

CHESTFIELD PARISH COUNCIL

MINUTES OF THE PARISH COUNCIL MEETING HELD AT 7.30 pm on 14 July 2025

Present:

Parish Cllr Steve Bailey (Chairman)
Parish Cllr Chris Brealy (Vice Chairman)
Parish Cllr Lorraine East
Parish Cllr Bob Todd
Parish Cllr Tricia Chapman
Parish Cllr Mike Poole
Parish Cllr Marissa Clark (co-opted at the meeting)
Amanda Sparkes, Clerk to the Council
CCC Cllr James Flanagan (for part of the meeting)
CCC Cllr Peter Old
KCC Cllr Alex Ricketts (for part of the meeting)

One member of the public.

40. Chairman's Opening remarks

Cllr Bailey welcomed everyone to the meeting.

41. Apologies for absence

Apologies for absence were received from Chenice Howard-Sparkes, Deputy Clerk, who is on maternity leave. There were no other apologies.

42. Candidate to fill one of the Three Vacancies on the council

Marissa Clark presented herself and read a short paragraph to the meeting as follows:

"My name is Marissa Clark, and I would like to put myself forward to fill one of the vacant seats on Chestfield Parish Council. Originally from the United States, I moved to the UK nearly ten years ago and settled in Chestfield in 2023. I live here with my husband, Daniel, and our 14-month-old son, Rory. By way of background professionally: I graduated from Harvard Law School in 2016 and spent several years working at a large law firm in London. I now work in customer success at a legal technology company. I believe both my professional experience and my personal perspective (as mother to a young family and a newer resident) will make me an asset to the Council. I hope to get the opportunity to serve my local community and to work alongside this esteemed group of Councillors."

Cllr Bailey proposed, and Cllr Brealy seconded that Marissa be co-opted, and Marissa signed the Declaration of Acceptance of Office.

43. Members' Interests

There were no declarations of interest.

44. Minutes of the parish council meeting held on 12 May 2025

Cllr Todd proposed, Cllr Poole seconded and all Cllrs were happy that the Minutes be accepted as a true record of the meeting and the Chairman duly signed them.

45. UPDATES:

NOTED the Grasmere Gardens new noticeboard has been delivered to Kitewood and a location agreed, however Kitewood will continue to wait for its installation until construction has progressed further to avoid damage due to road sweepers, construction lorries and/or workers.

Update re a Grant to Churchwood Park Management Ltd for up to £10,000 towards total renewal of the larger play area in Kendal Meadow (where overall cost is £30,356.40)

At the March 2025 parish council meeting Cllrs agreed that some of the CIL (Community Infrastructure Levy) receipts that the parish council is holding could be used for this project, rather than tax payers' money and a grant of up to £10,000 was pledged. Before any award

however, Cllrs first wanted to see commitment from the householders paying their additional one-off levy for this project.

As reported at the May 2025 parish council meeting, the Clerk sought an update from one of the directors – the Churchwood Park directors decided that asking the residents for their annual payment and the additional one for the play areas at the same time would not be the best approach; so the annual payment request went out separately in March and they were looking at asking for the additional one at the end of May.

The Clerk has sought an update – the collection of the additional money has gone well on the whole and Directors have met and confirmed that they meet the requirements and can proceed and are able to ask for the grant. All councillors agreed that £10,000 now be paid to Churchwood Park Management Ltd.

Bus stop improvements

Since the Agenda was posted, an update has been received from one of the BSIP (Bus Service Improvement Plan) Project Leads at Kent County Council, currently overseeing the improvement works in Chestfield.

As part of the current BSIP programme, KCC has four stops in Chestfield on file for potential improvements (raised kerbs, hardstanding, and lining). These are:

- Willow Way southbound (stop ID: *kntdtagw*) – with design to take into account the existing memorial bench.
- Willow Way northbound opposite The Drive (stop ID: *kntdtajw*)
- The Leas southbound (stop ID: *kntdtagt*)
- The Leas northbound outside 48 Chestfield Road (stop ID: *kntdtama*)

KCC officers held an inception meeting with its appointed consultants on 10 July 2025, to commission the design work, and a technical report. As part of the scope, the consultants will also be producing a PowerPoint presentation specifically the Parish Council, which will be shared with the parish council on receipt. The Clerk will then notify any nearby residents.

Maydowns Road flower beds area

NOTED that Cllr Todd and Cllr Poole grass-seeded the open middle area of the Maydowns Road flower beds, however need to do this again. And Cllr Poole and the Clerk have bought plants and shrubs to plant the area, and Cllr Poole, Cllr Todd and the Clerk will plant these.

46. New project – remembering the fallen

At the March 2025 parish council meeting, Cllr Bailey proposed a Project to remember the war dead of the parish (which in those days was known as Chestfield with Swalecliffe). This is particularly relevant given that this year is the 80th anniversary of VE Day. The board of remembrance at St. John's church lists the names of those parishioners that fell during World War One however there are no names of any fallen during World War Two. Cllr Bailey and his wife have researched the names of the World War II fallen. They are also now researching if anyone from the parish died in subsequent wars.

The St John's Church Faculty has agreed in principle to a new board – they need to know the size and style, which Cllr Bailey will provide. He explained he is aiming to have this in place by Remembrance Day.

Free personal alarm for residents initiative

NOTED that 210 have been given out to residents, with 45 left. These will be advertised in the September magazine on a first-come, first-served basis. Cllr Bailey explained that the National Press article was picked up by the company Mitie and a case study done and circulated.

Underpass murals

NOTED that the Clerk has emailed and left voicemails to seek a quote from the graffiti artist to touch up the murals and pillars at the Radfall Hill underpass now suffering some

unwanted graffiti – but has received no response. Cllr East offered to email an alternative contact.

New laptop and software for the Clerk

NOTED as resolved at the May meeting, the Clerk is yet to purchase a new laptop, antivirus, Cloud backup, Windows Set-up service and Microsoft 365 Business package but will do so soon.

47. Adjournment of the meeting

Cllr Bailey advised that he had anticipated residents attending tonight due to social media comments taken out of context about the parish council's representation to the Brooklands Farm planning application. He had therefore taken the unusual step and prepared a statement, which he read as follows, and asked that this be recorded in full in these Minutes. This statement will also be posted on the village noticeboards after the meeting.

Statement

"Chestfield Parish Council has remained fully engaged in the Brooklands Farm development proposal from original concept. This has involved discussions with the proposed developer, and it is through these talks that we were able to persuade the developer to arrange the two presentation consultations in September 2024 for all residents to attend and express comment. Throughout this process, we have remained opposed to the entire application – and this very much remains the case!

Despite our recorded opposition within our submission, it has been noted there has been a semblance of disquiet amongst many parishioners on social media platforms – indeed our clerk Amanda has also received emails from individuals on the same topic. Amanda has answered every such email pointing out our continued opposition to the developers' application. When the proposal was first mooted, there were actually NO slip roads included in the plan – the Eastbound slip road was included at our bequest so as to reduce potential traffic flow through the village. In fact, our precise comment to the developers at our very first meeting was that we did not want to see the village become a 'rat run' of any kind to pick up the A299 Thanet Way. However, and as can be seen from the developer's application, the building of the slip road is not proposed to be commenced until 50% of the housing is built – going by estimated house building rates of 80-100 per year, we would be looking at a minimum of 6-7 years before any slip road construction becomes part of the build. But what if house sales prove low and any second phase of the build is postponed before the stated 50% (for instance 45%) is put back? It is for this very reason why we have pushed for the slip roads to be delivered ideally at the outset of development, or at 15%, or 25% occupancy.

But this is the proposal for just one slip road – and therefore we have suggested in our representation that a Westbound slip road also be built and therefore ensure that our village is protected from unnecessary traffic flow and all the issues that this would bring including safety and mental health of all residents.

But no-one, nor any particular body, can predict how the overall decision makers may assess this particular proposal – so what happens if the scheme is approved? In situations like this it is vital to have a 'Plan B' just in case... and it also demonstrates to the council and/or inspector that there has been a lot of hard work and thought put into our submission - and therefore serves to 'plant certain seeds' in the minds of any planning committee.

We need to be able to show that we as your parish council are taking every possible eventuality of any decision into consideration - and I firmly believe that we have done this with the thoughts of all parishioners' interests firmly in the forefront of our efforts."

Cllr Bailey invited questions. There were none. Cllr Bailey stated that the parish council team had worked very hard on its submission. The parish council's full response can be read here:

<https://chestfieldparishcouncil.gov.uk/chestfield-parish-councils-response-to-the-brooklands-farm-application/>

Cllr Bailey then opened the adjournment proper and asked the resident present if she had any questions. She asked if the parish council could increase the number of litter picks organised from two to three times per year. Vegetation masks litter in the summer and the winter is likely to have an event cancelled due to poor weather – the councillors felt that two is enough and to increase could also cause an enthusiasm issue.

The resident also asked if more bins could be provided at the Radfall recreation ground as especially on match days there are bags around the bins that seagulls get in to. CCC councillor Cllr James Flanagan offered to follow this up with CCC.

The meeting continued.

48. City Councillor reports

CCC Cllr Peter Old advised of the launch on 08 July 2025 of Canterbury City Council's End Catapult Cruelty campaign. Residents have reported people, especially young people, and in Herne Bay in particular, targeting the wildlife in our district.

The campaign is backing calls from across the country, the county and nationally for a ban on people using catapults in public places and for shops and websites to stop selling them to anyone aged under 18. CCC has put out a petition and is hoping for 1,000 signatures - Sign the End Catapult Cruelty petition at: <https://you.38degrees.org.uk/petitions/end-catapult-cruelty>

Cllr Brealy advised he had suffered such an incident on 07 July 2025 when four young people were catapulting pigeons out side his house, which he'd found very frightening. He took video and has reported to the Police on 101 and also online.

Cllr Old advised of a police surgery being held on Sunday 20 July at 2pm in the Costa Coffee in Chestfield. Cllr Brealy will attend this. Cllr Bailey advised he would also attend the Police surgery – he attended a meeting in the Kings Hall a couple of weeks ago, with Chief Superintendent Rob Marsh present. He has requested details of the Chestfield Beat Officer to request an attendance at a parish council meeting.

Cllr Bailey advised he has also met with the Police Crime Commissioner at a KALC meeting.

KCC councillor, Cllr Alex Ricketts advised that CCC Cabinet has the catapult issue at the top of its agenda in the last couple of weeks – harming animals can be a precursor to worse behaviour. Cllr Bailey commented that its good to know this is being taken seriously.

Cllr Old advised residents have been leaving out scrap metal for a scrap metal dealer who is not registered or licensed with CCC – and he suspects this increases fly tipping of the waste bits left after the metal has been stripped out. He will write an article for the magazine reminding householders that it is their responsibility for ensuring that they use a licensed waste remover. Cllr Brealy advised that there is a unit behind Tesco that buys scrap metal.

Cllr Flanagan advised that he and Cllr Old, as the Ward councillors, have asked for the Brooklands Farm application to be refused. There are over 1600 objections on the portal. He explained that whilst the official consultation period closed on 04 July 2025, CCC will take additional representations by discretion, provided new points are made, up until the decision is made. He advised that he understands that CCC will work to the adopted 2017 Canterbury District Local Plan to determine it, and that has been the focus of his and Cllr Old's representation.

Several thousand homes in a large part of the western side of Whitstable, including Radfall and Dukeswood in Chestfield, were left without water for a week this month. Cllr Flanagan advised he wrote to the CEO of South East Water who cited a number of reasons including demand exceeding supply in the recent hot weather, an electrical fault and air in the pipes. There is concern about all the housebuilding and how future demand for water will be met. Cllr Bailey advised he is trying to set up a KALC meeting with Southern Water currently – and a future meeting could be with South East Water.

The Clerk explained that for the Broad Oak reservoir, an update from South East Water about Ground Investigation works was received 09 July 2025:

“As the scheme progresses, to start supplying water by 2035, South East Water is now carrying out Ground Investigation work on the Broad Oak reservoir site.

From 21 July to end October 2025, Ground Investigation work will be carried out in agricultural fields in proximity to the reservoir site, to provide the information South East Water needs to assess the proposed location and move forward with the scheme. This means that machinery, personnel, a site office, vehicles and high levels of activity will be visible on site for the first time.

However, this is not construction work, and does not signal the start of the reservoir build – it is exploratory survey work to provide us with the data necessary to plan a reservoir design and build. It is not fracking, or drilling for substances, or detrimentally impacting wildlife.

How will this exploratory work affect local residents and businesses?

