

To consultations@canterbury.gov.uk

From: John Reilly

13th October 2025

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Draft Canterbury District Local Plan: Focused consultation 2025

Local Plan period

The Focussed Regulation 18 Topic Paper para 4.4 proposes that the Local Plan period is 19 years from 2024/25 to 2042/43. The Draft Canterbury District Local Plan – focused consultation (Regulation 18) seeks views on this.

The NPPF (December 2024 amended February 2025) para 72 states that: Planning policies should identify ‘a supply of: specific deliverable sites **following the intended date of adoption**’. The Canterbury focused consultation reaffirms this in para 1.4 ‘... plans must have a lifetime of at least 15 years **from adoption**’. However, the CCC consultation states in 1.6 that: ‘In line with the NPPF and supporting Planning Practice Guidance (PPG), we are moving the start date of the plan forward to 2024/25 to ensure that past undersupply is not double counted.’

I have not been able to discover the guidance in the NPPF or PPG which requires this. The PPG (<https://www.gov.uk/guidance/housing-supply-and-delivery>) reiterates that the supply must be available ‘**from the intended date of adoption of the plan**’ Since it seems that the statutory requirements relate to fifteen years from the ‘**date of adoption**’ anticipated for Canterbury to be 2027 it would be helpful to have the rationale for the 19 years, which significantly increases the planned total.

Proposed deletion of Land north of the University of Kent (Policy C12)

I strongly endorse this decision and wish to thank the councillors. The decision demonstrates genuine sensitivity to the written concerns of a large number of residents and also the wider community, indicated by the scale of the Save the Blean Petition with more than **23,500 signatures**, which was submitted to the council.

In addition, particular note and weight should be given to the recently published participatory social-research project, supported by CPRE Kent, Kent Wildlife Trust and UCL. <https://www.cprekent.org.uk/news/how-is-the-onslaught-of-development-proposals-affecting-local-people/> “The participatory methods in this research could be used by the council to engage with local communities to develop plans that reflect local concerns and allocate sustainable housing that genuinely meets local needs and protects our natural environment. This research shows just how deeply local

communities care about their natural environment and wildlife, and how determined they are to protect it,”

The deletion of C12 is validated by the powerful evidence of the Focused Regulation 18 Topic Paper August 2025 in paras 6.51 to 6.57 including representations relating to highways from KCC Highways and National Highways: assessment of impacts on the wider road network including Tyler Hill Road; evidence relating to the deleterious impact on wildlife, ecology, loss of ancient woodland, and heritage in objections from statutory consultees Natural England, The Forestry Commission, Historic England, plus the Woodland Trust, Kent Wildlife Trust, CPRE and other organisations; the high (abnormal) costs and dislocation from the demolition and relocation of Blean Primary School; the substantial increase in traffic and the impact on local infrastructure.

All these reasons for deletion apply with equal force should the University of Kent or any other body acquiring the land propose a comparable development for C12. The Council is urged to ensure that this is made clear to the University and its agents.

NPPF – Local Housing Need and the CCC District Plan

Implications of District population increase

Recognising that the new methodology is mandatory the Plan fails to reflect on the reality of the implications and impact for the District of an increase in population from c.162,000 to c.240,000.

Social housing

The immediate priority should be the construction of at least 3000 units of social housing during the first five years. The commitment to small, **brownfield sites** is in this context welcome and wherever possible should concentrate on the delivery of social housing.

Brownfield sites

It is disappointing that more brownfield sites are not included. The proposed density on some of these, notably Wincheap, could be increased. The draft consultation does not explain why the number of proposed new dwellings on the Wincheap site has been reduced by 10% from 1000 to 900.

Student accommodation

There has been a significant decline in higher education students in Canterbury accompanied by more purpose-built student accommodation. Estimates suggest that in 2021 there were c.3800 houses occupied by students.

It seems probable that more ‘student houses’ will revert to the general housing market. Changes in second property taxation, the demographic decline in the student cohort, Government incentives to move away from Higher Education all seem likely to accelerate the number of former student houses returning to the general domestic housing market. Since the number is potentially significant the Plan should take account of this with a planning number. It should consider how it might

encourage this trend which will have other benefits for the local community and environment. Since full-time student households do not have to pay Council Tax it would also benefit the revenue stream

Strategic planning across local planning authority boundaries

The NPPF urges strategic planning across adjacent authorities. There is little evidence of this in the Plan in relation to the impact of a quantum increase in the population of the whole of East Kent resulting from large scale housing development. This will have a cumulative impact across authority boundaries on roads, transport, health provision, water supply, a sewage system which cannot cope with the current population especially during heavy rainfall. How these matters will be addressed in collaboration with adjacent authorities should form part of a coherent plan.

Hospital

A critical cross-authority issue is hospital provision.

The current three hospitals in East Kent cannot cope with demand. They are inadequate, outdated, not easily accessible and increasingly unfit for an effective provision of services to the community. This situation will be exacerbated as a result of the population increase from the housing growth in East Kent, which could see a cumulative addition of c.260000 in the four Districts - Canterbury, Thanet, Ashford, Swale. The plan gives no indication of this impending crisis.

