should provide sufficient external amenity space, refuse and recycling storage and car and bicycle parking to ensure a high quality and well managed streetscape. Planning permission will not be granted for development of poor design that fails to take the opportunities available for improving local character and quality of an area and the way it functions."
5.	Resident at 06 September Consultation Event	General	I was impressed with how well thought out the draft Plan is. I live in the area and don't want it altered too much.	Support Noted.

Item No.	From:	Plan Element Ref.	Comment:	Steering Group response:
6.	Resident at 06 September Consultation Event	Policy H1 – Future Housing	I would like to add that current houses already in the market are not selling. Pointless to build more if demand is not there.	We agree that the market is slow, but this is not something we can address in our Neighbourhood Plan. Housing Numbers are set by central government.
7.	Resident at 06 September Consultation Event	Policy D3 – Foul drainage	Improvements to foul drainage to be done prior to any new housing development (greater than 10 units). After heavy rains in September 2025, swimming in Tankerton was not advisable; this is after some improvement to Swalecliffe foul drainage was completed – meaning still not good enough.	Responses to the Regulation 14 consultation from CCC and Southern Water meant that we had to remove the “10 units” reference from Policy D3. The Policy wording has been amended so that CCC would consider on a case by case basis any planning application where Southern Water indicates that there are capacity constraints.
8.	Resident at 06 September Consultation Event	Policy H1 – Future Housing	New housing proposals promising new schools and medical centres should be done/secured before permission for housing.	The Local Planning Authority and Local Education Authority would take the lead on items like this – and contributions or requirements to build would be dealt with through Section 106 contributions and/or planning conditions. A Neighbourhood Plan cannot mandate a service to be provided at a certain point in time.
9.	Resident at 06 September Event	Policy H1 – Future Housing	Agree with the policy aims with the caveat that local families and young adults have opportunities for access to any new homes (See H4).	Support Noted. We believe this is in line with what we are aspiring for.
10.	Resident at 06 September Consultation Event	Policy H3 – Scale and Building Heights	Agree with the concept of no buildings taller than 3-storeys to maintain the “feel” of the village.	Support Noted.
11.	Resident at 06 September Consultation Event	Policy C1/C2/C3/C4 – PROWs and Cycleways	Urgent need for ‘safe’ cycle routes linking the village to (e.g.) Crab and Winkle, into Whitstable and elsewhere.	Support Noted. Our Policy H2 “Good Quality Design” now has additional text about links between PROWs and cycle ways.

Item No.	From:	Plan Element Ref.	Comment:	Steering Group response:
12.	Resident at 06 September Consultation Event	Policy D1/D2/D3 - Drainage	Any agreement to build new houses in the area would have to have drainage infrastructure constructed before any building begins.	The 10 units or more Policy D3 wording had to be removed and amended. CCC will consider on a case by case basis any planning application where Southern Water indicates that there are capacity constraints.
13.	Resident at 06 September Consultation Event	General	The Plan seems comprehensive but should adhere to the overall aim of maintaining the 'village' status of Chestfield. Not let it become merged into Herne Bay and Whitstable.	We address this in both our Vision Statement and our Policy S1 - Spatial Strategy.
14.	The Fairways (Molehill Road) Management Company	Policy LGS13 – Birkdale and Carnoustie Close community parkland	We had a meeting of the Fairways Management board this evening (08 September 2025) and agreed that we are very happy with the neighbourhood plan and the inclusion of the Birkdale Close/Carnoustie Close inclusion. We all agreed how impressed we were with the content and the effort put in to achieve this. Please pass on our thanks to all those involved.	Thank you for your comments and support.
15.	The Leas and Fairlawn residents' association	Unadopted Roads text	One part of The Leas is unadopted but is not included in the list of unadopted roads text.	Added "The Leas (in part)" to the list of unadopted roads.
16.	The Leas and Fairlawn residents' association	Table 4.7 in Local Green Spaces Audit – for LGS7 Fairlawn Green	Regulation 14 document has a spelling mistake – the area is shown as 030 hectares. It should be 0.342 hectares (0.9 acres).	Text amended to: 0.342 hectares (0.9 acres)
17.	Resident at 09 September Consultation Event	Policy H1 – Future Housing	I support Policy H1 to ensure that people are not priced out of the housing market and may be able to get on the housing ladder.	Support Noted.

Item No.	From:	Plan Element Ref.	Comment:	Steering Group response:
18.	Resident at 09 September Consultation Event	Policy H2 – Good quality design	Any new development to be kept in keeping with the style already in Chestfield to keep a village feel.	We think this is addressed in Policies H2 and H3.
19.	Resident at 09 September Consultation Event	Policy H1 – Future Housing	Quality homes and affordable housing and age-appropriate housing has been well considered.	Support Noted.
20.	Resident at 09 September Consultation Event	Policy D1 – Drainage and Sewerage Infrastructure	A need for a good policy to cover the drainage and sewerage for this area. Infrastructure needs updating.	We think this is already covered in our Drainage Policies.
21.	Resident at 09 September Consultation Event	Local Green Space policy	Local Green Space policy is good, to maintain areas for the residents.	Support Noted.
22.	Resident at 09 September Consultation Event	Policy H1 – Future Housing	Agree with all that's being said.	Support Noted.
23.	Resident at 09 September Consultation Event	Policy D1 and D3 - drainage	Agree that a thorough investigation needs to take place before any developments are agreed.	Noted.
24.	Resident at 09 September Consultation Event	C1/C2/C3/C4 – PROWs and Cycleways	Agree with all of these.	Support Noted.
25.	Resident at 09 September Consultation Event	B1 – Biodiversity Connectivity and B2 – Habitat creation	Very much agree with all that's being put forward!	Support Noted.

Item No.	From:	Plan Element Ref.	Comment:	Steering Group response:
26.	Resident at 09 September Consultation Event	B2 – Habitat creation	We have noticed an increase in wildlife living in our garden since houses built on the other side of the Brook as their current habitats have obviously been destroyed. New planning needs to ensure no loss of existing habitats. Trees are the lungs of the planet, and we need to keep and increase the number of English trees in the area to support the ecosystem.	Our Policy B1 states where trees are lost that they be replaced with appropriate native species to a ratio of 3 new trees to every tree lost.
27.	Resident at 09 September Consultation Event	D2 / D3 - Drainage	20/06/2024 we had a letter from Southern Water saying that they were putting in switches for the sump pumps to switch off waste water from Oxenden Park development when it was at capacity in Chestfield. Any development needs to consider the infrastructure and also the soil type for soakaway drainage – our clay base does not allow for easy drainage. That is why we had salt flats and big open spaces – not suitable for building!	Statement noted, no response from Steering Group required.
28.	Resident at 09 September Consultation Event	General	No mention of water supply or electricity. This has not been addressed in your Neighbourhood Plan.	We do not disagree. Our Vision Statement touches on Infrastructure to include water, waste, roads, power... but is not a Policy. We feel these areas are out of our control and area of influence.
29.	Resident at 09 September Consultation Event	C2 – PROWS and cycleways	Footways/cycle path at the end of Chestfield Road/roundabout connecting to Thanet Way. The ability to cross the Thanet Way is near impossible by foot. Crossing from where the car wash is into Swalecliffe means a blockage of traffic on roundabouts and means multiple crossing for people on foot accessing Swalecliffe.	We agree. The emerging outline planning application CA/24/00224 for Bodkin Farm proposes the provision of two pedestrian crossing and a reduction in the speed limit on the old Thanet Way.

Item No.	From:	Plan Element Ref.	Comment:	Steering Group response:
30.	Resident at 09 September Consultation Event	Policy D4 – Flood Risk	If there were to be further developments would further flood risk be looked into? The road always floods under the dual carriageway preventing many from travelling to Canterbury that way. This could affect the housing that could be built there and affect Chestfield by reducing land for rainwater to be absorbed and this, in my opinion, could produce more flooding here.	Yes. We share the same concerns.
31.	Resident at 09 September Consultation Event	Policy H1 – Future Housing	Whilst the intention to develop small numbers of 1, 2 and 3-bedroom houses is good, choosing where to put them so that they are suitable for those with limited mobility and age-related issues may be challenging. Realistically, there are very few areas where such housing could be incorporated into existing neighbourhoods and therefore it is likely that they will end up being a new 'estate' where opportunities to become part of an established community would be few.	Noted. We are not allocating any sites for development.
32.	Resident at 09 September Consultation Event	Policy D1 – Drainage and Sewerage Infrastructure	Last year, when Chestfield Road/Grasmere Road experienced an unprecedented number of leaks in the water mains, I spoke to some of the men working to fix it and first commented about how the situation would probably get worse if Brooklands Farm was approved. They knew nothing about that, and the comment was "no one bothers to ask us about how a development like that would affect the current infrastructure." Any proposed developments should be held to account to ensure that such infrastructures are in place and operative and inspected prior to any work continuing.	Noted. Southern Water and South East Water are statutory consultees on planning applications – although it is down to Canterbury City Council to engage with them on appropriate applications.
33.	Resident at 09 September Consultation Event	Policy B2 – Habitat Creation	This is important, to avoid concreting over the whole area. We need to protect wildlife.	Support Noted.

Item No.	From:	Plan Element Ref.	Comment:	Steering Group response:
34.	Resident at 09 September Event	Policy B1 – Biodiversity Connectivity	I agree.	Support Noted.
35.	Resident at 09 September Consultation Event	Policy H1, H2, H3 – Housing	I support all these proposals.	Support Noted.
36.	Resident at 09 September Consultation Event	Policy D1, D2, D3 – Drainage	These are essential measures as we already have inadequate sewerage facilities.	Support Noted.
37.	Resident at 09 September Consultation Event	Policy H4 – Rural Exception Sites	Good idea.	Support Noted.
38.	Resident at 09 September Consultation Event	General	This (Neighbourhood Plan) will benefit Chestfield and protect future residents as well.	Support Noted.
39.	The Coal Authority Planning Team	General	Thank you for your notification of 1 September 2025 seeking the views of the Coal Authority on the above. The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. However, the area to which this consultation relates is not located within the defined coalfield. On this basis we have no specific comments to make. Yours The Coal Authority Planning Team.	No action required.

Item No.	From:	Comment received:	Steering Group response:
40.	Sport England	Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 103 and 104.	We consider this Sport England response to be somewhat of a generic response, and would have liked a comment about our Inclusive Streetscapes and Active Design Policies AD1 and AD2 which encompass Sport England's Active Design Guidance and its 10 principles. NPPF Para 103. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate. NPPF Para 104: Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

		It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 104 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.	We are not proposing the loss of playing field land. Our LGS2 (Radfall Recreation Ground, LGS3 (Chestfield Road Play Park), and LGS4 (Whitstable Rugby Football Club) would afford Local Green Space designation if our Plan is accepted. This would be dealt with at developers and Canterbury City Council level. This is dealt with at Canterbury City Council level within the Canterbury District Local Plan evidence base documents. CCC's Open Spaces Strategy 2022 This is dealt with at Canterbury City Council level
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		http://www.sportengland.org/planningtoolsandguidance If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing Sport England's Active Design Guidance: https://www.sportengland.org/activedesign If you need any further advice, please contact Sport England using the contact details below. Yours sincerely, Planning Technical Team. E: planning.south@sportengland.org	This is dealt with at Canterbury City Council level This is dealt with at Canterbury City Council level Our Policies AD1 (Inclusive Streetscapes) and AD2 (Active Design Principles) address this. The 10 Principles are summarised on Page 31 of our Regulation 14 document and detailed on Pages 83 and 84 of our Regulation 14 document.
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Item No.	From:	Plan Element Ref.	Comment:	Steering Group response:
41.	Harbledown and Rough Common Parish Council	General	Harbledown and Rough Common Parish Council considered the Regulation 14 draft of the Chestfield Neighbourhood Plan at its meeting on Monday, 15th September. Councillors were given the full document and a 5-page summary. The Parish Council resolved to express its full support for the draft Plan. Councillors considered it to be well-evidenced, informed by good community engagement, and providing a robust framework for guiding development in a way that aligns with the National Planning Policy Framework and Canterbury City Council's Local Plan. In particular, the Parish Council welcomed the Plan's focus on protecting local character, safeguarding the natural environment, and promoting development that is proportionate, sustainable, and responsive to the needs of the community. We commend Chestfield Parish Council and the Steering Group for the high quality of the work undertaken and for producing such a comprehensive and well-structured Neighbourhood Plan and wish you well in its progress through the next stages towards formal adoption.	How lovely. Noted. No action required.
42.	Maydowns Road Residents Association	General	The MRRA are in support of the Chestfield Neighbourhood Plan and all the work that has gone into its preparation. It will be a document that will "influence" any future developments in the village and keep Chestfield's unique identity. We particularly fully support the Unadopted Roads Policy as outlined in Policy U1 & U2.	Support Noted. However, it is not always clear who owns an unadopted road or who maintains it, and the planning authority cannot make those legally responsible do things, and likewise for a developer, so the condition requested in the Regulation 14 Plan is not enforceable. Policy U1 has therefore been deleted. The wording of Policy U2 has been changed.

