



## **BEKESBOURNE-WITH-PATRIXBOURNE PARISH COUNCIL**

Minutes of the meeting held on Monday 8<sup>th</sup> September 2025  
at 7:30pm Bekesbourne Pavillion.

**Minutes to be formally agreed at the next meeting.**

### **1. Those Present**

Parish Cllr D.Sladden (Chair)	Parish Cllr Christine Sladden (Vice Chair)
Parish Cllr Andrea Nicholson	Parish Cllr Christine Ash
Parish Cllr Joanne Watt	Parish Cllr Caroline Tuffey
Parish Cllr Mark Rhodes	

Mrs N. Purcell (Clerk/Finance Officer to the council)

There were 0 Members of the public present.

### **2. Apologies for Absence**

Parish Cllr Mary Evans

### **3. Declarations of councillor interests relevant to this agenda**

Cllrs M. Rhodes and C. Tuffey are allotment tenants.

### **4. Public representation**

None

### **5. External Reports**

#### **5.1 County Councillor Reports**

Cllr Sole's monthly report was received and circulated to councillors ahead of the meeting.

#### **5.2 City Councillor Reports**

Cllr Castle's monthly report was received and circulated to councillors ahead of the meeting.

### **6. To Confirm minutes of the previous meeting**

**Resolved:** It was proposed by C. Ash and seconded by A. Nicholson that the minutes of the meeting held on 11<sup>th</sup> August 2025 are a TRUE and ACCURATE record.

**Outcome:** 3 votes in favour, 3 abstained, motion carried.

**7. To report any matters arising (*from the previous meeting not covered elsewhere on the agenda*)**

- Staff Matters (confidential item) are being progressed, awaiting further instructions from the LGPS.
- Cllr Ash has sent in an email chain evidencing that the footpath leading toward the train station from under the railway bridge, falls under the responsibility of Canterbury City Council. Matters are progressing.

**8. Any s101 Delegated Authority items to be noted by council.**

None.

**9. Any updates from representatives from external groups (*if any*)**

**9.1 Recreation Ground Management Committee**

New items have been purchased and installed with the grant money.  
(Tables, chairs, blinds.)

**9.2 Village Hall Management Committee**

No update.

**9.3 The River Group**

No update.

**9.4 KALC**

KALC autumn newsletter received and circulated to councillors.

**9.5 A257 Traffic Management Group**

Lots of concerns over the number of crashes on this road. Next meeting date to be confirmed.

**10. Highways Matters**

**10.1 20mph limit at Patrixbourne**

No further update since the August meeting: The 20mph scheme remains on track, with all necessary data now compiled and formally submitted to KCC for their review. We are currently awaiting the

scheduled meeting with KCC to discuss the findings and agree the next steps, ensuring the scheme continues to progress.

Clerk has chased the matter on 22nd August and 12th September.  
An update received today

### **10.2 Any new matters to raise**

Chalkpit Hill has become overgrown again. Previously KCC advised this would be part of their regular maintenance schedule.

## **11 To note September payment schedule & approve any new payments.**

**Payments Made Since the last meeting as per financial Regulation 6.8 iii.**

Payment	Amount
Hugo Fox Ltd Website fee	£23.99
August Salary	As Per Salary Slip

**Payments Due for Approval:**

Recipient	Detail	Amount
N. Purcell	September Phone Bill	£5.00
Hugo Fox Ltd	Website fee	£23.99
N. Purcell	September HP Ink Subscription	£9.99
N. Purcell	September Salary	As Per Salary Slip

**Resolved:** It was proposed by C. Ash and seconded by C. Tuffey to approve the September Payment Schedule.

**Outcome:** All in favour, motion carried.

### **11.2 S106 Funding (Updates)**

This has been progressed as resolved. Awaiting update. Clerk has kept the RGMC updated.

Cllr Sladden wishes to obtain quotes for a replacement playground plaque.

### **11.3 To begin budget discussions for 2026/27**

The Clerk advised that the council should commence the budgeting process for the 2026/27 financial year. Councillors to contact the Clerk with any suggestions for projects for the next financial year. This will enable the Clerk to start costings for any projects/ matters that council

wish to pursue, ensuring all provisions are identified and finalised by the November meeting.

## **12 Planning**

### **12.1 To Receive Updates on previous consultee responses**

No updates.

### **12.2 To Discuss any new applications**

No new applications were received.

### **12.3 Outbuildings**

Concerns raised over the structure in Aspinall Close- Additional correspondence received as per item14. Council requested that Planning Enforcement be notified to enquire.

### **12.4 Draft Canterbury District Local Plan - Focused consultation (Reg 18)**

Canterbury City Council's Cabinet considered a report at its meeting on 8th September recommending a focused consultation is undertaken on changes to the Draft Canterbury District Local Plan.

The report recommended that consultation is held on:

- a number of new draft site allocations policies
- changes to some of the draft strategic site allocations
- Gypsy and Traveller draft policies and allocations
- implications of other relevant changes to the NPPF

Cabinet decided not to consult on a full draft of the Local Plan again at this stage, and all comments made at previous consultation stages will be taken into account as preparations are made for the full Regulation 19 version for publication in early 2026, ahead of its Examination.

Cabinet agreed to launch the consultation and it will be open for a six-week period from 9th September to 21st October2025.

Full details of the consultation can be found here: [Draft Canterbury District Local Plan: Focused consultation 2025 | Have Your Say](#)

The Parish Council agreed to submit the following response:



## **Draft Canterbury District Local Plan – Focused consultation 2025**

### **Regulation 18 “The Town and Country Planning (Local Planning) (England) Regulations 2012”**

#### **Introduction and context**

Before we proceed to the final draft stage of the Local Plan’s preparation, known as Regulation 19 stage, and submit the plan to the Government for its Examination, this focused consultation is seeking views on:

- A number of new draft site allocations policies;
- Changes to some of the draft strategic site allocations; and
- Gypsy and Traveller policies and allocations.

We’re also asking for feedback on what some of the other relevant changes to the National Planning Policy Framework (NPPF), which was updated in December 2024, might mean for Canterbury District.

We are **not** consulting on the entire draft Local Plan again.

**You do not need to resubmit any comments you have previously sent to us.**

All the comments we have received through previous consultations will feed into final draft version for Regulation 19 stage early next year. At that stage any further amendments to the draft policies, including site allocation policies, needed to address these comments and to meet other government requirements will be set out.

There will be another opportunity to comment on the whole plan when we publish the full draft Canterbury District Local Plan for Regulation 19 stage in early 2026.

Questions that must be answered are marked with an asterisk (\*)

1. **Are you responding as...? \*** Please tick one box only

- A resident of the Canterbury district
- A visitor to the Canterbury district
- A worker in the Canterbury district
- A business, organisation or community group, please provide the name and state how many people you represent: \_\_\_\_\_
- A city, county, parish or town councillor, please specify:
  - Canterbury City Council councillor, please provide your name and state how many people you represent: \_\_\_\_\_
  - Kent County Council councillor, please provide your name and state how many people you represent: \_\_\_\_\_
  - Parish or town council councillor, please provide your name and the name of the parish or town council and state how many people you represent:  
\_\_\_\_\_
- An MP

Other, please specify: Parish LCerk for Bekebsourne with Patrixbourne Parish Council

2. **Which part/s of the focused consultation would you like to comment on? Please tick all that apply**

- Aligning the Local Plan with new NPPF requirements **Please go to Part 1**
- Canterbury area Draft Local Plan policies for consultation **Please go to Part 2 Canterbury area**
- Whitstable area Draft Local Plan policies for consultation **Please go to Part 2 Whitstable area**
- Herne Bay area Draft Local Plan policies for consultation **Please go to Part 2 Herne Bay area**
- Rural area Draft Local Plan policies for consultation **Please go to Part 2 Rural area**
- District-wide Strategic Draft Local Plan policies for consultation **Please go to Part 2 District-wide Strategic**
- Sustainability Appraisal and Impact Assessments **Please go to Part 3**

## **Part 1: Aligning the Local Plan with new NPPF requirements**

The new NPPF has introduced a number of policy changes which will affect the Local Plan, and we may need to adapt some of our draft policies to ensure it is consistent with new national policies.

This section seeks your views on some of these key changes, including in respect of the Local Plan period, affordable housing and economic development.

You will need to read the background information in Section 1 of the Draft Canterbury District Local Plan – focused consultation

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90322>  
before answering these questions.

### **Question 1: Local Plan period and housing needs**

Please **do not** include personal information in your responses below.

- 1. Do you have any comments on the proposed housing need and plan period for the new Local Plan? Please explain your answer.**

Bekesbourne with Patrixbourne Parish Council notes the proposed housing need and plan period set out in the Regulation 18 Draft Canterbury District Local Plan. While we recognise the legal requirement for the Council to plan for housing growth over a minimum 15-year period, we have several concerns regarding both the scale of housing proposed and the basis on which the need has been calculated.

#### **1. Housing Numbers and Methodology**

The housing need appears to be driven primarily by the Government's standard method, which does not adequately reflect the environmental and infrastructure constraints of Canterbury District. The Parish Council believes that the figure should be carefully tested against local capacity — including available land, environmental designations, and infrastructure limits — rather than simply accepted as a top-down requirement.

#### **2. Infrastructure Capacity**

Before any housing numbers are finalised, there should be robust evidence that local roads, public transport, schools, healthcare and utilities can accommodate the proposed growth. Without this, there is a serious risk of over-development and deterioration in quality of life for existing residents.

#### **3. Plan Period and Delivery**

The Parish Council supports a realistic and deliverable plan period. However, it is important that the early years of the plan focus on sites that are genuinely deliverable and supported by infrastructure commitments, rather than relying heavily on large, strategic sites that may not come forward until the latter years of the plan period. The opening of Thanington Primary School, originally scheduled for September next year, has now been delayed until 2030. The Council understands that this delay is the responsibility of Kent County Council (KCC). This situation reinforces our concerns that local infrastructure provision is not keeping pace with planned development.

#### **4. Sustainability and Local Character**

The housing requirement should not compromise the District's rural character, biodiversity, or heritage. Any housing target must be aligned with the capacity of the area to accommodate change

## Question 2: Affordable housing and social rent

Please **do not** include personal information in your responses below.

**2. Do you have any comments about how the new Local Plan should plan for social rent housing in the district? Please explain your answer.**

Bekesbourne-with-Patrixbourne Parish Council strongly supports the inclusion of a clear and deliverable policy within the new Local Plan to provide genuinely affordable housing for local people, with a particular focus on social rent homes.

**1. Meeting Local Need, Not Market Demand**

The Parish Council is aware that many residents, are priced out of the local housing market. However, the high cost of land and new development in the Canterbury area means that so-called “affordable” homes are often still out of reach. The Local Plan should therefore prioritise social rent housing—where rents are genuinely aligned with local income levels—over affordable rent or shared ownership products.

**2. Limited Land Availability**

The area surrounding Bekesbourne and Patrixbourne has very limited capacity for new development, constrained by its rural character, landscape quality, and environmental designations. Any housing that is delivered should therefore be small-scale and locally focused, aimed at meeting proven local need rather than contributing to general district-wide housing numbers.

**3. Delivery and Partnership Working**

The Parish Council encourages Canterbury City Council to work proactively with registered providers, local landowners, and community-led housing organisations to secure small rural exception sites for social rent housing. This approach can deliver modest, well-designed homes that meet community need without harming the character of the parish.

**4. Ensuring Long-Term Affordability**

Any social rent homes developed should be secured in perpetuity to ensure they remain available for local residents and do not convert to higher rent or ownership models in future

### Question 3: Economic development and modern economy

Please do not include personal information in your responses below.

#### 3. Do you have any comments about how the new Local Plan should plan for economic growth in the district, including in respect of modern economy uses?

Bekesbourne-with-Patrixbourne Parish Council recognises the importance of supporting sustainable economic growth across the district. However, this must be balanced carefully with the protection of rural character, the environment, and the wellbeing of local communities.

##### 1. Balanced and Sustainable Growth

The Parish Council supports growth that strengthens the local economy without generating adverse impacts on rural areas. Economic expansion should be directed towards appropriate, accessible locations with suitable infrastructure, rather than dispersed into villages where it would increase traffic, pollution, and harm to landscape character.