An urgent, concerted, joint authority, approach for a new fit for purpose, high quality, hospital should feature as a priority in the Plan. As it is the plan notes simply that there will be no funding for a new hospital in Canterbury and ignores the implications for the Canterbury District which, alone, will have a population of c. 240,000 with similar proportional growth in the neighbouring authorities. It cannot be sustainable to plan for such an increase with no viable plan for a major new acute hospital on a new accessible site.

Water supply

The Plan asks for comments on water use and supply.

There appears to be no quantification of the increase in water demand resulting from the scale of new housing envisaged. The Southeast water Board is consulting about the proposed Broadoak reservoir, but it is not clear whether (a) that will meet the increased demand (b) is viable. Moreover, it is unlikely to be operational until towards the end of the planning period, by which time many new dwellings will be built. The plan does not indicate how this challenge will be addressed.

The Water Board has suggested that it will develop a desalination plant at Reculver, but there is no evidence of ongoing work on this or reference to it in the District Plan.

The supply of water is another issue which should be addressed on a cross-authority basis and resolved **before** large scale development proceeds. In this context the Council should note The Independent Water Commission Report June 2025: para

579. 2020. It notes that the National Framework for Water Resources 2020 “marked a shift towards **strategic regional planning**, where regional groups made up of water companies and other sector water users form regional plans to build water resilience” para 579

https://assets.publishing.service.gov.uk/media/687dfcc4312ee8a5f0806be6/Independent_Water_Commission_-_Final_Report_-_21_July.pdf

Water efficiency

The Plan should require that all new build should implement, in an integrated, comprehensive way, the latest water efficiency measures and incorporate rainwater harvesting and water reuse. This should be a criterion for planning approval and monitored closely. As an example, see: ‘Enabling Water Smart Communities’

<https://www.ewsc.org.uk/>

Water Treatment

All the larger sites require the installation of a Water Treatment Plant but there is no indication of the associated risk mitigation, ownership, long-term management and maintenance responsibilities.

The construction of up-to-date, future oriented, water treatment plants for housing estates entails significant investment and risks such as late delivery – how will early occupied houses be catered for if the plant is not commissioned in advance? Underfunding, capacity limitations, resulting in discharges from heavy use or rainfall, environmental impacts from nutrient imbalances in the treated wastewater and air emissions are known risks. Disposal and treatment of sludge is a further consideration. While water treatment plants are subject to regulation this has not prevented serious problems, regulation is always in catch up mode. [see extract from The Independent Water Commission June 2025 below]

The number of new water treatment plants envisaged for the District, suggests that the Plan should pay more attention to the implications and long-term management and financing. The Independent Water Commission June 2025 highlights issues relating to wastewater: *117. The EU has recently updated the Urban Wastewater Treatment Directive to introduce stricter treatment requirements to address public health as well as environmental concerns 133. , growing concern about wastewater pollution has resulted in an increased focus on monitoring and enforcement of water industry operations. ... storm overflow data.recoup enforcement costs from water companies,annual Pollution Incidents.*

It stresses that: para 202. “*Current wastewater treatment standards do not account for emerging pollutants such as poly- and perfluoroalkyl substances (PFAS) (often referred to as ‘forever chemicals’), microplastics and micropollutants, which are becoming increasingly present across the water system*”

An article which might help to inform the development of this aspect of the Plan is : *Environmental Science and Ecotechnology Volume 2, April 2020 – Wastewater treatment in 2050: Challenges ahead and future vision in a European context*
Ana Soares Cranfield University

Housing on main sewer

All the Plan small-scale housing projects will be connected to the main sewage system. The number is significant. There is strong recent evidence (frequent, long duration, sewage overflows) that the local sewage system cannot cope with the current housing stock. The system is, in many parts, old, in poor condition and prone to leakages. The Plan gives no indication of how the system will be updated and enhanced to cope with a substantial increase in the volume of wastewater. If this is not undertaken the system will inevitably be overwhelmed with considerable adverse social and environmental impacts. This is an aspect of sustainability which the Plan ignores, yet it is critical to the environment, community health, wellbeing, future economic development. It is a massive costly infrastructure renovation and investment issue which, if not addressed, will undermine the overall viability of the Plan.

Infrastructure

The frequency of references in the NPPF to the need for strategic infrastructure planning underlines its importance, including (para 42) the need to deliver improvements in infrastructure '*preferably pre-application*'. It is thus disappointing that no fully up-dated strategic plan for infrastructure to accompany the plan will be published until early 2026. This undermines the validity of the plans in a major way as it means that viability cannot be adequately assessed – as indicated in relation to wastewater treatment.

Failure of developers to deliver the necessary infrastructure is well documented. The Council is urged to require that infrastructure is delivered at the outset of all development, **not** after a set number of dwellings have been completed. The Plan should not shelter behind the phrases '**at the earliest possible stage**'; '**secure the timely delivery** of infrastructure'. They give too much leeway to a developer and lead to the non-delivery which tends to be prevalent.

Windfall Strategy review

The plan envisages 2600 'windfall' dwellings. As this is a significant number there should be caveats which prevent promoters of sites, such as C12, which have been rejected, from using this category to bypass the plan.

John Reilly

13th October 2025

████████████████████

[REDACTED]
[REDACTED]
[REDACTED]