43. From Historic England

Thank you for inviting Historic England to comment on the Regulation 14 Pre Submission Draft of the Chestfield Neighbourhood Plan. We welcome the production of this neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time. We would refer you to our advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/ . For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local authority's planning and conservation advisers, and if appropriate the Historic Environment Record at Kent County Council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.	No action required.
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44. Environment Agency response - From the Environment Agency (received by email 06 October 2025)

Thank you for consulting us on the above. We have the following comments to make, which we hope you find useful. We support sustainable development that protects and enhances the natural environment, particularly the water environment. We expect all new developments to incorporate robust environmental safeguards and demonstrate a clear commitment to improving ecological outcomes. <u>Key expectations include:</u> • Surface Water Management: No surface water runoff should be discharged directly into watercourses. This is essential to prevent pollution, erosion, and habitat degradation. Sustainable Drainage Systems (SuDS) are the preferred mitigation measure for managing surface water runoff. These systems help to mimic natural drainage, reduce flood risk, improve water quality, and support biodiversity. • Water Environment (Water Framework Directive) (England and Wales) Regulations 2017: Developments must not cause deterioration in waterbody status under these regulations. Waterbodies classified under these regulations will hereafter be referred to as WFD waterbodies. Where possible, developments should actively contribute to the enhancement of the water environment, such as through habitat creation or improved water quality. If relevant for the development, work should be undertaken to complete actions set out within the River Basin Management Plan (RBMP).	We felt the Environment Agency officer(s) had read our document in some detail and given constructive comments. This text has been added to the Information and Justification section of our drainage Policy. Noted.
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• Buffer Strips: Buffer strips are vital for intercepting pollutants, reducing erosion, and providing wildlife corridors. These should be incorporated into site designs to protect water quality and support ecological networks. • Foul Drainage: All new developments should aim to connect to the existing mains drainage network. The use of private sewage treatment works or New Appointments and Variations (NAVs) should be avoided. • Engagement with Water Companies: The local council and developers must liaise with the relevant water companies throughout the planning and construction process. This ensures a clear understanding of existing drainage infrastructure and confirms that there is sufficient capacity at the local sewage treatment works to accommodate the proposed development. By adhering to these principles, we can help safeguard the water environment and contribute to a more resilient and sustainable future. Plan Specific Comments The Chestfield Neighbourhood Plan should be closely aligned with the Canterbury Local Plan to ensure consistency in environmental objectives and planning outcomes. The Chestfield Neighbourhood Plan can reinforce local commitments to environmental stewardship, support the delivery of WINEP schemes, and promote collaborative working with water companies and statutory bodies. This alignment ensures that development proposals not only meet legal requirements but also contribute positively to the district's long-term sustainability and ecological health. 2. Introduction It is promising to see that the top 5 priorities for the Parish include drainage and sewerage infrastructure capacity, and biodiversity/wildlife habitats protection. 4. Vision Statement <i>'All new development must deliver the requisite infrastructure which will assist rather than over burden the local community and the environment, enabling the community to grow economically and socially.'</i> This statement is positive, as the reference at the bottom of the page alludes to the inclusion of 'water' and 'waste'. Sewerage infrastructure and Wastewater Treatment Work capacity is vital when looking at a potential development site. <i>'All development will maximise and enhance the environmental assets in and around Chestfield, improving access to the countryside and open spaces for residents and visitors.'</i>	Noted. This text has been added to our drainage Policy. Agree. We believe this is standard practice. (WINEP stands for Water Industry National Environment Programme. It is a regulatory framework that outlines the environmental obligations for water companies in England, focusing on improving the environment and meeting national objectives for natural resources.) Support noted. Additional text to this effect has been added to the Vision Statement.
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Another positive statement, though we would encourage some specificity, in particular referencing the water environment. 7. Drainage and Sewerage Infrastructure <i>'Any new development must adequately manage drainage and sewerage and not place further pressure on the environment, nor should it compromise nationally applicable Water Framework Directive objectives.'</i> It is positive to see this statement. Potential development sites should be connected to mains drainage, councils should work closely with water companies during the planning and development process. The use of private sewage treatment works, or New Appointments and Variations (NAVs) should be avoided. <i>'In view of recent flooding in the village (2020-2021 and in 2023) any new housing development must have adequate drainage and sewerage facilities incorporating appropriate property level flood resilience measures.'</i> It's positive to see that there is emphasis on adequate drainage and sewerage facilities in relation to flooding events. Sustainable Drainage Systems (SuDS) are the preferred method to reduce surface water runoff pressure on the existing network. <i>'Explore alternative drainage routes:'</i> We don't support the suggestion to discharge surface runoff to a surface waterbody unless there is implementation of an interceptor to remove pollutants and sediment. Furthermore, if the surface water sewer eventually discharges the water to the river, then this practice is also not supported unless mitigation is included to remove pollutants and sediment. We recommend SuDS as the higher priority mitigation for surface water and road runoff. <i>'Natural flood management and the use of Sustainable Drainage Systems:'</i> We support this section. The information supplied is accurate and encompasses the benefits of SuDS. However, it is essential to consider groundwater water quality. If the assumption is for road runoff to be intercepted by SuDS, there is the potential for harmful pollutants to enter the groundwater. SuDS could also be an important mitigation for the protection of the Swalecliffe Brook WFD waterbody (GB107040019630). This waterbody runs through the neighbourhood plan area and therefore we encourage more emphasis on the protection of this waterbody within this plan. In addition, the following should also be noted and included where appropriate within this section.	This has now been added to Policy D1 "Drainage and Sewerage Infrastructure". Words to this effect have been added to the Information and Justification section. The Interceptor requirement has been added to the text under this section. And SuDS as the priority stated. This information has been added to Policy D2 "Sustainable Drainage Systems (SuDS)".
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- Access to the main river through any proposed development must be maintained to enable planned and reactive maintenance of the main river.
- During flood conditions, the Brook is already running at capacity. Further loading will likely lead to wider flooding, so the avoidance of discharging any runoff directly into the Swalecliffe Brook is paramount.
- This section of the Brook is narrow with high banks in places. It also runs through a lot of properties and borders the cricket club all of which have had issues with high water levels in the past.
- A thorough plan for the attenuation of runoff water, (potentially held all winter) and a suitable discharge regime to avoid overloading the system should be considered a must.

Policy D1 Drainage

'Before any development takes place, developers shall carry out a thorough investigation related to the drainage and sewerage systems. They are to identify any potential increase in flood hazard in Chestfield and the surrounding areas which might result from the development.'

We support the statement that these investigations should take place, however the scope should be wider, looking at the capacity of the current Wastewater Treatment Works (WWTW) and whether the integrity of the current sewerage infrastructure is adequate to take on increased quantities of surface water runoff.

'Any new development must not place further pressure on the environment, nor should it compromise nationally applicable Water Framework Directive objectives.'

It is positive to see the inclusion of the WFD objective within this policy. Further detail should be included to better support the environment. For example, please consider including a statement such as 'development must not cause a WFD deterioration in the Swalecliffe Brook WFD waterbody or any other watercourses in the neighbourhood plan area'. Furthermore, actions should be taken to enhance the natural environment, such as habitat creation and enhancement, implementation of riparian buffer zones and restoration of natural features, to name a few.

'Development will not be objected to where it is demonstrated that its surface water drainage will not add to existing site runoff, enter the foul-combined sewer network,'

This could be reworded for clarity. **'Development will only be accepted where it is demonstrated that its surface water drainage will not add to existing site runoff, enter the foul-combined sewer network, or cause any adverse impact to neighbouring properties and**

This has been added to Policy D1 "Drainage and Sewerage Infrastructure".

This has been added to Policy D1 "Drainage and Sewerage Infrastructure".

This has been reworded as suggested in Policy D1 "Drainage and Sewerage Infrastructure".

the surrounding environment. While this statement is an ideal scenario, it may not be a realistic goal. It is important to link back with the Canterbury Local Plan in these cases. <i>‘Proposals for new development in the Plan area should utilise Sustainable Drainage Systems (SuDS) unless there are compelling and identified practical reasons for not doing so. It will not be acceptable for an increase in surface water run off to enter the foul water system.’</i> In full support of this statement. <i>‘Developments will not be supported unless they contain details of the measures that will be taken to ensure that polluted runoff (including suspended sediment) does not leave the site and enter The Brook and surrounding waterbodies during construction and operation.’</i> In full support of this statement. <i>‘The hierarchy of discharge option preference is:’</i> We do not support options b or c of this hierarchy as there is no mention of interception of pollutants and sediment. Runoff can contain a multitude of pollutants that would be washed directly into the water course. This does not comply with WFD objectives to prevent deterioration. Policy D2 – Drainage using Sustainable Drainage Systems (SuDS) <i>‘Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance in perpetuity of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity.’</i> In support of this statement, a key consideration of SuDS is their long-term maintenance. Policy D3 Foul Drainage More clarity is needed in this policy and the supporting paragraphs on pages 17&18. The supporting paragraphs state that developments have the right to connect to sewerage systems even if they are already over capacity, yet the first paragraph of the policy states that proposals will not be supported unless there is sufficient capacity. There is then a statement about development being approved if they align with Southern Water's phased delivery of sewerage network reinforcement. The first paragraph could include wording such as ‘... will not be supported unless there is sufficient capacity or confirmed plans to improve capacity in the local sewerage system’.	Support noted. Support noted. Fair comment but b & c with interceptors are better than d. So, we have added wording to b and c (now Priority 3 and 4) of the need for an interceptor to remove pollutants and sediments. Support noted. The supporting paragraphs have been updated in light of others' comments. First paragraph now has “or confirmed plans to improve capacity” added.
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There is also a focus on developments of 10 units or more, please provide more information on how the wastewater will be managed in developments with less than 10 units. These developments should still be connected to foul drainage, and the use of NAVs and private sewage treatment works should be avoided. Meeting the Challenges of Climate Change and Flooding It is positive to see that climate change is being included within this document. While the link to flooding is key, it is also important to mention the impact on water quality and river flows generally. Rising temperatures and altered precipitation patterns are disrupting the natural water cycle, leading to more frequent and intense rainfall events followed by prolonged dry spells. These shifts can reduce river flows and dilution capacity, concentrating pollutants such as nutrients, sediments, and chemicals in waterbodies. Droughts can exacerbate nutrient buildup, while heavy rainfall can trigger runoff and combined sewer overflows, introducing contaminants into watercourses. 9. Unadopted Roads It is important to highlight that there can be environmental risks associated with unadopted roads, namely the improper maintenance and management, leading to erosion, runoff and increased vulnerability to flooding. This is even more of a risk if a road were to run alongside a waterbody (e.g. Grasmere Road and the Swalecliffe Brook). If, as mentioned within the ‘information and justification’ section, the use of an unadopted road leads to a drop in the standard of the road, this could have an environmental impact, and this would need to be managed and mitigated by the developer throughout the period of development. 10. Biodiversity Policy Map of Green Infrastructure Network: It is good to see waterbodies being mentioned within this section, specifically when discussing Green Infrastructure (GI). It would be ideal for the map to depict the waterbody to highlight the connectivity between green space and urban areas, as the Swalecliffe Brook runs along the west perimeter of the Chestfield Parish Council boundary. The map needs to be revised so that a key type of GI is properly considered in the Plan. As part of this, where the issue of connectivity of wildlife corridors is considered in Policy B1, the Swalecliffe Brook’s longitudinal and lateral connectivity along its length and with its flood plain must be added. This is because breaks in the connectivity of a river e.g. by bridges or, worse, culverts and buildings	The 10 units or more Policy wording has been removed and amended so that CCC would consider on a case by case basis any planning application where Southern Water indicates that there are capacity constraints. A paragraph with this information has been added to the “Meeting the Challenges of Climate Change and Flooding” section. A paragraph with this information has been added to the Unadopted Roads section. It is on the map but the original scale of the map made it hard to see – the map has been enlarged in the Regulation 16 version of the Plan. Email 23/12/25 to EA to advise we don’t have the appropriate mapping resources and to ask if they are able to provide a map like they suggest here. They replied
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have significant adverse effects on wildlife of all sorts e.g. movement of fish and insects, establishment of plants. In addition, improving connectivity of this type of GI should be supported in this policy. This should include “daylighting” the Brook by removing, whenever possible, any structure that is over it or too close to it creating shading or eliminating the riparian corridor and preventing, by policy, any works that would cover it. This could be done with relevant text on page 28 where there is reference to new development e.g. It should also look for opportunities to restore and enhance GI e.g. by removing buildings and structures that hide or cover important GI assets such as streams and the Swalecliffe Brook. Biodiversity Net Gain Use of the metric to record delivery of 10% Net Gain (NG) is currently specified in the draft Local Plan for the Canterbury District. The NHP appears to be suggesting that 20% will be required. This needs to be clarified with the Council. Policy B2 Habitat Creation <i>‘Retain or enhance existing landscape features (e.g. hedgerows, watercourses) to maintain wildlife corridors’</i> We support this statement but believe it would be beneficial to place more focus on watercourses. A suggested rewrite could be, ‘Retain, enhance, and actively manage existing landscape features (e.g. hedgerows, watercourses and riparian zones) to maintain and improve wildlife corridors, water quality, and ecological connectivity. Development should incorporate measures such as habitat restoration, buffer strips, and pollution interception to ensure watercourses contribute positively to biodiversity and comply with Water Framework Directive objectives.’ Policy B3 - Impacts on wildlife While the guidance suggest from the ILP is to be recommended, there is much more that can be done to reduce the impact of Artificial Light At Night (ALAN) including: • Use of timers and sensors to minimise emissions of ALAN to hours of darkness • Use of sensors to manage lighting for safety reasons so that it is only on when it is needed for people e.g. using paths, parks, car parks etc. • “colour” and intensity of the light as some bright white lights are more harmful than other colours • Fitting light shields to prevent backscatter of light falling onto watercourses • Low level and directional lighting where possible This should be researched and extended appropriately.	that they couldn’t, but suggested text be added – which has now been done. A new policy has been added in Policy B1 that reflects this advice. Requirement reduced to the 10% National BNG level requirement. Policy B2 paragraph amended to that suggested. Thank you. We have added in these useful comments for information.
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45. Hackington Parish Council (Email received 14/10/2025)

Hackington Parish Council (HPC) welcomes the opportunity to comment on the Chestfield Neighbourhood Plan (Regulation 14 Pre-Submission, August 2025). We commend Chestfield Parish Council for producing a clear, comprehensive and locally grounded plan that reflects strong community engagement and aligns well with the objectives of sustainable development. Having reviewed the document, Hackington Parish Council offers the following observations and recommendations: Overall comments HPC welcomes the Chestfield Neighbourhood Plan as a well-evidenced, community-driven document which focuses on sustainable, well-designed development. HPC particularly supports the strong focus on drainage, biodiversity, addressing individual needs, and design quality. However, given shared infrastructure, flood catchments, and ecological corridors, HPC recommends that the final plan explicitly acknowledges the need for cross-parish cooperation, particularly with Hackington, Blean, and Swalecliffe, to manage development impacts, sustain green infrastructure continuity, and deliver integrated walking and cycling networks. SPECIFIC COMMENTS 1. Spatial Strategy • Strongly support the proposed design that establishes and maintains a sense of place, encourages creative housing ideas and considers integration with the natural environment. • Support the policy's focus on containing development within the 'Built-Up Area Boundary' to prevent coalescence between Chestfield, Whitstable, and Herne Bay. • Suggest that the plan explicitly recognises cross-parish green buffer zones, particularly along the southern boundary with Hackington Parish, to maintain separation from Canterbury's northern border. • The vision statement creates an image of the infrastructure and community that is desirable, and one that could easily relate to other parish councils, however there is scope for strengthening and clarifying its direction.	We have added a sentence in our introduction to recognise the need for cross-parish cooperation with Hackington and Blean parish councils (Swalecliffe is currently unparished so not mentioned.) Support noted. Support noted. We have a defined Neighbourhood Plan area so legally we are not allowed to specify policies to relate outside of our defined area. The Vision Statement is not a Policy. The Steering Group are happy with its wording.
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• Define what is meant by ‘high quality housing’. • Recommend that Chestfield Parish Council consider aligning the Neighbourhood Plan period with the draft Canterbury District Local Plan (to 2040) and include a formal commitment to a mid-term review. This would ensure continued relevance and adaptability to strategic changes. 2. Drainage and Sewerage Infrastructure (Policies D1–D4) • Strongly support the emphasis on Sustainable Drainage Systems (SuDS), flood resilience and thorough investigations by developers related to the drainage and sewerage systems before developments take place. • Suggest that Chestfield and Hackington jointly map shared catchments for surface water and foul drainage, since the Brooklands Farm site and other developments could affect flows southwards toward Hackington and the Stour basin. 3. Public Rights of Way, Promoted Routes, and Cycleways • Strongly support policies promoting walking and cycling in line with Canterbury City Council’s Local Cycling and Walking Implementation Plan • Recommend connecting planned Chestfield cycle and footpath improvements to existing Hackington routes, especially those linking to the University, Blean Woods, and Canterbury. 4. Biodiversity Policy • Strongly support a minimum of 20 % Biodiversity Net Gain requirement and the focus on habitat connectivity. • • Propose that the plan extends its Green Infrastructure Network mapping to show linkages beyond the parish boundary, particularly woodland and hedgerow corridors into Hackington, Clowes Wood, and the Blean.	We have expanded the supporting text to better highlight key features and examples of what we consider is good design in Chestfield parish. Several responses suggested the end date of our Neighbourhood Plan should align with CCC’s Local Plan, so we have amended the end date to 2042-43 (the Regulation 19 version end-date) and also modified the housing numbers text to accord with this too. However, we do not want to commit to a timeframe for a review, and there is no requirement to do so. Support noted. Not as part of this Neighbourhood Plan. Support noted. We agree with the intent and think our Plan already covers this through its support for CCC’s Local Cycling and Walking Implementation Plan. Support noted however we have had to reduce it to the national 10% BNG level. We have consciously kept to our Neighbourhood Plan area, as we have been advised by CCC.
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• Recommend a shared biodiversity monitoring approach through Canterbury City Council or the Kent Nature Partnership. 5. Inclusive Streetscapes and Active Design • Strongly support the principles of equity and inclusivity based on the social model of disability in creating environments that accommodate diverse needs • Support 'lived experience' approach, Active Design principles and Secured by Design accreditation • Support limits on building height (max 3 storeys) as appropriate to maintain rural character and protect long-distance views from Hackington and the Blean embankment. 6. Infrastructure and Services • Note that the cumulative impact of strategic allocations (e.g. Brooklands Farm and Bodkin Farm) may have knock-on effects on Hackington's roads and wider infrastructure. • Recommend that Chestfield's Implementation Plan section (post-Reg 14) includes joint infrastructure planning with neighbouring parishes.	Potential idea but not through the Neighbourhood Plan. Support noted. Support noted, although the second part of Policy AD1 to use 'lived experience' panels has since been removed based on other comments. Support noted. Noted. We don't believe there is a role for this in a Neighbourhood Plan – it requires a multi-agency response and cooperation.
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46. Natural England (email received 14 October 2025)

