

Chestfield Neighbourhood Plan

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Historic England

Policy Team

Our Ref: PL00798138

Canterbury City Council

Direct Dial [REDACTED]

Date: 29 April 2026

by email only to
consultations@canterbury.gov.uk

Dear Policy Team,

Ref: Chestfield Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

We would be grateful if you would notify us on e-seast@HistoricEngland.org.uk if and when the Neighbourhood Plan is made by the 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.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Louise Dandy
Historic Places Advisor
E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



NH Response NH/26/15922 - Draft Chestfield Neighbourhood Plan - Regulation 16

From Bidur Rajbhandari [REDACTED]
Date Thu 5/14/2026 2:32 PM
To Consultations <Consultations@canterbury.gov.uk>
Cc [REDACTED]

You don't often get email from [REDACTED] [Learn why this is important](#)

--Email From External Account--

Your ref: Chestfield Neighbourhood Plan - Regulation 16

Our ref: NH/26/15922

FAO: Consultation Team

Thank you for your email of 17 April 2026, consulting National Highways on Chestfield Neighbourhood Development Plan - Regulation 16.

We have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with plans and/or proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of the Hawkhurst Neighbourhood Development Plan, our focus will be on any potential impact to the A2.

We notice that the Neighborhood Plan is not allocating sites to meet its local housing number needs and development will adhere to Canterbury District Local Plan.

We are content that the development proposed by the current Neighborhood Plan will not further affect the safe and efficient operation of the SRN in the area.

We therefore have no objection or further comment at this moment. However, we encourage further consultation as the Plan progresses so that we can remain aware of, and comment as required on its contents.

Should you have any queries regarding our response, please contact us via planningse@nationalhighways.co.uk

Kind Regards

Bidur Rajbhandari, Assistant Spatial Planner
South East Region, Operations Directorate

National Highways



Web: www.nationalhighways.co.uk

For information about our engagement with the planning system please visit
<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |
<https://nationalhighways.co.uk> | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Three Snowhill, Snowhill Queensway, Birmingham, B4 6GA

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KCC Response to Chestfield Neighbourhood Plan Consultation

From StrategicPlanning@kent.gov.uk <StrategicPlanning@kent.gov.uk>

Date Mon 08/06/2026 15:58

To Consultations <Consultations@canterbury.gov.uk>

Cc [REDACTED]

 1 attachment (234 KB)

KCC Response to Chestfield NP.pdf;

--Email From External Account--

Good Afternoon,

Please find attached Kent County Council's response to the Chestfield Draft Neighbourhood Plan Regulation 16 consultation.

Kind Regards,

Dan Neave | Strategic Planning and Infrastructure Graduate Officer | Strategic Planning and Infrastructure | Growth and Communities | Growth, Environment and Transport | Kent County Council | [REDACTED] | www.kent.gov.uk



Canterbury City Council
14 Rose Lane
Canterbury
Kent
CT1 2UR

BY EMAIL ONLY

Growth and Communities

Sessions House
County Hall
Maidstone
Kent
ME14 1XX

Phone: [REDACTED]
Ask for: Daniel Neave
Email: [REDACTED]

8 June 2026

Dear Sir, Madam

Re : Chestfield Neighbourhood Plan Regulation 16 Consultation

Thank you for consulting Kent County Council (hereafter referred to as the County Council) on the Chestfield Neighbourhood Plan Regulation 16 consultation, in accordance with the requirements of the Localism Act 2011.

The County Council has reviewed the draft Neighbourhood Plan and for ease of reference, has provided comments structured under the relevant policies within the document.

General Commentary:

Development Investment Team

The County Council, from a development investment perspective, considers that the Neighbourhood Plan is generally in conformity with the strategic policies of the emerging Canterbury District Local Plan (Regulation 19), and has appropriate regard to national planning policy. In particular, the Plan correctly assumes that the scale of housing growth and associated strategic infrastructure requirements within the Neighbourhood Plan area will be delivered through the allocations and policies of the Canterbury District Local Plan, rather than through additional neighbourhood-level site allocations.

From an infrastructure perspective, the County Council welcomes the Plan's clear recognition that new development must be supported by appropriate infrastructure, including education provision, drainage and sewerage, transport, green infrastructure and active travel measures.

The County Council also notes that the Neighbourhood Plan does not seek to undermine or re-plan the delivery of education infrastructure identified through the Canterbury District Local Plan, including primary, secondary and special educational needs provision associated with strategic site allocations.

For clarity and effective implementation, the County Council considers it would be helpful for the Neighbourhood Plan to more explicitly signpost that the delivery and funding of strategic infrastructure, including education land and mitigation, will be secured through the mechanisms set out in the Canterbury District Local Plan and associated infrastructure delivery policies, rather than through neighbourhood-level policies. This would assist in ensuring consistent interpretation alongside the Regulation 19 Local Plan.

Highways and Transportation

The County Council, in its role as Local Highway Authority, welcomes the opportunity to comment on the Regulation 15 submission of the Chestfield Neighbourhood Plan. The County Council recognises the considerable work undertaken by the Parish Council and Steering Group in progressing the Plan to this stage and acknowledges the positive changes made since Regulation 14, particularly in strengthening references to active travel, inclusive design and local movement.

The County Council is encouraged to see the introduction of policy content relating to Public Rights of Way, inclusive streetscapes and Active Design principles, alongside consideration of unadopted roads and their local significance. These additions represent a positive step forward in recognising the importance of how people move within and through the neighbourhood, and how development can support more sustainable and inclusive patterns of travel. The Plan's aspiration for Chestfield to be a walkable and cyclable parish is particularly welcomed, and aligns well with both national policy and local transport objectives.

The Plan also appropriately recognises the strategic growth proposed within the wider area, including the sites at Brooklands Farm and Bodkin Farm, which are referenced within the document and form an important part of the emerging spatial context. The County Council welcomes the inclusion of these strategic sites within the Neighbourhood Plan narrative, as this helps ensure that the Plan is grounded in the realities of planned growth and provides an opportunity to consider how such development can be successfully integrated with the existing community.

Notwithstanding these positive elements, the County Council considers that there remains an opportunity to further strengthen the transport aspects of the Plan so that they provide a clearer and more consistent framework for decision-making. At present, transport-related matters are addressed across a number of policies, and while these collectively move in a positive direction, they could be more clearly drawn together to form a coherent approach to movement, accessibility and connectivity within the parish.

In particular, while the Plan sets out a strong vision for active travel and recognises the importance of connectivity, it would benefit from clearer expectations around how development proposals should demonstrate that they can be safely and appropriately accommodated on the local highway network. In this respect, it would be helpful for the Plan to make explicit that development should be supported, where proportionate, by suitable transport information or assessment. This would ensure that proposals give appropriate consideration to matters such as access arrangements, potential impacts on highway safety, and opportunities to promote sustainable travel, in line with national guidance.

Overall, the County Council is supportive of the direction of travel taken within this Neighbourhood Plan submission and the increased emphasis on movement, accessibility and active design. With some further refinement, particularly in setting out clear expectations for how development proposals should demonstrate appropriate access and consider their impact on the highway network, the Plan has the potential to provide a strong and effective framework for promoting safe and sustainable travel within Chestfield.