##### 2. Impact of Through-Traffic on Rural Roads

The Parish Council is particularly concerned about the cumulative impact of increased through-traffic along Bekesbourne Lane, Bekesbourne Hill, Patrixbourne Road, and Station Road, which already experience high levels of non-local traffic. These are narrow rural lanes with limited capacity, sharp bends, and no pedestrian footways, making them unsuitable for additional traffic associated with business or logistics growth.

Further increases in vehicle movements would raise safety risks for residents, cyclists, and walkers, damage roadside verges, and undermine the tranquillity and heritage setting of the parish. The Local Plan should therefore ensure that any economic growth proposals are accompanied by robust transport assessments, clear routing strategies, and effective mitigation measures, and should actively discourage through-traffic on rural lanes such as those in Bekesbourne and Patrixbourne.

##### 3. Supporting the Modern Economy

The Parish Council supports policies that promote digital connectivity, remote working, and small-scale local enterprise. Reliable broadband and mobile coverage are essential to enabling residents to work from home or run small businesses, reducing the need to travel and supporting the modern economy in a sustainable way.

##### 4. Rural Enterprise and Tourism

The Plan should encourage small-scale, sustainable rural enterprises, such as farm diversification, local food production, and countryside or heritage-based tourism. These activities can provide valuable employment opportunities without compromising the parish's rural character or placing additional pressure on the local road network.

##### 5. Local Benefit and Inclusivity

Economic policies should demonstrate tangible local benefits, including access to training and employment for district residents, rather than prioritising large-scale developments that would primarily benefit commuter populations or external investors.

##### 6. Need for a Rural Traffic Management Strategy

The Parish Council urges Canterbury City Council to develop a Rural Traffic Management Strategy as part of the new Local Plan. This should specifically address the impact of economic growth on rural transport routes such as Bekesbourne Lane, Bekesbourne Hill, Patrixbourne Road, and Station Road, with the aim of reducing through-traffic, improving safety, and protecting the amenity and character of rural communities.

#### **Question 4: Water infrastructure and delivery**

Please **do not** include personal information in your responses below.

- 4. Do you have any suggestions about how the new Local Plan could ensure that improvements or upgrades to water infrastructure are considered earlier in the planning application process to support sustainable development?**

Bekesbourne-with-Patrixbourne Parish Council strongly supports the principle that **water infrastructure capacity and environmental impacts** should be addressed **at the earliest possible stage** of the planning process. Ensuring that adequate infrastructure is in place before development proceeds is essential to protect local communities, the environment, and the long-term sustainability of growth across the district.

- 1. Early and Proactive Infrastructure Planning**

The Parish Council believes the Local Plan should require early engagement between developers, Canterbury City Council, and statutory providers such as Southern Water and the Environment Agency before planning applications are submitted. Water supply and wastewater capacity assessments should form part of the **initial** site allocation evidence base, not left until detailed application stage.

- 2. Phasing Development to Infrastructure Capacity**

Development should be phased or delayed where water infrastructure is insufficient to support it. The Plan should include clear policies linking the timing of housing and employment growth to the delivery of essential water and wastewater upgrades, to avoid overloading existing systems.

- 3. Localised Capacity Constraints**

In rural areas such as Bekesbourne-with-Patrixbourne, drainage systems are already fragile, and there are concerns about the cumulative impact of additional development on both foul and surface water networks. Flooding from heavy rainfall and groundwater emergence has become more frequent, and new development must not exacerbate these risks. Early coordination with infrastructure providers is critical to prevent downstream problems in both local and strategic systems.

- 4. Environmental Protection**

The River Stour catchment and its tributaries are environmentally sensitive, and inadequate wastewater treatment can contribute to nutrient pollution and harm biodiversity. The Local Plan should therefore ensure that water infrastructure improvements support the Council's wider climate and ecological objectives, including compliance with the Habitats Regulations and protection of the River Stour SAC.

- 5. Policy Strengthening**

The Parish Council recommends that the Local Plan include a specific policy requiring Water Infrastructure Statements for all major developments, setting out existing capacity, proposed upgrades, and the timing of delivery. This would ensure that infrastructure improvements are secured and funded before occupation of new dwellings.

- 6. Heritage**

It is also important to highlight that Canterbury is a UNESCO World Heritage Site, and as such, we have a collective responsibility to act as custodians of its unique character and historic setting.

## **Part 2 – Draft Local Plan policies for consultation**

### **Canterbury area**

You will need to read the background information in **Section 2 of the Draft Canterbury District Local Plan – focused consultation**

**<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90332>**

and the draft policies for the **Canterbury area in Section 3**

**<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90323>**

before answering these questions.

This section also seeks your views on the deletion of two strategic site allocations at Canterbury – Land north of the University of Kent (Policy C12) and Land north of Hollow Lane (Policy C7).

**Question 5: Deletion of the draft strategic development allocation at Land north of the University of Kent (Policy C12)**

Please **do not** include personal information in your responses below.

5. **Do you have any comments on the proposed deletion of Land north of the University of Kent (Policy C12)?**

allocation at Land north of the University of Kent (Policy C12) from the new Canterbury City Council Local Plan. This decision is fully supported for the following reasons:

1. **Rural character, landscape and ecology**

The land proposed under Policy C12 lies within the green belt of the city's hinterland, adjacent to the ancient woodlands of the Blean and the sensitive rural setting of villages such as Tyler Hill and Blean. Development of around 2,000 homes (as the site was previously envisaged) would have represented a major expansion of urban form into deeply rural surroundings, risking significant harm to rural character and biodiversity.

By deleting this allocation, the Council stands a better chance of protecting the landscape integrity of the area and aligning the plan with its commitments to biodiversity and green infrastructure.

2. **Transport infrastructure and access constraints**

Several credible concerns were raised about the ability of the local highway network to accommodate the scale of traffic associated with such a development in this location. The site's primary access points would rely on rural lanes and roads not designed for large-scale residential expansion or the associated community hub, school and commercial uses that a "new settlement" would generate.

The deletion therefore avoids further pressure on junctions, rural lanes and village roads in the wider Blean/Tyler Hill area, which would have increased through-traffic and impacted local residents' amenity and safety.

3. **Consistency with plan soundness and infrastructure deliverability**

Representations to the consultation have identified that Policy C12 was at risk of undermining the coherence and deliverability of the Local Plan—contradicting other policies relating to environmental protection, transport strategy and rural settlement hierarchy. The deletion helps to ensure that the plan remains robust and credible by focusing development where infrastructure and access are more appropriate.

4. **Opportunity to redirect growth to more sustainable locations**

With the removal of this large greenfield allocation, there is an opportunity for the Local Plan to focus on better-connected and serviced sites, brownfield regeneration and smaller-scale housing growth that is compatible with existing communities and infrastructure. This approach is more in keeping with the rural context of Bekesbourne-with-Patrixbourne and the wider district.

5. **Local parish voice and precedent**

Many local parish councils and community groups (including Save the Blean) have made strong representations opposing Policy C12 on environmental, transport and heritage grounds. Their views reflect local knowledge of the constraints on land north of the University of Kent. The Council is therefore supportive of the Local Plan recognising these objections and responding by deleting the site.

**Recommendation**

Bekesbourne-with-Patrixbourne Parish Council therefore urges Canterbury City Council to maintain the deletion of Policy C12 and to ensure that no alternative large-scale strategic allocation is substituted in the immediate rural hinterland of the city without full evidence of infrastructure capacity, access safety, and environmental sustainability. The Council also encourages the Local Plan to publish a statement of how growth will be met now that this allocation has been removed and how the redistribution of housing numbers will be managed.

## **Question 6: Deletion of the draft strategic development allocation at Land north of the Hollow Lane (Policy C7)**

Please **do not** include personal information in your responses below.

### **6. Do you have any comments on the proposed deletion of Land north of Hollow Lane (Policy C7)?**

Bekesbourne-with-Patrixbourne Parish Council welcomes the proposed deletion of the allocation identified as Policy C7 (Land north of Hollow Lane) in the draft Local Plan. The Council supports this change for the following reasons:

#### **1. Landscape, environmental and rural-edge character**

The land north of Hollow Lane sits at the southern edge of Canterbury's built area and forms part of the transition between the city and its rural hinterland. The parish council considers that development of this scale in a location such as this would threaten the character, openness and visual setting of the countryside, undermining the rural edge and the identity of adjacent villages. Evidence from stakeholders indicates that the site lies within identified landscape-sensitivity areas and that large-scale development could have unacceptable visual, ecological and land-use impacts.

#### **2. Highway and access constraints**

One of the fundamental issues with Policy C7 has been its reliance on significant highway infrastructure interventions — particularly the proposed “South West Canterbury link road” connecting Cockering Road through to the A2 — which are considered to be untested, costly and with substantial risks to deliverability. The parish council shares concerns that traffic from a large allocation here would increase pressure on narrow rural lanes, such as Bekesbourne Lane, Bekesbourne Hill and Station Road, which are already impacted by through-traffic and commuter flows. The deletion therefore avoids placing further strain on local highway capacity and safety.

#### **3. Infrastructure and deliverability risks**

The deletion of C7 reflects the recognition by the council of deliverability concerns – both in terms of cost and timing of infrastructure, and in terms of ensuring that the development would be genuinely sustainable. The parish council supports this prudent approach, recognizing that sustainable development requires infrastructure (transport, drainage, services) to be in place or clearly funded, not simply promised at an aspiration stage. Evidence from local submissions flagged the red-listed nature of some constraints: ancient woodland adjacency, best & most versatile agricultural land, groundwater protection zones and mineral safeguarding areas.

#### **4. Opportunity to refocus growth on more sustainable locations**

By deleting the C7 allocation, Canterbury City Council has the opportunity to re-channel growth towards locations with better existing infrastructure, or to prioritise brownfield regeneration or smaller-scale developments that are in tune with local capacity and parish character. The parish council supports such a redirection, which would align with parish objectives of maintaining village character, protecting countryside and enabling incremental, sustainable growth.

#### **Recommendation**

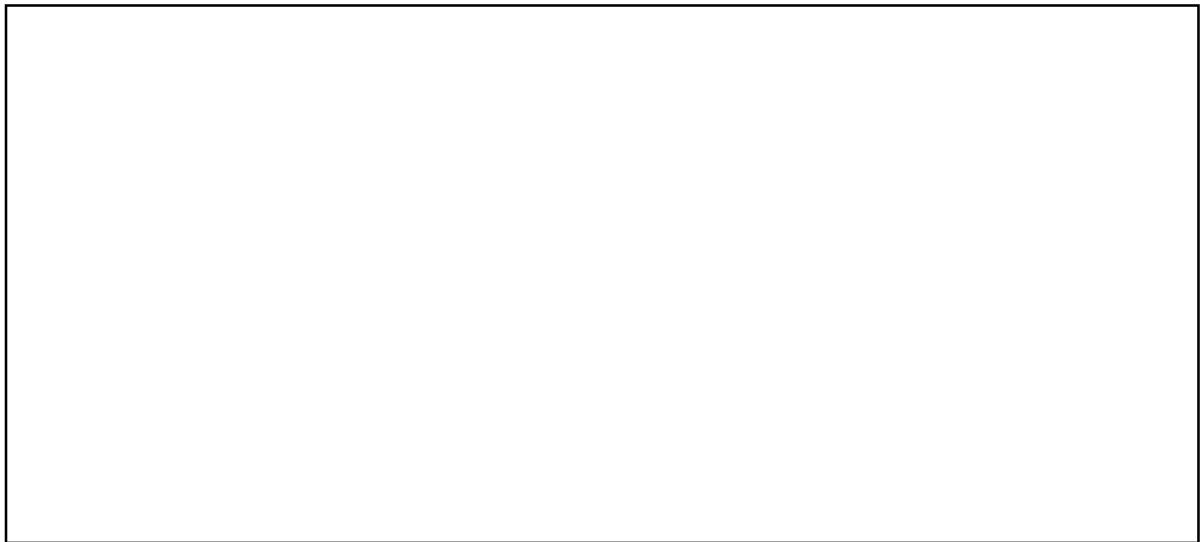
Bekesbourne-with-Patrixbourne Parish Council therefore supports the proposed deletion of Policy C7. The Council respectfully urges Canterbury City Council to ensure that:

- No alternative large strategic allocation is substituted in this location without fresh, robust evidence of infrastructure capacity, environmental impact, transport modelling, and deliverability.
- The parish's concerns about rural traffic, especially along Bekesbourne Lane, Bekesbourne Hill and Station Road, are explicitly acknowledged in the Local Plan's transport strategy.
- Any redistributed housing numbers resulting from the deletion of C7 are matched by infrastructure-led planning and measures to protect the distinctive rural character of villages and countryside.