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.	We considered this a very generic response. No specific modifications / action required.
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Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary. Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely Sally Wintle Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic

CCC has completed consultation and scoping opinion and confirmed that neither a [Strategic Environmental Assessment](#) nor [Habitat Regulations Assessment](#) is required, as we are not allocating any sites for development.

The Magic website is already referenced in our Biodiversity section.

CCC has provided us with a map with local designations now, including Sites of Special Scientific Interest and Local Wildlife sites.

activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here³. There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online. If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website. General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic⁴ website and also from the LandIS website⁵, which contains more information about obtaining soil data. Natural environment issues to consider The National Planning Policy Framework⁶ sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance⁷ sets out supporting guidance. Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments. <u>Landscape</u> Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness. If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping. ¹http://magic.defra.gov.uk/ ²https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england ³https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making ⁴http://magic.defra.gov.uk/ ⁵http://www.landis.org.uk/index.cfm ⁶https://www.gov.uk/government/publications/national-planning-policy-framework--2 ⁷http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/ <u>Conts/...</u>	The CCC map also now includes the Area of High Landscape Value (AHLV) as included in the adopted 2017 Canterbury District Local Plan. Our neighbourhood plan area is not within or adjacent to a National Park or Area of Outstanding Natural Beauty. We consider that this is not required in our Plan.
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Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the National Planning Policy Framework. If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory Biodiversity Metric and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's Green Infrastructure Framework sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#) ¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

⁸<https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹²<https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

Item No.	From:	Plan Element Ref.	Comment:	Steering Group response:
47.	Chestfield resident	Section 12. Policy SBD1 Secured by Design	Hi, you may already have seen this, but just in case (as it's new), there is a new guide for safer parks at: www.securedbydesign.com	Additional text has been added to the Policy page.

48. From Canterbury City Council (email received 13 October 2025)

These comments have been made by the Policy and Strategy Team at Canterbury City Council (CCC) in the context of the adopted Canterbury District Local Plan (CDLP) (2017), plus relevant evidence which supports the emerging Draft Canterbury District Local Plan. Please note, our comments on the emerging Chestfield Neighbourhood Plan (CNP) may need to change to reflect the increased weight of the new draft Local Plan as it moves through to examination stage. In general, the plan reads well and we support and recognise all the work that has gone into its preparation. This response is designed to be constructive and is focused on our main areas of concern, and where we think further work or changes will be needed. Spatial Strategy Policy S1 The Chestfield Neighbourhood Plan (CNP) states that Policy S1 <i>“seeks to ensure that [additional development proposals to those contained in the Local Plan] are directed to the most sustainable locations in the Parish – i.e. within the ‘Built Up Area Boundary’.”</i> While we support the principles of ensuring that development is directed towards the most sustainable locations, the policy, as drafted, does not currently outline the criteria for what constitutes a <i>“sustainable location”</i> beyond being within the ‘Built Up Area Boundary’, which is undefined within the CNP currently. We would recommend that the boundary is defined on a map and/or further explanation added to clarify how this should be interpreted. Housing Policy H1 The general aims of ‘Policy H1: Future Housing’ are supported and we recognise that this is broadly consistent with the findings of the Chestfield Housing Needs Report (April 2025). Policy H2 The CNP, under policy H2: Good quality design, defines <i>“good quality design”</i>, as <i>“responding to and integrating with local surroundings and landscape context as well as the existing built environment”</i>. We welcome the thrust behind this policy and would encourage you to expand the supporting text to better highlight key features or examples of good design in Chestfield parish to improve the effectiveness of the policy. Happy to discuss this further to support the aims of your neighbourhood plan.	Chestfield is part of the Whitstable Urban area. CCC officers have kindly supplied a map which is now included in our Spatial Strategy information showing the Urban boundary as defined in the adopted 2017 Canterbury District Local Plan. We have expanded the text, and with photos, and set design principles around the local vernacular and fenestration; boundary treatments; orientation of properties, etc.
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Policy H3 The CNP states under policy H3: Scale and building heights, states that <i>“No buildings taller than 3 storeys will be supported.”</i> While we support the principle of ensuring that housing densities are appropriate in relation to their surroundings, there is concern that this – as a blanket approach across the whole parish - is not compliant with paragraph 135(c) of the National Planning Policy Framework (2024): <i>135 (c) Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).</i> We think that, although this may be appropriate for certain areas of the parish, a more flexible approach may be needed in some areas and would be happy to discuss this further. Policy H4 The following comments have been provided by CCC Housing. In common with the majority of district councils, Canterbury City Council assesses housing need on a district-wide basis, which is reflected in the Housing Strategy and the Local Plan. It allocates its own homes and nominates prospective tenants to Registered Providers (formerly known as housing associations) in accordance with its Housing Allocations Scheme 2023, which reflects the complex web of legislation, regulation and government guidance. The Housing Allocations Scheme gives applicants the choice to bid for a home anywhere in the district. This reflects the fact that affordable housing is not distributed evenly across the district and that applicants' housing solutions are dictated by affordability, availability, family ties, support networks, employment and schools, which may change over time. Access to the Housing Needs Register is restricted. 1. Applicants may only join the Housing Needs Register if they are eligible. It is complicated, but, in effect, they must not be subject to immigration control. Therefore, access is restricted to those with a legal right to live in the UK. 2. In addition, applicants must qualify to join the Housing Needs Register by having a local connection to the district. 3. Furthermore, qualifying households must: • Have a housing need or already be a tenant of the Council who is under-occupying their home • Usually be over 18. • Not own a home or other property (except applicants for sheltered, sheltered plus or designated accommodation for older people or other exceptional cases) • Have income and/or savings below certain limits. The only exceptions are: A small number of homes provided by registered providers in some rural communities can only be offered to people with a very strong connection to that community. These are usually associated with	Policy H3 Building heights has been deleted, although some text added to the information section discouraging any building over 3 storeys as out of keeping and if justified should be “hidden” amongst the other housing and topography. CCC Housing team’s information and comments have been noted and accepted. No change to the text is required.
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conditions for granting planning permission, such as a Rural Exception Site or Section 106 agreements for the development. Or, a local lettings plan may be necessary: • During the first letting of homes on new developments • If there are circumstances when the Council must pay special attention to a particular area and be sensitive as to how vacant properties are let, for example in certain rural communities • To address community safety issues in an estate or area • To support the creation of balanced and sustainable communities • To support area regeneration or renewal. The use of local lettings plans is carefully considered to ensure that addressing an issue in one area does not have unforeseen consequences elsewhere. In either of the instances above, applicants must still be eligible to join the Housing Needs Register, demonstrate a local connection to the district and be in housing need. Chestfield is not rural or remote and is physically close to Whitstable, Tankerton and Swalecliffe. On small infill sites within Chestfield, there might be a case to aim for the affordable housing to be a form of low cost home ownership to meet the need identified in the Parish survey. However, there are considerable commercial pressures on the Registered Provider to sell the properties. For the first (time) sale, they will try to establish a local connection, but this cannot be guaranteed when properties come up for re-sale. Larger development sites on the periphery are meeting a district-wide need for housing that exceeds the need identified in the Chestfield survey, and therefore, it is not appropriate to restrict access to affordable rented homes to applicants with a local connection to Chestfield Parish. Drainage and Sewerage Infrastructure Policy D1 Under the information and justification section of Chapter 8 ‘Drainage and Sewerage Infrastructure’, the Draft Chestfield Neighbourhood Plan states “<i>The amount of development planned for Chestfield in the emerging Canterbury District Local Plan 2024 will need to carefully consider these issues [flooding]</i>”, before going on to list several ways in which to approach this. Policies across the draft Local Plan, including draft Policy DM15 ‘Sustainable Drainage’, are intended to address these issues effectively. We would strongly recommend that the policy paragraph below is reworded to ensure it is targeted at relevant developments, both in terms of the type and location of development.	With this exception, we believe our Rural Exception Site Policy is acceptable. We have however changed and strengthened the Policy wording. The parish council will bear this in mind for any future small infill sites. This would apply to windfall development which can’t be planned for. Noted, and accepted.
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<i>“Developments will not be supported unless they contain details of the measures that will be taken to ensure that polluted runoff (including suspended sediment) does not leave the site and enter The Brook and surrounding waterbodies during construction and operation.”</i> Policy D2 Under ‘The Natural flood management and the use of Sustainable Drainage’ heading, of the information and justification section within Chapter 8, the two different drainage approaches of Natural Flood Management and Sustainable Drainage Systems appear to have overlapped, and it would be clearer if the two approaches were separated out. Natural Flood Management refers to the use of measures including swales, hedges, ditches and leaky dams on streams, whilst SuDS seek to replicate natural systems to drain away surface water run-off through collection, storage, and cleaning before allowing it to be released slowly back into water courses. Further, we would suggest that this policy is reviewed to improve its clarity and legibility, and we would be happy to discuss this further with you. Policy D3 We are generally supportive of the aims of ‘Policy D3: Foul Drainage’, however Southern Water is responsible for the connection to the foul sewer under separate legislation to planning. There is also no evidence provided that the requirements outlined in Policy D3 are necessary under every application within the Neighbourhood Area. Where such issues are identified on specific large planning applications by Southern Water, this can be dealt with through phasing conditions on a case-by-case basis. On this basis, it would not be considered appropriate to include this as a policy requirement. We would be happy to discuss this further to support the aims of your neighbourhood plan. Public Rights of Way, Promoted Routes, and Cycle Ways Policies C1 – C4 We recommend that these policies are reviewed, and potentially combined, to improve the clarity of the policies. Policy C1 requires modifications to ensure it is positively prepared, and can respond flexibly where opportunities for improvements and mitigation may be required. Policy C3 is somewhat unclear in terms of what developer contributions are referred to e.g. CIL/s106 and how this could be implemented effectively. We would be happy to discuss this further to support the aims of your Public Rights of Way, Promoted Routes, and Cycle Ways policies.	This sentence has been added to the information section. We have made this relevant to developments of 10 units or more which would affect a waterbody due to its location. We have reworked the Drainage and Sewerage Infrastructure section/information/ and policies. The 10 units or more Policy wording has been removed and amended so that CCC would consider on a case by case basis any planning application where Southern Water indicates that there are capacity constraints. Policy C1 and C2 have been combined/and text changed. Policy C1 has been reworded more positively as suggested. Policy C3 has been reworded to replace “allocation of developer contributions” with “good sustainable design” – AND the
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Unadopted Roads Policy U1 While we understand the aspirations behind ‘Policy U1’ our view is that such a policy would not be effective, as it would be outside the control of any developer or public body to implement any works to a private unadopted road. Policy U2 The wording of this policy requires some revision to ensure it is effective as part of the Development Plan. Biodiversity and landscape Under the ‘Information and Justification’ section of the ‘Biodiversity Policy’ chapter it would be worth ensuring that all references to external evidence documents are up to date and refer to the most updated version of that document, such as the Consultation Draft of the Canterbury District Tree and Woodland Strategy 2022-2045 (October 2022). It is also recommended, when using maps as part of the justification or explanation for planning policy, to highlight various designations, including all sites as part of that designation within the Neighbourhood Plan Area boundary, rather than highlighting specific sites. We would be happy to discuss this further to ensure that all designations are identified. Policy B1 Whilst we support the aims of ‘Policy B1: Connectivity’, we recommend the inclusion of specific requirements to ensure that the policy is effective. The ambiguity of phrases such as “will be permeable to wildlife”, leaves the phrase up to interpretation. Referencing specific requirements as outlined elsewhere in the CNP, such as “nest boxes for swifts and bats”, that define the Parish’s interpretation of an environment permeable to wildlife, will ensure that the policy achieves what it aims to. Policy B2 The general aims of Policy B2 are supported. However, Policy B2 states that: <i>“All proposals for development, other than those exempt through national legislation, will be required to demonstrate and</i>	whole policy has now been moved to Policy H2: Good quality design. We accept that it is not always clear who owns an unadopted road or who maintains it, and that the planning authority cannot make those legally responsible do things, and likewise for a developer, so the condition requested in the Regulation 14 Plan is not enforceable. Policy U1 has therefore been deleted. The wording of Policy U2 has been changed. The latest versions of the Tree and Woodland Strategy (February 2024) and Kent Biodiversity Strategy 2020-2045 are now in the Plan. Thank you. CCC officers have kindly provided us with a map with local designations now, including the conservation areas, Local Wildlife sites, Sites of Special Scientific Interest and the Area of High Landscape Value (AHLV) as included in the adopted 2017 Canterbury District Local Plan. The phrase “will be permeable to wildlife” has been changed to “will support wider biodiversity connectivity.” Policy B1 has also been expanded based on others’ comments.
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<i>deliver a minimum of 20% Biodiversity Net Gain (BNG) calculated using the latest Natural England biodiversity metric (or an alternative metric set out in legislation) and taking consideration of any national or local guidance on what values / multipliers should be used.”</i> We would be keen to understand the evidence of requiring more than the national biodiversity net gain (BNG) level of 10%. Inclusive Streetscape and Active Design Policy AD1 This policy needs reviewing to clarify the function of a “lived experience” panel, and what specific forms and types of development this requirement could apply to. Policy AD2 The general aims of ‘Policy AD2: Active Design Principles’ are supported. It is worth noting however, as with other policies, that the types of sites/planning applications in which the policy should apply, needs to be clearly stated. For example, the Sports England Active Design Principles would not be appropriate when considering an application within the Neighbourhood Plan Area for a single dwelling. We would be happy to discuss this further with you to support the aims outlined within the policy. Secured by Design Policy SBD1 The general aims of ‘Policy SBD1: Secured by Design’ are supported. There is concern however, that the requirement to achieve “<i>full Secured by Design Gold accreditation</i>” contradicts Policy AD2: Active Design Principles’, and the requirement to adhere to Sports England’s Active Design Principles. The requirement for SBD gold accreditation may also lead to an increase in impermeable developments and reduce connectivity in their favour of closed cul de-sacs. It is also worth noting that SBD as a Police Security Initiative, accredit developers based on their discretion following the development of a site and so whilst it would be appropriate to require developers to include a series of outlined features within a site design in aim of achieving a gold standard of accreditation, no development would be able to ensure the accreditation would be achieved prior to the delivery of the site. We would be happy to discuss this further with you to support the aims outlined within the policy.	20% reduced to the national BNG 10% level. The Steering group representatives revisited this and on reflection the second part of AD1 has been removed as scrutiny and feedback of any new developments is already facilitated via local parish/ward councillors and CCC consultations. We have amended the Policy wording to be for developments of 10 or more residential units. We have deleted Policy SBD1 and incorporated the Secured by Design justification and information text into Policy H2 and reworded part of Policy H2 which includes demonstrating at the planning application stage that the development meets the requirements of ‘Secured by Design’ to minimise the likelihood and fear of crime (and including a series of outlined features within a site design in the aim of achieving a Gold standard of accreditation once the site is delivered)
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Additional Comments Whilst the inclusion of external evidence documents is supported within the CNP, we would recommend that all reference to other documents should be made using the full title and date of publication, rather than as links, and should include the phrase “or subsequent updates” to ensure it is future proofed in this regard. This ensures that they can be located from a printed copy of the CNP meaning that the CNP can function effectively in all formats, improving the documents accessibility. It would also be recommended that each policy within the CNP specify which type of development, site or application, they intend to be relevant to. For example, as is outlined under ‘Policy AD2: Active Design Principles’, it would not be appropriate for an application for the delivery of a single dwelling, however without specifying which sites it would be applicable to, the policy would be a requirement of all applications. Finally, we also encourage you to review policy wording to ensure it reads as Development Plan policy, as in some cases the current wording reads as recommendations to CCC, rather than planning policy. We would be happy to discuss any of these points further to support the aims of your neighbourhood plan. Yours sincerely, Lead Corporate Policy and Strategy Manager, Canterbury City Council	The full title and date of publication, and ‘or subsequent update’ has now been used throughout the document. However, we respectfully disagree about not using links as WCAG2.2 Accessibility Standards discourage the use of full web addresses to help people using card readers. We have amended the Policy AD2 wording to be for developments of 10 or more residential units.
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49. From Southern Water (email received 10 October 2025)