The County Council would be pleased to continue working collaboratively with the Parish Council and Canterbury City Council to support the ongoing development of the Plan as it progresses toward examination.

Public Rights of Way

As a general statement, the County Council, as the local Public Rights of Way and Access Service, is keen to ensure its interests are represented with respect to its statutory duty to protect and improve Public Rights of Way (PROW) in the county (PROW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic). The County Council is committed to working in partnership with local and neighbouring authorities, councils, and others to achieve the aims contained within the County Council [Rights of Way Improvement Plan](#) (ROWIP) and the KCC ['Reforming Kent' strategy for 2025-2028](#). Experience shows that local planning policy support for the work the County Council does is very helpful in both protecting the network and negotiating enhancements to it, often through new development.

There is good reason for the Plan to protect and enhance the PROW network as the parish develops until 2042-43 and beyond. The network serves a broad range of users and delivers diverse benefits - it may, to many, be simply a recreational network of paths for personal health and wellbeing but it is also a vital means for people to access services and workplaces; a safer alternative to local roads; offers sustainable transport opportunities so improving local air quality; supports many aspects of local (often rural) economies; and fosters community cohesiveness and interaction. These deliverables conform with the Plan's Vision for Chestfield, so there is every reason for the Plan to promote and enhance the local PROW network.

Although the draft Neighbourhood Plan makes several references to the Parish's PROW network, there is just one specific reference to the County Council's ROWIP. Specific reference embedding the document in the Neighbourhood Plan Policies will strengthen successful partnership working, provide additional funding opportunities for example through development contributions and ensure delivery of improvements to the PROW network in the parish.

Throughout the Plan, where there is reference to Active Travel and walking and cycling opportunities, the PROW network should be specifically referenced. The PROW Network & ROWIP should therefore be specifically referenced within the following policies: H2, C1, C2 and B1.

Please see below for further specific comments on the chapters and policies within the Draft Chestfield Neighbourhood Plan Consultation:

Policy S1 – Spatial Strategy

Highways and Transportation

This policy sets out the spatial strategy and reflects the reliance on development identified through the emerging Canterbury Local Plan. In this context, there is merit in strengthening the supporting text to reinforce the expectation that development will be accompanied by proportionate evidence demonstrating that safe and suitable access can be achieved and that the surrounding network can function effectively. Such an approach would not be onerous but would provide clarity and consistency in how transport matters are addressed.

Policy H2 – Good Quality Design

Highways and Transportation

KCC considers that this policy is welcomed, particularly its recognition of parking and streetscape considerations. There is an opportunity, however, to further emphasise the role of layout and design in supporting movement. This could include ensuring that development proposals demonstrate safe and convenient pedestrian and cycle routes, good connections to local facilities, and appropriate parking provision to avoid pressure on surrounding roads.

Public Rights of Way

The County Council strongly supports the statement in respect of Public Rights of Way - *“A priority for good sustainable design should be to provide new public rights of way.....including links between the village and surrounding countryside.”* The County Council considers that this could be further strengthened by specific reference to the ROWIP which shares these objectives.

Chapter 7 – Drainage and Sewerage Infrastructure

Flood and Water Management

The County Council is pleased to note that its previous suggestions with regards to reference and review of DEFRA's SuDS Technical Standards have been considered and included in chapter 7 and associated policies.

The County Council would also like to raise another comment in relation to a typographical error on page 20, point 1 which should be *“Collected for **non**-potable use”*. The statement is correctly worded under policy D1.

Chapter 8 – Public Rights of Way, Promoted Routes, and Cycleways

Public Rights of Way

The County Council welcomes the inclusion of a section dedicated to the protection and enhancement of Public Rights of Way and also requests that a link to the ROWIP document is to be included in this section. Given the popularity of horse riding along with its contribution within the rural, tourism and visitor economy, the County Council considers it worthy of inclusion. With this in mind, development proposals should provide new or amended bridleway links with safe road crossing points that enable connectivity between the village and the wider countryside. The Service also suggests possible projects include the upgrade of footpaths to bridleways which would increase the traffic free, off-road network for equestrians and cyclists.

Policy C1 / Policy C2 – Public Rights of Way

Public Rights of Way

With regards to policy C1, the County Council would suggest that the following text should be amended as follows: “Development will be supported where development does not encroach onto public rights of way (e.g. footpaths, bridleways and Restricted Byways).”

The statement “*Diversion of footpaths and bridleways would be dealt with under public rights of way legislation*” should be amended to “Amendments to the Public Rights of Way network would be subject to legal process under the Highways Act 1980 or the Town and Country Planning Act 1990.”

Policy C2 would be strengthened with the inclusion of wording such as “Development should enhance existing Public Rights of Way through initiatives such as better signage, mapping resources, improved multiuser surfaces and least restrictive furniture improvements to encourage and facilitate use.” The funding for such improvements could be secured through either 'Section 106' planning obligations or as part of a Community Infrastructure Levy (CIL) Charging Schedule. Canterbury City Council has a CIL Charging Schedule in place and Chestfield Parish Council should already receive an apportionment of CIL for its own use, a sum that will increase once the Plan is adopted. This apportionment enables Chestfield Parish Council to deliver various local projects, realising opportunities to deliver for the benefit of local communities - enhancement of the PROW network can be achieved at relatively small cost.

Chapter 10 – Biodiversity Policy

Public Rights of Way

As Public Rights of Way provide linear corridors that contribute to biodiversity connectivity, as well as providing sustainable access and recreation, the County Council welcomes reference to footpaths and bridleways within the section. Restricted byways within the parish referencing the Public Rights of Way network would be more accurate and would strengthen this policy.

Policy B1 – Connectivity

Public Rights of Way

As outlined above, there is strong synergy between PROW and the connectivity of green infrastructure. Therefore, KCC would ask that specific reference to the Rights of Way network should be included within this policy.

Policy U2 – Unadopted Roads

Highways and Transportation

This policy is a helpful and locally responsive addition, particularly in addressing potential construction impacts. There may be scope to build on this by recognising that the design of development, including appropriate on-site parking and access arrangements, can play an important role in ensuring that surrounding roads, whether adopted or not, continue to operate effectively over time.

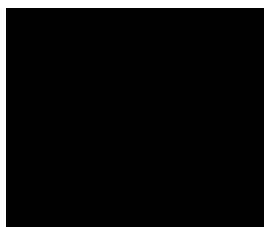
Policy AD1 – Inclusive Streetscapes

Highways and Transportation

KCC considers that the inclusion of this policy is particularly welcomed as it demonstrates a clear understanding of accessibility issues such as the lack of dropped kerbs, tactile paving and obstructions within the footway. Strengthening this policy through reference to recognised design standards would help ensure that these considerations are consistently delivered through future development proposals.

The County Council is keen to work collaboratively with the Neighbourhood Planning Group moving forward.