Ground Investigation works will take place during normal daytime working hours, and within noise limits which are set by the relevant local planning authority, to minimise disruption and impact to the environment. Unfortunately, there will be unavoidable noise and activity that may affect those living or working close by, and South East Water has contacted those whose land will be directly affected.

Find out more about the Ground Investigation works, and the Broad Oak reservoir project as a whole at www.southeastwater.co.uk/broad-oak.”

Smart water meters can also restrict flow and amount of water to new homes and can be retro-fitted to old homes too.

Cllr Flanagan then advised that he inspected Chestfield’s pavements today and reported problems with weeds to KCC.

For the Church Street Playing Fields, KCC will probably hear the village green application at the end of this year.

49. KCC Cllr Alex Ricketts report

KCC Cllr Alex Ricketts advised he has met with the KCC planning team re the Brooklands site for a briefing around highways and flooding. KCC will be putting in a full representation.

Cllr Ricketts advised he has been to Maidstone four times since elected. Most committee meetings have been postponed although Full Council met last week.

The Blue Badge scheme has a massive backlog. And a Motion passed recently to enable KCC to write to the Secretary of State that people, for example having cancer treatment, have to be able to prove that they will have the condition for 3 years or more.

50. Update on the Neighbourhood Plan

RECEIVED the Minutes of the Neighbourhood Plan Steering Group (made up of 2 parish councillors and 5 residents) meeting held on 27 May 2025 and a further meeting held on 08 July 2025. Cllr Todd (who chairs the group) explained that the Steering Group has set an ambitious timeline and are working up 8 Policies.

Cllr Bailey asked to record thanks to all the individuals involved in the project including Cllr Todd, Cllr Poole, and the Clerk.

RECEIVED an update on the Local Green Spaces audit and landowners’ responses (where given):

- The Landowners for Grasmere Gardens (Kitewood) and Land rear of Shepherds Walk (landowner and Hallam Land Management) objected and the body Locality confirmed therefore the sites cannot proceed to designation.

Kitewood (for Grasmere Gardens) did not give reasons and the Clerk has gone back and asked for their thoughts so that this may be recorded in the Audit to explain to residents.

(Hallam Land Management did give full reasons, arguing that the designation is in conflict with the emerging Local Plan; that the Neighbourhood Plan may not be ‘made’

before the Local Plan is adopted, and that they fundamentally believe that this Local Green Space is nothing more than the linear PRoW, which is already protected).

- Chestfield Cricket Club is not to be taken forward for designation as this could affect any future plans.
- Landowner for St Joseph's Church asked for rear lawn to be removed and only the front $\frac{3}{4}$ of the front lawn to be designated.
- CCC has no comments, feedback or concerns for Radfall Recreation Ground, Chestfield Play Park, and Whitstable Rugby Football Club.
- No response from the landowner of the Churchwood Park Toddler and Junior play areas has been received - A further recorded delivery letter has been sent to them. The letter advised that the directors of Churchwood Park Management Ltd locally fully support this proposal and wrote to the Clerk on 18 May 2025 to this effect.
- For Birkdale and Carnoustie Close community land, The Fairways (Molehill Road) Management Company fully supports the designation.

The Steering Group is working to finalise the pre-submission document. Regulation 14 requires a six-week consultation period so this could be 01 September to 14 October 2025. Details of the Plan will be sent to all the statutory bodies required by Regulation 14, and also businesses and organisations in the Plan area.

Two Presubmission document "Regulation 14" Consultation events for residents are booked: Saturday 06 September – the WI hall is booked to run a public event from 10am to 1pm; And Tuesday 09 September – the WI hall booked to run a public event from 6pm – 8pm.

Details of these and the updates on the Plan will run in the September magazine and also through the website, local social media and parish noticeboards before that.

51. **Use of Section 101 Scheme of Delegation to the Clerk in conjunction with a minimum of two councillors since the last meeting:** £250 for Canenco to repaint two pieces of The Outdoor Gym at the play park suffering corrosion.

52. Authorisation of Accounts

The Clerk presented finance sheets detailing the further online payments for May of £425.51, payments for June totalling £8422.85 and payments to date for July 2025 totalling £5618.39. The finance sheets were signed by the Chairman.

53. Financial matters

- a) RECEIVED the bank statement and bank reconciliation for May and June 2025 and RESOLVED the signature of a councillor other than the Chairman thereon;
- b) NOTED a payment taken on 13 June 2025 by direct debit of £47.00 for the Information Commissioner's Office (ICO) annual data protection fee.
- c) NOTED the annual PAT testing for the Clerk and Deputy Clerk's office equipment is now booked for 29 July 2025.
- d) RECEIVED an End of Quarter One expenditure against budget headings report, for information.

Local Government Pension Scheme (LGPS)

Child related leave

The Deputy Clerk, Chenice commenced a period of unpaid child related leave with effect from 01 June 2025.

As her maternity leave is unpaid, as the employee, she is not required to pay pension contributions throughout her period of unpaid leave.

However, Chestfield Parish Council as the employer is required to pay employer contributions on her Assumed Pensionable Pay (APP) for the period of ordinary maternity leave, and the pension will build up as if she had been at work.

Ordinary maternity leave is defined as the first 26 weeks of paid or unpaid maternity leave.

The employer will build up her pension as if she had been working normally on full pay during her unpaid maternity leave in the first 26 weeks. The 26 weeks runs from 01 June 2025 to 30 November 2025 inclusive.

A grant application for a £500 grant to the Kent Air Ambulance.

Cllrs considered a grant application for a £500 grant to the Kent Air Ambulance. A similar request was made last year. Cllr Bailey suggested that they be invited to have a fundraising stall at the Fun Day at no cost, and that they might like to consider having their helicopter there too. Cllr Todd stated he was uncomfortable about annual payments to charities. He proposed a £50 grant which was seconded by Cllr East alongside the Fun Day opportunity to fundraise.

Grant from The Green Leas Road Fund

Cllrs considered a request from the Green Leas Road Fund to fund the provision and installation of a Crab apple tree replacement for a Crab apple tree that has died on the Green Leas village green - with watering to be done by residents, and with November as the indicative best planting time. Cllr Poole proposed, Cllr East seconded and all councillors agreed to this, with a maximum budget of £150 for the tree, fertiliser, top soil and delivery. Cllr Todd kindly agreed to dig the hole and plant the tree. Cllr East and the Clerk will source the tree and fertiliser, etc.

New noticeboard at the Chestfield Doctors' surgery.

Councillors considered installing a new noticeboard at the Chestfield Doctors' surgery. Cllr Bailey reminded everyone that several years ago the parish council had an internal one in the surgery foyer, but this was lost in the surgery refurbishment/remodelling. The practice manager has agreed to an external noticeboard by the end of the bike racks – this just needs to be finalised with the practice manager which Cllr Bailey will do.

Kent Pension Fund - Pooling of Town & Parish Council - Formal Consultation

In preparation for the 31 March 2025 triennial valuation results, the Kent Pension Fund (the Fund) is formally consulting with town and parish councils currently participating in the Fund, and other interested parties (e.g. borough, district and city councils), on proposals to form a Local Government Pension Scheme (LGPS) funding pool (the Pool) specifically for town and parish councils as at 31 March 2025, with a possible universal LGPS pooled employer contribution rate for all involved, operative from 1 April 2026.

This consultation started on 4 June 2025 and ends on 4 August 2025.

Responses are invited by 04 August via email to kentpensionfundconsultation@kent.gov.uk

Background

The Local Government Pension Scheme (LGPS) is a Defined Benefit pension scheme in which the funding risks lies with the employer and not with the individual members.

Employer admission to the LGPS is currently governed by the Local Government Pension Scheme Regulations 2013 (as amended from time to time).

The Fund is not formally segregated so individual employers do not have legal ownership of any of the Fund's assets. However, in order to set contribution rates for individual employers, the Fund Actuary notionally allocates assets in the Fund to employers based on how much has been paid in and out of the Fund in relation to the employer's membership, and allocates a proportionate share of the investment returns achieved on the Fund's assets (which may be positive or negative). Employer contributions are set by calculating the cost of benefits accruing to the employer's employee members (net of employee contributions) and making adjustments as required where the notional asset share is more or less than the value of the employer's liabilities.

Town and parish councils do not participate as employers in the Fund by default as do for example, bodies such as county, borough, district or city councils. Instead town and parish councils may resolve to join the Fund by making a written resolution in accordance with Regulations 2, 3 and Schedule 2 Part 2 of the Regulations [LGPS regulations Schedule 2 PART2 2](#). Chestfield Parish Council participates in the Fund.

There are currently 61 town or parish councils participating in the Fund who vary in membership, size and by the longevity of their participation in the Fund. However, most are small employers with a small number of active members. In order to deliver greater stability of contributions for employers (which is easier to achieve based on a greater number of members), as well as reduce the burden on the Fund of administering separate contribution rates for all 61 councils, KCC is proposing to “pool” contributions for town and parish councils. In simple terms this means calculating a single contribution rate across the group.

After 04 August 2025 the responses to the consultation will be considered before a final decision is made by the Kent Pension Fund Committee. If, after considering the outcome of the consultation process, the Pension Fund Committee, decide to proceed with entering into a Pooling arrangement it is anticipated that those arrangements will be implemented on and from 1 April 2026 in line with the operative date of the 31 March 2025 triennial valuation results.

The exercise of public rights

NOTED that the council made arrangements for the exercise of public rights, publishing the Notice of Public Rights and the Annual Governance & Accountability Return Section 1 and Section 2 (approved and signed), along with a copy of the Internal Auditor’s report, on both its parish noticeboards and website on Monday 02 June 2025.

54. UPDATES re the Community Fun Day event to be held bank holiday Monday 25 August at the cricket club from 12.30pm-5pm:

Venue booked, inflatables and games booked, Sixfold Band booked, 3 x Portaloos booked, caterer and ice-cream van booked, Ambulance/First Aid company booked, stalls are offered and being advertised. Canon Philip gave permission for a Banner to advertise the Fun Day across St Joseph’s Church frontage and Cllr Brealy and Cllr Todd installed this. The Clerk will buy sweets as prizes for children taking part in the organised races and games and Cllr Bailey will buy Tombola items.

55. Highways

Kent County Council has made an Order under sections under Sections 81, 82, 84 and 124 of the Road Traffic Regulation Act 1984: The effect of the Order will be to reduce the National Speed Limit (60mph) to 40mph on the following length of roads in Thornden Wood, Blean and Chestfield, Canterbury: HACKINGTON ROAD – From its junction with Thornden Wood Road for a distance of 310 metres in a southerly direction. RADFALL ROAD – From its junction with Thornden Wood Road for a distance of 600 metres in a northerly direction. THORNDEN WOOD ROAD – From its junction with Radfall Road and Hackington Road for a distance of 35 metres in an easterly direction. The Order was made on 3 July 2025 and it came into effect on 4 July 2025.

The parish council welcomes this.

Noise of Motorbikes and cars racing along Reeves Way and other roads on the John Wilson Industrial Estate

There is an issue with motorbikes and cars racing and emitting ear shattering noise along Reeves Way and other roads on the John Wilson Industrial Estate. Residents have to close their windows and are unable to sit in the garden most weekends and evenings. As well as the nuisance and alarm it causes to local residents, it also raises the possibility of serious consequences for people living on the Grasmere Gardens estate who use the road as their primary route. There appears to be a breakfast meet every last Sunday of the month from 7am to 2pm.

Cllr Bailey said he would raise the issue with the Police officer at the Police Surgery on Sunday 20 July 2025 and he would also try and contact George Wilson as Reeves Way is the primary route to Grasmere Gardens.

Request that the parking space outside the dental practice in Chestfield Road be removed

Cllrs considered whether to support the Dental Practice' concern and submit a request to CCC for inclusion in the annual parking review, that the parking space right outside the dental practice in Chestfield Road be removed – it is regularly occupied by a van which offers a considerable hazard to vehicles exiting the practice as it is impossible to see round even when driving forward. Sometimes a receptionist has to risk walking into the road to see a driver out. There is no parking restriction limiting a space to only cars/vehicles of a certain size so the only option is to request its total removal with yellow lines.

Councillors were concerned about the loss of a parking space near to the WI Hall and did not support this request to put in the request from the parish council. The Dental Practice or a resident may put in the request to CCC for the annual review themselves however – the Clerk will explain this in her reply.

56. **Southeastern Railway Announcement – Great British Railways has now formed a single leadership team accountable for the railway's performance across track and train.**

Great British Railways has now formed a single leadership team accountable for the railway's performance across track and train.

