

Statement of Common Ground for the draft Chestfield Neighbourhood Plan (Reg 16)

Canterbury City Council and Chestfield Parish Council

1. Key matters

1.1. **Housing**

- 1.1.1. It is agreed between CCC and CPC that the following recommended modification, to the supporting text for **Policy 'H2: Good Quality Design'**, would be submitted to the Independent Examiner alongside the submission of the Draft Chestfield Neighbourhood Plan to address CCC's comment on this, and ensure the plan is consistent with the NPPF.

Draft Chestfield Neighbourhood Plan text	Recommended modification
On page 15 under 'Scale and building heights': <i>"there are no four-storey buildings in Chestfield. They would be completely out of character for Chestfield. Buildings taller than 3-storeys are discouraged and if justified should be "hidden" amongst the other housing topography."</i>	Change supporting text on Page 15 to read: <i>"there are no four-storey buildings in Chestfield. They would be out of character for Chestfield. New residential properties should typically be no more than 3 storeys reflecting the local character however in exceptional circumstances development taller than 3-storeys may be appropriate such as older persons accommodation above a Community Hub. A factor that needs to be taken in to account is that anything above 3 storeys needs to be sensitively considered."</i>

1.2. **Drainage and Sewerage Infrastructure**

- 1.2.1. The wording of **Policy 'D3: Foul Drainage'** is not currently agreed. CCC's Regulation 16 consultation response sets out the concerns raised, and no modification has been proposed by CPC to address these. The matter, including any modifications, is left to the determination of the Independent Examiner as part of the Chestfield Neighbourhood Plan Examination.

- 1.2.2. It is agreed between CCC and CPC that the following recommended modification, to the supporting text of **Policy D2 - Sustainable Drainage Systems (SuDS)** would be submitted to the Independent Examiner alongside the submission of the Chestfield Neighbourhood Plan to address CCC's comment on this and to ensure that the plan is clear and effective.

Draft Chestfield Neighbourhood Plan text	Recommended modification
On page 22, under the Sustainable Drainage Systems (SuDS) heading the current opening paragraph reads:	Change this opening paragraph to read: <i>"Sustainable Urban Drainage Systems (SuDS) are the preferred approach for managing surface</i>

<i>“SuDS is the higher priority mitigation for surface water and road runoff. SuDS seek to replicate natural systems to drain away surface water runoff through collection, storage, and cleaning before allowing it to be released slowly back into watercourses.”</i>	<i>water and road runoff associated with new development and urban areas. They use engineered features that mimic natural drainage processes to collect, store, treat and slowly release surface water from impermeable surfaces back into the environment and watercourses. Typically operating at the scale of individual developments, streets or neighbourhoods, SuDS measures include permeable paving, attenuation ponds, swales and rain gardens. As a development-led response, they are usually designed and implemented within or immediately adjacent to a specific site, helping to reduce local flood risk while improving water quality.”</i>
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1.2.3. It is agreed between CCC and CPC that the following recommended modification, to the supporting text of **Policy D2 - Sustainable Drainage Systems (SuDS)** would be submitted to the Independent Examiner alongside the submission of the Chestfield Neighbourhood Plan to address CCC’s comment on this and to ensure that the plan is clear and effective.

Draft Chestfield Neighbourhood Plan text	Recommended modification
On page 22 under the Natural Flood Management heading the current opening paragraph reads: <i>“Natural Flood Management refers to the use of measures including swales, hedge, ditches and leaky dams on streams.”</i>	Change this opening paragraph to read: <i>“Natural Flood Management involves the use of techniques that mimic or restore natural processes to slow, store and infiltrate water reducing flood risk further downstream. Interventions can involve slowing water before it reached a watercourse, or within a watercourse itself. In contrast to the site-specific focus of SuDS, Natural Flood Management is generally implemented at a landscape or river-catchment scale, with multiple features working together across a wider area to create a cumulative effect. This broader approach helps to reduce both the volume and speed of runoff throughout the catchment. Common Natural Flood Management measures include leaky dams, river re-meandering, floodplain reconnection, wetland creation and woodland planting, and are most commonly found in rural areas.”</i>

1.2.4. It is agreed between CCC and CPC that the following recommended modifications, to the supporting text for Policy ‘**D4: Flood Risk**’ and policy wording of **D4: Flood Risk** be submitted to the Independent Examiner alongside the submission of the Chestfield Neighbourhood Plan to address CCC’s comment on this, and to ensure that the plan is consistent with the NPPF.

Draft Chestfield Neighbourhood Plan text	Recommended modification
On page 25 under the heading “Meeting the Challenges of Climate Change and Flooding” there are two paragraphs in the supporting text that read: “In Flood Zone 3 due to these areas being susceptible to frequent and potentially severe flooding, posing significant risks to people and property, infrastructure development will not be supported in these areas. Development within Flood Zone 2 areas will only be permitted with appropriate flood and flow mitigation measures as directed by either the Environment Agency, or Kent County Council, the lead Flood Authority. Development proposals should be considered with reference to the flood zone maps produced by the Environment Agency, available at https://flood-map-for-planning.service.gov.uk.”	Delete these supporting text paragraphs.
Policy D4 Flood Risk Policy D4 Flood Risk on Page 26 currently reads: <i>“Proposals for new development within those parts of the Plan area which are at higher risk of flooding, as shown via the Flood Zone maps at https://flood-map-for-planning.service.gov.uk will only be supported if it can be satisfactorily demonstrated, through an accompanying Flood Risk Assessment and any required mitigation measures, that the development will not lead to any greater risks of flooding at the site itself and within the surrounding areas. Advice on flood risk and the preparation of Flood Risk Assessments is contained in Planning Practice Guidance (PPG) at https://www.gov.uk/guidance/flood-risk-and-coastal-change (September 2025 or subsequent update).”</i>	Change Policy D4 Flood Risk on Page 26 to read: <i>“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. 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.</i> <i>Advice on flood risk and the preparation of Flood Risk Assessments is contained in Planning Practice Guidance (PPG) at https://www.gov.uk/guidance/flood-risk-and-coastal-change (September 2025 or subsequent update).”</i>