Yours faithfully



Simon Jones

Corporate Director for Growth, Environment and Transport

Consultations Response - Chestfield Neighbourhood Plan - Regulation 16 Consultation

From SM NE Consultations (NE) [REDACTED]

Date Wed 10/06/2026 11:12

To Consultations <Consultations@canterbury.gov.uk>

 1 attachment (272 KB)

547413 NE Response.pdf;

--Email From External Account--

Please find Natural England's response in relation to the above-mentioned consultation attached.

Kind regards,

Sally Wintle

Officer
Natural England
County Hall
Spetchley Road
Worcester
WR5 2NP

Tel [REDACTED]
mail to: consultations@naturalengland.org.uk
www.gov.uk/natural-england



We strongly recommend using the [SSSI Impact Risk Zones](#) (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)
For further information on the Pre-submission Screening Service see [here](#)

From: Consultations <Consultations@canterbury.gov.uk>

Sent: 17 April 2026 10:44

Subject: Ref draft Chestfield Neighbourhood Plan

Dear Stakeholders,

Chestfield Neighbourhood Plan

Chestfield Parish Council has prepared a draft [Neighbourhood Plan](#), which sets out a vision for the future of Chestfield and planning policies which, if adopted, will be used to determine planning applications locally.

Chestfield Parish Council formally submitted the plan to Canterbury City Council in accordance with Regulation 15 of the Neighbourhood Planning (general) Regulations (2012) (as amended) on 10 March 2026.

Plan proposal

In accordance with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended), the submission includes the following documents:

- A map identifying the Neighbourhood Area
- Chestfield Neighbourhood Plan
- Basic Conditions Statement
- Consultation Statement
- Strategic Environmental Assessment and Habitat Impact Assessment Screening Report

Further information about the Chestfield Neighbourhood Plan is available [here](#).

Consultation

In accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended), Canterbury City Council is now publicising and consulting on the draft Chestfield Neighbourhood Plan for a period of eight weeks, between **Thursday 16 April** and **Thursday 11 June 2026**.

How to comment:

Read the draft [Neighbourhood Plan](#) and submit your comments:

- using [the online form link](#)
- by email: consultations@canterbury.gov.uk
- by post at: Policy Team, Canterbury City Council, 14 Rose Lane, Canterbury, CT1 2UR

Printed copies of the plan are available to view at the following venues:

- Canterbury City Council, 14 Rose Lane, Canterbury, CT1 2UR between Monday and Friday at 10am - 2pm
- Whitstable Library, Oxford Street, Whitstable, CT5 1DB between Monday and Friday at 10am - 5pm (closed for lunch 12:30pm - 1:30pm) Saturday and Sunday 10am - 4pm (closed for lunch 12:30pm - 1pm)
- Swalecliffe Library, 78 Herne Bay Road, Whitstable, CT5 2LX between 9:30am - 5pm at Monday, Tuesday, Thursday and Saturday 9:30am - 1pm (closed for lunch 1pm - 2pm)

All responses must be submitted no later than **5pm on Thursday 11 June 2026.**

Any representations may include a request to be notified of the council's decision under Regulation 19 in relation to the neighbourhood development plan.

If you would like to see what you will be asked before starting the survey, you can view the questions [here](#).

What happens next

Following the consultation, the plan, its supporting evidence and any representations made will be sent to an independent examiner.

The independent examiner will consider whether the plan meets the basic conditions.

If the plan passes the independent examination, a referendum will be held, where the community will be able to vote on whether it supports the plan.

Kind regards

Consultations Team
Canterbury



.....
Find us online at **canterbury.gov.uk**

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Date: 10 June 2026
Our ref: 547413
Your ref: Chestfield Neighbourhood Plan

Policy Team
Canterbury City Council

BY EMAIL ONLY
consultations@canterbury.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
[REDACTED]

Dear Sir/Madam

Chestfield Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 17 April 2026.

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.

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 an 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 faithfully
Sally Wintle
Consultations Team

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

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)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 \(England\)](https://www.gov.uk/government/publications/national-parks-in-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](http://www.local-environmental-records-centres.org/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². 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 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 [here](#)³.

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 [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁷ 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.

Landscape

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.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

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).

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>

- 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.

Southern Water comments in reply to the Regulation 16 consultation of the Chestfield Neighbourhood Plan

From Policy, Planning [REDACTED]
Date Tue 09/06/2026 16:31
To Consultations <Consultations@canterbury.gov.uk>

 1 attachment (205 KB)
260609 Southern Water Reg14 NP Response.pdf;

--Email From External Account--

Dear Sir/Madam, thank you for inviting Southern Water to comment on the Regulation 16 draft of the Chestfield Neighbourhood Plan. Please find our comments attached.

Please contact me should you have any queries regarding our response.

Yours faithfully,

Catherine Adamson
Strategic Planning Lead
Kent & East Sussex

[REDACTED]
southernwater.co.uk



From: Consultations <Consultations@canterbury.gov.uk>
Sent: 17 April 2026 10:44
Subject: Ref draft Chestfield Neighbourhood Plan

Dear Stakeholders,

Chestfield Neighbourhood Plan

Chestfield Parish Council has prepared a draft [Neighbourhood Plan](#), which sets out a vision for the future of Chestfield and planning policies which, if adopted, will be used to determine planning applications locally.

Chestfield Parish Council formally submitted the plan to Canterbury City Council in accordance with Regulation 15 of the Neighbourhood Planning (general) Regulations (2012) (as amended) on 10 March 2026.

Plan proposal

In accordance with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended), the submission includes the following documents:

- A map identifying the Neighbourhood Area
- Chestfield Neighbourhood Plan
- Basic Conditions Statement
- Consultation Statement
- Strategic Environmental Assessment and Habitat Impact Assessment Screening Report

Further information about the Chestfield Neighbourhood Plan is available [here](#).

Consultation

In accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended), Canterbury City Council is now publicising and consulting on the draft Chestfield Neighbourhood Plan for a period of eight weeks, between **Thursday 16 April** and **Thursday 11 June 2026**.

How to comment:

Read the draft [Neighbourhood Plan](#) and submit your comments:

- using [the online form link](#)
- by email: consultations@canterbury.gov.uk
- by post at: Policy Team, Canterbury City Council, 14 Rose Lane, Canterbury, CT1 2UR

Printed copies of the plan are available to view at the following venues:

- Canterbury City Council, 14 Rose Lane, Canterbury, CT1 2UR between Monday and Friday at 10am - 2pm
- Whitstable Library, Oxford Street, Whitstable, CT5 1DB between Monday and Friday at 10am - 5pm (closed for lunch 12:30pm - 1:30pm) Saturday and Sunday 10am - 4pm (closed for lunch 12:30pm - 1pm)
- Swalecliffe Library, 78 Herne Bay Road, Whitstable, CT5 2LX between 9:30am - 5pm at Monday, Tuesday, Thursday and Saturday 9:30am - 1pm (closed for lunch 1pm - 2pm)

All responses must be submitted no later than **5pm on Thursday 11 June 2026**.

Any representations may include a request to be notified of the council's decision under Regulation 19 in relation to the neighbourhood development plan.

If you would like to see what you will be asked before starting the survey, you can view the questions [here](#).

What happens next

Following the consultation, the plan, its supporting evidence and any representations made will be sent to an independent examiner.