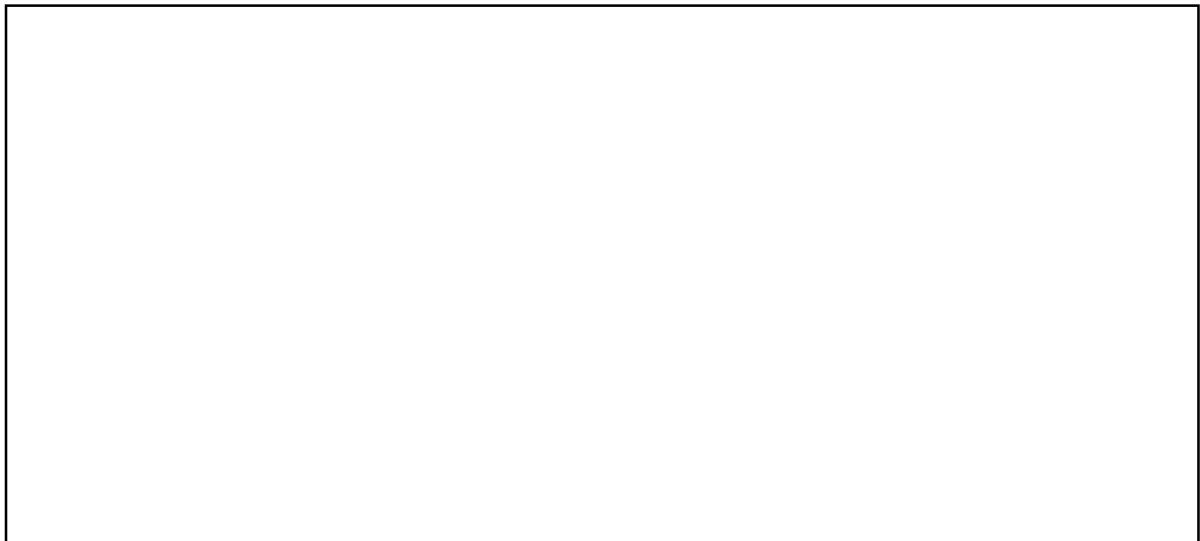
## **Policy N1: Land at Merton Park**

Please **do not** include personal information in your response below.

7. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, occupying the central portion of the page below the question. It is intended for respondents to write their comments.

8. **Do you have any comments on Site 10: Ridlands Farm and Langton Field, Canterbury being retained as a Carried Forward 2017 Local Plan Policy?** Please provide any evidence you have to support your comments.



#### **Policy N2: Land at Langton Lane**

Please **do not** include personal information in your response below.

9. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.



## **Policy N3: Thanington Recreation Ground**

Please **do not** include personal information in your response below.

10. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

## **Policy N4: Land south of Littlebourne Road**

Please **do not** include personal information in your response below.

11. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

Bekesbourne-with-Patrixbourne Parish Council objects to the allocation of Land South of Littlebourne Road unless robust evidence shows that development can be made sustainable in accordance with the **National Planning Policy Framework (December 2024)**.

**1. Infrastructure Capacity & Cumulative Impact (Paragraphs 20-23 & 35-36)**

Strategic policies must make sufficient provision for transport, water, wastewater, and flood-risk management (Para.20 b) and be supported by deliverable infrastructure (Para.35). The parish lies immediately south of the Mountfield Park (C6) urban-extension area, whose planned 4,000 homes and school campus will already add heavy traffic to Bekesbourne Lane, School Lane, and the A2 junction. The recent deletion of the proposed A2 slip-road improvements at Bridge—which were intended to relieve congestion from Mountfield Park—will significantly increase traffic pressure along the Bekesbourne–Littlebourne corridor. Without this strategic mitigation, development at N4 would further overload the road network and fail the NPPF soundness test of *effectiveness* (Para.36).

**2. Transport & Highway Safety (Paragraphs 109–118)**

Bekesbourne Lane and School Lane form a narrow rural link road to the A2 and already carry commuter and school traffic. They lack pavements and cycling provision, and the infrequent local bus service offers little alternative. Paragraph 110 requires growth in locations that “can be made sustainable,” and Para.115 d requires significant impacts on capacity or safety to be mitigated. No evidence of a comprehensive Transport Assessment or mitigation strategy has been provided.

Continued....

**3. Flood Risk & Drainage (Paragraphs 161–165 & 170–176)**

Surface-water run-off regularly affects low points along Bekesbourne Lane. Without strategic SuDS and capacity upgrades, new development would fail to comply with Para.161 (requirement to plan for climate-related flood risk) and the sequential test (Para.170).

**4. Rural Character (Paragraphs 135 c & 187 b)**

The site forms part of Canterbury's rural setting. Large-scale housing would erode the distinct gap between city and countryside, contrary to Para.135 c (design sympathetic to local character) and Para.187 b (recognising "the intrinsic character and beauty of the countryside").

**Recommendation:**

Delay or remove the allocation until funded infrastructure, full drainage modelling, and a district-wide transport assessment demonstrate deliverability.

## **Policy N5: Land south of Bekesbourne Lane**

Please **do not** include personal information in your response below.

**12. Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

Bekesbourne-with-Patrixbourne Parish Council strongly objects to Policy N5 due to cumulative traffic, infrastructure, and environmental constraints.

**1. Transport Network and Through-Traffic (Paragraphs 110 & 115 d & 118)**

Bekesbourne Lane and School Lane are functioning as an east-west link route between the A257 and A2, carrying commuter, school, and agricultural traffic. The lanes are narrow, without pavements, and already hazardous for pedestrians and cyclists. Additional development would increase through-traffic and conflict with Para.110 and 115 d. The policy must require a full Transport Assessment covering the entire Bekesbourne corridor and a Rural Traffic Management Plan.

**2. Infrastructure and Utilities (Paragraphs 20 b & 161–165)**

The parish experiences limited water pressure and foul-drainage surcharging after heavy rainfall. Southern Water has confirmed network constraints in this sector. Paragraph 20 b requires provision for water and wastewater infrastructure, and Para.161 requires development to reduce—not worsen—climate-related flood risk. No evidence of such provision accompanies this allocation.

**3. Environmental Impact (Paragraphs 135 c & 187–188)**

This greenfield site provides open views toward the Stour Valley and contributes to the ecological network. Paragraph 187 b recognises the "intrinsic character and beauty of the countryside," and Para.188 directs plans to allocate land of the least environmental value—criteria that N5 does not meet.

**4. Recommendation:**

- Require infrastructure upgrades to precede any occupation.
- Safeguard rural character and biodiversity through buffers and net-gain planting.
- Re-evaluate cumulative impacts with Mountfield Park (C6) under NPPF Para.36 (soundness).

## **Policy N6: Land north of Bekesbourne Lane at Hoath Farm**

Please **do not** include personal information in your response below.

13. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

Bekesbourne-with-Patrixbourne Parish Council objects to Policy N6 because the site is unsustainable in transport, infrastructure, and environmental terms.

1. **Unsustainable Location & Cumulative Effects (Paragraphs 8, 11 & 20–23)**

The site is peripheral, car-dependent, and would extend Canterbury's urban form southwards toward Bekesbourne. Together with Mountfield Park (C6), N4, and N5, it would overwhelm the Bekesbourne Lane / School Lane A2 link. Paragraph 8 sets the objectives of sustainable development, paragraph 11 requires plans to promote sustainable patterns, and Para.36 demands effectiveness—none are met here.

2. **Traffic and Safety (Paragraphs 110 & 115 b–d & 118)**

The lanes are already sub-standard for heavy vehicles; additional traffic would create highway-safety risks, conflicting with Para.115 b–d. A corridor-wide Transport Assessment and funded mitigation are essential pre-conditions.

3. **Water & Drainage (Paragraphs 161–165 & 170–176)**

The site lies on clay soils with poor infiltration; drainage issues already affect properties downhill toward Bekesbourne Valley. Without SuDS and capacity upgrades, the proposal would fail Para.161 and the sequential test in Para.170.

4. **Design and Landscape (Paragraphs 135 c–d & 187 b)**

Development must be sympathetic to landscape setting (Para.135 c) and maintain the area's open rural identity (Para.187 b). Large-scale housing here would visually merge Canterbury with rural Bekesbourne.

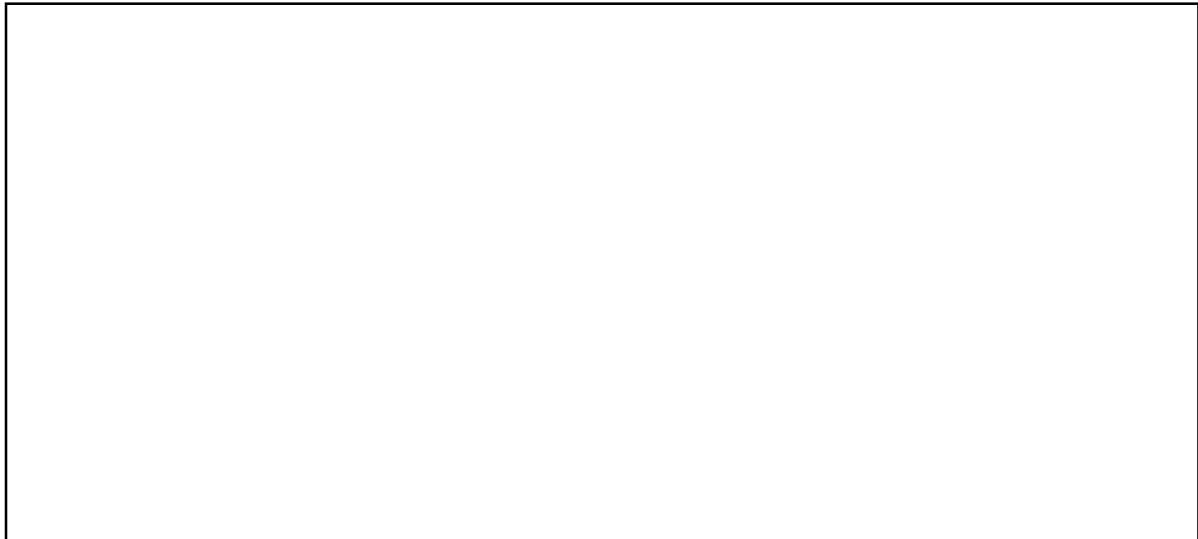
**Recommendation:**

Re-assess Policy N6 under the NPPF Para.36 tests of soundness. If retained, the allocation should be reduced to community-led affordable housing only, contingent on prior delivery of drainage and transport improvements and supported by biodiversity-net-gain landscaping.

### **Policy N7: Land at Seotamot**

Please **do not** include personal information in your response below.

14. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

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### **Policy N8: Millers Field Car Park**

Please **do not** include personal information in your response below.

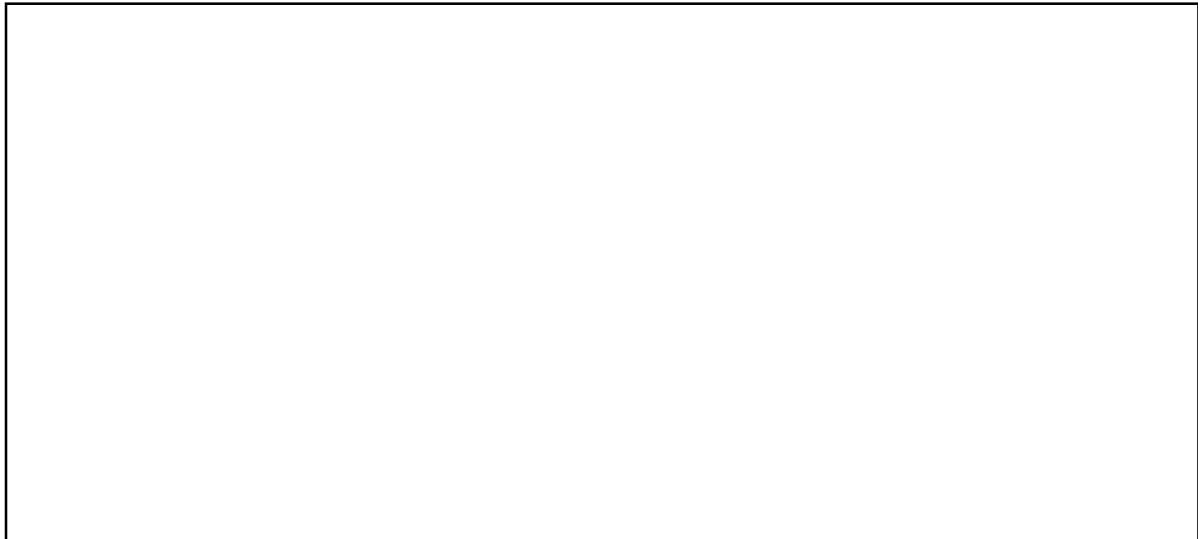
15. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

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### **Policy N9: Land at Hawk's Lane**

Please **do not** include personal information in your response below.

16. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, intended for the respondent to provide comments on Policy N9.

### **Policy N10: Land at Military Road**

Please **do not** include personal information in your response below.

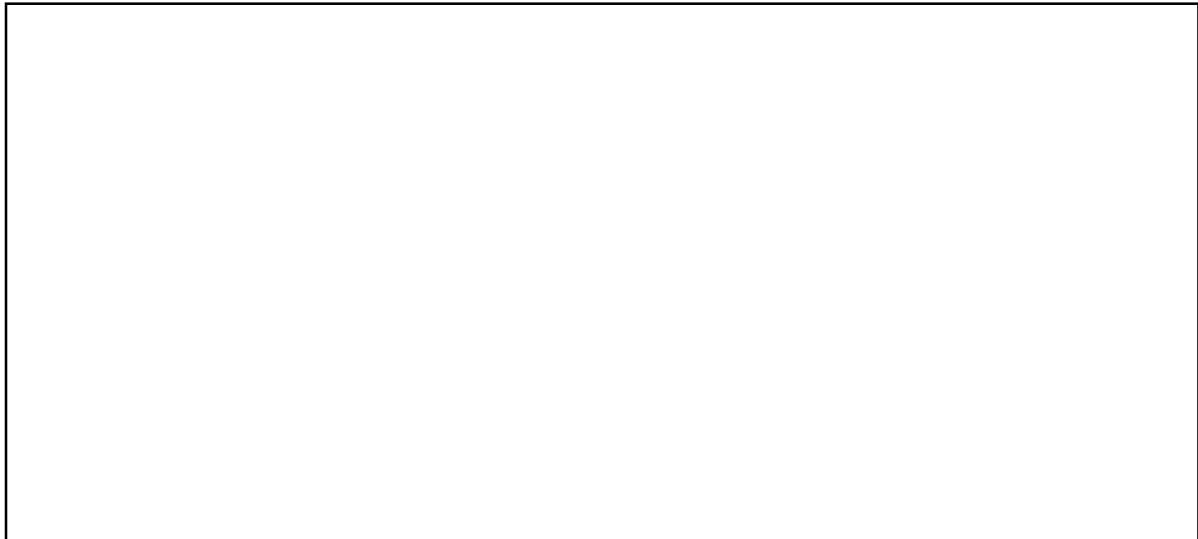
17. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, intended for the respondent to provide comments on Policy N10.

### **Policy N11: Land at Long Meadow Way**

Please **do not** include personal information in your response below.

18. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, intended for the respondent to provide comments on Policy N11.

### **Policy N12: Land at Bawden Close**

Please **do not** include personal information in your response below.

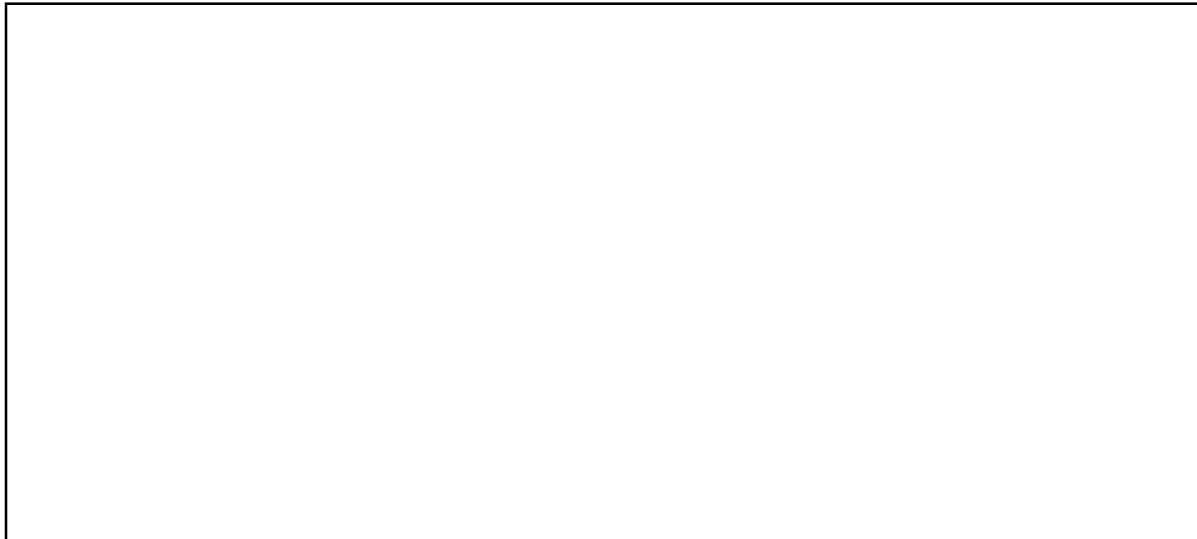
19. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

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### **Policy N13: Land at Copinger Close**

Please **do not** include personal information in your response below.

20. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

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### **Policy N14: Land at Jesuit Close**

Please **do not** include personal information in your response below.

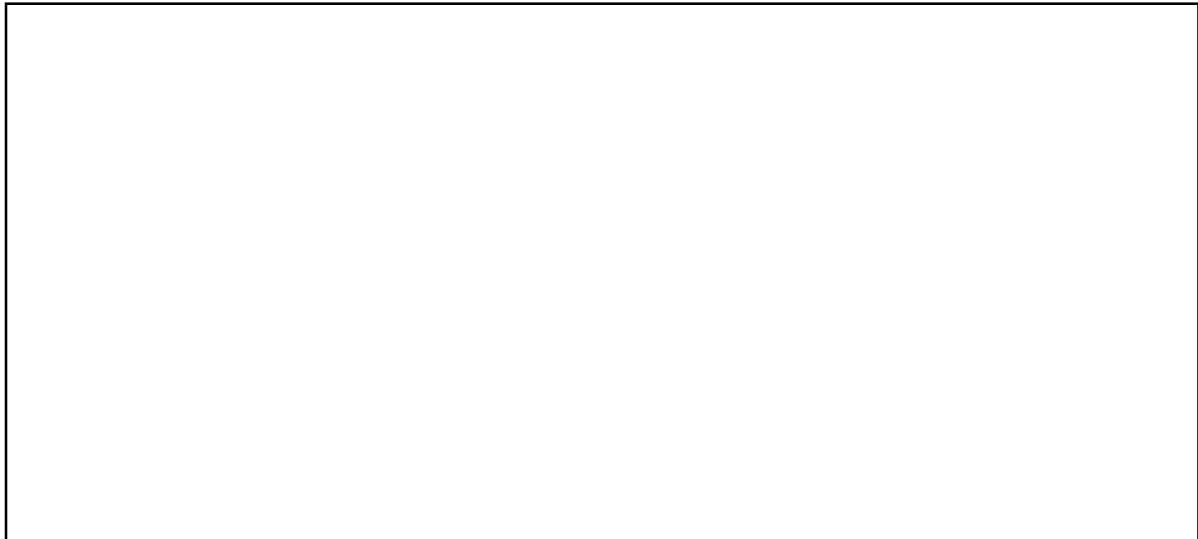
21. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

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### **Policy N15: Land at Suffolk Road**

Please **do not** include personal information in your response below.

22. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

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### **Policy N16: Land at St Stephen's Road**

Please **do not** include personal information in your response below.

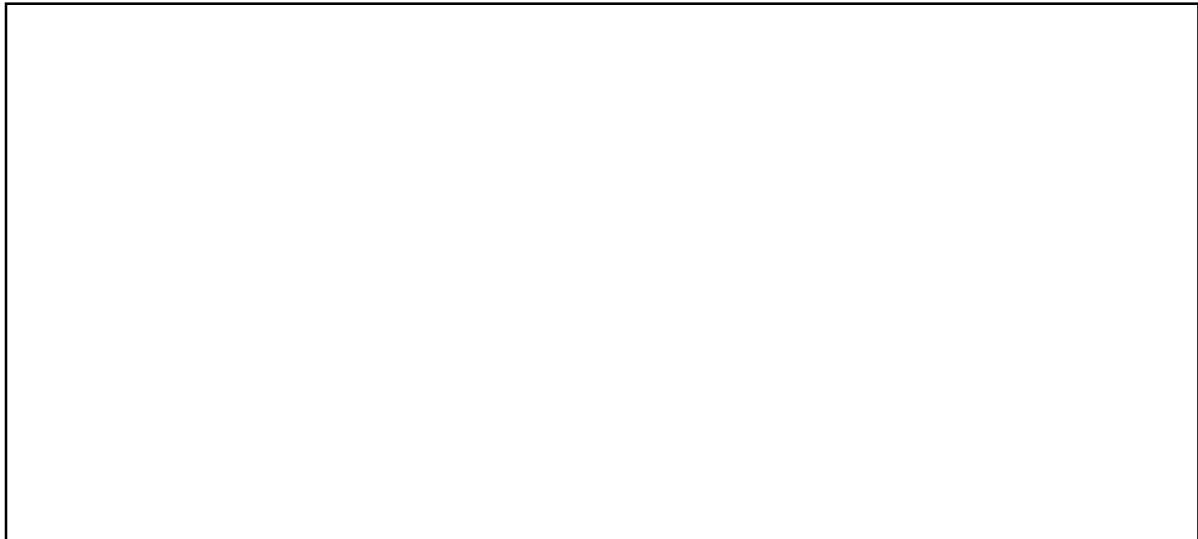
23. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, intended for the respondent to provide comments on Policy N16.

#### **Policy N17: Land at Whitehall Close**

Please **do not** include personal information in your response below.

24. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, intended for the respondent to provide comments on Policy N17.

#### **Policy N18: Land at Sussex Avenue**

Please **do not** include personal information in your response below.

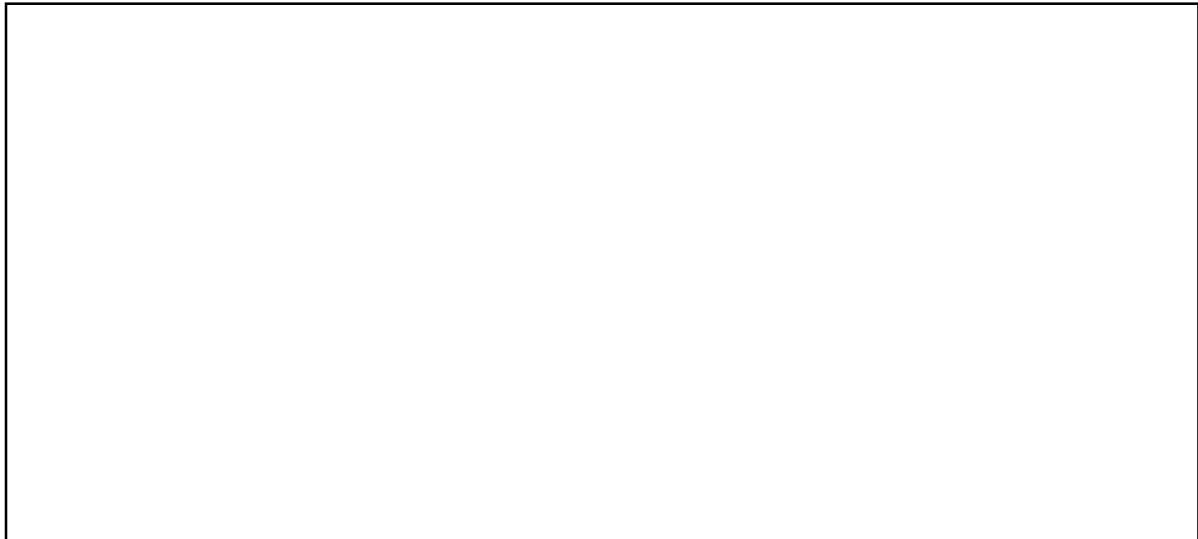
25. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

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**Policy N19: Spitfire Ground**

Please **do not** include personal information in your response below.

26. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

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## Part 2 – Draft Local Plan policies for consultation

### Whitstable area

You will need to read the background information in **Section 2 of the Draft Canterbury District Local Plan – focused consultation**

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90332>

and the draft policies for the **Whitstable area in Section 3**

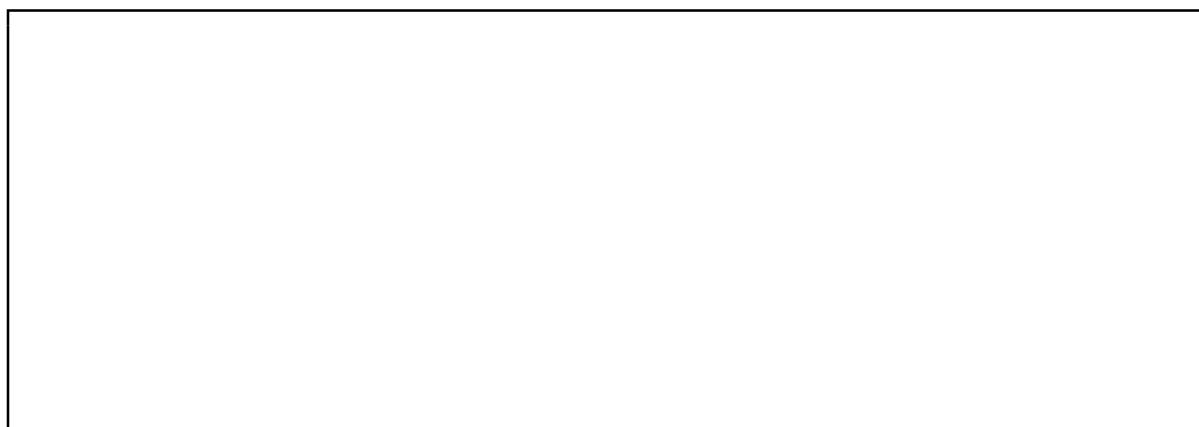
<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90324>

before answering these questions.

#### **Policy N20: Land east of Chestfield Road**

Please **do not** include personal information in your response below.

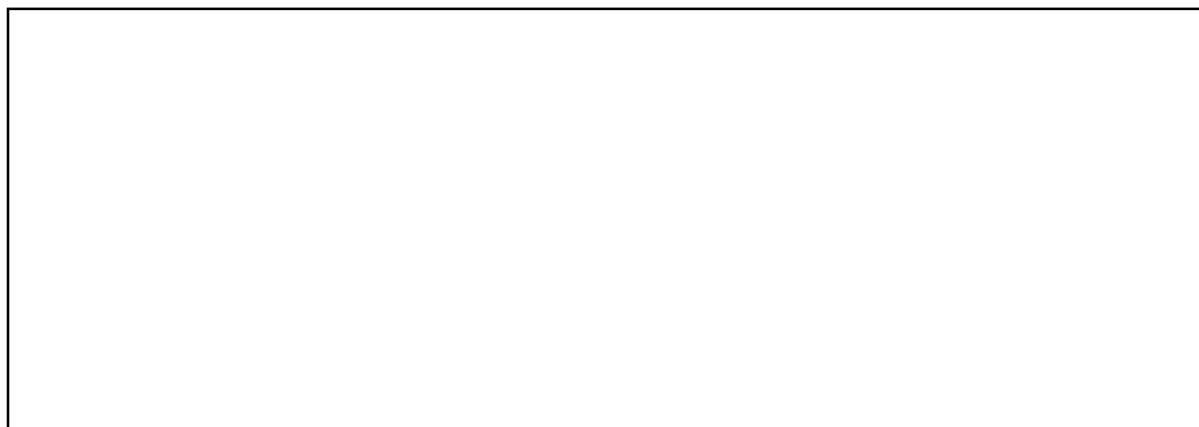
27. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.



#### **Policy N21: Land at Golden Hill**

Please **do not** include personal information in your response below.

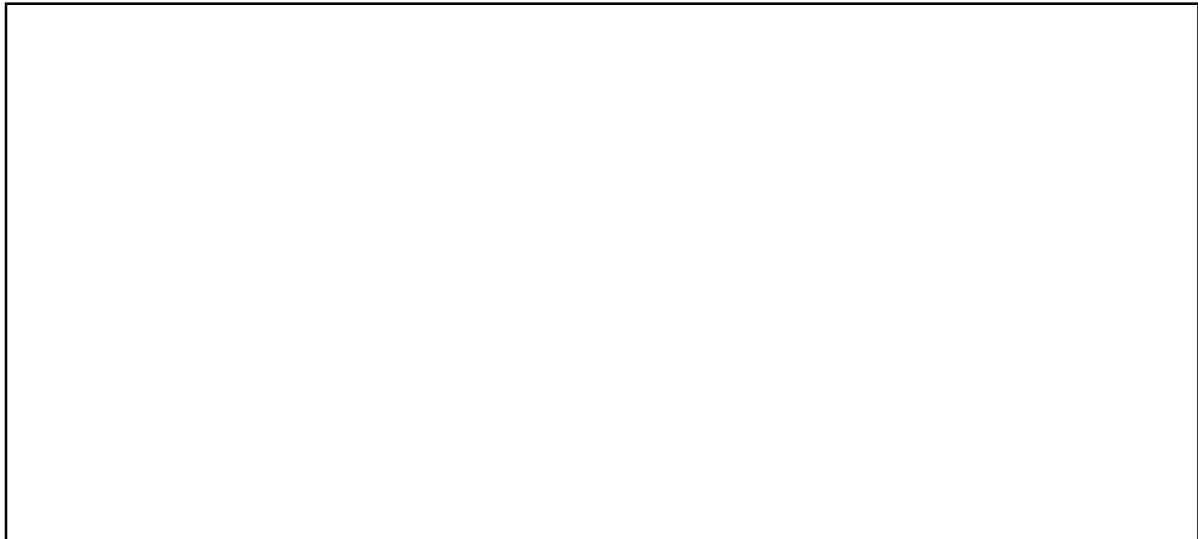
28. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.



#### **Policy N22: Land at Beresford Road**

Please **do not** include personal information in your response below.

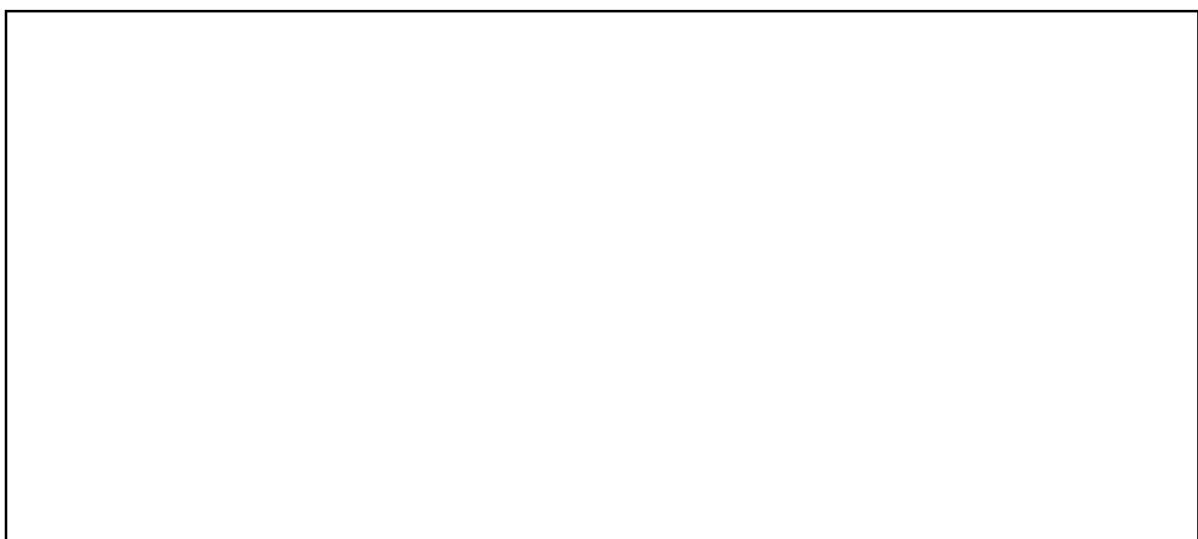
29. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, intended for the respondent to provide comments on Policy N22.

#### **Policy N23: Land to the south west of Joseph Wilson Business**

Please **do not** include personal information in your response below.

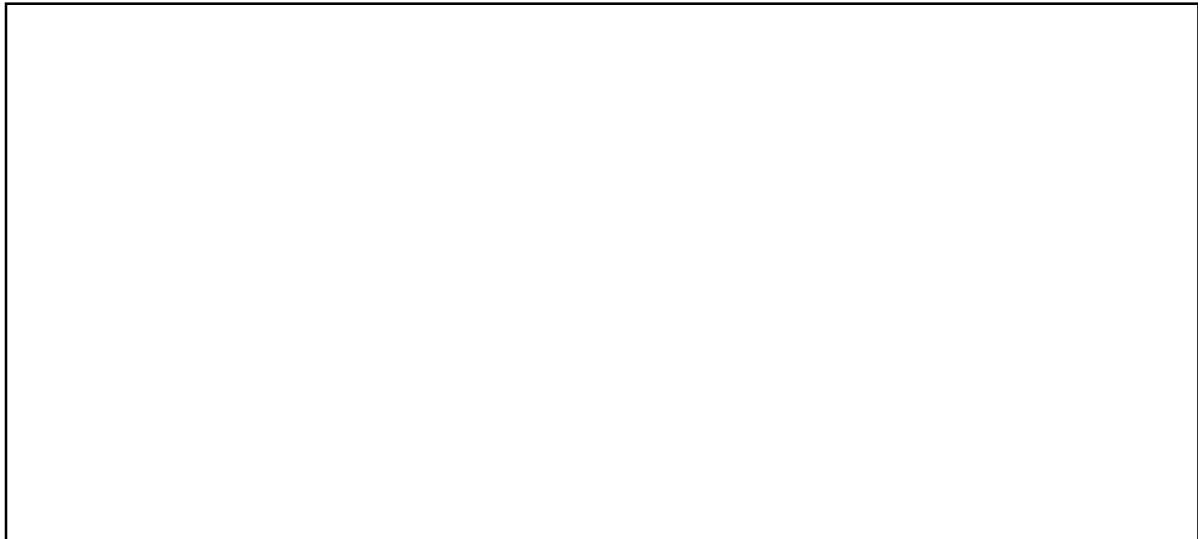
30. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, intended for the respondent to provide comments on Policy N23.

**Policy N24: Land Lying to the West of Golden Hill**

Please **do not** include personal information in your response below.

31. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

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## Part 2 – Draft Local Plan policies for consultation

### Herne Bay area

You will need to read the background information in **Section 2 of the Draft Canterbury District Local Plan – focused consultation**

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90332>

and the draft policies for the **Herne Bay area in Section 3**

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90325>

before answering these questions.

#### Policy N25: Moyne

Please **do not** include personal information in your response below.

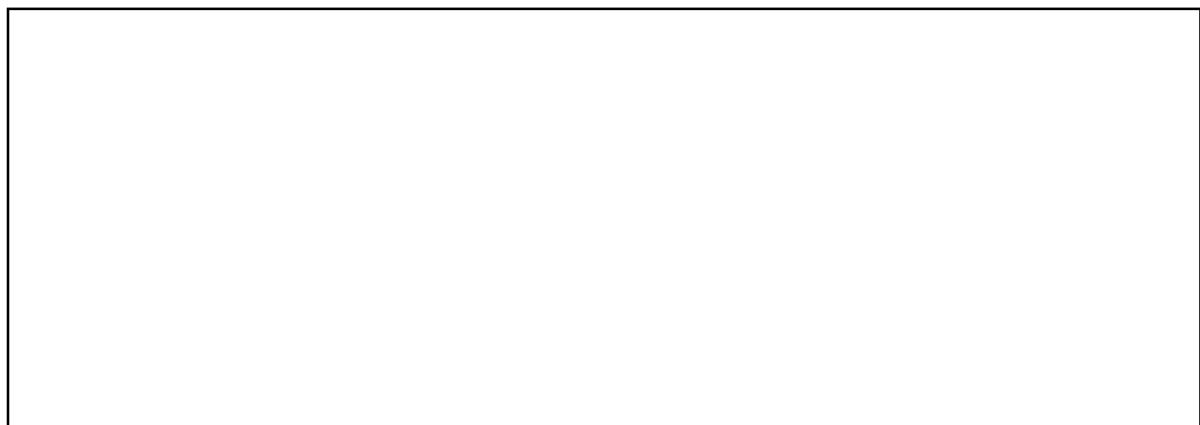
32. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, intended for comments on Policy N25: Moyne.