Thank you for consulting Southern Water on the Pre-Submission version of the Chestfield Parish Neighbourhood Plan. Southern Water is the statutory wastewater undertaker for your neighbourhood. We have reviewed the draft Plan with interest and attach below our representations on the policies relating to drainage, in addition to information on the new National Standards for Sustainable Drainage Systems issued by the Government in June 2025 that mean the draft Plan would benefit from update in a number of places, in particular Chapter 7 of the Plan – https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds Please do not hesitate to contact me further should you have any queries regarding our response, which I do hope that you find useful. We look forward to being kept informed of progress. Yours faithfully, Strategic Planning Lead for Kent and East Sussex Requests for correction and update Please could all references to ‘foul-combined sewer network’ and ‘combined sewer’ in the draft Neighbourhood Plan be updated to ‘foul sewer network’ - the original design of this network is foul only.	Text added to the Plan for information. Text added to the Plan for information. And information updated. All references amended as requested. Text added to the Plan for information.
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This is an important distinction for Chestfield as it will help to ensure future developments provide drainage solutions that are sustainable for the local community. Our maps show that there are separate foul and surface water drainage networks serving Chestfield. The National Standards for Sustainable Drainage (issued by the Government in June 2025) do not allow surface water connections to foul networks. Please see https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds in particular: • General Requirement 1.10, and • Note 2 of Standard1 on Runoff Destinations - <i>a combined sewer is a sewer intended to receive both foul sewage and surface runoff and does not include a sewer intended to receive only foul sewage, even if it has the capacity to accommodate additional flows or has an element of surface water in it already</i>). Developer adherence to the National Standards will be necessary for Chestfield Parish to achieve the sustainable development they are seeking. We therefore consider that Chapter 7 of the draft Plan could be made more effective throughout by review to the new National Standards, including references to these Standards as appropriate. In line with this, the Parish could also consider changing part (g) of Policy H2 on Good Design to read: <i>adopting the National Standards for Sustainable Drainage Systems, where appropriate</i>. Policy D1 Drainage and Sewerage Infrastructure Southern Water is the wastewater service provider for Chestfield. Whilst we understand and support the intention of policy D1 to protect local areas in relation to flood risk, in places the policy wording does not make clear how it can be implemented, particularly where it states that: <i>developers shall carry out a thorough investigation related to the drainage and sewerage systems</i>. The policy also requires update in places to bring it in line with the (new) National Standards for Sustainable Drainage Systems issued by the Government in June 2025 that makes clear how development must ensure no increase to flood risk. Requested changes: 1.For the reasons explained further below we request the following change so that the first paragraph of the policy reads: <i>Before any development takes place, developers shall identify any potential increase in flood hazard in Chestfield and the surrounding areas which might result from the development</i>. 2. Please update the ‘<i>foul-combined sewer network</i>’ references in this policy to ‘<i>foul sewer network</i>’ - the original design of this network is foul only. The National Standards make clear that the original design of the network defines its place in the drainage hierarchy.	Text added to the Plan for information. Text added to the Plan for information. Text added to the Plan for information. Thank you for this. Policy H2 (g) now H2 (i) has been amended as suggested. Policy D1 wording amended as requested. (Note Environment Agency amendments requested have also been added in this Policy D1 section). All references amended as requested. And this line added to Foul drainage information.
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3. Please could you add to the section reading <i>‘Developments will not be supported unless they contain details of the measures that will be taken to ensure that polluted runoff (including suspended sediment) does not leave the site...’</i> by also noting that temporary trade effluent consents can be required in order to lawfully discharge from building sites – for further information please see https://www.southernwater.co.uk/commercial/trade-effluent-businesses/trade-effluent-consent/ 3. Updates needed to align with the National Standards include the SuDS drainage hierarchy listed in the policy – please refer to Standard 1 for Runoff Destinations. Further explanation and evidence: 1. In order for the Plan to meet the Basic Conditions it must have regard for national policies and advice. Paragraph 16(d) of the National Planning Policy Framework (NPPF) 2024 states that <i>‘Plans should: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;’</i> However, as it is not feasible for developers to carry out thorough investigation of the public sewer network that Southern Water is responsible for, we cannot see how this part of the proposed policy could be interpreted by a decision maker. We therefore recommend that this policy is amended as suggested in (1) above. The flood risk wording could be expanded upon by reference to the National Standards for Sustainable Drainage Systems – in particular Principle 7 of the Standards. 2. Our maps show that there are separate foul and surface water drainage networks serving Chestfield. The National Standards do not allow surface water connections to foul networks (see General Requirement 1.10, and Note 2 of Standard1 on Runoff Destinations - <i>a combined sewer is a sewer intended to receive both foul sewage and surface runoff and does not include a sewer intended to receive only foul sewage, even if it has the capacity to accommodate additional flows or has an element of surface water in it already</i>). 3. Please see Principle 5 of the National Standards. For more information on temporary trade effluent consents please see https://www.southernwater.co.uk/commercial/trade-effluent-businesses/trade-effluent-consent/ 4. Please refer to the National Standards for Sustainable Drainage, in particular for updates to the drainage hierarchy included in the draft Policy D1: a. Standard 1: Runoff Destinations; (1.1)..<i>runoff shall be treated as a resource and managed in a way that avoids negative impacts of the development on flood risk.. (1.2) Runoff from the development shall be discharged to the following final destinations, to the maximum extent practicable, in accordance with the below hierarchy – Priority 1, collected for non-potable use.</i>	Information / text added to the information text. Policy updated to include and list hierarchy as per Standard 1. Policy amended as above. Thank you. The Flood Risk wording has been expanded to refer to Principle 7 as suggested. Text added to the Plan for information. Principle 5 text added to Information section of Natural Flood Management. Text added to the foul drainage information. Information / text added to the Policy D1.
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b. Principle 3 – SuDS Approach; <i>mimicking natural drainage systems and delivering surface water management that recognises the value of rainfall and runoff as a resource...</i> Policy D2 Drainage using Sustainable Drainage Systems (SuDS) Southern Water is the wastewater service provider for Chestfield. Whilst it is true that Southern Water has certain design standards to meet before we can consider SuDS adoption, developers are entitled to approach other organisations to adopt and maintain SuDS. For policy to suggest developers should always approach Southern Water could be against Competition Law in the UK water industry. The Competition Act 1998 prohibits water company activities that restrict, prevent, or distort competition, and Southern Water should not be seen as potentially exploiting ‘a dominant position in ways that harm competition’. We must therefore ask that this policy wording is removed: <i>‘the developer is to request adoption of SuDS by Southern Water’</i> We suggest instead using alternative policy wording in line with the ‘Maintenance and Management Plan’ and ‘Adoption and Maintenance’ sections of the National Standards for Sustainable Drainage - https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds Policy D3 Foul Drainage Southern Water is the wastewater service provider for Chestfield. Whilst we appreciate the intention of Policy D3, we do not believe the policy could be implemented in full, in particular the wording: <i>A Grampian condition for any new development of 10 units or more to align the build/phasing/occupancy of with capacity in the Southern Water network.</i> It is not feasible (or necessary) for Southern Water to carry out reinforcement work for all developments of 10 or more. We therefore cannot see how the proposal for a Grampian condition for any new development of 10 or more could be implemented. Although the draft Plan refers to a Southern Water ‘Briefing Note for LPA’, our note does not anywhere refer to a specific size of development in this way. This is because we undertake sewer network capacity checks in response to planning applications, and it is the outcome of these checks that determines our request to the LPA for planning conditions. Requested changes: Canterbury City Council (CCC) would typically apply conditions as they see fit in response to comments received on any planning applications Southern Water is consulted on. CCC may therefore advise the Parish further on this part of the policy and whether it is needed, but should the Parish prefer to retain a paragraph we would suggest: <i>A condition for any new development to align the build/phasing/occupancy with any constraints indicated by Southern Water in response to planning applications.</i>	Principle 3 text added to Information section. Thank you for this information. We agree. Policy wording removed as requested. We have amended our text and policy wording accordingly. The 10 units or more Policy wording has been removed and amended so that CCC would consider on a case by case basis any planning application where Southern Water indicates that there are capacity constraints. Policy wording text has been amended.
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and the root causes of releases from storm overflows, please see – https://www.southernwater.co.uk/our-region/clean-rivers-and-seas-task-force/pathfinders/ https://www.southernwater.co.uk/our-performance/storm-overflows/storm-overflow-task-force We therefore recommend that this policy is amended as suggested above. Policy on flood risk and sustainable drainage is addressed separately within the draft Plan.	Our Plan has been reworded and reworked for this section.
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50. From The Drive, The Drove, Meadow Drive and The Leas Residents Road Association (email received 25 September 2025)

Policy U1 and U2 Unadopted Roads	Your assumptions are correct, increases in traffic, weight of vehicles and their total disregard for speed limits are causing more damage to the roads. We expected to resurface ours every 10 years, we may just make that this time, but I think in future it's likely to be about 8 years. Costs have doubled on resurfacing at least so it's a big cost for members to bear, especially when they see most of the damage by building works not of their doing. We do have policies in place for all works to our roads, but we have no legal way of enforcing them on members doing building works. We do force service providers to carry out repairs with 100% success so far! We also have policies on contractors' vehicles parking, but again it's very difficult to enforce, and often we have to ask contractors to remove vehicles parked on roads as they are not wide enough for cars to pass. I think in policy U1 the works should be to the satisfaction of the Private Road Association responsible for the roads, not CCC. As with most other planning conditions they have no interest in enforcing them as they don't have the resources to inspect / investigate. Policy U2 I think is fine.	It is not always clear who owns an unadopted road or who maintains it, and the planning authority cannot make those legally responsible do things, and likewise for a developer, so the condition requested in the Regulation 14 Plan is not enforceable. Policy U1 has therefore been deleted. The wording of Policy U2 has been changed.
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51. From Nexus Planning on behalf of Hallam Land Management (email received 14 October 2025)

Nexus Planning on behalf of Hallam Land 1. On behalf of Hallam Land please accept the following representations in response to the public consultation on the submission version of the Chestfield Neighbourhood Plan. 2. Hallam Land is promoting the Land at Brooklands Farm (SLAA ref: SLAA104), which measures 82.26ha and is located to the south of Whitstable and to the south-west of Chestfield	
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and comprises draft Policy W4 in the emerging Canterbury Local Plan 2040 (previously Policy W5 in the 2022/23 Draft Canterbury District Local Plan to 2045 consultation Plan). The draft allocation identifies the site for a comprehensive mixed use development including:

- a. Approximately 1,400 new dwellings;
- b. A community hub, including a local centre, business space and mobility hub;
- c. New two form entry primary school;
- d. SEND school;
- e. Local retail and community uses; and
- f. On-site open space.

3. A planning application on Land at Brooklands Farm was submitted to Canterbury City Council, and was validated on 2nd May 2025, with application reference CA/25/00779 and remains under consideration at the time of writing. The description of development is: Outline application with all matters reserved apart from principal access from South Street and Chestfield Road for a mixed use development of up to 1350 dwellings, including older persons housing (Classes C2 and C3); a mixed use Local Centre comprising of retail, commercial, office, health, community uses and a mobility hub (Use Classes E and F); a primary school and a SEND school, business/employment space (Use Classes B2, B8 and E(g)); open space and associated works including landscaping, drainage infrastructure, engineering operations, open space, roads, pedestrian and cycle routes; and new A299 east off / east on slip roads to the south of Chestfield.

4. The application has been submitted to accord with the relevant policies of the emerging draft Local Plan 2040.

The proposals at Land at Brooklands Farm will deliver a highly sustainable development on the edge of one of the most sustainable settlements in the District.

6. The seven basic conditions that a Neighbourhood Plan must meet are set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The Submission Plan has been considered in the light of these conditions, with the following being particularly relevant to our consideration:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan); and
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

7. Where concerns with the Neighbourhood Plan are raised, recommendations are made to make the relevant part of the Plan compliant with the basic conditions. In those instances, additional text is shown in bold and deleted text is struck through.