The independent examiner will consider whether the plan meets the basic conditions.

If the plan passes the independent examination, a referendum will be held, where the community will be able to vote on whether it supports the plan.

Kind regards



Find us online at **canterbury.gov.uk**

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Chestfield Parish Council

By Email

Date
09 June 2026

Contact
[REDACTED]

Your ref

Our ref

Dear Sir/Madam,

Chestfield Parish Pre Submission Neighbourhood Plan

Thank you for consulting Southern Water on the Submission version of the Chestfield Parish Neighbourhood Plan. Southern Water is the statutory wastewater undertaker for your parish. Please find our response attached to this letter, further to our comments at the Regulation 14 consultation stage.

We hope that you find our response helpful, please let me know should you have any queries.

Yours faithfully,

[REDACTED]

Catherine Adamson
Strategic Planning Lead for Kent and East Sussex

Policy D1 Surface Water Runoff Flood Management

Whilst we appreciate the intention of Policy D1 to safeguard the effective operation of the sewer network, as the statutory wastewater service provider for the Parish, Southern Water cannot see how the Parish could implement the paragraphs below. Including this wording tends to contradict other parts of the policy making it unclear in places. At present we therefore do not consider policy D1 to meet the Basic Conditions for Plan making. Also, as no new connections of surface water to the foul network are permitted (including run-off) by the National Standards for SuDS (see section 1.10) we consider that these paragraphs are not needed.

To avoid confusion and ensure that the Policy is interpreted clearly and effectively we therefore request the following paragraphs be removed from Policy D1:

The scope should also look 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.

Proposals which allow surface water drainage into the foul sewer network will not be supported unless the developer can robustly demonstrate that the proposal is unable to make provision for surface water drainage to ground, watercourses or surface water sewers.

Further explanation and evidence:

Southern Water strongly supports requirements that seek to ensure surface water is appropriately managed as close to source as possible. The complexities and challenges of drainage need a collaborative approach between the responsible organisations, such as Local Authorities, Southern Water, the Environment Agency and community groups to adapt the urban environment to be more resilient to our changing weather patterns.

As set out in Defra's Storm Overflows Discharge Reduction Plan "*Water companies must remove rainwater from the combined sewer system as part of effectually draining their areas. This should include limiting any new connections of surface water to the combined sewer network, and any new connections should be offset by disconnecting a greater volume of surface water elsewhere within the network.*

By controlling the rate and volume of surface water entering the combined sewer network, sustainable urban drainage systems (SuDS) can improve existing flood risk and water quality. This is also in line with several paragraphs of the National Planning Policy Framework (December 2024) including paragraph 172(c) that requires:

using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management).

Whilst some parts of the wastewater network were originally designed to accommodate surface water, the expansion of towns and cities, and 'urban creep', contributes to increases in surface water run-off. As stated in Water UK's 21st Century Drainage Programme; "*The country's built environment is constantly changing and "urban creep" – home extensions, conservatories and paving over front gardens for parking – can all add to the amount of water going into our sewers and drains. Green spaces that would absorb rainwater are covered over by concrete and tarmac that will not. In fact, studies show that "urban creep" results in a larger increase in predicted flooding than new housing, because it adds more rainwater to these systems*'.

We need planning policy to require development to adhere to the principles of integrated water management in line with the National Standards for SuDS. In terms of future flood risk, better



rainwater management through SuDS is the preferred approach to avoid placing added pressure on drainage networks during heavy rainfall.

This is made clear in the new National Standards for SuDS where it states *“Sustainable drainage systems are a key part of the measures designed to reduce flood risk, protect water quality, and encourage biodiversity and amenity. It is for this reason that consistent SuDS are a government priority. Developments which could affect drainage on or around the site should incorporate SuDS for surface water to reduce the pressure on the sewerage network, reduce the use of storm overflows and reduce the risk of flooding from surface water and other sources.”*

Climate change is expected to have an impact on the risk of flooding in several wastewater systems. Preventing surface water from entering the foul and combined systems during heavy rainfall (that can also run off surrounding areas and drain to networks not designed to accept these overland flows) is the most sustainable and cost-effective way to reduce storm overflows. Southern Water is investing heavily in work to reduce releases in part by removing existing connections of surface water to the combined and foul networks. However, even as we deliver this work, development continues to increase surface water run-off in those areas. For more information on Southern Water’s work, the greener solutions we prefer that can bring additional benefits to the local water cycle and the environment, 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>

Policy D3 Foul Drainage

Whilst we appreciate the intention of Policy D3 to safeguard the effective operation of the sewer network, as the statutory wastewater service provider for the Parish, Southern Water cannot see how the Parish could implement the final paragraph of this Policy. Also, as no new connections of surface water to the foul network are permitted (including run-off) by the National Standards for SuDS, we consider that this paragraph is not needed. To avoid confusion and ensure that the Policy is interpreted clearly and effectively we request the following paragraph be removed from Policy D3:

The scope should also look 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.

Further explanation and evidence:

In compliance with section 1.10 of the Standards, all surface water run-off to foul sewers should be avoided through the use of SuDS, and we do not consider a capacity check necessary to inform this scenario. At present we therefore do not consider this policy to meet the Basic Conditions for Neighbourhood Plan making.

For resilience to climate change, communities need planning policy to require development to adopt the principles of integrated water management in line with the National Standards for SuDS.

In terms of future flood risk, better rainwater management through SuDS is the preferred approach to avoid placing added pressure on drainage networks during heavy rainfall. This is made clear by Government in the new National Standards for SuDS where it states “*Sustainable drainage systems are a key part of the measures designed to reduce flood risk, protect water quality, and encourage biodiversity and amenity. It is for this reason that consistent SuDS are a government priority. Developments which could affect drainage on or around the site should incorporate SuDS for surface water to reduce the pressure on the sewerage network, reduce the use of storm overflows and reduce the risk of flooding from surface water and other sources.*”

By controlling the rate and volume of surface water entering the sewer network, sustainable urban drainage systems (SuDS) can improve existing flood risk and water quality. This is also in line with several paragraphs of the National Planning Policy Framework (December 2024) including 172(c) that requires:

using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management).

Climate change is expected to have an impact on the risk of flooding in several wastewater systems. Preventing surface water from entering the foul and combined systems during heavy rainfall (that can also run off surrounding areas and drain to networks not designed to accept these overland flows) is the most sustainable and cost-effective way to reduce storm overflows. Southern Water is investing heavily in work to reduce releases in part by removing existing connections of surface water to the combined and foul networks. However, even as we deliver this work, development continues to increase surface water run-off in those areas. For more information on Southern Water’s work, the greener solutions we prefer that can bring additional benefits to the local water cycle and the environment, 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>

Whilst some parts of the wastewater network were originally designed to accommodate surface water, the expansion of towns and cities, and ‘urban creep’, contributes to increases in surface water run-off. As stated in Water UK’s 21st Century Drainage Programme; “*The country’s built*



environment is constantly changing and “urban creep” – home extensions, conservatories and paving over front gardens for parking – can all add to the amount of water going into our sewers and drains. Green spaces that would absorb rainwater are covered over by concrete and tarmac that will not. In fact, studies show that “urban creep” results in a larger increase in predicted flooding than new housing, because it adds more rainwater to these systems’.