#### Policy N26: Land at Beacon Road

Please **do not** include personal information in your response below.

33. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, intended for comments on Policy N26: Land at Beacon Road.

### **Policy N27: Former Herne Bay Driving Range**

Please **do not** include personal information in your response below.

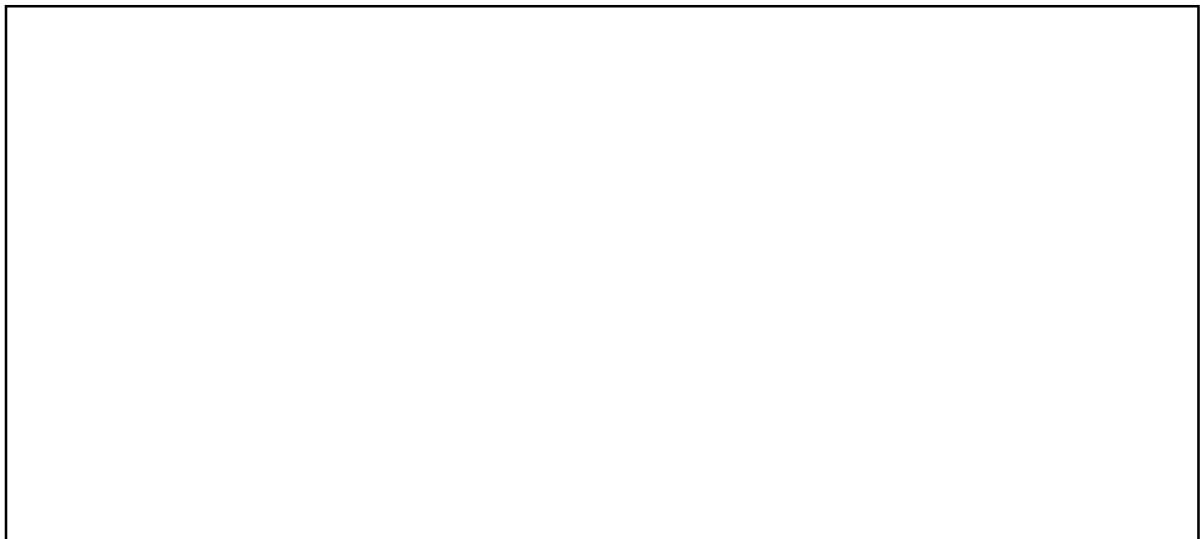
34. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

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### **Policy N28: Land to the east of Bullockstone Road**

Please **do not** include personal information in your response below.

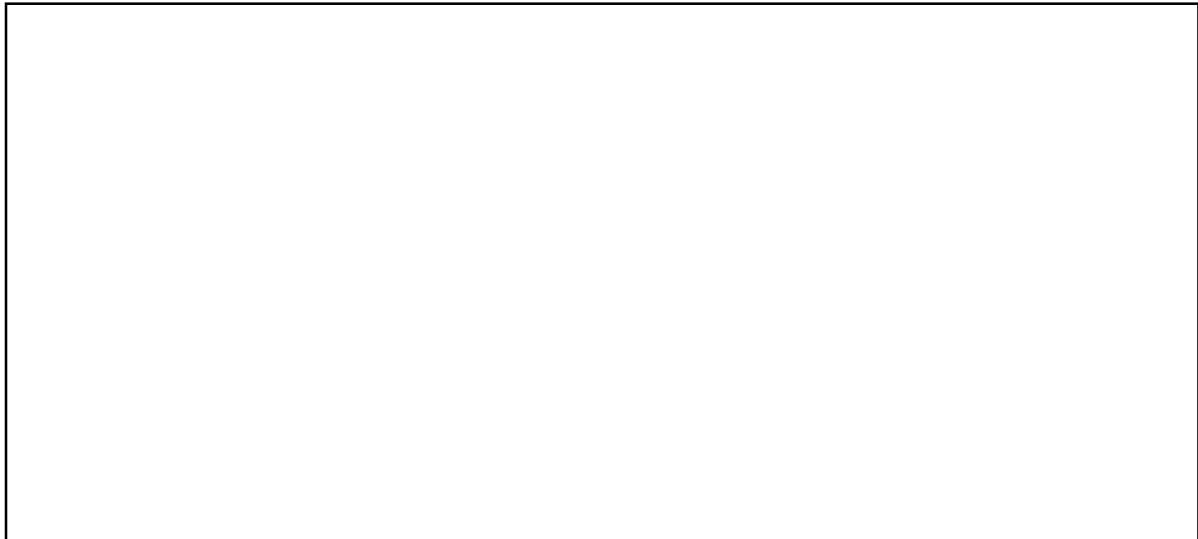
35. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

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### **Policy N29: Land at Home Farm, Strode Park**

Please **do not** include personal information in your response below.

36. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, intended for respondents to write their comments on Policy N29.

### **Policy N30: Land to the west of Bullockstone Road**

Please **do not** include personal information in your response below.

37. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

A large, empty rectangular box with a thin black border, intended for respondents to write their comments on Policy N30.

## Part 2 – Draft Local Plan policies for consultation

### Rural area

You will need to read the background information in

**Section 2 of the Draft Canterbury District Local Plan – focused consultation**

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90332>

and the draft policies for the **Rural area in Section 3**

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90326>

before answering these questions.

#### **Policy N31: Chartham Paper Mill**

Please **do not** include personal information in your response below.

38. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.



#### **Policy N32: Land at Rattington Street, Chartham**

Please **do not** include personal information in your response below.

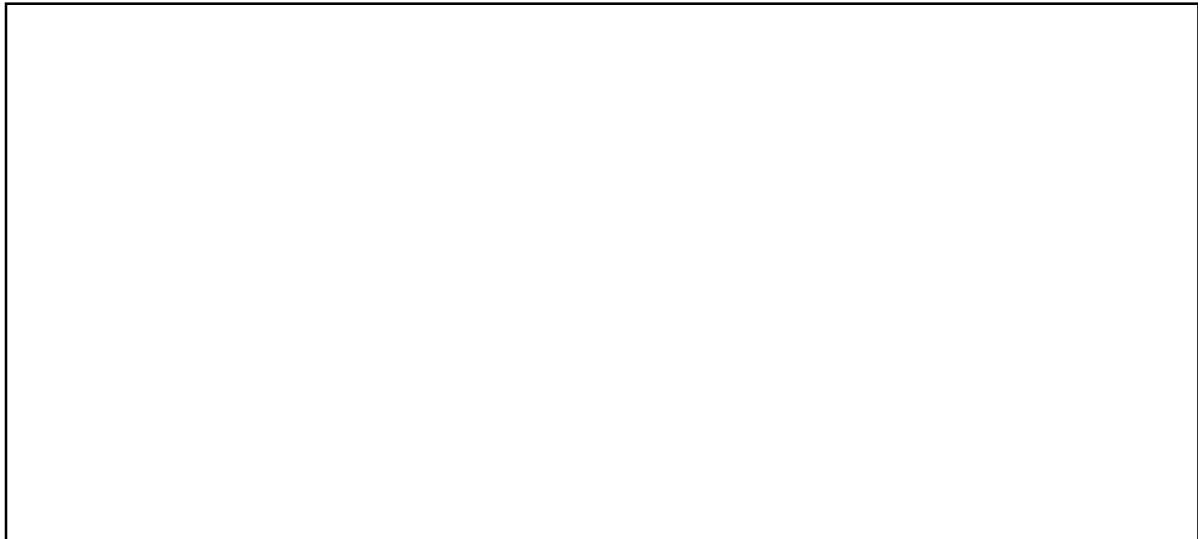
39. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.



### **Policy N33: Land at former Spires Academy, Hersden**

Please **do not** include personal information in your response below.

40. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.



### **Policy N34: Barham Layby**

Please **do not** include personal information in your response below.

41. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.



## **Part 2 – Draft Local Plan policies for consultation**

### **District-wide Strategic**

You will need to read the background information in

**Section 2 of the Draft Canterbury District Local Plan – focused consultation**

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90332>

and the **District-wide Strategic policy in Section 3**

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90327>

before answering these questions.

### **Policy N35: Gypsy and Traveller Accommodation**

Please **do not** include personal information in your response below.

42. **Do you have any comments on this policy?** Please provide any evidence you have to support your comments.

Bekesbourne-with-Patrixbourne Parish Council notes the inclusion of Policy N35 on Gypsy and Traveller Accommodation and offers the following comments:

**1. Support for Needs-Based Provision**

The parish council supports the principle that the Local Plan should make adequate provision for Gypsy and Traveller accommodation in line with national policy and locally assessed needs. It is important that the policy addresses the genuine demand, avoids under-provision, and ensures that sites are sustainable, well-integrated and managed.

**2. Suitability of Sites and Local Infrastructure**

Any allocation or extension of Gypsy/Traveller sites must carefully assess whether local infrastructure — including access roads, waste water/sewerage capacity, water supply, drainage and services — can support the usage without detriment to existing residents or the environment. Given the rural nature of Bekesbourne-with-Patrixbourne, roads are narrow and rural drainage/flooding is already a local issue; the policy should require that any new site in or near our parish satisfies robust infrastructure and environmental assessments.

**3. Location and Environmental Impact**

The policy should emphasise that site selection must consider the impact on the countryside, landscape character, biodiversity and rural amenity. The legacy of the NPPF (e.g. paragraphs on natural environment and countryside) demands that new development protects the “intrinsic character and beauty of the countryside.” As such, any Gypsy and Traveller site should not be sited in locations which would erode rural character, create unacceptable visual intrusion, or impose heavy traffic on narrow rural lanes such as Bekesbourne Lane or nearby rural roads.

**4. Access and Transport Considerations**

Given the rural access constraints in parts of our parish, any new site must include a **Transport Assessment** showing that access is safe, suitable, and will not generate significant impacts on the existing network (including narrow country lanes, connection to the A2 corridor, bus services, etc.). The policy should reflect that constraint and require mitigation where traffic, access, or public transport deficiencies exist.

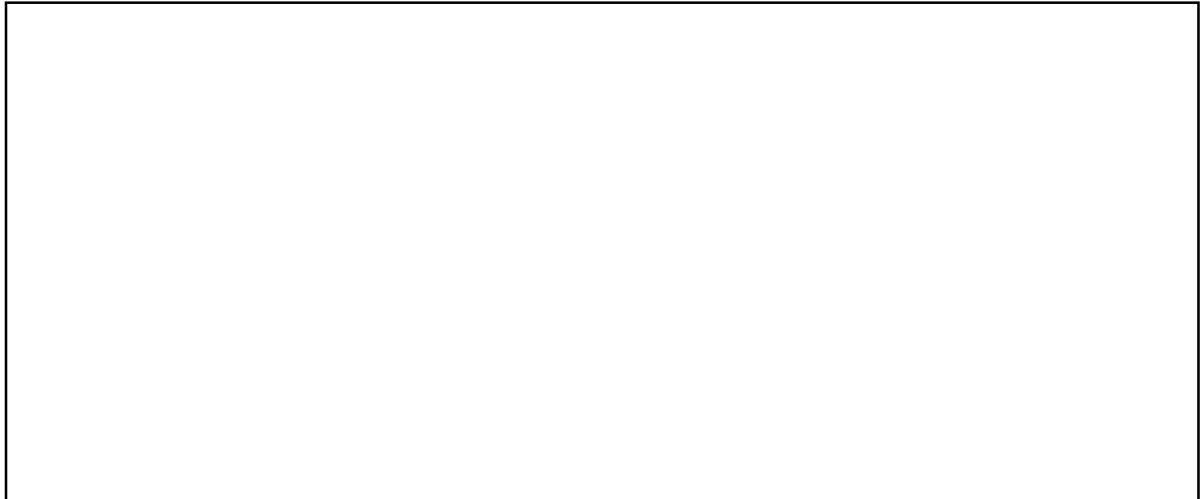
**5. Long-Term Management and Integration**

The policy should require that Gypsy and Traveller sites are designed and managed in a way that supports social integration, good neighbour relations, and long-term sustainability. This means setting clear conditions around utilities provision, visual screening, landscaping buffering, local consultation, and ensuring the site is sustainable in tenure, access to services and transportation.