1.3 Public Rights of Way, Promoted Routes, and Cycle Ways

1.3.1. It is agreed between CCC and CPC that the following recommended modification, to **Policy ‘C2’**, would be submitted to the Independent Examiner alongside the submission of the Chestfield Neighbourhood Plan to address CCC’s comment on this to ensure that the plan is justified and effective in line with the NPPF.

Draft Chestfield Neighbourhood Plan text	Recommended modification
Under Policy C2: <i>“New developments should link in to existing public rights of way and cycleways with interconnecting public rights of way and cycleways from the new development”</i>	Under Policy C2 add new wording as follows: <i>“Proposals for new residential or commercial development should establish how they connect to existing public rights of way, cycleways, footpaths and walkways in close proximity, and assess where improvements may be made, such as overgrown vegetation or access. “</i> Under Policy C2 change wording to: <i>“New developments, where justified in terms of scale and type and location, should link in to existing public rights of way, cycleways, footpaths and walkways if in close proximity with interconnecting public rights of way, cycleways, footpaths and walkways from the new development”</i>

1.4 Unadopted Roads

1.4.1. It is agreed between CCC and CPC that the following recommended modification, to **Policy ‘U2’**, would be submitted to the Independent Examiner alongside the submission of the Chestfield Neighbourhood Plan to address CCC’s comment on this, and ensure the plan is effective and deliverable in line with the NPPF.

Draft Chestfield Neighbourhood Plan text	Recommended modification
Under Policy U2: <i>“Where development requires a Construction Management Plan, the developer must endeavour to avoid the use of unadopted roads.</i> <i>If an unadopted road cannot be avoided the impact of construction must be assessed, the condition of the unadopted road assessed before construction, and any degradation in this</i>	Under Policy U2: Leave this paragraph in Policy U2. Delete this paragraph.

<i>highway should be reinstated to a standard to match that prior to construction.</i> <i>The developer should liaise with the road owners / road associations as appropriate before, during, and after the development is complete.</i> <i>The Construction Management Plan should also consider items such as the routing of construction vehicles for procurements and removals during the period of development; tradesperson parking; and positioning of skips and building materials; and fencings and hoardings.”</i>	Delete this paragraph but substitute with: <i>“Applicants for any development of over 10 units wishing to use an unadopted road are strongly encouraged to liaise with unadopted road representatives to inform their Construction Management Plan and their use of the unadopted road. And look at whether improvements could be made to the road, for example, to bring it up to an adoptable standard by Kent County Council highways (or equivalent department following the Local Government reorganisation).”</i> Retain this paragraph in Policy U2.
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1.5 General Comments

1.5.1. As set out in CCC’s Regulation 16 consultation response, the council is concerned that certain policies fail to specify which type/scale of development, site or application is relevant. For **Policy C2 Public Rights of Way, Promoted Routes and Cycleways**, the proposed modification under paragraph 1.3.1 addresses the concerns raised and is agreed between the parties. However, no associated modification has been proposed by CPC for the other policies identified, as such this point is currently not agreed on the other policies. For the following policies, the matter, including any modifications, is left to the determination of the Independent Examiner as part of the Chestfield Neighbourhood Plan Examination for the following policies, and any other policy the Inspector deems necessary:

- Policy D1 Surface Water Runoff Flood Management
- Policy D2 Sustainable Drainage Systems (SuDs)
- Policy D3 Foul Drainage
- Policy B1 Connectivity.

1.5.2. The approach regarding the inclusion of unadopted quotes, links and images of emerging draft Local Plan policy and draft guidance is not currently agreed. CCC’s Regulation 16 consultation response sets out the concerns raised, and no modification has been proposed by CPC to address these. The matter, including any modifications, is

left to the determination of the Independent Examiner as part of the Chestfield Neighbourhood Plan Examination.

1.5.3. The inclusion of time sensitive updates within the ‘Introduction’ section of the CNP is not currently agreed. CCC’s Regulation 16 consultation response recommends this is removed but no modification has been proposed by CPC. The matter, including any modifications, is left to the determination of the Independent Examiner as part of the Chestfield Neighbourhood Plan Examination.

1.5.4. As set out in CCC’s Regulation 16 consultation response, the council recommends referencing other documents in the Neighbourhood Plan using the format ‘*document title name, or subsequent updates*’ rather than hyperlinks. No modification has been proposed by CPC to address this; therefore, the matter is currently not agreed. The matter, including any modifications, is left to the determination of the Independent Examiner as part of the Chestfield Neighbourhood Plan Examination.

2. Governance arrangements

2.1. This SoCG will be submitted to the independent Examiner alongside the submission of the Chestfield Neighbourhood Plan and it’s supporting documents.

3. Signatories/declaration

Chestfield Parish Council

Signature	
Position	Clerk and Responsible Financial Officer
Date	10 September 2026

Canterbury City Council

Signature	
Position	Joint Chief Executive
Date	15 September 2026