As also set out in Defra’s Storm Overflows Discharge Reduction Plan “Water companies must remove rainwater from the combined sewer system as part of effectually draining their areas. This should include limiting any new connections of surface water to the combined sewer network, and any new connections should be offset by disconnecting a greater volume of surface water elsewhere within the network.

The complexities and challenges of drainage need a collaborative approach between the responsible organisations, such as Local Authorities, Southern Water, the Environment Agency and community groups to adapt the urban environment to be more resilient to our changing weather patterns. Together, we need to separate rainwater from wastewater.

Chestfield Neighbourhood Plan Reg 15 Response

From KSLPlanning [REDACTED] >

Date Wed 10/06/2026 12:38

To Consultations <Consultations@canterbury.gov.uk>

 2 attachments (425 KB)

Chestfield Neighbourhood Plan Response.pdf; KSL Neighbourhood Plan Guidance Nov 2025 (1).pdf;

--Email From External Account--

Dear Canterbury Planning Team,

Thank you for consulting us on the Chestfield's Regulation 15 Neighbourhood Plan.

Please see the attached our updated Neighbourhood Plan Guidance note and our full bespoke response.

If you have any queries, please do not hesitate to reach out.

Kind regards,
Adam

Adam Higman (*He/Him*)
Planning Advisor

**Kent and South London Sustainable Places
Operations**



For homes and habitats



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Canterbury City Council
Council Offices

Our Ref: KT/2006/000189/OR-20/PO1

Sent by email

Date: 10 June 2026

Dear Planning Team,

**Neighbourhood Plan for Chestfield 2026 – 2042-43 (NHP)– Regulation 15
Submission Version – March 2026.**

Thank you for consulting us on the above.

Please find attached our Neighbourhood Plan Advice Note which covers all the aspects we would expect to see in Neighbourhood Plans and will provide detailed advice. In addition, we have reviewed the Chestfield NHP and can provide the following comments:

It is encouraging to see the inclusion of infrastructure capacity, water quality and the no deterioration principle within the neighbourhood Plan. Furthermore, the plan and policies within seek to utilise Sustainable Urban Drainage and catchment-based approaches when considering future development and the capacity of infrastructure under different conditions.

We expect all new developments to incorporate robust environmental safeguards and demonstrate a clear commitment to improving ecological outcomes.

Key expectations include:

- **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).

- **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.
- **Culverting:** Culverting of main river channels should not be permitted, as it disrupts the connectivity of river corridor habitats and poses a risk to biodiversity. Deculverting should be actively encouraged, provided it can be demonstrated that doing so will not increase flood risk elsewhere. This approach supports the restoration of natural river processes and enhances ecological resilience.

It is encouraging that the plan considers the protection of water quality with the Swalecliffe Brook and Kite Farm Ditch being specifically mentioned. However, it's crucial to extend this focus to encompass the water quality of all aquatic environments, encompassing freshwater, transitional, and coastal areas

Policies D2 and D3 appear comprehensive and will help mitigate developments outlined in the Canterbury Local Plan. Ensuring future site allocations & development have less impact on the natural environment.

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the draft, please reconsult us.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Adam Higman
Sustainable Places Planning Advisor

Neighbourhood Plan Guidance Note: Kent and South London Area

Last Updated: November 2025

This guidance has been produced to help you plan and prepare your Neighbourhood Plan.

It sets out the environmental issues we expect to be considered as part of a Neighbourhood plan. Please be aware that this guide is not exhaustive and further details may be requested by us to address site specific environmental issues.

This guidance is only for use in the Environment Agency's Kent and South London Area and should be read alongside our detailed national guidance which can be found on the GOV.UK website.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <https://neighbourhoodplanning.org/wp-content/uploads/Environment-Toolkit-20181220.pdf>

We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including:
Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (<https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies>),

The South East River Basin Management Plan (<https://www.gov.uk/government/publications/south-east-river-basin-management-plan/> or the Thames River Basin Management Plan (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf).

The information below explains the key issues we would consider in reviewing your Plan.

Content:

- Section 1 - Flood Risk
- Section 2 - Main Rivers & Ecology
- Section 3 - Groundwater Quality and Contaminated Land
- Section 4 - Foul Water Drainage & Water Resources
- Section 5 – Environmental Permitting Regulations
- Section 6 – Infrastructure delivery
- Disclaimer

Section 1: Flood Risk

Development must be safe and should not increase the risk of flooding.

Neighbourhood Plans should conform to national and local policies on flood risk: If a Neighbourhood Plan is proposing sites for development, please check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations.

You can view a site's flood zone on the Flood Map for Planning on our website: <https://flood-map-for-planning.service.gov.uk/>. It is important to note the Flood Map for Planning shows a combined flood zone 3. It does not separately distinguish flood zone 3b (functional floodplain) from flood zone 3a. Instead, areas of flood zone 3b have been identified by Local Planning Authorities (LPAs) within their Strategic Flood Risk Assessment (SFRA). To identify future flood risk and other sources of flooding including surface water and reservoir flood risk please visit our long term flood risk map at <https://www.gov.uk/check-long-term-flood-risk>.

If the proposed allocation is located within Flood Zone 2 or 3, you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG): <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

The guidance will help you determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy, the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk. This should be informed by the Environment Agency's Flood Map for Planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.

We would have concerns if development were allocated in a high-risk flood zone without the Sequential Test being undertaken.

It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.

We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at ksle@environment-agency.gov.uk for further details.

In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA) now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.

1.1 Climate change allowances

The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change.

On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

1.2 Flood Defences

Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case, the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

1.3 Thames Estuary 2100 (Tidal Defences) (Applies to Richmond, Wandsworth, Lambeth, Southwark, Lewisham, Greenwich, Bexley, Dartford, Gravesham and Medway tidal areas)

In line with requirements set out in the [Thames Estuary 2100](#) (TE2100) plan, any development which borders the Thames tidal flood defences will need to demonstrate how the development is informed by the TE2100 plan and how any flood defences can be raised now or in the future. Check the [policy unit map](#) for actions required in [each policy unit](#).

No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences. In some cases, we hold technical drawings of flood defence structures which may be of use. To request these, you should contact our Customers and Engagement Team at ksle@environment-agency.gov.uk

The Plan should be informed by the latest good practice and guidance such as the [Estuary Edges Guidance](#), Strategic Flood Risk Assessments and Riverside Strategy Local plan policies and guidance.

1.4 Proximity to main rivers

Development must avoid harm to biodiversity and seek to protect and enhance it

Main rivers can be viewed on the Environment Agency's map: <https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a56386>

We normally require a buffer zone of 8 metres (fluvial) and 16 metres (tidal) between any new development and the top of the bank of the main river. The permanent retention of a continuous unobstructed area is an essential requirement for emergency access to the river for repairs to the bank and for future maintenance and/or improvement works. A buffer between new development and the river wall is also required to ensure no adverse loading

which could impact the stability of the channel wall. This buffer zone will help provide more space for flood waters, provide improved habitat for local biodiversity and allows access for any maintenance requirements.