**6. Evidence and Transparency**

The Parish Council requests that the policy is underpinned by transparent evidence of the assessed need for Gypsy and Traveller accommodation in the district (including rural parishes), and that land availability, deliverability and infrastructure cost are clearly demonstrated in supporting documents, such as the “Gypsy and Traveller Site Assessment Approach and Outcomes” paper.

43. **Do you have any other comments you would like to make as part of this consultation?**

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## Part 3 - Sustainability Appraisal and Impact Assessments

### Habitats Regulations Assessment

You will need to read the Habitats Regulations Assessment

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90426>

before answering this question.

44. **Do you have any comments on the Habitats Regulations Assessment of the Draft Canterbury District Local Plan – Focused Consultation (Regulation 18)?** To help us process your comments effectively please reference which section of the Habitats Regulations Assessment you are commenting about. Please provide any evidence you have to support your comments. Please **do not** include personal information in your response below.

Thank you for the opportunity to comment on the **Habitats Regulations Assessment (HRA) of the Draft Canterbury District Local Plan (Regulation 18)**. Bekesbourne-with-Patrixbourne Parish Council offers these comments, with reference to specific sections of the HRA.

**Section references below refer to the HRA document (February 2024 version).**

#### 1. Scope of assessment and baseline context (HRA, Section 3)

- The HRA sets out the baseline of European and nationally important habitats in the district, including the SACs and SPAs, waterways and sensitive groundwater systems.
- Comment: We support this thorough baseline. However, the HRA appears to rely on broad district-wide assumptions rather than providing fine-grain local modelling for small settlements such as Bekesbourne and Patrixbourne. Given the parish's proximity to rural landscape and drainage corridors, more detailed local baseline might be warranted (e.g., for small tributaries of the Stour valley).
- Suggestion: Request the Council include mapped overlays of surface water flows, groundwater vulnerability and nearby habitat linkages (especially linking rural parishes to major habitats) to support site-level assessment.

#### 2. Assessment of likely significant effects (HRA, Section 5)

- The HRA identifies likely significant effects (LSEs) for certain allocations and the overall plan on European sites via pathways such as increased nutrient loads, hydrological change, recreational pressure, fragmentation, increased traffic flows and water abstraction.
- Comment: We note that some of the transport and hydrology pathways, particularly for smaller allocations along the Bekesbourne corridor (e.g., N4, N5, N6), may be under-assessed. For example, the document acknowledges increased road traffic as a pathway, but it does not fully reflect the rural lane network's sensitivity, or the cumulative load of through-traffic using Bekesbourne Lane / School Lane / Station Road as links to the A2.
- Suggestion: The HRA should explicitly examine the cumulative effects of small allocations plus strategic allocations (e.g., Mountfield Park) on rural roads, and whether increased traffic may indirectly increase run-off, verge damage, and disturbance to adjacent habitats.

#### 3. Mitigation and avoidance measures (HRA, Section 6)

- The HRA proposes mitigation measures (for example, buffer zones, sustainable drainage, nutrient management, phasing).
- Comment: While the mitigation list is strong in principle, in many cases the HRA ends with "subject to mitigation" without sufficiently assessing whether the measures are *likely to be secured and delivered*. For Bekesbourne-with-Patrixbourne, we emphasise concerns about water/drainage infrastructure constraints, surface-water run-off and the adequacy of rural lanes (which affect hydrology and ecology). The HRA would benefit from clearer "deliverability risk" ratings for each mitigation measure.

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- Suggestion: Add a requirement that any allocation reliant on mitigation must include binding legal agreements (e.g., S106, conditions, monitoring triggers) and that the HRA should indicate where mitigation may be difficult to enforce.

#### **4. Alternative sites and deletion of certain allocations (HRA, Section 7)**

- The HRA recognises that some sites previously included have been deleted (e.g., certain strategic sites).
- Comment: The parish council supports the removal of unsustainable allocations and considers that the HRA should explicitly demonstrate how deleted sites reduce risk of adverse effects. In particular, the removal of some large greenfield sites should reduce hydrological and ecological pressure.
- Suggestion: The HRA should include a comparative table of “deleted vs retained” sites showing projected changes in ecological/hydrological risk to better support parish-level submissions.

#### **5. Monitoring and adaptive management (HRA, Section 8)**

- The HRA sets out monitoring proposals and triggers for review.
- Comment: We support the monitoring approach but ask that it includes local parish-level monitoring of indicators such as verge damage, watercourse quality, small stream flows, and traffic flows on rural lanes that connect to designated habitats (which may act as corridors). The monitoring should include provisions for adaptive management if impacts exceed thresholds.
- Suggestion: Request the insertion of explicit monitoring indicators linked to Bekesbourne Lane / Station Road corridor as a path of indirect pressure to habitats (via traffic, run-off, disturbance).

#### **Summary Recommendation**

Bekesbourne-with-Patrixbourne Parish Council supports the overall approach of the HRA but calls for stronger localised and cumulative assessment, clearer delivery assurances for mitigation, and enhanced monitoring tied to rural-corridor pressures (traffic, drainage, hydrology). We ask the Council to revise the HRA accordingly so that decision-making is robust at parish level and aligned with the precautionary principle embedded in the Habitats Regulations.

## **Sustainability Appraisal of the draft Local Plan**

You will need to read the Sustainability Appraisal of the draft Local Plan

<https://haveyoursay.canterbury.gov.uk/43579/widgets/130223/documents/90351>

before answering this question.

If you want to read the Appendices to the document, you can find these

<https://haveyoursay.canterbury.gov.uk/sustainability-appraisal-and-impact-assessments>

45. **Do you have any comments on the Sustainability Appraisal of the Draft Canterbury District Local Plan – Focused Consultation (Regulation 18)?** To help us process your comments effectively please reference which section of the Sustainability Appraisal of the draft Local Plan you are commenting about. Please provide any evidence you have to support your comments. Please **do not** include personal information in your response below.

Bekesbourne-with-Patrixbourne Parish Council welcomes the opportunity to comment on the **Sustainability Appraisal (SA)** of the Draft Canterbury District Local Plan – Focused Consultation (Reg 18). Our comments draw on the main SA report (February 2024) and its supporting appendices.

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## **1. Baseline Data and Geographic Detail (SA Section 2 & Appendix A)**

The SA provides a district-wide environmental and socio-economic baseline, but it lacks sufficient detail for rural parishes such as Bekesbourne-with-Patrixbourne.

- The Bekesbourne valley has distinctive environmental conditions: chalk aquifers, groundwater emergence, and frequent surface-water run-off along Bekesbourne Lane and Station Road.
- These local constraints are not reflected in the baseline mapping, which treats the area as generic countryside.
- Likewise, Bekesbourne Lane and School Lane serve as a link route between the A257 and the A2, yet are omitted from the baseline transport mapping.

**Request:** Expand the baseline dataset to include parish-scale mapping of rural transport corridors, flood-risk hotspots, and biodiversity linkages, to ensure local conditions inform appraisal scoring.

## **2. Appraisal of Site Allocations and Cumulative Effects (SA Section 5 & Appendix E)**

The SA assesses individual allocations but does not appear to test the cumulative effect of multiple developments south and east of Canterbury — particularly Mountfield Park (C6) and the proposed N4–N6 allocations along the Bekesbourne corridor.

- The deletion of the A2 Bridge slip-road improvement, originally intended to mitigate Mountfield Park's traffic, substantially alters the sustainability context.
- Without that mitigation, cumulative traffic and emissions on Bekesbourne Lane / School Lane will be significant.

**Request:** Re-run the cumulative assessment for the Canterbury southern corridor, incorporating:

- the loss of the A2 Bridge mitigation,
- combined housing and traffic impacts from C6 + N4–N6, and
- infrastructure capacity for drainage, water, and rural roads.

This aligns with SEA Reg 12(3) and the NPPF Paragraphs 20 b and 36, requiring infrastructure-led, effective planning.

## **3. Transport and Accessibility (SA Objectives 1 & 5; Section 4)**

The SA rightly promotes modal shift, yet it over-estimates public-transport availability in Bekesbourne.

- Bus services are infrequent and cease early, and there are no continuous footways or cycleways along Bekesbourne Lane or School Lane.
- Additional development would increase car dependence, contrary to NPPF Paragraph 110 and SA Objective 5 (reduce need to travel).

**Request:** Update the SA transport baseline to reflect limited rural public-transport options and evaluate the feasibility of modal shift in such areas.

## **4. Water, Flooding and Drainage (SA Objective 6; Section 4)**

The SA identifies flood and drainage issues but under-represents localised constraints.

- Bekesbourne experiences surface-water flooding from heavy rainfall and pressure on the foul-sewer network, with limited Southern Water capacity. (Such as the bottom of Bekesbourne hill onto School lane by the railway bridge.)
- Allocations N4–N6 would increase impermeable surfaces, contrary to SA Objective 6 (reduce flood risk).

**Request:** Strengthen the appraisal of these sites under the water/flooding objective, require SuDS and groundwater management plans, and explicitly record cumulative hydrological impact.

## **5. Natural Environment and Landscape (SA Objectives 9 & 10; Section 6)**

The SA rightly recognises landscape and biodiversity assets but does not map smaller ecological corridors connecting the Stour Valley, Blean Complex SAC, and rural parishes.

- Incremental traffic and verge damage along rural lanes can fragment these habitats.
- Development south of Canterbury should be tested for its effect on landscape character (NPPF Paragraph 135 c) and intrinsic countryside beauty (Paragraph 187 b).

**Request:** Include landscape-connectivity mapping for rural parishes and reassess site scores accordingly.

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## **6. Monitoring and Adaptive Management (SA Section 8)**

The SA proposes district-wide indicators, but none capture change in rural corridors such as Bekesbourne Lane.

**Request:** Add parish-level indicators—e.g.,

- annual traffic counts on Bekesbourne Lane / Station Road,
- records of verge or habitat damage,
- small-stream water-quality measures, and
- local drainage-event logs.

Trigger adaptive review if thresholds are exceeded.

### **Summary Recommendation**

Bekesbourne-with-Patrixbourne Parish Council supports the SA's strategic approach but recommends targeted revisions to ensure it meets the tests of effectiveness and proportionality required by the NPPF Para. 36 and SEA Regulations.

In particular, the Council requests:

1. More detailed rural baseline data for transport, flooding, and ecology;
2. Explicit cumulative-impact appraisal of Mountfield Park (C6) with N4–N6 and the deletion of the A2 Bridge mitigation;
3. Realistic assessment of public-transport availability; and
4. Parish-level monitoring indicators for transport, flooding, and biodiversity.

Without these amendments, the SA underestimates the sustainability challenges faced by rural parishes such as Bekesbourne-with-Patrixbourne and the cumulative infrastructure burden of development south of Canterbury.

## Sustainability Appraisal of the Strategic Land Availability Assessment

You will need to read the Sustainability Appraisal of the Strategic Land Availability Assessment

<https://haveoursay.canterbury.gov.uk/43579/widgets/130223/documents/90355>

before answering this question.

If you want to read the Appendices to the document, you can find these

<https://haveoursay.canterbury.gov.uk/43579/widgets/130223/documents/90471>

This section is only in reference to the Sustainability Appraisal of the Strategic Land Availability Assessment (2023), and not the Strategic Land Availability Assessment or Addendum to the Strategic Land Availability Assessment.

46. **Do you have any comments on the Sustainability Appraisal of the Strategic Land Availability Assessment?** To help us process your comments effectively please reference which section of the Sustainability Appraisal of the draft Local Plan you are commenting about. Please provide any evidence you have to support your comments. Please **do not** include personal information in your response below.

Bekesbourne-with-Patrixbourne Parish Council welcomes the opportunity to comment on the **Sustainability Appraisal (SA) of the Strategic Land Availability Assessment (SLAA) (2023)**.

Our response references the main SA document (2023) and its appendices.