Southeastern and Network Rail Kent Route have been formally bought together as South Eastern Railway with a single leadership team accountable for both passenger services and infrastructure. This provides a clear point of accountability for the railway's performance and improved services for passengers and freight in the journey towards Great British Railways. They will create a more responsive, simplified and efficient railway for customers, colleagues, communities and taxpayers as part of the government's rail reform agenda.

Enabled by their respective public ownership, Southeastern and Network Rail Kent Route have been working in closer partnership since October 2023. This has enabled new ways of working to improve collaboration, efficiency, and ultimately make better, faster decisions for customers and taxpayers. Already cancellations are among the lowest in the country, while customer satisfaction has reached 86%, and the subsidy required to operate Southeastern is forecast to reduce by almost £50 million year on year.

The creation of the integrated leadership team is a significant milestone in the government's plans for rail reform and the journey to create Great British Railways (GBR).

They are focused on delivering:

- Better train performance and fewer delays.
- £40 million investment to improve stations.
- A safer, more inclusive and accessible railway.
- Growth in passengers and freight, reducing taxpayer subsidy.
- Support for communities and promotion of social mobility.
- Improvement in biodiversity and management of green spaces across stations, depots and trackside, making the railway more welcoming to nature and people alike.

The Rail Minister has confirmed that South Eastern Railway builds on other initiatives to simplify and unify the railway for customers ahead of GBR. Southeastern, and all publicly owned operators, are being transferred onto new contracts that have an increased focus on performance and provide operators with greater flexibility to take decisions at a local level to better reflect the needs of customers. As a group, they have also all adopted an enhanced policy allowing passengers to travel on one another's services in times of disruption. South Eastern Railway was officially launched on 18 June by the Rail Minister during a visit to Hither Green station.

57. **CiLCA Review**

SLCC reviews its Certificate in Local Council Administration (CiLCA) portfolio every five years to ensure it remains relevant, meets current standards and criteria, and reflects the

latest legislative landscape. The last full review took place in 2021, and the next update is due in 2026. The last date to sign up for the 2021 CiLCA portfolio course is 1 August 2025. This allows 16 months to complete the portfolio, when that version together with the online platform closes on 31 December 2026. NOTED that as the Deputy Clerk is on maternity leave until January 2026, she cannot undertake the 2021 CiLCA portfolio course and will need to apply for the 2026 portfolio course in due course.

58. Environment

Weed clearances on beds in the Chestfield Road play park

The Clerk contacted a CCC officer regarding an offer for a parish councillor volunteer effort to do some more weed clearances on other beds in the Chestfield Road play park. Cllr Todd and the Clerk will meet the officer on site on 16 July 2025 to discuss what and where might be done, and for CCC to take the arisings away.

59. Community Litter Pick

RESOLVED that the Clerk organise another litter pick for September and undertake all the necessary actions.

60. Amphenol fan unit noise

A tonal noise emits daily from a fan unit at Amphenol – and the noise has been ongoing since February 2023. See the summary background report that the Clerk pulled together as an Appendix to these Minutes. The Environment Agency is now dealing.

RESOLVED that Cllr Bailey becomes Amphenol's main point of contact with residents and so that Amphenol can keep him up to date on progress of the improvements.

61. Flood risk in Chestfield

As advised at the March 2025 meeting, Cllr Todd as one of two Flood Wardens on the parish council has attended meetings and been thinking about what Chestfield Parish Council can do to help. He suggested informing households at risk and providing them with flood risk information. He will look at the flood risk map to enable this work. It would require some small financial money for printing. Cllr Todd advised he is still to do this.

62. Clerk's Report

A letter dated 17 June 2025 was posted to the Clerk, enclosing by way of service on the Parish Council (and all parish councils in the Canterbury district) a notice under section 45 of the local government (Miscellaneous Provisions) Act 1976 Part II. The notice states the intention of Canterbury City Council's to pass a resolution that the provisions of Part II of the above Act (apart from section 45) are to apply throughout the area of the council. Part II of the above Act contains the provisions relating to Hackney Carriages and Private Hire Vehicles.

At CCC's request the Clerk acknowledged receipt of the letter on 19 June 2025.

The Act can be found at: [Local Government \(Miscellaneous Provisions\) Act 1976](#)

63. Another Community Quiz

RESOLVED to organise another community quiz for a Friday night in October.

64. Planning

Current planning matters and planning applications are contained in Appendix 2 of Cllrs meeting paperwork - that had been previously circulated to all Cllrs. Decisions reached and latest information is now attached as an appendix to these minutes.

- i) CA/24/00224 – Bodkin Farm, Thanet Way** – Outline application with all matters reserved except vehicular access including a secondary school (including sixth form); 300 dwellings; an 80-bed care home and a Local Centre. (The parish council's response to this Outline application was both uploaded and sent to CCC officers on 20 March 2024 and is detailed in full in the May 2024 meeting Minutes).

The development team has submitted further information to CCC.

The application is anticipated to be heard at planning committee in the summer. The Clerk has emailed the new CCC Case officer (as the previous one has left CCC) asking if there is any update.

II) CA/25/00779- Land At Brooklands Farm Whitstable

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.

NOTED that the parish council's objection/response to this application was sent to CCC on 30 June 2025 and is detailed in full in these Minutes as an Appendix. It has also been uploaded to the parish council's website at <https://chestfieldparishcouncil.gov.uk/chestfield-parish-councils-response-to-the-brooklands-farm-application/>

To repeat Minute No 48 above: Cllr Flanagan advised that he and Cllr Old, as the Ward councillors, have asked for the Brooklands Farm application to be refused. There are over 1600 objections on the portal. He explained that whilst the official consultation period closed on 04 July 2025, CCC will take additional representations by discretion, provided new points are made, up until the decision is made. He advised that he understands that CCC will work to the adopted 2017 Canterbury District Local Plan to determine it, and that has been the focus of his and Cllr Old's representation.

Revised Canterbury District Local Plan timetable

The Local Development Scheme (LDS) outlines the timetable for the review of the Local Plan, and the key milestones in its progression through to adoption. The LDS was last updated in September 2024, following the General Election and the publication of a revised draft National Planning Policy Framework (NPPF) for consultation. ([Cabinet was asked to approve a new timetable](#) for the Local Development Scheme, at its previous meeting on 30 September 2024. This document outlined the council's intention (then) to progress to Regulation 19 stage in autumn 2025, ahead of submission in spring 2026.)

Cabinet considered again at its 16 June 2025 meeting a further updated timetable for the Local Plan

<https://democracy.canterbury.gov.uk/documents/q13837/Public%20reports%20pack%2016th-Jun-2025%2019.00%20Cabinet.pdf?T=10>

The revised NPPF was formally published in December 2024 and contained a series of amendments to national policies, including a significant increase in CCC's Local Housing Need figures. This has increased the minimum annual need figure from 1,149 at the time of the last Regulation 18 consultation to 1,216.

The government's deadline for submission of Local Plans for examination under the current system has also been formally extended to December 2026.

In response to these changes the council launched an additional Call for Sites exercise, with a particular emphasis on land availability from brownfield sites. This Call for Sites ran from 21 October until 1 December 2024 inclusive. [Call for Sites](#)
<https://canterburycity.maps.arcgis.com/apps/instant/basic/index.html?appid=d5eb0786ef4145b1bbcbef1fb2587f64>

Consultation analysis of the comments received from the previous Regulation 18 consultation has continued as has technical evidence gathering and engagement with stakeholders. Given

this background CCC will undertake another “focused” Regulation 18 consultation on a limited number of new or amended policies, before proceeding to the Regulation 19 stage.

The previous Regulation 18 consultation results are at
www.canterbury.gov.uk/regulation18feedback

Timeline summary:

September 2025 – Focused Regulation 18 consultation on new or amended policies

Spring 2026 – Regulation 19 publication of submission version of Draft Canterbury

District Local Plan Autumn 2026 – Submission to Secretary of State for Examination

Winter 2027 – Adoption

KCC has a Devolution webpage <https://www.kent.gov.uk/about-the-council/devolution>

The meeting closed at 9.17pm.

Signed: Date:
Chairman

Please note these Minutes remain as draft Minutes until they are approved by the parish council at their next parish council meeting.

Appendix

Amphenol fan unit noise

A tonal noise emits daily from a fan unit at Amphenol from 4am to 11pm.

The situation started in February 2023 and was reported to CCC by an affected resident and Steve Bailey (as a resident) in April 2024.

However, several residents are affected. (Not just through the noise, and lack of sleep, but through having to keep windows closed and the effect on mental health.)

Diary logs were undertaken since 14 April 2023 and provided to CCC, along with resident’s recordings.

The noise has arisen because Amphenol installed a new fan unit in 2022 but this was phased in and wasn’t running at full capacity until early 2023.

The tonal noise is coming from the casing around the large fan unit.

Amphenol has done its own noise testing – at least twice – and commissioned its own reports through an independent acoustic specialist.

CCC undertook internal noise testing in a resident’s bedroom.

Because of the safety critical nature of the equipment, it is not practical to completely shut it down.

Amphenol has upgraded both software and hardware to allow operation of the stack fans both remotely and on a timer. This is being done out of hours during the week and at weekends.

The fans run at full capacity from 4am until 11pm. The 4am start is frustrating although is needed for the incoming shift in the morning.

Amphenol installed a sound proofing barrier in July 2024 around the base of the unit which reduced the noise somewhat but noise still emanates from the chimney type stack.

Cllr Flanagan advised the parish council in November 2024 that CCC had served a Noise Abatement Notice to Amphenol Ltd. This follows an investigation and independent advice determining that current noise levels constitute a statutory nuisance.

Minute No 139 of the 10 March 2025 parish council meeting then recorded:

Re the ongoing noise complaint about Amphenol operations Cllr Flanagan read out an email from CCC Cllr P Old, as follows:

“I spoke with Simon Thomas, Head of Planning at CCC during the week expressing concern at the continuing delay.

Based on that conversation, my understanding of the current situation is as follows:

The Amphenol site operates under a permit issued by the EA (Environment Agency). Amphenol should have displayed a public notice to that effect. They are in breach for failing to do so.

The EA take primacy over the Council in dealing with premises operating under permit. CCC cannot proceed with a prosecution without permission of the relevant Secretary of State if the premises fall within the jurisdiction of the EA. CCC admitted fault in not realising this and I discussed the need for staff training and the need to learn lessons from this episode.

The EA have broader and stronger powers than CCC (e.g. they could suspend / remove the permit to operate)

As required under the conditions of the permit, Amphenol notified the EA that CCC had identified a statutory nuisance. The EA became involved in December 2024 when they received the notification from Amphenol.

Subsequently, the EA have formally required Amphenol to produce a detailed description of the work to be done to mitigate the noise by 31 March 2025."

On 10 April 2025 Cllr Peter Old provided the resident and Steve Bailey with an update as follows:

"I have been in touch with the Environment Agency who, as you know, have taken over the investigation of the Amphenol noise nuisance. Based on the information given to me, my summary of the situation is as follows:

Amphenol appealed the noise abatement notice issued by CCC and when the EA first issued its report in December 2024, Amphenol also entered an appeal process with the EA. Following the appeal, the non-compliance score was upheld, however a minor amendment to the wording in the report was required and the report was reissued on 12 March 2025.

Since the 12 March report was issued, Amphenol requested an extension for the submission of the feasibility assessment report until 30 May 2025 due in part to the appeal process. This extension was granted by the EA. This resulted in a delay in Amphenol appointing a specialist industrial fan noise consultant to carry out the necessary assessment. The consultant has now carried out the work, Amphenol are awaiting their report.

In the meantime, the EA are continuing to investigate this as an ongoing non-compliance. The EA believe that the noise pollution constitutes a significant breach of a permit condition and are responding accordingly.

The EA say that have had only one report on their incident hotline. I think it might support the case against Amphenol if other residents submitted a report. The EAs incident hotline number 0800 80 70 60. Please share this with any other residents you know to be affected."

On 29 May 2025, an update email from an Environment Agency officer was sent to Cllr Peter Old as follows:

"Good afternoon Cllr Old,

Hope you're well, I have an update for you regarding this issue. Please see the attached reports for further details regarding our most recent site visits. I can confirm that significant permit breaches have been recorded, and ongoing amenity non-compliance scores have been issued for the past three calendar months. For further information regarding how the EA assess permit compliance you can refer to our policy here [Waste operations and installations: assessing and scoring environmental permit compliance - GOV.UK](#). Please note that permit holders have a right to appeal compliance reports within 14 days of them being issued so the most recent report is not yet published on the public register.

Amphenol have now met the extended deadline for submitting an appropriate measures feasibility assessment and they have also submitted a plan to bring the site back into compliance, this plan includes noise abatement measures recommended by a suitably qualified noise and vibration consultancy. The EA will review this proposal internally in consultation with our noise specialists. I will then need to present the case to our Enforcement Governance Group and agree the most appropriate way to ensure that the improvement plan is adhered to.