Where development is proposed next to the river, we recommend that it includes a green buffer strip alongside the watercourse. Where such a buffer strip does not currently exist, we normally seek that it is established. This is a key way in which we carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.

The provision of green infrastructure, particularly along rivers, and the inclusion of sustainable drainage techniques can help reduce the risk of flooding. This can also provide recreational and wildlife benefits. Opportunities to incorporate biodiversity in the Plan will be encouraged. In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it, delivering biodiversity net gain. We would not support development proposals if there was shown to be a likely detrimental impact on the water environment.

Section 2: Main Rivers & Ecology

2.1 Improvements to the water environment

Local level actions and decision making can help secure improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under [The Water Environment \(Water Framework Directive\) \(England and Wales\) Regulations 2017](#).

It seeks to:

- deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and
- encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.

Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the water environment. Local Water Framework Directive (WFD) catchment data can be obtained from: <https://environment.data.gov.uk/catchment-planning/>

Overall deterioration in water quality and promoting improvement in the ecological status of any water body. Actions to achieve this are listed in the Thames River Basin Management Plan (RBMP) and the South East River Basin Management Plan <https://www.gov.uk/search?q=River+Basin+Management+Plans>

Where appropriate, a WFD Assessment (<http://planningguidance.communities.gov.uk/blog/guidance/water-supply-wastewater-and-water-quality/water-supply-wastewater-and-water-quality-considerations-for-planning-applications/>) should assess any potential impacts on the watercourse and demonstrate that the required enhancements will be delivered. Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us.

Section 3: Groundwater Quality and Contaminated Land

Development must not cause pollution to the water environment.

3.1 Source Protection Zones

[The Environmental Permitting \(England and Wales\) \(Amendment\) \(England\) Regulations 2023](#) were implemented on 2 October 2023. We are reviewing the Environment Agency's approach to groundwater protection and updating it where applicable. Therefore, our [groundwater protection position statements](#), noting our position on groundwater protection for both planning and permitting regimes, are under review (correct as of November 2025).

Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance: <https://www.gov.uk/government/collections/groundwater-protection>

To see if a proposed development is located within a Source Protection Zone, please use our online map: <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

3.2 Land contamination

You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development.

You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A list of potentially contaminated sites can be accessed on the following link:
<https://claire.co.uk/information-centre/water-and-land-library-wall.html?view=article&id=198:doe-industry-profiles&catid=41>

We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.

Further information can be accessed on the following links:

Land contamination: technical guidance

<https://www.gov.uk/government/collections/land-contamination-technical-guidance>

NPPG: Land affected by contamination

<https://www.gov.uk/guidance/land-affected-by-contamination>

Model Procedures for the Management of Land Contamination:

<https://webarchive.nationalarchives.gov.uk/20140328160926/http://cdn.environment-agency.gov.uk/scho0804bibr-e-e.pdf>

Approach to Groundwater Protection:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf

3.4 Surface Water Drainage

We recommend the use of Sustainable Drainage Systems (SuDS). These techniques can provide a method for reducing runoff that could otherwise lead to flooding. They can also minimise pollution impacts, improve biodiversity and provide amenity areas. The Lead Local Flood Authority is the main contact for SuDS issues. However, we have interest in SuDS from a groundwater protection perspective and those areas of critical drainage.

The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to controlled waters.

We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found at: <https://www.gov.uk/government/collections/groundwater-protection>

The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Section 4: Foul Water Drainage & Water Resources

4.1 Foul Water Drainage

Government guidance contained within the [NPPG](#) (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer
2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)
3. Septic tank

The first presumption must be to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works. Only where an applicant can demonstrate to the satisfaction of the LPA that connection to a public sewer is not feasible due to the cost and/or practicability should a non-mains foul sewage disposal solution be considered.

The NPPG states that ‘applications for developments relying on anything other than connection to a public sewage treatment plant should be supported by sufficient information to understand the potential implications for the water environment’. Any planning application which includes a non-mains system should therefore be accompanied by a [foul drainage assessment form](#) (FDA) which provides sufficient information for an assessment to be made of the risks of pollution to the water environment. For the proposal to be acceptable the FDA will need to demonstrate that the proposed system will be viable and will not be detrimental to the water environment.

Where the proposed development involves the connection of foul drainage to an existing non-mains drainage system, the applicant should ensure that it is in a good state of repair, regularly de-sludged and of sufficient capacity to deal with any potential increase in flow and loading which may occur as a result of the development. We have provided [guidance](#) to LPAs on non-mains drainage from non-major development to help them determine these planning applications.

Further information on septic tanks and treatment plants can be found [here](#).

4.2 Water Resources

All new homes are required to meet the mandatory national water efficiency standard for consumption as set out in the [Building Regulations](#) of 125 litres/person/day. In some water-stressed areas, LPAs have adopted policies in their Local Plans that require developers to apply the tighter Building Regulations optional requirement of 110 litres/person/day. While the use of the tighter consumption requirement is not required everywhere, we still recommend developers apply it where possible to ensure their schemes minimise their impact on the environment as much as possible by reducing demand for water.

We also recommend that new non-residential commercial buildings are required to achieve a BREEAM ‘excellent’ rating for water efficiency (or an equivalent rating with any successors).

Older buildings are often the least efficient in resource use. We strongly recommend the retrofitting of existing buildings where opportunities arise through refurbishments and changes of use. There are a number of [BREEAM Technical Standards](#) documents to support retrofitting for commercial and residential buildings.

Section 5: Environmental Permitting Regulations

To see if your proposed development requires an Environmental Permit under the Environmental Permitting Regulations please refer to [gov.uk](https://www.gov.uk).

Under the Environmental Permitting (England and Wales) Regulations 2016, a flood risk activity permit (FRAP) may be required for work:

- in, over or under a main river;
- within 8m of the bank of a main river, or 16m if it is a tidal main river;
- within 8m of any flood defence structure or culvert on a main river, or 16m on a tidal main river.

Flood risk activities can be classified as: exclusions, exemptions, standard rules or bespoke. These are associated with the level of risk the proposed works may pose to people, property and the environment. Local Authorities should advise developers to refer to the [flood risk activity permit section](https://www.gov.uk/guidance/flood-risk-activity-permit-section) of gov.uk for further information.

Section 6: Infrastructure delivery

6.1 Infrastructure

We would recommend that environmental infrastructure, including habitat enhancements, water storage areas and green space, is taken into account if the Plan looks to fund local infrastructure.

Disclaimer

Please note that this document is a response to a Neighbourhood Plan enquiry or consultation and does not represent our final view in relation to any future planning application made in relation to any site. We reserve the right to change our position in relation to any such application. This response is based on current planning policy, associated legislation, and environmental data/information. If any of these elements change in the future then we may need to reconsider our position.

As part of this standard response we have not technically reviewed any documents. You should seek your own expert advice in relation to technical matters relevant to any planning application before submission.