Policy S1 (Spatial Strategy) 8. Policy S1 seeks to establish the spatial strategy for Chestfield. It does not allocate any sites for development, and instead relies on the emerging Canterbury Local Plan 2040 to make allocations. The Neighbourhood Plan aligning itself with the emerging Canterbury Local Plan 2040 is welcomed. 9. It should be noted that Canterbury City Council has undertaken a further focused consultation on with new sites included in the emerging Canterbury Local Plan 2040, including Land east of Chestfield Road (Policy N20), which would be located within the Neighbourhood Plan area, and therefore Policy S1’s reference to the “Draft” Local Plan may be imprecise in practice. Paragraph 30 of the National Planning Policy Framework (“the Framework”) sets out that neighbourhood plans “should not promote less development than set out in strategic policies for the area, or undermine those strategic policies”. Therefore, Policy S1 needs to make reference to the fact that if the emerging Local Plan is adopted, it will allocate a different level of housing growth than previous drafts. 10. It is recommended that: a. Policy S1 should be amended to read: “The Neighbourhood Plan is not allocating sites to meet its local needs, as it is assumed to be being addressed through the strategic sites set out in the Draft Canterbury City Council’s Canterbury District Local Plan 2040 (or subsequent adopted Canterbury District Local Plan 2040)” Policy H1 (Future Housing) 11. Policy H1 establishes a requirement for developments of more than 10 units to deliver “small” numbers of “1, 2 and 3” bedroom dwellings, and “smaller” open market dwellings. The policy then requires affordable housing to focus on affordable home ownership, rather than other types of affordable housing tenure. 12. This differs from Policy DS1 of the emerging Canterbury Local Plan 2040, which establishes an affordable housing tenure mix of 66% affordable or social rent, 25% First Homes and 9% other affordable home ownership models. This follows the relevant evidence base document “Canterbury Housing Needs Assessment Update” (July 2025). 13. The Chestfield Neighbourhood Plan seeks to align itself with the emerging Canterbury Local Plan 2040 on other matters, particularly the spatial strategy, yet it differs here in the approach to affordable housing tenure.	We were aware of the Policy N20 allocation since our Regulation 14 version of the Plan was produced, although in the CCC Regulation 19 Local Plan (March 2026) it is deleted. The housing figure in the Information and Justification section was increased to 1,950 to reflect the additional 150 homes proposed under Policy N20 but now reverts back to 1800. Policy S1 has been amended to this recommendation wording, although with the year 2042-43 to reflect the CCC Regulation 19 Local Plan (March 2026). Thank you. We appreciate that as the Brooklands Farm proposal is such a large strategic site if the outline application is approved and Brooklands progresses to a reserved matters application CCC would want the scheme mix to match the district wide need. The wording of Policy H1: Future Housing has therefore been reworded that “Sites allocated within the Canterbury District Local Plan would not be expected to adhere to this policy...”
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14. Policy DS2 of the emerging Canterbury Local Plan 2040 establishes the market housing mix for new developments, split into four spatial categories; Canterbury, Coastal Towns, Rural North and Rural South. Chestfield would be a Coastal Town and the market housing mix required through Policy DS2 would be: <table data-bbox="192 327 600 502"> <tr> <th>House type</th><th>Requirement</th></tr> <tr> <td>1 bed</td><td>5%</td></tr> <tr> <td>2 bed</td><td>34%</td></tr> <tr> <td>3 bed</td><td>42%</td></tr> <tr> <td>4+ bed</td><td>18%</td></tr> </table> 15. There is therefore a requirement for 18% of dwellings delivered in Chestfield to be four or more bedroom dwellings. Conversely, Policy H1 of the Chestfield Neighbourhood Plan seeks to direct developments of more than 10 units to develop 1, 2 and 3-bedroom affordable homes and smaller market homes. This policy does not reflect the need for the four or more bedroom homes identified through the emerging Local Plan. 16. The Planning Practice Guidance (“PPG”) sets out that the evidence base supporting an emerging Local Plan is “likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested”. It is therefore important that this Neighbourhood Plan recognises and responds to this evidence. 17. Policy H1’s requirement for sites of more than 10 dwellings to “develop small numbers of affordable 1, 2, and 3 bedroom homes” has the potential to conflict with emerging Local Plan Policy, which requires sites of 10 or more dwellings to deliver 30% of the dwellings as affordable housing. It is unhelpful in the first instance to refer to “small numbers” in this policy, when it would be more appropriate to use proportions or percentages. 18. It is recommended that: a. Paragraph a of Policy H1 is amended to read “Deliver affordable housing which includes 1, 2, 3 and 4-bedroom homes, and market housing including smaller homes”. Policy H3 (Scale and Building Heights) 19. Policy H3 seeks to limit development to buildings no taller than 3-storeys. However, as referred to previously in these representations, the Neighbourhood Plan seeks to align itself with the emerging Canterbury Local Plan 2040. The emerging Canterbury Local Plan 2040 is seeking to identify sites to deliver a significant level of growth across Canterbury as a whole, including Land at Brooklands Farm (Policy W4), for 1,400 dwellings, which would sit entirely within the Neighbourhood Plan once made. It is imperative that Neighbourhood Plan does not prevent	House type	Requirement	1 bed	5%	2 bed	34%	3 bed	42%	4+ bed	18%	To repeat as above, we appreciate that as the Brooklands Farm proposal is such a large strategic site if the outline application is approved and Brooklands progresses to a reserved matters application CCC would want the scheme mix to match the district wide need. The wording of Policy H1: Future Housing has therefore been reworded that “Sites allocated within the Canterbury District Local Plan would not be expected to adhere to this policy...” We have amended (a) of Policy H1 to this suggestion. Policy H3 Building heights has been deleted, although some text added to the information section discouraging any building over 3 storeys as out of keeping and if justified should be “hidden” amongst the other housing and topography.
House type	Requirement										
1 bed	5%										
2 bed	34%										
3 bed	42%										
4+ bed	18%										

sustainable development and efficient use of land, where the use of buildings of greater than 3-storeys may be appropriate.

20. It should be noted that there is no policy within the draft Canterbury Local Plan 2040 which seeks a blanket restriction on development to no greater than 3-storeys.

21. Moreover, no evidence has been prepared at this stage to justify this restriction across the whole of Neighbourhood Plan Area. Without this evidence, this policy is not justified and would overly constrain the effective use of land.

22. To comply with the basic conditions, it is recommended that Policy H3 is deleted.

Policy D1 (Drainage and Sewerage Infrastructure), Policy D2 (Drainage Using Sustainable Drainage Systems (SuDS), Policy D3 (Foul Drainage) and Policy D4 (Flood Risk)

23. Policies D1, D2, D3 and D4 address flood risk and drainage matters, by setting out a hierarchy for surface water discharge options, expectations for developments in terms of SuDS, requirements for foul drainage capacity and the requirement for flood risk mitigation where necessary.

24. These representations are supported by a Technical Note prepared by Brookbanks (Appendix 1 attached to email of 14 October 2025), which considers Policy D1, Policy D2, Policy D3 and Policy D4 in the context of the proposed development at Land at Brooklands Farm. The Technical Note concludes that the proposed development would comply with those policies, and therefore the delivery of Land at Brooklands Farm is not prejudiced by those policies.

Policy B2 (Habitat Creation)

25. Policy B2 requires developments to deliver a minimum of 20% Biodiversity Net Gain. While this is consistent with the emerging Canterbury Local Plan 2040, it should be noted that this exceeds the statutory requirement established by the Environment Act 2021, which requires 10% BNG.

Hallam Land has also raised this with representations to the emerging Canterbury Local Plan 2040.

26. The PPG is clear that plan-makers should not seek requirements of greater than 10% unless justified¹ (¹Reference ID: 74-006-20240214). This justification would need to set out "local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development".

27. No evidence has been provided as part of this consultation to justify the need for an increase to the minimum level of BNG. A minimum BNG level of 20%, whilst admirable, could have implications on development viability, meaning the Neighbourhood Plan would need to be supported by robust viability assessments, justifying this increase in minimum BNG. This policy would therefore not comply with part a of the basic conditions at the present time.

Noted, thank you, although the text and policies wording have since been amended to reflect comments received from the Environment Agency and Southern Water to the Regulation 14 consultation draft.

28. As no evidence to that effect is available, the policy should require a minimum of 10% BNG, in line with the Environment Act 2021. 29. It is recommended that: a. Policy B2 is amended to read “All proposals for development, other than those exempt through national legislation, will be required to demonstrate and deliver a minimum of 10% Biodiversity Net Gain (BNG) calculated using the latest Natural England biodiversity metric (or an alternative metric set out in legislation) and taking consideration of any national or local guidance on what values / multipliers should be used.” Policy SBD1 (Secured by Design) 30. Policy SBD1 seeks to ensure that developments of more than 10 units “include full Secured by Design (SBD) Gold accreditation”. In practice this policy would be difficult to comply with at the planning application stage. SBD Gold accreditation is provided once a development has been constructed. It cannot be secured during the determination of a planning application. 31. However, Policy H2 (Good Quality Design) sets out that development must demonstrate good quality design, and good design in Chestfield includes “meeting the requirements of ‘Secure by Design’ to minimise the likelihood and fear of crime”. As this policy simply seeks developments to meet the requirements of Secure by Design, it is possible for developments to demonstrate compliance at the planning application stage. 32. As Policy H2 addresses Secure by Design in a practicable way, Policy SBD1 is not necessary and in any event would not be workable policy. 33. It is recommended that: a. Policy SBD1 is deleted. LGS4.9 Swalecliffe Brook/Rear of Shepherds Walk 34. The Neighbourhood Plan provides an assessment of a number of sites against their potential for Local Green Space designation. One such site is ‘Swalecliffe Brook/rear of Shepherds Walk’. The assessment of the site takes into account criteria within the Framework as well as a response by the landowner, Hallam Land. Hallam’s view is that the site does not meet the criteria for Local Green Space designation and instead is only a linear Public Right of Way. 35. The assessment concludes with a recommendation that the site is not designated as Local Green Space, and this is welcomed and supported. Summary 36. The submission version of the Chestfield Neighbourhood Plan intends to support the emerging Canterbury Local Plan 2040, which is welcomed. However, there remain a number of elements of	20% reduced to the national BNG 10% level. We have amended Policy B2 to reflect this observation. Thank you. We have deleted Policy SBD1 and incorporated the Secured by Design justification and information text into Policy H2 and reworded part of Policy H2 which includes demonstrating at the planning application stage that the development meets the requirements of ‘Secured by Design’ to minimise the likelihood and fear of crime (and including a series of outlined features within a site design in the aim of achieving a Gold standard of accreditation once the site is delivered) Noted. No further action/amendment required.
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the Neighbourhood Plan which cannot be supported, often because this Regulation 14 version of the Neighbourhood Plan departs from the Canterbury Local Plan without sufficient evidence. In its current form the Neighbourhood Plan does not meet the basic conditions required by Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. 37. Principally, many of these concerns are due to a lack of justification and supporting evidence for the proposed policies at this point in time. 38. Where there are policies or other elements of the Neighbourhood Plan which are considered to conflict with the basic conditions, these representations have made recommendations to amend the Plan to resolve those issues, in order to ensure the Neighbourhood Plan is compliant with the basic conditions. 39. We would be grateful to be kept updated on the progress of the Neighbourhood Plan following this consultation.	
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52. From Turleys on behalf of Parker Strategic Land Ltd (email received on 14 October 2025)

REPRESENTATIONS ON BEHALF OF PARKER STRATEGIC LAND LTD We write on behalf of our client, Parker Strategic Land Ltd to provide representations on the Chestfield Regulation 14 Presubmission Neighbourhood Plan. As the Parish Council will be aware, Parker Strategic Land is promoting the land at Bodkin Farm, south of the Thanet Way, Chestfield, for development with that site proposed to be allocated via the draft Canterbury City Local Plan, and subject to an application for outline planning permission. These representations are provided in order to set out our client's constructive comments on the content of the draft Neighbourhood Plan. Plan Period The Neighbourhood Plan is intended to cover the period 2025 – 2036. In our view, the Parish Council should consider aligning the end date of the plan-period with that of the emerging Local Plan. Policy S1 - Spatial Strategy We note that the Neighbourhood Plan does not propose to allocate sites, but refers to the draft Canterbury City Council Local Plan. In our submission, this Neighbourhood Plan should set a supportive framework to guide proposals for such sites. Policy H1: Future Housing This Policy sets out expectations in relation to the size (bedroom number) of market and affordable homes, a focus on affordable home ownership models and the provision of accessible housing,	Several responses suggested the end date of our Neighbourhood Plan should align with CCC's Local Plan, so we have amended the end date to 2042-43 (the Regulation 19 version end-date) Policy H2 Good Quality Design has been strengthened and added to.
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encourages the development of bungalows and requires that proposals (of more than 10 dwellings) should have regard to the Housing Needs Survey. We note that the Housing Needs Survey (HNS) was commissioned in March 2025, whereas the Neighbourhood Plan is intended to cover the period to 2036. It may be that towards the end of that period, the HNS no longer provides up-to-date evidence of housing needs in the area and so the Policy should allow consideration of more recent evidence where this is available. Policy H2: Good quality design We support the Neighbourhood Plan striving for good quality design, however we make the following observations. First, the Policy is titled ‘Good quality design’ and that is what the first and final paragraphs refer to, yet points b) and f) refer to ‘high quality’. We suggest that the Neighbourhood Plan includes consistent terminology in order to avoid confusion. Policy H3: Scale and building heights Policy H3 states that no buildings taller than 3-storeys will be supported, yet it also states that 3 storey buildings are discouraged. This could create confusion as to the form of development that might be acceptable. Policy H4: Rural Exception Sites We encourage the Parish Council to define what it means (by reference to the size of a site or the number of dwellings proposed) by ‘Rural Exception Sites’. Policy D1 Drainage and Sewerage Infrastructure The Policy expects that a ‘thorough’ investigation related to drainage and sewerage be carried out. However, in our view this Policy requires clarification so that there is a clear and consistent expectation as to what is required, and what is meant by the term ‘thorough’. What defines thorough in terms of a drainage investigation? The Policy states that new development must not place further pressure on the environment. We note that this requirement is unclear and appears to be a generic statement rather than being related solely to the topic within the policy. It should also be noted that this policy could restrict development where existing infrastructure has capacity, but proposals would give rise to ‘further pressure’.	Policy H1 has been modified with revised wording of “Have regard to the Housing Needs Survey (April 2025) recommendations listed above, or subsequent evidence should this emerge over the life of this Neighbourhood Plan.” Agreed. “High” is now substituted with “good” for points b) and f). Policy H3 Building heights has been deleted, although some text added to the information section discouraging any building over 3 storeys as out of keeping and if justified should be “hidden” amongst the other housing and topography. Any Rural Exception Site would be led by CCC Policy and land availability/size. We do not want to restrict any site by setting minimum or maximum parameters. Our drainage policy has been rewritten and we believe all of these comments have now been considered and addressed where appropriate.
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Whilst the logic behind considering net increase in wastewater generation is understood, the regulatory mechanism for securing upgrades is via the Water Authority and not necessarily related to whether a development is appropriate.