This is all progress, however there is no quick fix to this issue unfortunately. The source of the noise is safety critical equipment, a series of engineering modifications are required, which will be bespoke. This will require design, fabrication, and installation by specialist contractors. Exact start date is yet to be confirmed however all parties are viewing this as an urgent matter. I will be meeting with Amphenol's team next week to discuss the improvement plan and timescales in more detail. The EA will continue to monitor the ongoing amenity non-compliance on a monthly basis."

On 19 June 2025 Amphenol's Environmental, Health & Safety Manager emailed Cllr Bailey as follows:

"Good afternoon, Councillor Bailey,
I hope that this email finds you well.
I apologise that our last communication was, out of necessity, brief, due to the legal situation with the City Council abatement notice and crossover with the Environment Agency's jurisdiction of the noise complaint.

As you will be aware, the EA have now taken over full control of the noise mitigation process, and Adrian Redfern has been taking the pragmatic, measured approach that one might expect from the Agency. As a result, I am in a better position to resume our correspondence with a view to making sure that we're keeping you and your parishioners clearly up to date as we move into what we all hope are the final stages of resolving the noise problems associated with our A5 Stack.

We've agreed a number of long term control measures with the agency, which are intended to permanently mitigate the noise signature of the equipment. This process is likely to take us to the end of the year to complete, and will consist of several stages. In the meantime, we're putting some additional limitations on our processes to try and alleviate the weekend impact of the noise.

The key measure is that we're going to, as far as possible, limit any weekend work with the relevant systems. Production works on weekends will be significantly reduced, and timeframes limited so that the fans are only ever operated at full speed after 07:00 in the morning and will be slowed again at 16:00 on Sundays, and no later than 19:00 on Saturdays.

If emergency maintenance works are required on either day, the fans will only run at full speed for as long as is necessary, between 06:00 and 18:00, so that we react to any safety critical issues.

We have also suggested to the EA that, if you are agreeable, you become our main point of contact with the residents so that we can keep you up to date on progress of the improvements and keep you informed of any planned production works in advance. While the nature of emergency work limits our ability to plan it in advance, we'll also undertake to notify you when we've had to conduct any emergency maintenance works so that the actions being taken are clear to all involved.

These controls are effective immediately. For your prior information, we do have some critical motor installation works that need to be completed this Sunday, but the fans will actually be switched off for the majority of this with a 2-hour test period in the early afternoon, after which they will run at their reduced rate to limit noise.

If in the meantime, you or the parishioners have any questions that are in my power to answer, I will do my best to do so."

Amphenol's Environmental, Health & Safety Manager further confirmed to Cllr Bailey by email on 27 June 2025 that Amphenol expects to be starting work on implementing damping and timing solutions over the summer, and will keep him informed in parallel with the agency.

RESOLVED that Cllr Bailey becomes Amphenol's main point of contact with residents and so that Amphenol can keep him up to date on progress of the improvements.

CHESTFIELD PARISH COUNCIL PLANNING REPORT, 14 July 2025

APPENDIX 2

New Applications

38.	CA/25/00078 Two-storey detached dwelling following demolition of existing dwelling. Limberlost , Radfall Ride, Chestfield, Kent, CT5 3EW	Letter received 13 May 2025 advising of amended plans. The parish council had no new comments on the revisions.
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39.	<i>The following representation was uploaded to the CCC Planning Portal on 23 June 2025:</i> CA/25/00908 - 6 Shepherds Walk, Chestfield, CT5 3NB Single-storey detached outbuilding. Originally a similar proposal was refused by CCC (CA/23/01670). The new submission is of good quality, and the arguments to grant in light of similar examples are quite compelling. The design is okay mimicking a mock tudor look like the main house. It's in a plot on the unmade section of Shepherds Walk and not very visible to many properties. However councillors are very concerned about the concrete slab that is used in the "tree document" to negate the concerns about damage to tree roots. It would appear you can lay a slab without planning and then apply for planning for a building and negate the issue of tree root damage as the slab is already there? If CCC is minded to now grant permission the parish council requests two conditions: Chestfield Parish Council requests a firm condition that protects both the area and neighbouring properties and prevents the current and any future owners of the property from converting the store/home office space into a fully independent residential living space capable of providing short term or holiday letting opportunities. Should CCC be mindful to approve, Chestfield Parish Council asks that a condition be applied that the building is to be used only for activities ancillary to the enjoyment of the main residence known as 6 Shepherds Walk Chestfield Kent CT5 3NB to prevent any future standalone dwelling.
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40.	CA/25/00955 - 29 Chestfield Road, Chestfield CT5 3LF Single-storey rear and side extension together with dormer to front elevation following the demolition of the existing garage and conservatory.	The parish council has no comments
41.	CA/25/00857 - Eastwell, The Drive, Chestfield, CT5 3NU Replacement windows from timber to UPVC to side and rear elevations.	The parish council has no comments
42.	CA/25/01033 - Mancroft, The Drove, Chestfield CT5 3NY Two storey front extension and single storey rear extension together with first floor extension to side elevations.	The parish council has no comments

Notifications

CA/25/00181 – (Pogles Wood) 86A Chestfield Road, Chestfield, CT5 3LT 5 detached two-storey dwellings with associated car barns following demolition of existing dwelling, outbuildings and removal of Swimming Pool.	Granted by CCC
CA/25/00542 - Primrose Orchard , 16 Share And Coulter Road, Chestfield CT5 3LE Side and rear two-storey extension and pitched roof to existing garage.	Granted by CCC
CA/24/02283 - Formerly Part Of Britton Court Farm, Land East And West Of Hackington Road, Tyler Hill, Canterbury. Erection and operation of a solar farm with battery energy storage and associated infrastructure on a land at Britton Court Farm, Tyler Hill, CT2 9NG	Granted by CCC

CA/25/00779 - Land At Brooklands Farm Whitstable

Chestfield Parish Council's response to the Outline planning application was sent to CCC on 30 June 2025:

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.

Chestfield Parish Council objects to this Outline planning application.

As it is fully understood that the bulk of this application would be dealt with under subsequent reserved matters application(s) should this outline application be given approval, we have not therefore commented on the indicative or illustrative designs, drawings, and diagrams.

Our detailed representation below raises concerns/comments around the following headings:

1. Lack of foul drainage capacity and a call for a Grampian condition;
2. Early engagement with Hallam Land Management Limited;
3. Construction Environmental Management Plan; and
 - 3.1 Lack of a Traffic Management Plan;
 - 3.2 Need to secure construction and implementation of the slip roads at an earlier stage of development; and
 - 3.3 Scope for Westbound slip roads to reduce flows westbound on the A299.
4. Surface Water Management and the Long-term management of SUDS, WwTW, MUGA, play areas, etc;
5. A welcoming of the two proposed speed limit reductions;
6. Primary school and SEND school
7. Parking provision
8. Brooklands Farm and the Blean Area of High Landscape Value;
9. Support for CCC Arboricultural representation and revised access point;
10. Mention of the emerging Chestfield Neighbourhood Plan and Neighbourhood Plan area to include the whole of the Brooklands Farm development;
11. The 2025 Chestfield Housing Needs Survey information;
12. Four-storey build height proposal;
13. Secured by Design;
14. Transport, Accessibility and Movement
15. Response to Socioeconomic and Human Health document (Volumes 7 and 8)
16. Bio Diversity plans and the design responses in the DAS document to identify the possible effect the development will have on protected species, their habitats and arboriculture
17. Conclusion.

1. Call for a Grampian Condition

Foul drainage capacity is a major concern for the parish council.

This is exacerbated in the area as a whole by the planned Bodkin Farm Strategic site (outline application CA/24/00224 for a secondary school; up to 300 dwellings; an 80-bed care home; and a Local Centre) – adding stress to the local foul network – together with the Oxenden Park emerging development (planning application CA/21/01430) adding a further 450 homes at Greenhill and which is routed and discharging along Maydowns Road - with its new connection at the top of Maydowns Road now completed in 2024.

Swalecliffe Waste Water Treatment Works has three 1000m³ storm storage tanks but once these are full, sewage water is discharged into the sea.

In response to incidents of sewage discharged into the sea, Southern Water did undertake upgrades to the Swalecliffe site. In August 2023, the company completed a £750,000 project to optimise the site, increasing available storage and reducing storm overflows by 36%. This optimisation involved installing new chambers and pipework to redirect stormwater during heavy rainfall, thereby reducing the frequency of discharges into the sea.

However, in 2023 despite the improvements reducing the storm overflows, Southern Water reported that Swalecliffe Waste Water Treatment Works still discharged sewage 11 times over a total of 37.9 hours, accounting for approximately 0.43% of the year. (In 2024, there were 3 discharges over 15 hours, or about 0.17% of the year).

For this outline planning application, we request, and consider it imperative, that CCC imposes a Grampian condition to align the build/phasing/occupancy of Brooklands Farm with capacity in the Southern Water network.

We understand that the Grampian condition must be imposed at outline planning application stage (rather than at a discharge of foul drainage condition application) – so this is the only opportunity to request this. We feel this request is justified.

A Grampian condition to align the build/phasing/occupancy of Brooklands Farm with capacity should mean that the potential risk of flooding to properties and/or environmental pollution can be mitigated in a timely manner.

Southern Water's own Briefing Note to Local Planning Authorities – [briefing-note-for-lpa-on-infrastructure-provision-1.pdf](#) details that Water and Sewage Companies (WaSC) 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 will therefore instead request conditions on the grant of planning permission. This is intended to enable Southern Water to agree with the developer the layout, drainage and water use strategy, preferred point of connection, whilst also allowing for existing capacity to be considered and upgrading work to be programmed. Such an approach allows the legal right to connect to be sensibly managed.

There is a right for a development to connect under section 106 of the WIA 1991. However, problems can arise from the fact that this right to connect can be exercised on 21 days' notice - too short a period of time for the WaSC to effectively plan, design and deliver reinforcement works.

The use of Grampian style planning conditions has been affirmed in case history eg the Welsh Water decision (2009) relating to wastewater connections - *"The planning authority can make planning permission conditional upon there being in place adequate sewerage facilities to cater for the requirements of the development without ecological damage.. Thus the planning authority has the power, which the sewerage undertaker lacks, of preventing a developer from overloading a system before the undertaker has taken steps to upgrade the system to cope with the additional load."*

The purpose of Grampian style conditions is to enable Southern Water to manage the impacts of development and the connections to the public network. This approach therefore allows the legal right to connect to be sensibly managed prior to occupation of the development. The LPA has no further purpose in pursuing such conditions, and scrutiny of WaSC performance and decision making is through the statutory regulatory body Ofwat. Alongside the LPA planning conditions, Southern Water will agree with the Developer:

- an appropriate drainage strategy, including surface water management and SuDS,
- a water-efficient use strategy (where applicable), and
- the preferred points of connection,

whilst allowing for existing capacity to be considered and upgrading work to be programmed.

When consulted on a planning application, where necessary Southern Water will therefore request that a Grampian style condition is imposed upon the grant of planning permission.

Southern Water's response to CCC is on the CCC Planning Portal dated 10 June 2025:

Southern Water has undertaken a capacity check to understand the impact that the additional foul sewerage flows from the proposed development will have on the existing public sewer network. This indicates that these additional flows may lead to an increased risk of foul flooding from the sewer network. Any network reinforcement that is deemed necessary to mitigate this will be provided by Southern Water.

Whilst Southern Water confirms inadequate capacity to accommodate this development, it states it cannot object on these grounds, and confirms the developers' right to connect. But Southern Water

requests that development aligns occupation with its provision of services – unambiguously supporting our call for a Grampian condition.

This condition should read: **"Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate waste water network capacity is available to adequately drain the development."**

2. Early engagement

Chestfield Parish Council undertook early engagement with the applicant Hallam Land Management Limited.

Given the importance and weight we accord to the foul drainage capacity and the request for a Grampian condition (above) we have led with that as our first paragraph, however we would take this opportunity to thank Hallam Land Management Limited for meaningful engagement with both the parish council and residents – the dialogue was extremely useful, and we thank Hallam Land Management Limited for listening and responding positively to make changes to the master plan etc. We are grateful for the opportunities afforded and found it very constructive.

3. Construction Environmental Management Plan (10709 CEMP 01; Rev.01)

Whilst the above document covers all aspects of environmental management during the construction of the Brooklands Farm site, it is largely generic in content, and (with the exception of certain specific statements therein) wording and phraseology that one would find in any such document for the highlighted purpose.