If you have any questions please contact the Kent and South London Sustainable Places team: kslplanning@environment-agency.gov.uk

Chestfield Neighbourhood Plan - Representations on behalf of Hallam Land

From Dominic MacDougall [REDACTED]
Date Wed 10/06/2026 16:46
To Consultations <Consultations@canterbury.gov.uk>
Cc Oliver Bell [REDACTED] Matt Harris [REDACTED] >

 1 attachment (361 KB)

Chestfield Neighbourhood Plan Regulation 16 Representations OBO Hallam Land.pdf;

You don't often get email from [REDACTED] [Learn why this is important](#)

--Email From External Account--

To whom it may concern,

In response to the Regulation 16 public consultation on the Chestfield Neighbourhood Plan, please see attached representations on behalf of Hallam Land.

I would be grateful if you could confirm receipt of this submission.

Kind regards,
Dom
Dominic MacDougall
Principal Planner



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nexusplanning.co.uk



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Chestfield Neighbourhood Plan Regulation 16 Consultation (June 2026)

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 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.
5. 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.

Hallam Land – Chestfield Neighbourhood Plan

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.

Policy S1 (Spatial Strategy)

7. 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 2042/43 to make allocations. The Neighbourhood Plan aligning itself with the emerging Canterbury Local Plan 2042/43 is welcomed.
8. Since the previous Regulation 14 public consultation, Policy S1 has been amended to set out clearly that the Neighbourhood Plan is not allocating sites to meet its local housing needs. This is welcomed.

Policy H1 (Future Housing)

9. Policy H1 in the previous consultation version of the Neighbourhood Plan established 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.
10. Since the previous public consultation, the amendments to Policy H1, which removes the reference to developing “small numbers” of affordable housing, has been removed. This amendment is welcomed.

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

11. 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. Since the Regulation 14 consultation, these policies have been amended to make reference to the National Standards for Sustainable Drainage, or subsequent update.
12. This amendment is supported.

Policy B2 (Habitat Creation)

13. Policy B2 requires developments to deliver a minimum of 10% Biodiversity Net Gain (BNG), which reflects a revision from the previous consultation version of the Neighbourhood Plan which required a minimum of 20% BNG.
14. The amendment to Policy B2 to require 10% BNG rather than 20% BNG is supported.

4.9 Swalecliffe Brook/Rear of Shepherds Walk

15. 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.
16. The assessment concludes with a recommendation that the site is not designated as Local Green Space, and this is welcomed and supported.

Summary

17. The submission version of the Chestfield Neighbourhood Plan intends to support the emerging Canterbury Local Plan 2042/43, which is welcomed.
18. A number of amendments to the Neighbourhood Plan have been made since the Regulation 14 public consultation, with some previously proposed policies now deleted. The amendments to policies which have been retained in this draft that are supported have been set out above.
19. We would be grateful to be kept updated on the progress of the Neighbourhood Plan following this consultation.

Chestfield Neighbourhood Plan Representations

From David Murray Cox [REDACTED]

Date Thu 11/06/2026 07:52

To Consultations <Consultations@canterbury.gov.uk>

 1 attachment (216 KB)

Chestfield NP reps obo Parker Strategic Land FINAL SUBMISSION.pdf;

--Email From External Account--

To whom it may concern

Please find attached representations to the Chestfield Neighbourhood Plan on behalf of Parker Strategic Land.

We would be grateful for confirmation that these have been received.

Kind regards

David Murray-Cox
Director



Turley



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11 June 2026

By email (consultations@canterbury.gov.uk)

Policy Team,
Canterbury City Council,
14 Rose Lane,
Canterbury,
CT1 2UR.

Dear Sir/Madam

**CHESTFIELD REGULATION 16 NEIGHBOURHOOD PLAN
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 Neighbourhood Plan. As the 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

We welcome the extension to the Plan period to 2042 – 43 and consider that this is likely to better align with 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.

The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830 turley.co.uk

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, 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 2043. 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. This is covered by the reference “or subsequent evidence”, but it may be useful to clarify that such evidence could include that put forward by applicants themselves.

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 point g refers to ‘high quality’. We suggest that the Neighbourhood Plan includes consistent terminology in order to avoid confusion.

Policy D1 Drainage and Sewerage Infrastructure

Policy D3 contradicts the preamble in the Foul Drainage section, which states:

“...The risk is exacerbated by the fact that Water and Sewage Companies cannot object to, or the Council refuse to grant, planning permission for development on the grounds that no improvement works are planned for a particular area. (Southern Water’s own Briefing Note to Local Planning Authorities – briefing-note-for-lpa-on-infrastructure-provision-1.pdf), and section 106 of the Water Industry Act 1991 which states all Water and Sewerage Companies have a legal obligation to provide developers with the right to connect to a public sewer regardless of capacity issues.”

In contrast, Policy D3 states:

“Policy D3 Foul Drainage

Development will only be accepted where it is demonstrated that its surface water drainage will not add to existing site runoff, enter the foul sewer network, or cause any adverse impact to neighbouring properties and the surrounding environment. Planning proposals will not be supported unless there is sufficient capacity in the local sewerage system or confirmed plans to improve capacity, and that any new connections will not increase the risk of system back up/flooding or cause any adverse impact to the neighbourhood area environment.”

The Neighbourhood Plan seems to accept that developers have a right to connect, but the policy is that it will not be accepted/supported without specific evidence that there is no detriment. We consider that additional clarification is therefore required.

Policy B1: Connectivity

We note that part of the land at Bodkin Farm (the western part of the application site) is shown on the maps on pages 33 and 34 as being part of the Green Infrastructure Network. On the basis that the City Council’s draft Local Plan has consistently identified the land at Bodkin Farm as being proposed for allocation this graphic should be removed from the site in the Neighbourhood Plan. Both the application material and the concept plan contained in

the draft Local Plan show the land at Bodkin Farm identified as part of the Green Infrastructure Network on pages 33 and 34 as being proposed for development.

Accordingly, we suggest that none of the land at Bodkin Farm should be shown as being part of the Green Infrastructure Network as this is likely to cause confusion in the event of the site being allocated or granted permission.

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 note that this requirement is in excess of the requirements in the Environment Act 2021. Should such a requirement be imposed, the Neighbourhood Plan should be supported by evidence to consider the feasibility and viability of 20% BNG.

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.

Yours sincerely

David Murray-Cox
Director

[Redacted signature]

Chestfield Regulation 16 Draft Neighbourhood Plan Consultation Response

From Policy <policy@canterbury.gov.uk>

Date Thu 11/06/2026 09:13

To Consultations <Consultations@canterbury.gov.uk>

 1 attachment (372 KB)

Chestfield Regulation 16 Consultation Response .pdf;

Good morning,

Please see attached Canterbury City Council's response to Chestfield's Regulation 16 Draft Neighbourhood Plan Consultation.

Many thanks,

The Policy Team (Planning)
Canterbury City Council



.....
Find us online at **canterbury.gov.uk**

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11 June 2026

Chestfield Neighbourhood Plan Steering Group

BY EMAIL ONLY

Dear Sir/Madam,

Draft Chestfield Neighbourhood Plan – Canterbury City Council Regulation 16 Response

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), the National Planning Policy Framework (NPPF), and any relevant evidence which supports the emerging Draft Canterbury District Local Plan.