Under the DEFRA national standards for sustainable drainage systems document, re-use of water is at the top of the hierarchy (refer to Standard 1) and the NP should reflect this latest guidance. More generally, with potential changes to the right to connect being removed in the Water Industry Act (and noting the intent of indicating a hierarchy) it may be more appropriate to signpost to LLFA. <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems>

Policy D2 Drainage using Sustainable Drainage Systems (SuDS)

Below is a copy of the DEFRA standards on adoption which it would be advisable to refer to as the wording and intent is comparable with the aims of D2.

“It is fundamental that arrangements are put in place for the future maintenance of SuDS features. Where they serve a single property, such as a dwelling, business or retail complex, maintenance will remain the responsibility of the property owner, unless another appropriate body is to adopt the SuDS features. For surface water drainage systems serving more than one property, an appropriate body will need to adopt and be responsible for the maintenance of the SuDS features and ensure that they continue to comply with the national standards. To be adopted by an appropriate body, the surface water drainage system shall be designed, constructed and function as approved in accordance with the national standards.

Under Ofwat’s Code for Adoption Agreements, surface water drainage assets can be presented to sewerage companies for adoption. Since 1 April 2020, this includes SuDS which are considered to be sewers. The Sewerage Sector Guidance [footnote 51], including Model Sewer Adoption Agreements and Design and Construction Guidance, sets out the procedures, standards and requirements for any SuDS which are to be adopted by sewerage companies”

Policy D3 Foul Drainage

It is not possible to reserve capacity in the sewage network so referring to sufficient capacity being required to support a development may be unreasonable because the water authorities’ position is ever changing due to new connections.

The Policy refers to “A Grampian condition for any new development of 10 units or more to align the build/phasing/occupancy of with capacity in the Southern Water network. The Grampian condition must be imposed at outline planning application stage (rather than at a discharge of foul drainage condition application).”

Conditions should only be imposed where they are necessary to do so, and this matter will be informed by the responses from statutory consultees and assessed by Planning Officers. In our

D2 has been amended to include this adoption text in full.

The 10 units or more Policy wording has been removed and amended so that CCC would consider on a case by case basis any planning application where Southern Water indicates that there are capacity constraints.

view, it would not be appropriate for the Neighbourhood Plan to suggest that such conditions are necessary as a matter of course. Policy D4 Flood Risk We question whether Policy D4 is necessary as this is a topic which is addressed in detail through the NPPF and Planning Practice Guidance, which this Policy appears to be broadly consistent with, although we note that the Policy does not refer to the Sequential or Exceptions Tests. Policies C1 and C2 We note that Policy C1 states that “Development should not encroach onto footpaths, bridleways or cycleways or have any significant adverse impacts on their amenity, safety or accessibility.” We suggest that this Policy is reviewed as there may be instances where proposals have the ability to improve the accessibility, safety or accessibility of such routes, for example through their diversion or improvement. That approach is then consistent (and could be combined with) with Policy C2. Policy C3 This Policy states that “A priority for allocation of developer contributions should be to provide new footpaths and cycleways, links between existing footpaths and cycleways and to improve the quality and accessibility of footpaths and cycleways, including links between the village and surrounding countryside.” Any contributions should be consistent with the statutory requirements of CIL Regulation 122(2) and so the necessity of such improvements and routes will need to be demonstrated in each case. Policy C4 We have no comments to make on this Policy Policy U1 We have no comments to make on this Policy Policy U2 We have no comments to make on this Policy Policy B1: Connectivity We have no comments to make on this Policy Policy B2- Habitat creation This Policy states that “All proposals for development, other than those exempt through national legislation, will be required to demonstrate and deliver a minimum of 20% Biodiversity Net Gain (BNG) calculated using the latest Natural England biodiversity metric (or an alternative metric set out in legislation) and taking consideration of any national or local guidance on what values / multipliers should be used.”	We prefer to keep this section and Policy. Policy C1 reworded, thank you, and combined with C2. Policy C3 has been reworded to replace “allocation of developer contributions” with “good sustainable design” – AND the whole policy has now been moved to Policy H2: Good quality design.
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Policy SBD1: Secured By Design This Policy states that “Any development over 10 units to include full Secured by Design (SBD) Gold accreditation.” Whilst we recognise the intention behind this Policy, our experience is that the SBD requirements can lead to proposals which become contrived and which do not always reflect good practice overall. In our view, a more appropriate approach would be to expect development proposals to be supported by material which demonstrates how SBD principles have informed the design. Appendix 2 - Strategic Sites in the Neighbourhood Plan Area We suggest that this material is removed as: • It replicates material within the draft (not adopted) Local Plan; • As a consequence, it is subject to change. We hope that these representations are useful, and look forward to engaging with the Parish Council, particularly in relation to the proposals at Bodkin Farm.	We have deleted Policy SBD1 and incorporated the Secured by Design justification and information text into Policy H2 and reworded part of Policy H2 which includes demonstrating at the planning application stage that the development meets the requirements of ‘Secured by Design’ to minimise the likelihood and fear of crime (and including a series of outlined features within a site design in the aim of achieving a Gold standard of accreditation once the site is delivered) We prefer to retain information on the strategic sites within this Appendix, as the maps and content is considered useful for residents and others reading the Plan. A disclaimer line advising that the information could be subject to change has been added, however, thank you.
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53. From a Chestfield resident (email received 14 October 2025)

I have the following comments and observations on the above consultation. Introductory Comments There are many regulatory, planning and administrative procedures that have been updated recently or are currently under review as outlined below: 1. Parish Council Level Draft Chestfield Neighbourhood Plan (CNP) Consultation 01/09/25 to 14/10/25. 2. Local Authority Level Canterbury City Council (CCC) publication of revised proposals for the Draft Canterbury District Local Plan (Focussed consultation (Regulation 18) September 2025). (Draft CDLP-Fc)	Noted.
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Consultation 09/09/25 to 21/10/25. The revised proposals include: (a) The proposed deletion of strategic sites Policy C7 (Land to the north of Hollow Lane) and Policy 12 (Land north of the University of Kent); (b) Among others, the proposed inclusion of new draft site allocation under Policy N20 (Land east of Chestfield Road - including 150 dwellings). This site falls within the Chestfield Parish boundary; (c) An assessment of the possible impact of the updated NPPF published 12/12/24 on the draft CDLP 2040. I understand that CCC intend to publish the Draft CDLP 2040* early next year, ahead of submission and examination by the Secretary of State. *or later date 2042/43 : Paragraph 1.5 of Section 1 "Aligning the Local Plan with the new NPPF requirements." Draft CDLP -Fc refers. Status of current major outline planning applications registered with CCC within Chestfield Parish taken from the CCC website 13/10/25. (d) Bodkin Farm - Policy W6: Planning application No CA/24/00224 Status : Awaiting decision. Ward - Greenhill With respect to former application No CA/14/01319 Decision : refused. Ward : Chestfield (e) Brooklands Farm - Policy W4 : Planning application No CA/25/00779 Status : Awaiting decision Ward - Chestfield 3. Regional Level Proposed Unitary Authority Designation in Kent (a) CCC press notice 05/09/25 advised that Kent and Medway councils have asked their advisors KPMG to look at two options for unitary councils in Kent. I understand that business plans need to be submitted to the Government by 28/11/25 for decisions by ministers. Whichever option is finally adopted will see the complete demise of CCC. 4. National Level (a) Updated NPPF published 12/12/24. (b) National Risk Register published 2025.	We were aware of the Policy N20 allocation since our Regulation 14 version of the Plan was produced, although in the CCC Regulation 19 Local Plan (March 2026) it is deleted. The CCC Regulation 19 Local Plan has now come out in March 2026 with the end year amended to 2024-43. Planning application still awaiting determination at March 2026. In the CCC Regulation 19 Local Plan Bodkin Farm has become site Policy W7. We are aware of this refusal. Planning application still awaiting determination at March 2026. The Local Government Reorganisation is progressing. Business Plans were submitted on 28 November 2025. The decision is outside of the scope of the parish council or our Neighbourhood Plan. Central government will decide in 2026.
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I appreciate that this Register covers many risk topics outside of the scope of the CNP. However, the chapter "Natural and Environmental Hazards" is I suggest, relevant to consideration of the draft CNP. 5. Summary (a) There are many regulatory, planning and administrative initiatives in prospect at the present time, some having been announced recently and others yet to be finalised with uncertain timescales for their completion. (b) It is against this challenging and fluid background that decisions will need to be made concerning the specific contents of the draft CNP. In my view it is therefore important that the quality of life of the residents of Chestfield is not adversely affected by future development or the adverse effects of climate change plus our coalescence with the neighbouring communities of Herne Bay and Whitstable. Appropriate measures to mitigate such events should therefore be enshrined in the draft CNP if they are not already included in the draft CDLP, which unfortunately has yet to be published as noted above paragraph 2(c). The Draft Chestfield Neighbourhood Plan <u>Neighbourhood Plan Area</u> (page 5) Designated neighbourhood area boundary (page 6) 6. I note that the parish boundary has been amended to include the proposed Brooklands Farm development under draft Policy W4 CDLP 2040. However, with respect to the proposed Bodkin Farm development under draft Policy W6 (<i>now W7 in the Regulation 19 CDLP 2042-43</i>) CDLP 2040, which would be bisected by the current parish boundary, the Parish Council proposed** that the boundary should be extended locally eastwards to include the whole of the Bodkin Farm development within the Chestfield parish boundary. Is this still an option? **Chestfield PC response to CCC 20 March 2024 refers. 7. Just to mention that the current description given by CCC to the Bodkin Farm application No CA/24/00224 is "<i>Greenhill</i>" and not as previously "<i>Chestfield</i>" under application No CA/14/01319. <u>Vision Statement</u> (page 7) 8. The second sentence of the first paragraph "<i>....It describes what we would like the Parish to look like in 2036....</i>". This date is not consistent with the draft CDLP date of 2040: should it not align with the draft CDLP 2040 date or later date? Paragraph 2(c) above refers.	We agree. The land to the east of Bodkin Farm is proposed to be allocated to the secondary school (not housing). Chestfield Parish Council will seek to extend the parish boundary to include this land (along with the Brooklands Farm land allocation) at the earliest opportunity i.e. at the next Community Governance Review exercise. (We anticipate the next periodic review circa 2028.) This question is a useful comment, and a footnote has been added in our Neighbourhood Plan (Section 3 Neighbourhood Plan Area) for clarity on our future intentions. Noted. Does not require any amendment to our Neighbourhood Plan. Several responses suggested the end date of our Neighbourhood Plan should align with CCC's Local Plan, so we have amended the
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9. <i>"All development must deliver the requisite infrastructure...."</i> It is suggested that this statement needs to be expanded to indicate an appropriate timescale for the provision of the requisite infrastructure. For example, highway infrastructure should be considered for early provision given the need for construction traffic access to the development site from the public highway. In addition, the phased introduction of medical services, schools, surface water & wastewater services and the like during the construction and population of the development should also be considered. 10. <i>"The new emerging housing developments will be sympathetically and sustainably designed...."</i> I suggest that these terms need to be defined in order to give planners and developers an indication of what is and what is not, acceptable. <u>Spatial Strategy</u> (page 9) Policy S1-Spatial Strategy 11. I assume that the date of the Draft CDLP will be Paragraph 2(c) above refers. 12. The Policy includes the advice that <i>".... Should additional development proposals to those contained in the Local Plan come forward, Policy S1 seeks to ensure that they are directed to the most sustainable locations in the Parish-i.e. within the "Built Up Area Boundary." This will serve to discourage any further coalescence with Whitstable or Herne Bay."</i> 13. Several issues would seem to arise from the above Policy S1 as follows: (a) The recent publication by CCC of their draft CDLP-Fc proposes a new draft site allocation under Policy N20 "Land east of Chestfield Road" among other new allocations. This proposal (which includes 150 dwellings) would appear to be in conflict with Policy S1, since although not located in the Herne Bay and Whitstable Green Gap (Policy DS19 Draft CDLP 2040), it would seem to add to the coalescence between Herne Bay and Whitstable. It also does not seem to be in the most sustainable location in the Parish. (b) With respect to the final sentence of Policy S1, in particular the discouragement of coalescence of Chestfield with neighbouring Whitstable it would appear that with the current development under "Land south of the Ridgeway" aka Grasmere Gardens together with the proposed Brooklands Farm development, that our urban coalescence with Whitstable north of the A299 is almost complete. In short, Chestfield could be described as an urban extension of Whitstable.	end date to 2042-43 (the Regulation 19 version end-date). We completely agree however this would be dealt with by CCC as the planning authority at determination stage of planning applications, on a case by case basis. We have not amended the Vision Statement, but we have strengthened and expanded the Good Quality Design Policy H2. The wording has been changed now to 2042-43 to match the Regulation 19 Plan. We were aware of the Policy N20 allocation since our Regulation 14 version of the Plan was produced, although in the CCC Regulation 19 Local Plan (March 2026) it is now deleted. Comment noted.
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(c) The "District wide key diagram" on page 10 of the draft CDLP 2040, I suggest, illustrates this point.

(d) I assume that Appendix 3 "Indicative Housing figures for the Neighbourhood Plan" - "Calculations" - "Draft development allocations" will need to be amended in the light of the draft CDLP-Fc Policy N20.

Drainage and Sewerage Infrastructure (page 15)

Introductory Comments

For background I have used the following descriptions:

Wastewater sewer Surface water sewer Combined sewer ie a pipe, duct or culvert or similar conveyor carrying both wastewater and surface water.

Land Drainage

There are three authorities in Kent who are responsible for land drainage within the county as follows:

Kent County Council (KCC)

14. KCC are responsible for ordinary watercourses that are outside Internal Drainage Board's (IDB) districts and Main River networks. They have powers to regulate the proper function of ordinary watercourses.

Internal Drainage Boards (IDBs)

15. IDBs are the operating authority for their designated drainage areas and manage and directly maintain watercourses in their individual districts. There are no IDBs within the CNP area.

Environment Agency (EA)

16. The EA is responsible for designated Main Rivers in England. There are two Main River watercourses within the CNP area namely, Swalecliffe Brook and Kite Farm Ditch.

17. The KCC diagram "Land drainage consents map" identifies the IDB districts and EA Main Rivers in Kent.

Utility Service Providers

18. These are:

(a) Potable water: South East Water and (b) Sewage treatment: Southern Water. South East Water also arrange the billing of both water and sewage services.