Having now read and fully digested the content of this CEMP, the following (related) sections/paragraphs give cause for comment/concern – for ease of both reference and clarity these are referenced in document order, although in no way should they be considered as being prioritised:

1.1.0.5

CEMP Comment: 'The purpose is to reduce the risk of adverse impacts of construction on sensitive environmental resources and to minimise disturbance to local residents'

Parish Council Comment:

Whilst this both identifies and considers possible risk of disturbance to local residents, this is very much considered as a generalisation, as this does not consider the actual cause of such disturbance to local residents (and, it should be stated, the undoubted adverse impact on village life in general). Document 10709 CEMP document (otherwise referred to as CEMP) neither highlights nor investigates possible risks likely to be experienced by local residents (including immediate non-parished areas, namely South Street). The approach to managing risk as per IOSH guidelines and directives is to initially eliminate any perceived risk from the outset.

This therefore infers that a localised, site-specific risk assessment should be considered from the outset planning approval stage, particularly given that 'CEMP item 7.16.23.69' serves to confirm that site access routes will be used under the 'Canterbury Phasing Policy' (this is additionally commented on further within this document). Whilst the intention of the CEMP is focussed on environmental impact, it cannot be ignored that impact of possible or perceived risk to local residents extends far and beyond those highlighted within. For example, there is no mention or consideration given towards the possible (many may say – undoubted) effect on current village life, particularly mental health.

2.1.0.1

CEMP Comment: 'These proposals will need to remain flexible and be adapted throughout the works as necessary to accommodate changing needs and circumstances'

Parish Council Comment:

Going by the exact definition of this statement, the proposals will effectively be a 'live' document presumably subject to ongoing re-assessment and evaluation.

We would therefore ask how this will be achieved, and as to which (if any) the consultees of any such adaptation will be, particularly given the likelihood of impending and future Local Government Reorganisation.

2.4.6.15

CEMP Comment: 'Method statements will contain as a minimum (line 6) Health, safety, and environmental considerations'

Parish Council Comment:

As a 'follow-on' from 2.1.0.1 (above), it is assumed that this statement applies to site conditions and those working within its confines only. This is seen as a complete disregard to affected residents. As in our above comment/query, health and safety of all parties should be considered – this should include areas outside of site perimeters, particularly as by virtue of de-facto inference and planning, both Chestfield Road and South Street will effectively both be considered part of the proposed construction and logistics route.

would therefore request clarity of this point, particularly given the absence of a specific construction traffic and logistics plan.

2.9.11.28

CEMP Comment: 'It is noted that as development progresses through the phases, the situation will arise where residents will occupy early development phases whilst construction continues on nearby plots. The future residents will then become receptors in their own right and therefore measures are provided within the CEMP to ensure that any effects in terms of air quality/dust, noise, lighting and construction traffic routing are minimised'

Parish Council Comment:

3.1 Lack of a Traffic Management Plan

Whilst it is somewhat reassuring of further measures in regards to site conditions and associated traffic routing for future residents, we believe that this statement is seen as somewhat of a slight towards existing residents, as it is apparent that those same existing residents' comments and concerns, voiced in the presentation and consultation events held, have not been either considered or addressed during initial planning proposal stage. Therefore, we do not feel that the effects of construction traffic routing on existing residents have been considered – should this not be the case, we would request copy of any relevant consultative documentation or findings as we do not believe that due consideration has been afforded towards existing or current residents and/or village life.

Furthermore, we don't believe that a satisfactory Transport Management Plan is achievable.

If permission is granted, then the scheme will be sold on to one or more developers. The unknown is how many developers. Most housebuilders build out at the rate of around 100 dwellings per year – so a sole builder could take 14 years to finish this scheme. And likewise, if there are several developers then this will mean more vehicles all at the same time to serve their own parcels of land.

A Traffic Management Plan should be provided now before outline permission, notwithstanding that we appreciate that the final number of developers is unknown – but a Traffic Management Plan should be sought by Canterbury City Council with maximum and minimum scenarios modelled – to include weight of vehicles, number of vehicles, size of vehicles, times for deliveries, and routing paths.

6.3.1.8

CEMP Comment: 'Quarterly newsletters will be produced and distributed to update the local community on construction progress and contain information such as working hours and contact information'

Parish Council Comment:

Whilst it is pleasing to note that the developer will be producing quarterly updates to the local community, it is unclear whether the term 'local community' applies to existing residents, or confined/applicable to new or future residents. It is also unclear how such information will be distributed to all affected residents – particularly as the effect of the proposed development will affect the entire village of Chestfield and also the residents of South Street.

We would therefore seek clarity and confirmation as to how such regular information updates will be distributed.

6.3.3.10

CEMP Comment: 'Formal and informal liaison with the Community Lead Housing at Canterbury City Council to act as a representative of Whitstable's community about construction works'

Parish Council Comment:

It is likely that Canterbury City Council will experience full breakdown due to Local Government Reorganisation during the duration of the proposed development.

In this regard, Chestfield Parish Council would therefore propose to be considered as representative of the community from the outset, particularly as any impending Local Government Reorganisation will not affect Town/Parish council organisations.

7.3.2

CEMP Comment: 'Develop and implement a stakeholder communications plan that includes community engagement before work commences onsite.'

Parish Council Comment:

It is pleasing to note that the developer intends to maintain community engagement prior to any site works commencing. Whilst this is most welcome in context, we would ask how such meaningful discussions can be entered without a full complement of documents being available for comment or consideration. We have been informed that the actual construction and logistics plan will not be issued until after planning approval. This we feel is totally unacceptable, given that there will without doubt be a significant impact on the village and its parishioners in its current plan. We would therefore draw your attention to our comment regarding general hours of operation.

7.15.23.66

CEMP Comment: 'Working hours for construction traffic are to be restricted as follows:

** 08:00 and 18:00 weekdays*

** Occasional working outside these hours may be required which will be agreed with Canterbury City Council and neighbours will be notified.'*

Parish Council Comment:

In October 2024, Chestfield Parish Council commissioned an all-day traffic survey between the hours of 07:00hrs – 18:00hrs. This traffic survey was carried out in-person by volunteers stationed on the junction of Chestfield Road and South Street, without reliance or reference to any designed traffic modelling. It should be further emphasised that this exercise was carried out during normal school term time so that a true peak of highway usage was evidenced. The resultant findings (as shown below) clearly show that the peak use times recorded indicate that the proposed timings of construction traffic coincide with those of residents' use, exemplifying the fact that there WILL be significant and adverse risk and disruption to local residents and this is therefore seen as direct conflict to developer comments/assurances (see 1.1.0.5).

Brooklands Farm Traffic Counting

Date:

Wednesday 16 October 2024

	Traffic coming OUT of South Street going towards Chestfield	Traffic coming OUT of South Street going towards Canterbury	Traffic going IN to South Street from Chestfield village direction	Traffic going IN to South Street from Canterbury/Radfall Hill	Traffic on Chestfield Rd from Radfall direction	Traffic on Chestfield Rd from Chestfield Village direction
7am- 8am	16	128	32	42	71	247
8am-9am	30	155	55	55	139	299
9am-10am	15	76	35	33	148	195
10am-11am	23	71	21	63	145	130
11am-12pm	17	66	36	63	149	146
12pm-1pm	23	58	20	70	173	166
1pm-2pm	23	63	32	63	146	128
2pm-3pm	16	62	25	61	171	139
3pm-4pm	35	76	44	79	177	152
4pm-5pm	51	79	33	121	239	155
5pm-6pm	20	93	27	138	215	171
<i>Totals:</i>	<i>269</i>	<i>927</i>	<i>360</i>	<i>788</i>	<i>1773</i>	<i>1928</i>

Whilst a certain degree of disruption would be both expected and acceptable for a short duration – the fact that this would likely be for a prolonged (unknown) period cannot be considered as conducive to ongoing village life. This is further commented on within this document (see 7.16.23.69 – 72 inclusive).

It is also noted that “occasional working outside these hours will be agreed with Canterbury City Council and that neighbours will be notified”. Given the previous assurances within the CEMP that the developer intends to engage with the community before work commences, it is most disappointing that decisions such as out of hours working (and therefore introducing further disruption to residents) can be agreed between the developer and the City Council without consultation of the community.

This we see as a direct conflict with regards previous statements of assurance or intention. As referred to previously within this document, the introduction of Local Government Reorganisation (and therefore the possible cessation of Canterbury City Council) leads to the question as to who will then be the consultee with the developer / project team?

Traffic Modelling

Traffic modelling of the Chestfield Road roundabout (Chestfield Road / Herne Bay Road / Thanet Way)

In the morning peak period, drivers using the Chestfield Road roundabout can experience delays (queue-times) of **more than a minute** on the east arm of the roundabout (i.e. approaching from Greenhill). Also in the morning peak, drivers can experience delays of up to **4 minutes** approaching the roundabout from the Herne Bay Road.

However, when the Applicants model this roundabout, they state the maximum AM queue time is (in 2024) **4.44 SECONDS** on the A2990 from Greenhill, and **10.51 SECONDS** on the Herne Bay Rd. This is clearly

not reflecting the actual situation of the current experience before Brooklands Farm is built out and grossly under-estimates the congestion already experienced.

When assessed by actual length of queues, the Applicants state that the maximum queue length on the eastern arm in the morning peak period is **1.2 cars** (more or less 1 car!) and **2 cars** on the northern arm of the roundabout. In reality, the queue on the eastern arm can stretch back to Garden Centre "X" (about **450m**), and it is almost as long on the northern arm (up Herne Bay Rd in the direction of Swalecliffe Primary School).

The Applicants' modelling for 2024 is in Transport Assessment Part 7 (document 3665896), and copied out below is the most important modelling:

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.67	10.51	2.0	B
2 - Thanet Way (E)	0.53	4.44	1.2	A
3 - Chestfield Road	0.42	5.65	0.7	A
4 - Thanet Way (W)	0.36	2.61	0.6	A

Applicant's modelling of
Chestfield Rd roundabout
2024 AM peak

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.72	13.60	2.4	B
2 - Thanet Way (E)	0.48	3.97	0.9	A
3 - Chestfield Road	0.38	4.76	0.6	A
4 - Thanet Way (W)	0.55	3.55	1.2	A

Applicant's modelling of
Chestfield Rd roundabout
2024 PM peak

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.69	10.38	2.1	B
2 - Thanet Way (E)	0.57	4.69	1.3	A
3 - Chestfield Road	0.56	8.12	1.3	A
4 - Thanet Way (W)	0.32	2.43	0.5	A

Applicant's modelling of
Chestfield Rd roundabout
Scenario 2 AM peak

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.72	13.19	2.5	B
2 - Thanet Way (E)	0.51	4.15	1.0	A
3 - Chestfield Road	0.47	5.68	0.9	A
4 - Thanet Way (W)	0.52	3.41	1.1	A

Applicant's modelling of
Chestfield Rd roundabout
Scenario 2 PM peak

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.77	14.49	3.2	B
2 - Thanet Way (E)	0.60	5.34	1.5	A
3 - Chestfield Road	0.52	7.21	1.1	A
4 - Thanet Way (W)	0.39	2.74	0.7	A

Applicant's modelling of
Chestfield Rd roundabout
Scenario 5 AM peak

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1 - Herne Bay Road	0.77	16.32	3.1	C
2 - Thanet Way (E)	0.52	4.35	1.1	A
3 - Chestfield Road	0.43	5.35	0.8	A
4 - Thanet Way (W)	0.58	3.84	1.4	A

Applicant's modelling of
Chestfield Rd roundabout
Scenario 5 PM peak

The most relevant column in the table is "MAX Q PCU", which means maximum queue in terms of cars (PCU = passenger car unit.....a term used by modellers to adjust vehicle counts if there is a high percentage of HGVs, but the important thing to remember is 1 PCU = 1 car).

It should be noted that similar queues on Herne Bay Road also occur at c 15:30 at the end of the school day at Swalecliffe Primary, and in the evening peak hour (17:00 – 18:00).

The Developers' modelling does not appear to take sufficient account of how this roundabout is adversely affected by the very well-used signalised crossings on the western and northern arms of the roundabout. Nor does the modelling appear to take account of the proximity of the St John Road roundabout and the Reeves Way roundabout. There are certainly occasions when queues from the St John's Road roundabout can extend back onto the main Chestfield roundabout.

The Developers' modelling also under-estimates queue lengths at **the Millstrood Road / Thanet Way roundabout**, at **Long Reach roundabout** and the junction of **Belmont Road and Canterbury Road**. So far as we can see, the Developers have omitted to model the junction of **A2990 Thanet Way / Prospect Retail Park**. This is completely unacceptable because very long queues form from this junction onto the A299 dual carriageway, which is a safety hazard due to the high-speed nature of this road.