Where the Draft Chestfield Neighbourhood Plan (CNP) has referred the emerging Canterbury District Regulation 19 draft Local Plan (2042/43), comments are provided on consistency with the emerging Local Plan. However, it is acknowledged that the Inspector will apply an appropriate level of weight to the emerging Local Plan given its current status.

CCC firmly believes that neighbourhood planning has an important role to play in shaping the future of the district and commends all the effort that the Parish Council have put into developing the CNP, especially at the pace in which it has been prepared.

This response is designed to be constructive and is focused on our main areas of concern, and outlines where we believe modifications are required to ensure that the CNP meets the basic conditions.

Housing

Policy H1: Future Housing

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). We are supportive of the changes that you have made since the CNP Regulation 14 consultation.

Policy H2: Good quality design

The CNP, under the supporting text for policy H2: Good quality design, states that *“there are no four-storey buildings in Chestfield. They would be completely out of character for Chestfield.”* and that *“Buildings taller than 3-storeys are discouraged and if justified should be “hidden” amongst the other housing and topography”*

While we support the principle of ensuring that housing densities are appropriate in relation to their location and surroundings, following advice as included in the Council’s response to the CNP Regulation 14 consultation, we remain concerned that this – as a blanket approach across the whole parish - is not compliant with paragraph 135(c) of the National Planning Policy Framework (2024).

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).

Although this may be appropriate for certain areas of the parish, a more flexible approach may be needed in some areas. Accordingly, we consider that a modification is required to Policy H2, to ensure that the policy enables appropriate innovation and change while being sensitive to the existing local character.

Drainage and Sewerage Infrastructure

Policy D3: Foul Drainage

We are generally supportive of the aims of ‘Policy D3: Foul Drainage’, however, in line with our response to the Regulation 14 CNP consultation, we remain concerned that the policy is not justified and would not be effective as it is currently written.

“Planning proposals will not be supported unless there is sufficient capacity in the local sewerage system or confirmed plans to improve capacity, and that any new connections will not increase the risk of system back up/flooding or cause any adverse impacts to the neighbourhood area environment.”

“CCC can make planning permissions conditional and impose a condition at outline planning application stage for any new development to align with the build/phase/occupancy with any constraints indicated by Southern Water in response to planning applications.”

While we appreciate the Parish Council's concerns on this matter, there is insufficient evidence to justify that this approach is necessary for all planning applications within the Neighbourhood Planning Area.

Further, the implementation of the policy is contingent upon adequate information being provided at planning application stage however Southern Water is under no obligation to respond to all consultations on planning applications, limiting the effectiveness of the policy.

We therefore consider that a modification is required to make the policy justified and effective, such as to encourage early engagement with infrastructure providers, which can have the effect of making more information available at planning application stage to inform the consideration of the need for conditions on a case by case basis.

It is also considered that the distinction between Sustainable Drainage Systems (SuDS) and Natural Flood Management (NFM) remains unclear following the advice provided as part of the Regulation 14 CNP consultation response.

Further clarification on the distinction between SuDS and NFM would improve the clarity of the CNP and would help ensure that the plan can be interpreted as intended by the CNP Steering Group. We are content to leave the specifics of any such modification to the Inspector as part of the CNP examination.

Policy D4: Flood Risk

The CNP, under the supporting text for policy D4, Flood Risk, states *"In Flood Zone 3 due to these areas being susceptible to frequent and potentially severe flooding, posing significant risk to people and property, infrastructure development will not be supported in these areas."*

While we agree with the general aims of this text, the refusal of all development within flood zone 3, is not justified and is in contradiction with national policy and national guidance as outlined by the Environment Agency.

The NPPF states under point 170 that, *"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere."*

In line with the NPPF and the Environment Agency's advice the Adopted Local Plan under Policy CC4 Flood Risk, requires that *"Development proposals within Flood Zones 2 and 3 and sites larger than 1ha in Flood Zone 1 shall be subject to a Flood Risk Assessment"*.

Accordingly, we consider that modification is required to Policy D4 Flood Risk, to ensure that the CNP does not restrict the development of necessary infrastructure where proposals are in conformity with the NPPF and have passed the tests advised as part of the Environment Agency's Flood Risk Guidance.

Public Rights of Way, Promoted Routes, and Cycle Ways **Policy C2**

The CNP, under Policy C2 states, *"New development should link in to existing public rights of way and cycleways with interconnecting public rights of way and cycleways from the new development..."*

It is considered that there is insufficient evidence to require this of development of all scales and the scale and type of developments required to adhere to the policy should be specified.

Accordingly, we consider that modification is required to Policy C2 to ensure that is proportionate to the scale and development and any evidence for justification. We are content to leave the specifics of any such modification to the Inspector as part of the CNP examination.

Unadopted Roads **Policy U2**

While we understand the aspirations behind 'Policy U2', as expressed as part of our response to the Regulation 14 CNP consultation, we remain concerned 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.

We appreciate that the policy has been revised and the requirement modified somewhat in response to our initial feedback, however it is still considered that the policy is ineffective, due to the likely inability for the policy to be implemented. We are content to leave the specifics of any such modification to the Inspector as part of the CNP examination.

General Comments

In line with the recommendations provided at the Regulation 14 stage of the CNP, we remain concerned that the policies in the CNP fail to specify which type/scale of development, site or application, they intend to be relevant to. For example, as outlined under our response to Policy C2, it would not be considered appropriate to require all scales of development to link to existing PRoW. This is relevant to 'Policy D1 Surface Water Runoff Flood Management', 'Policy D2 – Sustainable Drainage Systems (SuDS)', 'Policy D3 Foul Drainage', 'Policy C2' and 'Policy B1: Connectivity'. We are content to leave the specifics of modifications to address these points to the Inspector as part of the CNP examination.

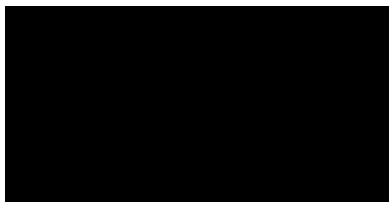
As identified as part of our response to the Regulation 14 CNP consultation, there remains, throughout the CNP and its appendix, the inclusion of quotes, links and images of emerging policy and draft guidance. We would recommend that the CNP avoids quoting or linking draft evidence documents or draft policies as these not yet being adopted and still subject to change.

The inclusion of changeable policies or evidence as part of the CNP's justification may mean that the evidence justifying the Neighbourhood Plan and its policies changes and hence the CNP becomes out of date and its justification weakened over time. We would instead recommend a reference to the document title, rather than a link, and clarifying that policy should be implemented in line with the referenced document or subsequent updates to the document. We are content however to leave the recommendation for modifications relating to this, to the decision of the Inspector as part of the CNP examination.

This is also relevant to the inclusion of time sensitive updates included within the Introduction section of the CNP which pinpoint the timeline of the plan.

Similarly, whilst the inclusion of external evidence documents is supported and encouraged 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. 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.

Yours sincerely,
Andrew Thompson



Lead Corporate Policy and Strategy Manager
Canterbury City Council