Local Flood Authority

19. The Local Lead Flood authority is KCC.

Drainage and Sewerage Infrastructure (page 15)

Explore alternative drainage routes

20. The third sentence: "Generally the aim should be to discharge surface water run-off as high up the following hierarchy of drainage options as reasonably practicable: 1. into the ground (infiltration); 2. to a

Our drainage text Information and Justification section and the policies have been rewritten in light of comments received from the Environment Agency and

surface water body; 3. to a surface water sewer, highway drain; or 4. to a combined sewer." With respect to options 3 and 4: Option 3. Is it appropriate to connect a surface water outfall from a new development into an existing highway drainage system which I imagine would not have been designed to accommodate such run-off from neighbouring development, either existing or proposed? No doubt the relevant Highway Authority would wish to be consulted on any such proposal. Option 4. The proposed connection of a surface water outfall from a new development into an existing combined sewer, although considered as a last resort option, is still in my view, not an option particularly given the acknowledgement on page 15 of the draft CNP that <i>"....Much of the Neighbourhood Plan area has a combined sewer system that collects rainwater run-off, and at times of heavy rainfall the system cannot cope, and instances of flooding on the road and side roads occurs."</i> 21. In short, such a surface water sewer connection would make an existing unacceptable situation even worse with potentially greater flooding of the road and side roads plus the added potential public health issue of untreated raw sewage being deposited on the public highway including footways. Additionally, I suggest that it would create an unwelcome precedent. A new surface water system would seem to be necessary in such cases, using a Grampian condition. 22. I appreciate that paragraph 21 above is not in agreement with the Supreme Court ruling of the 09 December 2009 but at first sight agree with Lady (now Baroness) Hale's dissenting view on this matter. Proposed Policy D1 Drainage and Sewerage Infrastructure. 23. I suggest that this policy should be reviewed in relation to Options 3 and 4 discussed above. 24. With respect to paragraph 5 of proposed Policy D1, I also suggest that reference should not only be made to "Swalecliffe Brook" but also to "Kite Farm Ditch" since the policy would seem to apply to both Main River watercourses. Meeting the Challenges of Climate Change and Flooding (page 19) 25. Having looked at the Government's planning flood maps both for the present day and future years 2070 to 2125, it is not clear to me what is causing the flooding on the Swalecliffe Brook and the Kite Farm Ditch adjacent to the railway embankment in the CNP area. Both watercourses appear to have greater flooding on the immediate southern side of the railway embankment than on its northern side in the present day. However, in the future year scenario, the extent of the flooding on the southern embankment side remains almost the same as that for the present day but visibly increases on the northern embankment side. This is particularly noticeable in the case of the Kite Farm Ditch.	Southern Water to the Regulation 14 consultation draft. The National Standards for Sustainable Drainage (issued by the Government in June 2025) do not allow surface water connections to foul networks. Our drainage text Information and Justification section and the policies have been rewritten in light of comments received from the Environment Agency and Southern Water to the Regulation 14 consultation draft. Kite Farm Ditch has been added to the Policy wording. Thank you. Comment noted.
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26. Given that the flows of both watercourses are from south to north with outfalls into the Thames Estuary, it would seem that the capacity of the culverts under the A2990 or the railway embankment may not be of sufficient capacity even to cope with present day flows? Of course, there may be other factors which are causing this situation but at present it is difficult to come to any firm conclusions. No doubt the watercourses leading to the A2990 and railway culverts are backing up during periods of heavy rainfall. 27. I note that under the draft CNP (page 3), Section 2 <i>"Introduction"</i> <i>"Where did our Neighbourhood Plan come from?"</i>, the third paragraph states that of the top five priorities, <i>"Drainage and Sewerage infrastructure capacity"</i> was ranked first. Given the prominence of this subject, I would hope that due weight will be given to drainage and sewerage issues. <u>Local Green Spaces assessment and designation (page 34)</u> 28. I support the proposals set out in Table 3.1 : List of Candidate Local Green Spaces" (page 36).	We believe we have. Support noted. Thank you.
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54. From Kent County Council (KCC) – email received 03 November 2025

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapters and policies used within the document. <u>General Commentary:</u> <u>Waste Management</u> KCC is the Waste Disposal Authority for the area and as such has a statutory duty to provide Household Waste Recycling Centres (HWRCs) and Waste Transfer Stations (WTSs) with sufficient capacity to accept arisings from across the county. While the Chestfield Neighbourhood Plan does not specifically mention waste infrastructure, the development is mentioned in the Canterbury Local Plan, which should address the additional pressure on waste infrastructure that increased development in the area will bring. <u>Flood & Water Management</u> We have gone over the provided Neighbourhood Plan proposals, and whilst we can confirm that the contents of chapter 7 – "Drainage and Sewerage Infrastructure" – seem suitable and generally robust, we would advise that DEFRA released new SuDS Technical Standards in June of this year, Standard 1 of which adjusted the acceptable hierarchy for dealing with surface water – replacing No. 1 in the listing, Infiltration, with water re-use – and that surface water connections to foul sewers are no longer permitted (only to existing combined sewers where no other alternatives are available) and that as such you may wish to adjust your wording in said chapter and Policy D1. The latest standards can be found here: National standards for sustainable drainage systems (SuDS) - GOV.UK	Noted. Our drainage text Information and Justification section and the policies have been rewritten in light of similar and other comments received from the Environment Agency and Southern Water to the Regulation 14 consultation draft. The new standards are now referred to in several places.
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<u>Development Investment Team</u> There are no comments from the Development Investment Team. The housing development sites of Brooklands Farm and Bodkin Farm have been commented on via the planning applications and Canterbury City Council's (CCC) Reg 18 Consultation. <u>Minerals and Waste</u> We have no land-won minerals or waste management capacity safeguarding objections or comments to make regarding this neighbourhood plan Regulation 14. Please see below for further specific comments on the policies with the Regulation 14 Consultation: <u>Biodiversity</u> Policy B1 – Connectivity It states: New development proposals that lie within or adjoining the Chestfield Green Infrastructure Network must incorporate measures to create, enhance and sustain the network's functionality in the design of their layouts, landscaping and provision of public open spaces. The County Council would advise that we do not anticipate that only developments that are within or adjoining the Infrastructure Network must incorporate such measures. The policy should be requiring all developments to improve connectivity to the green network across the whole plan area. The assessment of impacts to the green network must be based on up-to-date ecological information. Policy B2- Habitat creation The measures to assess and improve on site biodiversity opportunities must be based on up-to-date ecology information. If a site is not required to do Mandatory Biodiversity Net Gain (BNG) the policy should still require those developments to implement on site biodiversity opportunities. Policy B3 – impacts on wildlife Development layouts should be considering the impact from lighting during the design stage to minimise impacts from external lighting. <u>Highways & Transportation</u>	Noted. Noted. Policy B1 amended to remove "that lie within or adjoining the Chestfield Green Infrastructure". This line has been added to Policy B1. This line has been added to Policy B2. We have added to our Policy: "If a site is not required to do Mandatory Biodiversity Net Gain (BNG) developments are still required to implement on site biodiversity opportunities." We have added additional text on measures to reduce the impact of Artificial Light At Night.
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The report fails to identify any policies directly relating to transport. We would have considered that how people move through the neighbourhood, parking pressures, connectivity to other settlements and through traffic would all be things to consider when taking account of any vision statement for Chestfield. Policy S1 – Spatial Strategy This Policy supports that no strategic allocations will be forthcoming within the plan area, but the neighbourhood plan area of Chestfield has been extended to include the draft site allocation of Brooklands Farm (W4 in Reg 18). This should be reflected in the wording of the policy. It is stated that the Chestfield Neighbourhood Plan will not be allocating any sites, as it is assumed to be being addressed through the strategic sites set out in the CCC District Local Plan 2040. Policy H2 – Good quality design There is no mention of access, ensuring that new development will be located to ensure safe and convenient walking routes to local amenities within the neighbourhood area. Car and bicycle parking is mentioned with regard to properties having sufficient external amenity space, but how this is provided will also influence security, levels of use and on-street parking. Policy C3 – Footpaths and cycleways This is supported, but it should be noted that the policy appears only to relate to public rights of way. For clarity, the reader should understand that when referencing a footpath, it generally refers to cross-field and headland path connections in the rural settings and is not referring to the “footways” that run alongside the carriageway. There may be instances that sections of footway or improvements to carriageways to incorporate improved cycle facilities may also be required using developer contributions. Policy U1 Whilst it is understood that residents would not want further deterioration of a private road by the additional use of construction vehicles and new trips generated by a new site or property (development), the County Council would consider it prudent to ensure that any new development	Transport was not within the residents’ top 5 priorities for us to concentrate on within this edition of our Neighbourhood Plan. Parking standards would be addressed through good design. We have added good design principles to Policy H2. The parish council scrutinises all planning applications and makes representations on traffic etc. We have added additional information within Section 3: Neighbourhood Plan Area (rather than alter wording of Policy S1) – this additional information explains the boundaries of both Bodkin Farm and Brooklands Farm strategic sites. We are not allocating any sites. The Steering Group believes that these comments are addressed within other areas of the Plan. Footpaths has been changed to “public rights of way” wording instead. It is not always clear who owns an unadopted road or who maintains it, and the planning authority cannot make those legally responsible do things, and likewise for a
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will have sufficient parking within its curtilage to prevent overspill parking onto the private road, which could be to the detriment of existing users. It should be recognised that whilst the road may still be within private ownership, the maintenance of which would fall to the frontagers, public rights may exist, and it will be difficult to prevent visitors or homeowners of the new development from parking on the access road to the site. Policy AD1 – Inclusive streetscapes Examples of unexpected barriers to a walkable neighbourhood should also include the lack of dropped kerbs and lack of tactile paving at appropriate crossing points, which can be an obstacle to both visually impaired people and mobility impaired people. Local Green Spaces It should be mentioned that these spaces should be accessible by safe and secure routes that are overlooked. Many historic green spaces are accessed through wooded areas or alleyways that are not secure by design and can be a barrier to use and can attract anti-social behaviour. Overall, the plan does not identify any issues relating to traffic currently, including but not limited to speeding through the main roads, pavement and inconsiderate parking causing obstruction, safety of children walking to schools, peak hour queueing or congestion impacting on active travel or air quality. The County Council would anticipate that there are traffic issues in and around the neighbourhood that the Neighbourhood Plan should be seeking to address.	developer, so the condition requested in the Regulation 14 Plan is not enforceable. Policy U1 has therefore been deleted. The wording of Policy U2 has been changed to include the use of Construction Management Plan to consider items such as routing, parking, etc. Lack of dropped kerbs and tactile paving has now been added to the examples list, thank you. All of our LGS sites being recommended for the LGS designation are accessible by safe, overlooked routes, so we feel there is no need to include this wording. Transport was not within the residents' top 5 priorities for us to concentrate on within this edition of our Neighbourhood Plan. The emerging outline planning application CA/24/00224 for Bodkin Farm proposes the provision of two pedestrian crossing and a reduction in the speed limit on the old Thanet Way. We have, and support, an active Speedwatch group of volunteers who do regular speedwatch checks. Parking standards are set by the higher authority/authorities. Parking standards would be addressed through good design. Our Policy H2 has: "Good design should provide sufficient external amenity space, refuse and recycling storage and car and
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	bicycle parking to ensure a high quality and well managed streetscape. Planning permission will not be granted for development of poor design that fails to take the opportunities available for improving local character and quality of an area and the way it functions.” We have also added Good Design Principles to Policy H2 Good Quality Design.
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55. From Rubix Estates Ltd and Lee Evans Partnership (email received 13 October 2025)