Further uncertainty about the value of the modelling is due to the Developers not clearly stating which planned housing in the Canterbury District is included in the modelling. Does it include the 220 houses approved in 2023 in application 22/01527 (Church Lane, Seasalter)? Presumably it does not include the houses and school at Bodkin Farm (application CA/24/00224 as yet undetermined), Benacre View (CA/23/00379 granted in April 2025 for 220 houses, 400sqm local shopping/ community facility and a 300 space Park and Bus facility), nor the 2000 houses at the University of Kent/Blean strategic site in CCC's latest draft Local Plan (which would have a major impact at the A299 / Radfall junction and at Long Reach and Clapham Hill roundabouts). The traffic modelling submitted for the most recent application at Benacre View (CA/23/00379) when compared with Brookbanks' modelling for this Brooklands Farm application is noticeably higher – so we can reasonably assume the modelling for this application is not accurate as it would be higher if it were accurate.

3.2 Implementation of the slip roads at an earlier stage of development

7.16.23.69

CEMP Comment: *'The eastern parcel of the scheme will be accessed primarily from South Street and Chestfield Road. A299 slip roads are not anticipated to be delivered until at least 50% of the scheme has been developed (Canterbury Phasing Policy).'*

Parish Council Comment: We feel that this statement is somewhat spurious in as much that the designed A299 slip roads "are not anticipated to be delivered until at least 50% of the scheme has been developed". Clarification is therefore sought as to the true intent of this statement, as (based on an average build of 100 houses per year per developer), both Chestfield Road and South Street could experience traffic disruption for approximately seven (7) years! This period could also be prolonged should house sales/occupancy not be fulfilled, and therefore development of new homes could be suspended by the developer for lack of economic viability – thus causing further disruption to residents and village life in general.

An alternative could be that a new access is created off the Thanet Way at the outset for delivery/construction traffic only – one lane could be used purely for construction traffic.

Chestfield Parish Council would push for the slip roads to be delivered ideally at the outset of development, or at 15%, or 25% occupancy.

The Whitstable Labour councillors' representation to this application (submitted 20 June 2025) points out that the Jacobs transport assessment very usefully includes a number of scenarios which show the impact of the development with and without the A299 slips at various different stages of occupation. It shows the necessity for an A299 slipway and how this will reduce eastbound flow on the Thanet Way but increase flow westbound as people travel via Clapham Hill to Canterbury.

Chestfield Parish Council supports the Whitstable Labour Councillors' opinion that planning permission should only be granted with conditions relating to the building of the A299 slip. At present the evidence suggests that if 50% of the homes are occupied without the A299 slip being built the capacity of the road between Estuary View and Clapham Hill will be reached. We believe that the assessment needs to consider a further scenario of 25% and 15% occupancy so that the phasing of any infrastructure can be adequately conditioned. Paragraph 116 of the NPPF stipulates authorities should be able to judge whether the plan will have an unacceptable impact on highway safety or severe impact on the road network. We don't believe this is possible until the LPA can be confident that its own phasing won't compromise the traffic network during the build and an assessment of the impact on Radfall Road has been made.

3.3 Scope for Westbound slip roads to reduce flows westbound on the A299.

Whilst we welcome the eastbound slip roads on the A299 which substantially mitigate the effect flows (particularly eastbound on the Thanet Way) we consider it short sighted that westbound slips onto the A299 were also not considered as a means of reducing flows westbound on the A299.

It would be good to go further and extend this site with additional homes in order to build a further two slip roads to completely future-proof this junction/development. It is a missed opportunity not to have both East and West access and egress.

Before granting any permission CCC should ask the applicant to explore if there is any scope for negotiating further land (which is in the same landowner ownership) and providing a further two more West-bound slip roads which would bring benefits:

- i) to 'future-proof' the whole development
- ii) benefit the existing Chestfield village and wider region
- iii) bring cost economies of scale in both the planning and build process and disruption rather than add on at a later date, and
- iv) increase CCC's housing numbers.

Chestfield Parish Council stated in its January 2023 representation to the consultation on the emerging Canterbury District Local Plan that the proposal to have a green gap designation (**The Natural Environment and Open Spaces Topic Paper 2022**, Page 28) that would preclude the provision of two further slip roads is NOT supported. The parish council felt that this proposal appeared to be reactionary to the inclusion of W5 Brooklands Farm allocation rather than as a result of assessment or analysis.

Provision of the slip roads gives an opportunity to address flooding issues that occur at the bottom of Radfall Hill under the underpass.

7.16.23.70

CEMP Comment: 'The key potential access points could include:

'South Street – This road will be the main point of access for the first circa 50% of the scheme. Within the first phase of The Site's delivery, the New South Street will be developed to facilitate access to the development parcels on the western side of the scheme. This will then be the primary access route into this area. Traffic management measures may be required to prevent congestion or disturbance to residents.'

'Chestfield Road – Depending on feasibility and local traffic considerations, this road may serve as a secondary access point after South Street. Given its proximity to residential properties, access may be restricted or limited to specific times to reduce disruption from construction. Traffic calming measures may be introduced where necessary to minimise disturbance to local residents and road users. These physical features provided along a road are used to encourage drivers to reduce speed.'

Parish Council Comment:

Although not within the parish boundary, the adverse effect caused by traffic diverting onto Chestfield Road due to South Street "being the proposed main point of access for the first circa 50% of the scheme" is of concern, particularly as there is no indication or estimated time frame of the development of the New South Street road. The final statement pointing out that "Traffic management measures may be required to prevent congestion or disturbance to residents" infers that existing traffic flow and highway usage has not been fully considered. We therefore believe that the early construction of the New South Street road should be considered in the first instance – this we feel would serve to alleviate the need for any introduction of additional traffic management measures – such measures that presumably refer to the use of Chestfield Road as the secondary access point after South Street.

In this regard, we therefore suggest that the overriding possibility for road users to divert onto and through Chestfield Road as a 'rat run' is one that is very much a concern to all residents. This therefore further highlights the distinct need for the both the New South Street road and the building of the A299 slip roads to be developed in advance of any site construction or house construction, particularly given the 'unknown or scheduled timeframe'. Such measures would also serve to greatly reduce the potential risk and impact on resident lifestyle.

7.16.23.71

CEMP Comment: 'A Construction Traffic Management Plan (CTMP) will be part of the detailed CEMP provided to Canterbury City Council for approval.'

Parish Council Comment:

At the time of writing of this representation, the CTMP has not yet been documented or made available on the Canterbury City Council planning portal.

7.16.23.71

CEMP Comment: 'This CMTP should be developed to define the primary access points, deliver and enforce the proposed construction routing strategy, and mitigation measures to manage traffic flow, minimise environmental impacts, and ensure safety for both workers and the surrounding community'

Parish Council Comment: Given the inclusive nature of the content of the referred CMTP, this is considered a vital and strategic document, and will serve as informational towards the minimisation and disruption of resident lifestyle.

Given the many topics to be considered (as per the CEMP comments above), we would ask when this document will be made available for comment and further request that the appropriate timeframe is extended to allow a full and measured response.

Chestfield Parish Council is also led to understand that the CTMP will NOT include a logistics movement or delivery plan – a document which one would expect to be part of any legible planning application.

- 4 Surface Water management and Long-term management of SUDS, WwTW, MUGA, play areas, etc**
- A Sustainable Drainage System (SuDS) including swales, attenuation basins, and flow controls is proposed.
 - Designed for the 1-in-100-year storm event with 45% climate change allowance.
 - Primary discharge is to Swalecliffe Brook, which is already a flood-prone watercourse.
 - There is no evidence of long-term storage capacity or inclusion of high-performance green infrastructure.

We comment on the document: Hydrology & Flood Risk – Appendix 11.2 Drainage Strategy 3665907:

Section 4.22: Why are green roofs, proprietary treatment system, attenuation storage tanks and ponds/wetlands not being considered? All of these should be explored and implemented.

Section 5.7: a discharge rate of 4 l/s/ha has been agreed but in table 5.3 the discharge run off rates for a significant number of the catchment areas are considerably higher than 4 l/s/ha?

Section 6.5: Brooklands has completed a Surface Water Model and associated report (10709 FS01 Rv0) but this is not included in the submitted documents - this report needs to be made available before outline planning is granted.

Presumably the long-term maintenance and management of items like the SUDS, MUGA, play areas etc will follow most new-developments “model” nowadays and pass to a management company where all the new occupiers pay a levy for their maintenance.

What are the maintenance requirements and a certainty that these essential assets will be able to be maintained in perpetuity?

The parish council would like a condition of any planning application that the drainage system (including SuDS) for the residential portions of the development be offered up for adoption to Southern Water via a Section 104 agreement.

And that the SuDS comply with Southern Water’s standards and criteria ([Sewerage Sector Guidance - approved documents | Water UK](#)) for their design and construction in order that Southern Water will adopt them.

5 Primary school and SEND school

Chestfield Parish Council welcomes the provision of a primary school and SEND school. Primary schools should not be as big as secondary schools – so a new school is preferable, rather than developer contributions to Swalecliffe and/or Briary primary school at Greenhill. A new local school on site to serve the development it sits within will mean many pupils will be able to walk or be walked to school, thus saving car commute, and reducing school drop off and pick up traffic movements.

Whilst the land would Transfer to KCC at commencement of development in Policy W4, the parish council requests that there needs to also be a S106 condition to this effect (if CCC is minded to grant outline permission) – to avoid any future uncertainty of a school not being built after approval of planning – and an undesirable second tranche of housing on this land being applied for instead. The land conditioned for educational purposes only by condition, would secure against any further housing instead.

6 Parking Provision

It is important that the schools, especially the SEND school which will have a high percentage of its pupils being ferried to and from school by KCC-funded drivers have sufficient parking provision.

There is a concern that Chestfield Road will become clogged at school drop off and school pick up times without provision either within the school sites or within the actual development through a reserved matters layout.

Similarly, this situation already arises on match days at Radfall Recreation ground, and it is likely that new playing pitches, sports provision, and the community hub will be used by non-residents so it is imperative that parking provision for these is given proper consideration.

7 A welcoming of the two proposed speed limit reductions

Chestfield Parish Council welcomes the two speed reduction proposals, namely:

- Proposed reduction in Speed Limit from 60mph to 40mph on Molehill Road detailed in the [PROPOSED TRAFFIC CALMING MEASURES ON MOLEHILL ROAD document](#).
- And an extension to the 30mph speed limit at the junction of South Street shown in the [Proposed Access Strategy document](#).

8 Brooklands Farm and the Blean Area of High Landscape Value

Brooklands Farm lies in an Area of High Landscape Value (AHLV), as shown in the map on page 10 of the not-yet superseded Canterbury District Local Plan 2017.

The importance of farmland in the setting of the Blean Woods has been recognised for more than 25 years. Brooklands Farm was included in the Blean Woods Special Landscape Area (SLA) as specified in the Canterbury Local Plan 1998. The SLA was the precursor of the current AHLV.

The AHLV that covers Brooklands Farm is the Blean Woods AHLV. The Local Plan 2017 states this “identifies landscapes important to the character and setting of the Blean Wood Complex. It is an important objective of the Council and other agencies to preserve and enhance this landscape, with long term objectives to meet habitat network potential for woodland and heathland, particularly where it improves habitat connectivity of the Blean woodlands.”

The 2017 Local Plan 2017 defines an AHLV as “a designation applied by the Local Planning Authority to define areas of high landscape importance within their administrative boundary. They are often designated for their intrinsic physical, environmental, visual, cultural and historical value in the contemporary landscape, which may be unique, exceptional or distinctive to the local authority area.”

Whilst we are aware that a 2021 review of the District Local Landscape Designations proposed a redrawing of the boundaries of the Blean AHLV to remove the Brooklands site, these changes have not been formally adopted by the council and cannot be given planning weight.

Development proposals within the AHLV (2006) are expected to be sensitively designed, landscape-led, and demonstrably necessary - a criterion which this scheme fails to meet.

9 Support for CCC Arboricultural representation and revised access point

The CCC tree officer representation is dated 05 June 2025 on the planning portal for this application. Chestfield Parish Council supports the call for a revised access.

G5 and G15 are Category A/B trees and it is proposed that partial removal will be necessary to facilitate the construction of access roads. There is little alternative to G5 partial removal and it is limited but the breach of G15 on Chestfield Road could be avoided if H9 is used as the access point.