### 1. Assessment Methodology and Scoring Approach (SA Section 2)

The SA explains that SLAA sites were tested against sustainability objectives to assess relative suitability.

- **Comment:** The appraisal's scoring system appears heavily weighted toward housing delivery potential, with limited discrimination between urban-edge sites and constrained rural locations. In Bekesbourne, infrastructure limitations—narrow rural roads, limited bus service, and poor drainage—mean that nominally “available” sites are not *sustainably deliverable*.
- **Request:** Future SLAA appraisals should explicitly distinguish between physical availability and sustainable capacity, applying stronger negative weighting where sites depend on significant un-funded infrastructure (as per NPPF Para.20 b and Para.36).

### 2. Baseline and Local Constraints (SA Section 3 and Appendix A)

The baseline for environmental and transport factors is described in Section 3.

- **Comment:** The SA recognises flood-risk zones and protected habitats but omits detailed rural drainage, groundwater emergence, and highway constraints. For example, Bekesbourne Lane and School Lane are narrow link routes to the A2 with known congestion, safety, and drainage problems. These constraints materially affect the sustainability of nearby SLAA sites (including those now identified as N4–N6 in the Draft Local Plan).
- **Request:** The SA should integrate fine-grain parish-level constraints mapping, including lane widths, flood-event frequency, and bus-service frequency, so that rural sustainability is realistically reflected in SLAA scoring.

### 3. Cumulative and Cross-Boundary Impacts (SA Section 5)

Section 5 summarises the comparative appraisal of development scenarios.

- **Comment:** The SA of the SLAA does not appear to test the combined effect of multiple sites south of Canterbury together with the strategic allocation at Mountfield Park (C6). The recent deletion of the A2 Bridge slip-road improvements removes the key mitigation that underpinned previous traffic assessments. Without that link, cumulative traffic through Bekesbourne Lane and Station Road will increase sharply, undermining the SA's assumption of manageable impacts.

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Continued.....

#### **4. Water, Drainage, and Utilities Capacity (SA Section 4 and Objectives 6–7)**

- **Comment:** The SA briefly notes that new housing will require water and wastewater infrastructure but does not identify specific capacity constraints within the Bekesbourne area. Local experience indicates surface-water flooding and foul-drainage surcharging after heavy rainfall. The SA's "neutral" scores for these locations therefore understate risk.
- **Request:** Future iterations should draw on Southern Water's Infrastructure Delivery Plan evidence to assign "moderate adverse" or "significant adverse" scores where capacity is already limited or dependent on uncommitted upgrades.

#### **5. Landscape and Rural Character (SA Objectives 9–10)**

- **Comment:** The SLAA SA recognises designated landscapes but does not adequately evaluate non-designated rural edge character—such as the landscape transition between Canterbury and Bekesbourne. Allocations south of Canterbury would visually extend the city into open countryside, conflicting with NPPF Para. 135 c and Para. 187 b on design and protecting the "intrinsic character and beauty of the countryside."
- **Request:** Apply higher sensitivity ratings to rural-edge sites and include qualitative assessment of settlement-gap and visual coalescence impacts.

#### **6. Monitoring and Transparency (SA Section 6)**

- **Comment:** The SA outlines monitoring but provides no parish-scale indicators.
- **Request:** Introduce parish-level monitoring for rural traffic, drainage, and biodiversity indicators so that SLAA conclusions can be validated locally over time.

#### **Summary Recommendation**

Bekesbourne-with-Patrixbourne Parish Council supports the use of Sustainability Appraisal to guide the SLAA but believes the 2023 appraisal:

- under-represents rural infrastructure, drainage, and transport constraints;
- fails to account for the loss of A2 Bridge slip-road mitigation and its effect on cumulative impacts; and
- lacks parish-level data to test deliverability realistically.

We therefore request that Canterbury City Council updates the SA of the SLAA to include a refined rural methodology, re-scoring of southern Canterbury sites (including those around Bekesbourne), and transparent publication of infrastructure-capacity evidence to demonstrate compliance with the NPPF (Dec 2024) Paragraphs 20 b, 35 and 36 on infrastructure-led, effective and sustainable plan-making.

## Corporate consultations

We have several corporate consultations coming up soon and we would like to hear from you.

47. **Which of the following corporate consultations would you like to be informed about? \***

Please tick those that apply

- Environment
- Housing
- Leisure and events
- Parking
- Regeneration
- Budgets and finance
- Governance
- Enforcement
- Licensing
- Planning Policy
- Transport
- Other, please state: \_\_\_\_\_

If you'd like to be informed, and are happy for the council to contact you about corporate consultations, please tick the box to indicate your consent to us contacting you:

- I consent to being contacted by the council

**How would you like to be contacted? \***

- By email
- By post

Please provide your email address: \*

Please provide your details:

Title *	<input type="text"/>
First name	<input type="text"/>
Surname *	<input type="text"/>
Address *	<input type="text"/>
Address	<input type="text"/>
Town *	<input type="text"/>
Postcode *	<input type="text"/>

48. **How did you find out about this consultation? \*** Please tick those that apply

- Email from the council
- Council Facebook post
- Council Twitter post
- Council LinkedIn post
- Council website
- Word of mouth
- Other, please state: \_\_\_\_\_

## Privacy Notice

### Processing your information

Canterbury City Council is the data controller.

Your personal information is processed under UK General Data Protection Regulation Article 6.1(c) and Article 9.2(g) in the performance of an official duty in relation to The Town and Country Planning (Local Planning) (England) Regulations 2012 and to meet our Public Sector Equality Duty under the Equality Act 2010. In submitting a representation, your personal data will be stored for up to one year from the date the Local Plan is adopted.

All information you give us will be stored securely by Canterbury City Council.

We are required to publish the responses we receive, including your name and the name of the organisation, body or person you are representing. Please do not include information in your comments unless you are happy for it to be published. We may also share your data with the Planning Inspectorate.

We use the following Data Processors to help us process your personal data: Microsoft, Granicus.

We'll let you know when the Local Plan reaches the next stage in the process, in line with the Town and Country Planning (Local Planning) (England) Regulations 2012.

### Equalities Duty

The council has a legal duty to consider the needs of its diverse range of customers. As well as questions about our services we ask you questions relating to our equalities duties. Although you do not have to answer these questions, without this information the council will be limited in understanding whether views differ among different groups of people.

## Your Rights

You have the rights to:

- Access your personal data
- Rectify or correct your personal data
- Restrict the processing of your data
- Complain to the Information Commissioner's Office

You also have the right to object to our processing of your personal data.

The appointed Data Protection Officer is Canterbury City Council's Head of Corporate Governance, who can be contacted by email at [dataprotection@canterbury.gov.uk](mailto:dataprotection@canterbury.gov.uk), by phone on **01227 862 175** or at the address below.

Canterbury City Council, 14 Rose Lane, Canterbury, Kent, CT1 2UR.  
Phone: **01227 862 000**. Web: [canterbury.gov.uk](http://canterbury.gov.uk)

## Contact information

Your first name: \*

Nicola

Your surname: \*

Purcell

Your email address: \*

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House name/number: \*

C/O 29

Street: \*

Purcell

City, town or village: \*

Winder Place

Your postcode: \*

CT3 3FS

## Equality information

**What age are you?** Please tick one box only

<input type="checkbox"/> Under 18	<input type="checkbox"/> 55 to 64
<input type="checkbox"/> 18 to 25	<input type="checkbox"/> 65 to 74
<input type="checkbox"/> 26 to 34	<input type="checkbox"/> 75 to 84
<input type="checkbox"/> 35 to 44	<input type="checkbox"/> 85 and above
<input type="checkbox"/> 45 to 54	<input checked="" type="checkbox"/> Prefer not to say

**What gender are you? Please tick one box only**

- Male
- Female
- Prefer to self-describe (for example, non-binary, gender fluid etc)
- Prefer not to say

**Do you consider yourself to be disabled? Please tick one box only**

- Yes
- No
- Prefer not to say

**Thank you for taking the time to respond to this consultation**

## **10 Allotments**

### **10.1 Any Updates**

As per the August update: Tenancy agreements have been prepared and will be circulated to tenants by the end of sept- to align with the growing season following feedback from plot holders.

### **10.2 Any New Matters to Report**

A tree that has fallen onto the boundary fence remains, contact with the landowner has been unsuccessful. Clerk to attempt further contact, then seek quotes for tree removal and forward to landowner.

## **11 Correspondence**

### **KCC Community Warden Report Received 3rd September:**

I have been undertaking extensive Visible Presence across Sturry and Little Stour Wards including Adisham throughout August.

Highlights are:

On the 5th August the Canterbury and Thanet Community Warden Team attended Scripture Union's Water Event at The Dip on the esplanade of Minnis Bay, where we had a KCC Community Warden Gazebo offering a quiz to children and gave away one-hundred footballs. We undertook traffic control at key points at junction of roads.

I attended the weekly coffee morning where possible at St Nicholas's Church, Sturry

- spoken to hosts and residents about various issues and general chats. I have arranged for a Scam Awareness Talk in St Nicholas' Church, Sturry at 1045am - 11:30am during the coffee morning which starts at 10:30am. All are welcome. The flyer/poster have been sent to the parish councils for circulation.

I attended Monthly Coffee Morning in Bekesbourne Village Hall - spoke to hosts and residents and arranged to have a Scam Awareness Talk in the village hall on

2nd October at 1:30pm-2:15pm - Myself and KCC Trading Standards will talk and there will be a questions and answers at the end. All are welcome. The flyer/poster have been sent to the parish councils for circulation.

I have also made the local police officers aware of the Scam Awareness Talks, should they have the spare time to attend.

From next week I will be the Deputy Team Leader for Canterbury and Thanet Community Warden team.

Roger Lithgow | Community Warden

**Outcome:** Council Noted the correspondence.

**Resident Correspondence Received Friday 12th September:**

Good afternoon Nicola,

I would like to raise a concern over a garden structure at my neighbouring property 21 Aspinall Close, CT4 5DN. My neighbours are building what I was told was a 'home office' in their rear garden. They have not applied for or received planning permission for the structure which does not meet planning regulations on a number of points.

They have exceeded height restriction with the height from under the front eaves to the floor measuring at 2.7metres. The structure has been built very close to the boundary fence of my property and has not been built using non-combustible materials. The structure takes up the full width of their garden and a third of the overall size of the garden. Having seen that they have taken delivery of a waste

macerator, which is used for a toilet I believe that they intend to use the structure as additional accommodation for visitors/family. The works that have been carried out thus far have not been done by registered companies - works that include

groundworks and electrics and soon to be plumbing which raises the question of compliance and whether the work has been carried out to a safe standard. I feel that the structure is going to have a detrimental impact on my property - restricting sunlight to areas of my garden, light pollution into my property from outside lighting on the structure, potential

noise pollution should they have people residing in it for periods of time. Future negative impact if I wish to sell my property. Needless to say the impact on our already struggling drainage system with the installation of a toilet and possible sink/shower. Works are also being carried out during unsociable hours during the week when I have young children trying to sleep. I have reported this to the council planning department and to Town C Country Housing and would urge you to discuss this at your upcoming parish meeting. I am aware that there have been several other complaints to the parish council and planning department about this build and would like these concerns to be taken seriously. I am unable to attend the meeting as I have young children but would welcome a response to my concerns.

**Outcome:** This matter was discussed under item 12.3.

**12 Kent Devolution and Local Government Reorganisation (*any updates*)** an extract from the KALC September newsletter is available as part of the agenda pack.

**Outcome:** Council noted the update.

**13 Overgrowth at Cramner Close**

Support is requested for further action from the parish council regarding an ongoing issue regarding the overgrown foliage and plants at the entrance to Cranmer Close and along the pavements leading around to Aspinall Close. Cllr Tuffey initially reported this to Kent County Council in April/May, and Mike Sole kindly followed it up.

KCC confirmed that the land is privately owned and that letters had been sent to the property owners. However, no action has been taken since, and the situation has continued to deteriorate.

The overgrowth now makes parts of the pavement completely impossible to use, forcing pedestrians into the road. Entering Cranmer Close has also become increasingly dangerous due to severely restricted visibility for both drivers and pedestrians.

It is believed that one side of the entrance belongs to Plumb Bob Cottage and the other to Southern Housing.  
Clerk to escalate.

**17. Next Meeting Date**

10<sup>th</sup> November 2025 (*at the village hall*)

Meeting Closed 21:02