REPRESENTATIONS TO THE CHESTFIELD NEIGHBOURHOOD PLAN (REGULATION 14 CONSULTATION) - SUBMITTED ON BEHALF OF RUBIX ESTATES LTD AND THE WHITSTABLE NON-ECCLESIASTICAL CHARITIES Introduction and Context Rubix Estates is working on behalf of the landowners (including the Whitstable Non-Ecclesiastical Charities) on promoting the land that is allocated under Policy N20 of the Draft Canterbury District Local Plan (Reg 18, Sept 2025) for 150 new homes. The Whitstable Non-Ecclesiastical Charities is a long-established local charity that provides relief from hardship and distress to people living locally. The Whitstable Non-Ecclesiastical Charities provides grants and practical assistance to local residents in need, using income from land and property it owns. Any development or land promotion involving the charity is therefore intended to support its wider charitable purpose of giving back to the local community. The site that the Whitstable Non-Ecclesiastical Charities own is allocated under Policy N20 of the Draft Canterbury District Local Plan (Reg 18, Sept 2025) for approximately 150 new homes that including affordable and accessible housing, public open space and substantial landscape buffers. We welcome the opportunity to continue our engagement with Chestfield Parish Council as it prepares its Neighbourhood Plan, and to demonstrate how this allocation can complement Chestfield Parish’s vision by delivering carefully planned, sustainable growth that benefits the local community and is shaped by local feedback and input. We fully recognise Chestfield Parish Council’s long-standing commitment to safeguarding the parish’s distinctive character, landscape setting, and green separation from Whitstable — a theme reflected in our early discussions and evident throughout the Parish Magazines we have reviewed. The N20 scheme has been, and will continue to be, consciously shaped to uphold and reinforce those principles.	Noted. We were aware of the Policy N20 allocation since our Regulation 14 version of the Plan was produced, although in the CCC Regulation 19 Local Plan (March 2026) it is deleted. Noted. As above. We were aware of the Policy N20 allocation since our Regulation 14 version of the Plan was produced, although in the CCC Regulation 19 Local Plan (March 2026) it is deleted.
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Our meeting with Chestfield Parish Council on 26 September 2025 was invaluable, allowing open and constructive discussion on key matters such as drainage and sewerage capacity, housing mix, and the importance of maintaining Chestfield's distinctive identity while planning for modest, well-designed growth. Rubix Estates and our clients share these priorities and remain committed to continuing a collaborative dialogue as both the Local Plan and Neighbourhood Plan progress. Alignment with Neighbourhood Plan Objectives The Neighbourhood Plan rightly focuses on preserving the village's character while accommodating proportionate growth. We share this balanced approach and believe Policy N20 offers an opportunity to demonstrate how carefully managed, landscape-led growth can reinforce Chestfield's rural identity rather than dilute it. Policy N20 provides a clear framework for achieving this through a landscape-led scheme with strong green infrastructure and improved local connectivity. Our emerging concept design, which will be shared with the Chestfield Parish Council in due course, fully supports these objectives and the Neighbourhood Plan's Vision Statement by: • Providing high-quality, landscape-led housing contained by hedgerow and planting and open space to the east and south; • Delivering a range of new homes, including affordable and accessible new homes consistent with the Housing Needs Survey (April 2025) which identified strong local support (73.5 %) for smaller-scale homes and downsizing options; • Incorporating green corridors, native planting, and biodiversity net gain; • Enhancing public rights of way, including links to Footpath 155, creating safe, walkable connections to the wider village. Housing Policies H1–H3 and Housing Needs Survey (April 2025) Policy H1 – Future Housing Policy H1 correctly identifies the need for small-scale, well-designed housing that meets local needs. This objective is strongly supported. The emphasis on providing a balanced housing mix, including smaller and more accessible homes, is fully consistent with the findings of the Housing Needs Survey (April 2025). The survey confirmed that Chestfield has an ageing population (with over half of respondents aged 60 or above) and a limited supply of smaller properties, with around 50% of homes having four or more bedrooms and over 63% owned outright. It also found a clear local demand for smaller homes and bungalows, particularly from older residents wishing to downsize, alongside a need for affordable housing suitable for first-time buyers and younger families. The survey reported that 73% of respondents supported limited, small-scale growth within or adjoining the village, provided it is well designed and meets local needs. Respondents also expressed support for housing that enables local people to remain within the community, highlighting affordability, accessibility, and energy efficiency as key priorities. These findings provide a strong evidence base for Policy H1's	Thank you. We look forward to any potential further engagement and learning more. No action required.
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focus on modest, balanced growth and align closely with the objectives for Land East of Chestfield Road (Policy N20). At the meeting with Chestfield Parish Council, Rubix Estates discussed the importance of ensuring that future affordable housing is genuinely responsive to local people. This included exploring mechanisms to prioritise homes for those with a local connection and considering a preferred list of Registered Providers to manage the affordable homes. These discussions reflect a shared commitment to ensuring that future housing is tailored to Chestfield's needs and helps local residents remain within their community. Policy H2 – Good Quality Design This policy is sound and consistent with national guidance and emerging Local Plan Policy DS6. Rubix Estates fully supports the objective for new development to respect local character while achieving high standards of sustainability. During our meeting with Chestfield Parish Council, it was highlighted that “Russetts” by Stirling Homes (built around 30 years ago) provides a positive local example of design that complements the surrounding village character. This insight is appreciated and will inform our approach. Rubix Estates will seek to deliver a scheme that draws on the established Chestfield style building on the qualities seen at Russetts whilst enhancing the character of the area through thoughtful layout, materials and landscaping. To strengthen flexibility, the Neighbourhood Plan could include a short supporting paragraph clarifying that good design encompasses both traditional and innovative approaches, enabling contemporary, energy efficient architecture that complements local identity. This would ensure that design policies encourage high quality, sustainable development without inadvertently limiting the use of low-carbon materials, modern construction methods, or enhanced accessibility standards. Policy H3 – Scale and Building Heights The aspiration for new development to reflect Chestfield's established scale and massing is supported and considered appropriate. To provide added clarity, the policy could cross-refer to the emerging Local Plan's approach to context-based density and design, confirming that building height and form should respond to landscape character and local setting rather than be constrained by fixed numerical limits. This would offer the flexibility required for well-designed, site-specific solutions while ensuring that new development remains in keeping with Chestfield's distinctive character and visual identity. Summary Taken together, Policies H1–H3 provide a balanced and sensible framework for meeting local housing needs through modest and high-quality growth. Rubix Estates fully supports this approach and will continue to engage constructively with the Chestfield Parish Council to ensure that the Land East of	No action required. We have expanded the text in Policy H2 Good Quality Design, and with photos, and set design principles around the local vernacular and fenestration; materials in-keeping; boundary treatments; orientation of properties, etc. Policy H3 Building heights has been deleted, although some text added to the information section discouraging any building over 3 storeys as out of keeping and if justified should be “hidden” amongst the other housing and topography. Our Neighbourhood Plan has to take account of the adopted 2017 Canterbury District Local Plan, not the emerging draft Plan.
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Chestfield Road (Policy N20) scheme delivers smaller, affordable, and accessible homes that directly respond to the priorities identified in the Housing Needs Survey (April 2025) including opportunities for local downsizing, affordable ownership, and greater housing choice for younger families. Drainage and Infrastructure (Policies D1–D2) Drainage and wastewater capacity were key discussion points with Chestfield Parish Council. Rubix Estates supports Policies D1–D2 and confirms that the N20 scheme will: • incorporate comprehensive SuDS, on-site attenuation ponds, and permeable surfaces; • manage foul flows through early engagement with Southern Water and the LLFA (KCC); and • contribute to strategic upgrades at Swalecliffe WwTW, ensuring no net increase in run-off or flood risk. We recommend that the Neighbourhood Plan note that such infrastructure delivery is managed by statutory providers, with Chestfield Parish Council playing a valuable role in local monitoring and liaison. We also acknowledge Chestfield Parish Council's and residents' concerns regarding local traffic and road safety. The project team is commissioning further transport and highways related work that will include mitigation along Chestfield Road and Radfall Road, explore opportunities to enhance pedestrian links and where feasible integrate with the Parish's '20 Is Plenty' community speed initiative. Design, Landscape and Connectivity Biodiversity and Wildlife (Policies B1–B3) The biodiversity policies are clear, positive, and well-aligned with the national requirement for biodiversity net gain. Rubix Estates welcomes their inclusion and supports Chestfield Parish Council's focus on enhancing local habitats and wildlife corridors. It may be helpful for the supporting text to briefly refer to Local Plan Policy DS17 (Functionally Linked Land and Biodiversity) to ensure consistency across both plans and to reinforce a shared commitment to protecting and improving local ecology. Active Design and Inclusive Streetscapes (Policies AD1–AD2) These policies rightly encourage safe, inclusive, and accessible places for people to walk, cycle, and interact. Rubix Estates supports this approach and recognises its importance to Chestfield's sense of community and wellbeing. We suggest a minor clarification in the supporting text to confirm that active design principles will be applied in a proportionate way, reflecting the scale and character of each site while ensuring connectivity and accessibility for all users. Secured by Design The reference to Secured by Design principles is welcomed and reflects good planning practice. Including this within the supporting text—rather than as a separate policy—would allow flexibility for	Statement noted, no action from Steering Group required. Our drainage text Information and Justification section and the policies have been rewritten in light of comments received from the Environment Agency and Southern Water to the Regulation 14 consultation draft. Statement noted, no response from Steering Group required. In light of several representations from various bodies the 20% BNG requirement has been reduced to the national BNG 10% level. Our Neighbourhood Plan has to take account of the adopted 2017 Canterbury District Local Plan, not the emerging draft Plan. We have amended the Policy wording to be for developments of 10 or more residential units. We have deleted Policy SBD1 and incorporated the Secured by Design justification and information text into Policy
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different types of development while still embedding safety, security, and natural surveillance as integral parts of good design. Rubix Estates strongly supports the overall intent of the Neighbourhood Plan and Chestfield Parish Council's commitment to maintaining Chestfield's distinctive character. We would simply encourage that the final version of the Plan continues to align closely with the emerging Canterbury District Local Plan and the National Planning Policy Framework (2024). This will help ensure the Neighbourhood Plan meets the statutory basic conditions and sits comfortably alongside district-wide policies on housing, infrastructure, and biodiversity. The Neighbourhood Plan and Local Plan can together provide a powerful, complementary framework for Chestfield's future combining Chestfield Parish Council's detailed local knowledge and priorities with the strategic direction set by Canterbury City Council. Rubix Estates looks forward to working collaboratively with the Chestfield Parish Council to help deliver this shared vision through the careful and sensitive implementation of Policy N20 (Land East of Chestfield Road). Engagement with Chestfield Parish Council Rubix Estates is committed to an open and collaborative approach in shaping proposals for Land East of Chestfield Road (Policy N20). Our early discussions with Chestfield Parish Council have been positive, focusing on shared priorities such as drainage, landscape setting, housing mix and maintaining Chestfield's distinctive village character. These conversations will continue through regular meetings as the design develops, ensuring that local knowledge and feedback directly inform the masterplan. We also recognise that Chestfield residents place great importance on early and transparent communication. Rubix Estates is committed to maintaining a clear and consistent dialogue with the Parish Council throughout the design and planning process, enabling any concerns to be addressed collaboratively and constructively as the project evolves. A dedicated public consultation will be held to share the emerging proposals with residents. This will include, but not be limited to: • An exhibition at a local venue • Leaflets delivered to households • An online platform providing plans, visuals, and opportunities for comment • Regular updates through the Chestfield Parish Council Magazine	H2 and reworded part of Policy H2 which includes demonstrating at the planning application stage that the development meets the requirements of 'Secured by Design' to minimise the likelihood and fear of crime (and including a series of outlined features within a site design in the aim of achieving a Gold standard of accreditation once the site is delivered) Statement noted, no response from Steering Group required. Statement noted, no response from Steering Group required. We look forward to any potential further engagement and input. We would welcome and would assist with this by publicising through our magazine and on our noticeboards, and posts on available local social media groups.
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All feedback received will be carefully reviewed to ensure that the scheme evolves in a way that responds sensitively to community views and reflects local needs. To help keep everyone informed, Rubix Estates will also contribute progress updates to the Chestfield Parish Council Magazine. We recognise the Parish Magazine as an important communication tool, valued by residents for transparency on local matters. Rubix Estates would welcome continuing to provide factual updates through it, coordinated with the Clerk. The magazine reaches more than 1,400 households each quarter and provides a trusted way to communicate village news and planning information. Through this regular feature we hope to share key milestones, highlight upcoming consultation opportunities, and explain how residents' feedback is shaping the proposals. Coordination with the Parish Clerk will ensure content aligns with publication deadlines and community priorities. Our aim is to work in genuine partnership with Chestfield Parish Council and residents to deliver a high-quality, landscape-led development that complements Chestfield Parish's vision, supports local infrastructure, and contributes positively to village life. Rubix Estates is also working with a locally based professional team, including Lee Evans Partnership, TaylorHare Architects, Fortis South East, Strutt & Parker (Canterbury) and Furley Page (Whitstable), all of whom bring extensive experience in delivering high-quality, context-sensitive developments across the area. Their local understanding and presence will help ensure that the proposals for Land East of Chestfield Road (Policy N20) are well considered, genuinely landscape-led, and responsive to community feedback. If Chestfield Parish Council is aware of any other locally based consultants or specialists who could add further value to the project, Rubix Estates would be pleased to explore opportunities to work collaboratively with them. This open and inclusive approach reflects our shared commitment to creating a scheme that is both technically robust and authentically shaped by Chestfield's identity and aspirations. Conclusion In summary, we consider the Chestfield Neighbourhood Plan (Regulation 14 Draft) to be a well-prepared and balanced document that demonstrates strong community engagement and a clear understanding of local priorities. The policies on housing, design, biodiversity, and infrastructure are robust and align well with wider planning objectives. The proposed development at Land East of Chestfield Road (Policy N20) is well placed to help realise the Neighbourhood Plan's ambitions by delivering high-quality, landscape-led design; a balanced mix of affordable and accessible homes; measurable biodiversity enhancements; and coordinated infrastructure improvements. We would gently encourage that the final version of the Neighbourhood Plan continues to maintain close alignment with the emerging Canterbury District Local Plan and the National Planning Policy Framework (2024), particularly on strategic matters such as housing delivery, infrastructure provision, and biodiversity.	We would welcome this. We would welcome this. Statement noted. Noted. Statement noted, no response from Steering Group required. Statement noted, no response from Steering Group required.
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Rubix Estates and the Whitstable Non-Ecclesiastical Charities remain fully supportive of Chestfield Parish Council's work and welcome the opportunity to continue engaging positively and collaboratively as both the Neighbourhood Plan and Local Plan progress. We believe this constructive and collaborative approach will help deliver a plan that is both locally shaped and strategically robust, providing lasting benefits for the community of Chestfield. Lastly, we also wish to record our appreciation for the time and dedication that the Parish Council and its volunteers have invested in preparing this Neighbourhood Plan on behalf of the community. Yours sincerely, Elouise Mitchell, LLB Hons, MSc, MRTPI Associate (Planning Consultant) For and on behalf of Lee Evans Partnership LLP Gurdev Moore Director of Rubix Estates Limited	
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56: From a Chestfield resident

I do a lot of walking in the parish. It is important that the public rights of way footpaths can be used all year round. The improvements that the parish council made to the path across the golf club course are very much appreciated and made a massive difference to so many people.	Good idea. We have added the following to Policy C2: Development should have a positive contribution on the PRoW network by ensuring that existing routes that would be used by future occupants to access important local facilities are of a suitable standard to enable safe year-round use. New or improved PRoW routes should be made up to a standard suitable for year-round use for all lawful users.
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57: From a Chestfield resident

It would be good to reduce the amount of hard standing and have more permeable paved surfaces.	We agree. We have added this to our Drainage section.
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Appendix 1: Letter/Email to Statutory Consultees re Regulation 14 consultation:

29 August 2025

Dear Consultee

Chestfield Neighbourhood Plan – Pre-Submission Consultation (Regulation 14)

As part of the requirements of the Localism Act 2011 and of the Neighbourhood Planning (General) Regulations 2012, Chestfield Parish Council is undertaking Pre-Submission Consultation (Regulation 14) on its Neighbourhood Plan. As a body that we are required to consult, we are hereby seeking your views on the Draft Neighbourhood Plan.

The draft Neighbourhood Plan may be viewed at <https://chestfieldparishcouncil.gov.uk/neighbourhood-plan/>

This pre-submission consultation runs for a period of six weeks: 01 September 2025 to 14 October 2025. The consultation period will conclude at **Midnight on Tuesday 14 October 2025**.

If you have difficulty in meeting this deadline please contact us for an extension.

Even if you have no comments to make it would be useful if you would respond if this is the case.

The input received through this consultation will be instrumental in finalising the Plan before its submission to Canterbury City Council.

We look forward to receiving your valuable feedback.

Please specify which Policy your comments relate to.

Representations would preferably be emailed to clerk@chestfieldparishcouncil.gov.uk or by post to Chestfield Parish Council Clerk c/o Chestfield Cricket Club, The Pavilion, Grasmere Road, Chestfield CT5 3LX.

Appendix 2: Survey form used at the Regulation 14 consultation events held 06 and 09 September 2025:

We are seeking your views on the draft Chestfield Neighbourhood Plan Pre-Submission (Regulation 14) Public Consultation The draft Neighbourhood Plan may be viewed at https://chestfieldparishcouncil.gov.uk/neighbourhood-plan/ Feedback from Presubmission document Consultation events Saturday 06 September from 10am to 1pm; or Tuesday 09 September from 6pm – 8pm: <i>Thank you for taking the time to look at Chestfield's draft Neighbourhood Plan. The Steering Group drafted this to reflect the points raised by the community back in January 2025. We would now ask for your feedback on the Policies in this Plan. The Chestfield Neighbourhood Plan will become a planning policy document carrying equal weight to the Canterbury District Local Plan so your input is critical. It is looking to shape future development in the area but cannot conflict with the Canterbury District Local Plan. Therefore, please restrict your comments to the content and policies included in our draft pre-submission Plan only.</i> Policy No: Your comments: Policy No: Your comments: Policy No: Your comments:	Policy No: Your comments: Policy No: Your comments: Do you feel that there are any key planning-relevant issues that have not been addressed in this draft Plan? <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <tr> <td style="width: 20%;">Your Name</td> <td></td> </tr> <tr> <td>Your Address</td> <td></td> </tr> <tr> <td>Your contact details</td> <td></td> </tr> </table> This consultation runs from 01 September 2025 to 14 October 2025. Statutory bodies, local organisations and businesses, and key interested parties are also being offered the opportunity to comment. Following the consultation, the Steering Group is bound to show that all the comments have been assessed and decisions taken on what further action (if any) to take for each, and a Consultation Statement will be prepared and uploaded to our dedicated webpage at https://chestfieldparishcouncil.gov.uk/neighbourhood-plan/ Representations may be made on this form or would preferably be emailed to clerk@chestfieldparishcouncil.gov.uk or by post or hand delivered to Chestfield Parish Council Clerk c/o Chestfield Cricket Club, The Pavilion, Grasmere Road, Chestfield CT5 3LX. Please specify which Policy your comments relate to. Thank you for your feedback.	Your Name		Your Address		Your contact details	
Your Name							
Your Address							
Your contact details							