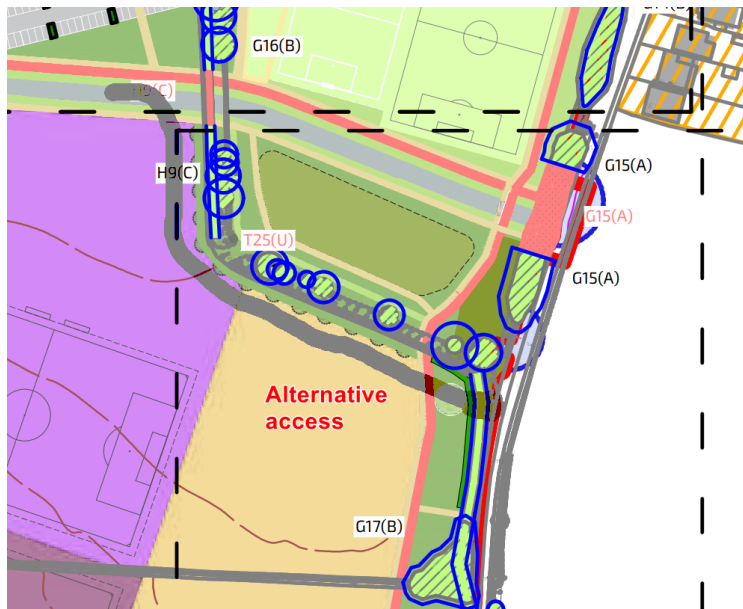


H9 is a Category C hedgerow whilst G15 is a Category A landscape scale belt of trees some of which are 850mm diameter affording to wider landscape value and scale.

A breach in the feature will significantly reduce their wider value.

An alternative access can be provided as suggested by the CCC officer and as indicated below with significantly less landscape and arboricultural impact.

Chestfield Parish Council supports this recommendation:



We assume Canterbury City Council will seek Kent County Council Highways' comments on this access adjustment.

10 The emerging Chestfield Neighbourhood Plan and Neighbourhood Plan area

We should explain that the Brooklands Farm site is covered in the emerging Chestfield Neighbourhood Plan being developed by some parish councillors and residents:

On 14 January 2025, Chestfield Parish Council submitted an application to Canterbury City Council for the designation of a Neighbourhood Area in line with Regulation 5 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

The parish boundary dissects the Brooklands Farm development site.

The Neighbourhood Area, as submitted by Chestfield Parish Council, therefore includes the existing Chestfield Parish boundary along with additional land to the west of the Parish, that currently sits outside of the parish boundary, to include the full extent of the draft site allocation policy 'W4 - Brooklands Farm' as identified in the Draft Canterbury District Local Plan (Regulation 18) (2024) and now forming this outline application area.

In accordance with Regulation 6 of the Neighbourhood Planning (General) Regulations (2012), Canterbury City Council ran a consultation on this area for 6 weeks from 11 February 2025 to 25 March 2025. Then CCC Cabinet considered responses at its meeting on 23 April 2025.

At the Cabinet meeting Canterbury City councillors unanimously resolved to approve this area.

Therefore, when the Neighbourhood Plan is 'made' in due course, its policies will apply to the whole of the Brooklands Farm site.

11 The 2025 Chestfield Housing Needs Survey information

Chestfield Parish Council has just commissioned a Housing Needs Survey (March 2025). The document may be read at <https://chestfieldparishcouncil.gov.uk/wp-content/uploads/2025/05/Housing-Needs-Report-draft-April-2025.pdf>

A postal and online survey was distributed to 1,430 households in March 2025. 359 responses were received, a 25% response rate.

84.7% are detached houses and 50% of homes have four or more bedrooms.

Chestfield has a significantly older population than district and national averages.

Housing stock is dominated by large, detached, owner-occupied homes.

Very few smaller properties (1- or 2-bedrooms) exist, limiting downsizing opportunities.

Chestfield faces a growing mismatch between its aging population and its existing housing stock.

One of the recommendations is to develop small numbers of affordable 1, 2, and 3-bedroom homes and smaller market housing homes. And focus on affordable home ownership models and accessible housing for people with limited mobility.

There is a clear need for smaller, more affordable, and accessible homes to maintain a balanced, sustainable community. Providing opportunities for younger households to stay and for older residents to downsize will help preserve the social cohesion and vibrancy of the parish into the future.

12 **Four-storey build height proposal**

The Building Heights Parameter plan proposes development up to four-storeys in height.

Four storeys is completely out of character for Chestfield and is totally unacceptable. There are no four-storey buildings in Chestfield.

A condition if CCC is minded to approve this outline application should set maximum build height at 3.5 storeys.

13 **Secured by Design**

Chestfield Parish Council is pleased to read that a Security and Crime Prevention Strategy has been developed and informed by Secured by Design (SBD) principles.

Secured by Design (SBD) is the official police security initiative in the UK that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop and visit.

Secured by Design advises on the construction of buildings and development schemes to encourage the [adoption of techniques or designs that are thought to discourage crime](#). SBD recommendations are included in the National Model Design Code and the programme incorporates training police officers as Designing Out Crime Officers, who are referred to in the National Planning Policy Framework.

Chestfield Parish Council would like any subsequent reserved matters application(s) to include full [Secured by Design \(SBD\) Gold accreditation](#). This incorporates the security of the external environment through layout and design with physical security measures; it is based on academic research that shows reductions in crime of up to 87% in new-build housing. Achieving this, helps create safer, more secure environments for cohesive, vibrant communities with lower crime rates that will benefit residents.

Secured by Design (SBD) Gold Accreditation is free of charge for applicants.

14 **Transport, Accessibility and Movement**

The ES Volume 1 - Chapter 8: Transport, Accessibility and Movement has the following areas we would comment on:

8.13 Severance is the perceived division that can occur within a residential area if it becomes separated by a major traffic artery and is used to describe the factors that separate people from other people and places.

Parish Council Comment:

There is a significant risk of this occurring on Chestfield Road that has no crossings. Plans propose only one new crossing near the proposed new primary school – which is welcomed. However, at least one more should be considered ideally near the current play park area on Chestfield Road.

8.15 Driver delay is assessed in terms of 'driver stress'

Given the age demographic local drivers are likely to be sensitive to the relatively small changes to this.

8.53 Baseline traffic data

This was obtained in June 2024 using a mix of manual surveys covering the weekday peak periods and Automatic Traffic Counters recording 24-hour data over a 1-week period. The locations of these surveys are identified in the TA (at Appendix 8.1) which included a total of 15 junctions and four Automatic Traffic Counters.

Chestfield Parish Council consider this to be fundamentally flawed in that only 2 x 1 hour slots per day were modelled. There is no reflection of School traffic at approximately 3 pm and this is already known to cause issues. The addition of proposed schools in this and other nearby builds must make this a key consideration. As well as the additional traffic there will be the delays caused to vehicles with school children (and parents) crossing roads.

8.87 Based on the definition, severance can occur when communities become separated by major transport infrastructure. None of the identified roads in the study area are currently considered to act as a barrier that separates communities. For example, the settlement of Chestfield is situated on both sides where footways and crossings support non-motorised users.

Chestfield Road is already potentially causing some severance. It is suggested that the increased traffic will tip the scale. It should also be noted that there are no controlled crossings on Chestfield Road - a fact that Chestfield Parish Council find wholly unacceptable now let alone should this build go ahead.

8.89 This indicates that based on the existing layout of these junctions, the detailed junction assessments are forecast to experience increases in the Ratio to Flow Capacity results. This identifies that the development could result in a major environmental impact.

It is not clear what will be done to mitigate this.

The following is a brief synopsis of randomly selected statements (by index reference) as provided within developer application documents.

7.45 Developer Comment

'At 68.9%, the most common method of travelling to work by residents in the immediate Zone is by private vehicle, which is slightly higher than in the other assessment areas, The proportion of people travelling to work via public transport is slightly below regional and national averages'.

Parish Council Comment

Given that Brooklands Farm lies essentially in a rural area, it is unsurprising that travel by private vehicle is the common method of travel. This is further emphasised by the fact that there is limited public transport in the immediate area, either by bus or train. Although it is understood that improved bus service may be introduced in the future, the ongoing trend of preference for using private vehicular travel is unlikely to decrease given a combination of comparative isolation of the site, lack of infrastructure, and a certain degree of necessity to meet the demands of working life – and associated travel - in general. Private vehicle travel (whether for work or otherwise) has been an accepted factor in rural semi-isolated areas for many years, and through a combination of both personal preference and necessity, one that is highly unlikely to change the basic demographic of village life. Given these restricting factors, the percentage of private vehicle use (already acknowledged as being 'slightly higher than in other assessment areas') WILL without doubt increase by at least 1,000 vehicles, thus adding to increased traffic flow in an already exhausted road network.

7.47 / 7.48 Developer Comment

(7.47) "There are three GP surgeries in the immediate Zone: Chestfield Medical Centre, Whitstable Health Centre and Estuary View Medical Centre. The three surgeries form the Whitstable Medical Practice Group. (7.48) Based on NHS Healthy Urban Development Model (HUDU Model) population size standards of 1,800 people to justify one General Practitioner, there is an average excess capacity of 13,416 patients in the area, which is equivalent to approximately 7 FTE GP."

Parish Council Comment

This statement serves to confirm that there is currently an excess of patient capacity at high level. Although there is reference to a possible 'community hub' within the proposed development plans – there is no definitive guarantee or assurance that further medical centres will be developed. Based on the provided figures of 2.25 persons per residence, this figure would increase by 3.037 patients – a figure that will be further exacerbated by the introduction of the proposed Bodkin Farm development. Although potential developers may state their confirmation of any 'realms of concern' by providing land for community hubs – this again further exposes the deficiencies in local amenity, and although this is possibly something that the potential developer could be excused from – this remains a major concern for the local community in general, and something that authorities MUST consider during any consultation/approval processes.

7.49 Developer Comment

"According to the NHS 'Find a Dentist' tool, there are five dental surgeries in the immediate Zone: Chestfield Dental Practice, Kelvin House Dental Practice, Tankerton Dental Centre and Swalecliffe Dental Centre. Capacity data for dental surgeries is not published in the same way as for GP surgeries. However, according to the practice websites, none of the five surgeries are currently accepting new NHS adult patients, which indicates they are experiencing capacity issues".

Parish Council Comment

Please refer to our previous comment as highlighted in 7.47 & 7.48 above, as we consider that this is similarly relevant in terms of exhausted facilities, particularly given the absence of firm data being available.

7.74 Developer Comment

"The net additional jobs anticipated to be supported as a result of the Proposed Development within the regional area is 2,339 person years of employment in construction related jobs across the 11-year build period, or 213 jobs per annum"

Parish Council Comment

Whilst it is generally accepted that additional construction jobs will be generated during the development phase, this will further exacerbate and increase traffic flow, particularly during peak morning periods (please refer to our comments and findings in the developers' submitted Construction and Management Plan.

7.83 Developer Comment

*"The Proposed Development is therefore considered to have a **negligible** impact on the receptor. The sensibility of this receptor is considered low, however the transport assessment work will identify the final impact of construction traffic".*

Parish Council Comment

Chestfield Parish Council has approached the developer for more concise and definitive information so as to enable us to comment on potential impact from construction traffic. However, we have been advised by 'Hallam Land' that such a Construction and Logistics will not be published until the award of building contractor. Whilst we would accept that plans may be subject to change during the construction phase, we find it unacceptable that 'outline rules' haven't been established in terms of traffic routing, types of vehicles, weight loading or restrictions at initial planning approval stage (how for example, would a potential contractor be expected to submit their respective bids without such information?). This (we fear), would lead to a certain degree of disorganisation and local conflict. We would therefore seek to request publication and subsequent local agreement prior to any planning approvals by the City Council. In view of this (rather open) 'agenda' and absence of such crucial information for such a long-term project – we would question how the suggestion of 'negligible impact' has been assumed or derived?

7.148 Developer Comment

"The construction phase is expected to have a limited short-term impact on travel to work methods and distances. In view of the residual Proposed Development is considered to have a negligible impact on travel to work patterns".

Parish Council Comment

Whilst the topic of impact on work travel (particularly when mixed with that associated with traffic flow being affected by the introduction of additional construction traffic, we fail to understand (yet again!) how impact can be considered as either 'short-term' or 'negligible'. Consequently, we believe that the proposed developer has fallen short in their understanding of local issues or demographics, instead being reliant on outdated traffic modelling rather than actual.

7.149 Developer Comment

'The construction phase of the Proposed Development is not expected to affect existing travel patterns and therefore it is considered to have a negligible impact on the receptor'.

The subject of our protestations regarding the effect on existing travel patterns has been covered within our comments concerning statements 7.83 & 7.148 respectively. Yet again we would voice our concerns regarding the term 'negligible'.

7.151 Developer Comment

"Overall, the residual impact of the construction phase is considered to have a negligible impact on health and educational facilities".

Parish Council Comment

Having listened to the views of many local residents regarding this proposed development, it is sadly obvious that many of our parishioners are very concerned as to impact on personal health and wellbeing. It has been established within this document that many of the roads and associated walkways are narrow, and by virtue of this there is a probable likelihood of this becoming a concerning factor where 'normal' village life will be affected.

Of particular and key concern is the impact that such a long-term project may have on mental health and wellbeing of individuals – something that our discussions (and also those that the developer would have witnessed first-hand during their open consultation with residents) have proved extremely relevant. Again, we would strongly object and question how the developer can assume that impact on health is considered 'negligible'.

7.155 Developer Comment

'The Proposed Development will provide up to 1,350 new dwellings, including a range of housing types and sizes. The residual impact is therefore considered to be moderate beneficial'.

Parish Council Comment

We have highlighted our various concerns throughout this document, particularly during actual construction phase (approximate duration 11 years). It is interesting to note that the presumed residual impact is now considered as 'moderate beneficial' upon completion.

Again, we would seek clarification as to how such assumptions can be derived. We do not believe that this development will be of any benefit (moderate or otherwise).

FOR REASONS UNKNOWN, DOCUMENT VOLUME '8', COVERING TRANSPORT, ACCESSIBILITY AND MOVEMENT' IS INCLUDED WITHIN THE SAME DOWNLOADABLE DOCUMENT ENTITLED 'SOCIOECONOMIC AND HUMAN HEALTH' – WE HAVE THEREFORE TAKEN THE DECISION TO 'ANSWER AS LAID OUT' SO AS TO AVOID CONFUSION:

The following is a brief synopsis of randomly selected statements (by index reference) as provided within developer application documents.

TRANSPORT, ACCESSIBILITY AND MOVEMENT

8.5 Developer Comment

"Construction of the Development will result in additional short-term temporary vehicle movements on the local road network to transport general construction materials to the Site in Heavy Goods Vehicles (HGV's). This results in a temporary intensification of HGV traffic on the public road network. The scale of intensification fluctuates depending on the size of the Development and the phase of construction".

Parish Council Comment

Whilst it is fully understood that there may be an element of vehicle movements during any proposed construction phase, we would question how such HGV traffic movements / intensification on the local road network can be considered as 'short-term temporary'.

Whilst such traffic will without doubt have effect on the 'main' road network (namely the A299), the main concern is how such increased volume of traffic movement through existing residential areas (namely Chestfield Road and South Street) will be managed, whether this be through timed deliveries or otherwise. The existing (residential) road infrastructure is considered neither stable or suitable enough for such heavy loads, not just from a weight-laden point of view, but also in terms of the viability of such and potential of lasting damage to the 'hidden' Victorian infrastructure that lies beneath. It is noted however that there are long-term plans to slip road from the A299 upon completion of 50% of the development.

As current industry average build quota stands at circa 100 houses per year, this would equate to an approximate 7 year period – this duration figure gives cause to further question the developers' continuing assumptions regarding 'negligibility'.

Given this (and also taking into consideration of our previous comments and concerns as highlighted within this document), we would encourage the planned slip road be built at the onset of the project (ie: before actual housing build).

This we see as the most viable and overall acceptable option to ensure that construction efforts can proceed without either disruption to ongoing village life in terms of health and wellbeing, but also to protect a very tired and fragile existing infrastructure.

8.6 Developer Comment

'Operation of the Site will result in an increase in vehicle movements (primarily cars) as the road network associated with residents and visitors travelling to/from the Site. The assessment of traffic and transport effects is structured around consideration of the potential environmental impacts that may arise from the additional vehicles on the local road networks as a result of both the construction and operation of the Site. The environmental impacts considered (where applicable), as identified by the IEMA Guidelines, are as follows:'

- a) Severance of Communities
- b) Road vehicle driver delay
- c) Non-motorised user delay

- d) *Non-motorised user amenity*
- e) *Fear and intimidation*
- f) *Accidents and safety*

Parish Council Comment

Whilst we believe that we have both highlighted and emphasised our thoughts within the context of this document, it is interesting to note that our concerns are somewhat echoed within stated IEMA guidelines. As a consequence to this, we do not feel the need to further comment on this particular statement as highlighted, but merely point out our respective understandings.

8.20/8.21/8.22 Developer Comment

(8.20) 'The assessment of pedestrian delay serves as a proxy for the delay that other modes of non-motorised users may experience when crossing roads'.

(8.21) 'Changes in the volume, composition or speed of traffic may affect the ability of people to cross roads, and therefore increases in traffic levels are likely to lead to greater increases in delay. Delays are dependent upon the general level of pedestrian activity and general physical conditions of the crossing location.'

(8.22) 'Given the range of local factors and conditions which can influence pedestrian delay, the IEMA guidelines do not recommend that thresholds be used as a means to establish the significance of pedestrian delay but recommend that reasoned judgements be made instead. However. The IEMA guidelines do note that, when existing traffic flows are low, increases in traffic of around 30% can double the delay experienced by pedestrians attempting to cross a road'.

Parish Council Comment

The highlighted increase of traffic flow serves to highlight the fact that there are no recognised crossing points on the existing roads. Again, such concerns could be largely eliminated should the developer/KCC chose to build the planned slip roads prior to commencement of site development.

8.23 Developer Comment

'Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic'.

Parish Council Comment

As previously highlighted, the village of Chestfield currently has no formal road crossings. The parish council have lobbied on several occasions over the years to have a pedestrian crossing installed in the village, although on each occasion this has been rejected by KCC/KHS. It is interesting to note that the developer has recognised this in its application, and in fact plans to install a crossing on Chestfield Road, although not within the core village centre. Whilst Chestfield Road itself does have some central islands to aid road crossing, these do not have any direct impact on traffic control.

By its very nature, Chestfield Road (being the only road leading to main areas and bus route) has become increasing busy in terms of traffic flow, particularly at peak times (the same timings that the developer has cited for construction traffic!).

Chestfield Road does not have adequate walkways/pavement width, and we see the addition of further traffic being introduced during the construction phase as detrimental towards existing village life. Our previous suggestion of considering building the planned slip roads at project outset (as opposed to when 50% of the build is complete), is a definite and positive solution towards ensuring quality (pleasantness) of the health and wellbeing of village life.

8.24 Developer Comment

Appraisal guidance which sets out guidance on assessing the hindrance of pedestrian movements as indicated below:

- a. *None – little or no hindrance to pedestrian movement*
- b. *Low – All people wishing to make pedestrian movements will be able to do so, but there will probably be some hindrance to movement.*
- c. *Medium – Pedestrian journeys will be longer or less attractive, some people are likely to be dissuaded from making some journeys of foot.*
- d. *High – People are likely to be deterred from making pedestrian journeys to an extent sufficient to induce a reorganisation of their activities. In some cases, this could lead to a change in the*

location of centres of activity or to a permanent loss of access to certain facilities for a particular community. Those who do make journeys on foot will experience considerable hindrance.

Parish Council Comment

As alluded to in our previous comments (8.23), we feel that the above indicated assessment being quantified as **(d) – HIGH**, as determined within IEMA guidance procedure.

8.31 Developer Comment

'The scale of fear and intimidation experienced by pedestrians is dependent on the volume of traffic, HGV composition, its proximity to people or the lack of protection caused by such factors as narrow pavement widths as well as factors such as the speed and size of vehicles'.

Parish Council Comment

We would draw attention to our comments against developer statements 8.20 to 8.24 inclusive.

8.44 Developer Comment

'Discussions with KCC regarding the Application Site has been ongoing for a number of years. Initially, these discussions included the use of the Kent wider traffic model to demonstrate the Application Site should be considered as part of the Emerging Local Plan. Following this work, a scoping note was produced (ref:10709 SN01) dated 9 May 2024. The scoping note was assessed by KCC, who subsequently confirmed on 17 May 2024 that the methodology included within the scoping note was appropriate and acceptable'.

Parish Council Comment

Whilst the Parish Council remain fully respectful of developer discussions with KCC, we note that such discussions/agreements were made on 9 May 2024 with confirmation of scoping note assessment obtained on 17 May 2024.

In this regard, we would respectfully point out that all such discussions and/or agreements were made with the previous KCC administration, which was changed following the 01 May 2025 local elections. We would therefore seek to question the validity of such agreements given this factor, and further in doing so ask whether further discussion and/or agreement has been reached with the new KCC administration team as of 01 May of this year?

16 Bio Diversity plans and the design responses in the DAS document to identify the possible effect the development will have on protected species, their habitats and arboriculture

Chestfield Parish Council thinks that overall, the design response has adhered to the brief in that potential habitats have mostly been identified and addressed however, there are a few points which we would like to raise:

Bats

Paragraph 220, refers to 'no evidence of Bats roosting' in trees in which they would normally be found. Bats tend to roost June - August and so, our question is, when was this survey carried out? if it is ongoing then this report needs to be updated accordingly.

Curlews

Paragraph 222 The site includes - Wintering birds, 'including a small assemblage of farmland birds, generalist species and limited wetland bird assemblage including linnet, curlew and golden plover.' Chestfield Parish Council would point out that Curlews are a red listed species and are protected under the Wildlife and Countryside Act 1981. Contravention of this status quo could be construed as a criminal offence.

Curlews are ground nesting birds and so any disturbance or change to their habitats including the draining of wetlands and urbanisation will have a significant effect on their population numbers. It is paramount that these nesting sites are not disturbed.

Please clarify how these endangered birds will be protected? If they are nesting in the wetlands and are disturbed then this could seriously affect their numbers. Landowners should be made aware of this and liaise with relevant agencies before any ground works are undertaken.

Paragraph 216. refers to three ancient oak trees which are described as in 'open field landscape.

Paragraph 7.35 explains that 'The existing hedgerows and trees for example will be retained and along with newly-planted trees and hedgerows will form interesting vistas within the development complementing the proposed built form and representing a significant improvement from their current context within an intensely farmed agricultural environment. A variety of different natural and semi-natural landscape

character areas are proposed to enhance the existing environment and offer opportunities for habitat creation and biodiversity gain. The resulting landscape will be diverse and distinctive, with interest for all users'.

Confirmation is required that these ancient oak trees will be retained!

In conclusion, potential developers need to adhere to all of the stipulations which have been referred to in the DAS document.

Disturbance to habitats, feeding and hunting grounds will be inevitable during the building of the development - What steps will be taken to mitigate this issue?

Suggestions going forward-

Dimmed street lighting will aim to reduce the amount of artificial light spilling over onto habitats and lessen disruption to insects and nocturnal animals.

Developers should consider including brick/air holes in their builds so that swifts, swallows, and house martins can roost safely.

Garden highways should be encouraged for hedgehogs to maintain routes around the area.

Ecology constraints must be in place and monitored infinitum to ensure that buffer zones between designated and recreational open spaces are fit for purpose and to ensure the effective safeguarding of protected species.

Implement wild meadow planting for insects and birds.

17 Conclusion

This application is without doubt the most significant planning application Chestfield has ever experienced – and if granted and built will double the size of the existing village. Chestfield Parish Council urges CCC to refuse this application.

Chestfield Parish Council objects to this outline application on the grounds of:

- Insufficient Foul drainage capacity as acknowledged by Southern Water;
- Lack of a traffic management plan;
- Surface water management;
- It is too much development with only two slip roads;
- The proposal is also unacceptable due to the levels of congestion and delay at the Chestfield Road / Herne Bay Road roundabout, and the Long Reach roundabout which are already close to capacity. The Developers' traffic modelling is flawed and would require it to be fundamentally re-worked before any possible re-submission of an application by the Developers.

Should CCC be minded to grant we would ask:

- That a Grampian condition be imposed to align the build with capacity in the network;
- Consideration of West bound slips;
- Earlier implementation of the slips at either the outset or at 15% build;
- A condition that the drainage system (including SuDS) for the residential portions of the development be offered up for adoption to Southern Water via a Section 104 agreement.
- And that the SuDS comply with Southern Water's standards and criteria ([Sewerage Sector Guidance - approved documents | Water UK](#)) for their design and construction in order that Southern Water will adopt them.
- Whilst the land would Transfer to KCC at commencement of development in Policy W4, the parish council requests that there needs to also be a S106 condition to this effect – to avoid any future uncertainty of a school not being built after approval of planning – and an undesirable second tranche of housing on this land being applied for instead. The land conditioned for educational purposes only by condition, would secure against any further housing instead.