



ALLIANCE OF CANTERBURY RESIDENTS' ASSOCIATIONS
(ACRA)

ACRA response to CCC draft Local Plan public consultation

9 September – 21 October 2025

Introduction

ACRA welcomes the opportunity to comment on this latest iteration of the Canterbury City Council (CCC) Draft Local Plan.

We acknowledge that the current consultation purports to cover only material changes from the preceding version. Accordingly we have confined our main observations to those changes. We make what we hope will be regarded as constructive suggestions related to new or revised site allocations, policies and strategies.

We recognise that the Council's approach to a second or third (or fourth!) Regulation 18 consultation on a draft Local Plan has become accepted municipal practice. Nonetheless, in this particular case we see the changes made by the Council as so substantial and so radical, particularly regarding greenfield site allocations and related highways links, that there ought to have been a re-consultation on the whole draft Plan.

This ACRA response is consistent with, and takes its starting point from, previous evidence backed ACRA submissions.¹ Those submissions remain on the record as statements of our position on the draft Local Plan as a whole.

1 ACRA response to previous DLP consultation 03/06/2024

ACRA response to NPPF consultation 22/09 /2024

ACRA press release 27/09/2024

Letter from David Kemsley and Peter Styles on proposed East Canterbury allocation 05/09 2025

Executive Summary

- ACRA does not accept that a limited consultation is acceptable, given the scale of changes from the previous iteration of the draft Local Plan.
- The major shift of proposed strategic greenfield development from the north of the City (on University of Kent land) to the south-east (land to the south of Littlebourne Road) will create major traffic congestion in an area where the A257 and its feeder roads already struggle to cope with traffic into and out of the city during peak hours (including a high volume of travel to and from school private vehicles.) These new allocations south of Littlebourne Road will also add massively to the strain on infrastructure for sewage treatment and wastewater disposal, water supply and electricity supply. Valuable agricultural land, open space and woodland will be lost forever.
- The Council has failed to identify or put forward a sufficient proportion of brownfield sites, seems to have ignored some obvious examples of such sites (including some involving existing buildings whose use could be changed to residential) and has not considered carefully enough opportunities to plan much higher density housing on sites close to the city centre and/ or to existing public transport facilities.
- The draft Plan makes no provision for the forthcoming reorganisation of Local Government in the County of Kent
- The benefits of the previously consulted-on District wide Development Management Policies remain in place in theory. However, we are concerned about the introduction of potential loopholes in this revision, either by virtue of poorly drafted language or by virtue of policies relating to social housing, which could lead to dilution of standards or legal challenges.
- We strongly doubt that the planned numbers of houses could be built annually in and around Canterbury, even if specific sites have been identified. Our doubts are based on the build-out record of developers of sites around the city in the last twenty years, and on problematic phasing of enhanced and additional infrastructure. (See final and penultimate bullets of this summary).
- ACRA rejects the concept that housing for social rent should feature inferior build and design standards and lower infrastructure and environmental enhancements than other housing
- Proposed mitigation measures to be funded by developers of sites at Merton Park and East Canterbury are, we consider, inadequate, untested and (on the basis of experience with current or other planned developments around Canterbury such as Thanington Park, Howe Barracks, housing estates to the north of Sturry Road and the South Canterbury Urban Extension) highly likely to be gravely delayed and even ultimately resisted by developers.
- There is no evidence of serious follow-through on the Council's stated "bus first" strategy. The Canterbury Alliance for Sustainable Transport (CAST) made this clear in its response to the June 2024 consultation, stressing that such a strategy can only succeed if backed by concrete measures: reallocating road space, prioritising walking, cycling and public transport, and securing funding through tougher parking controls and road use charging (for example initially, through introduction of a LEZ)

- *ACRA considers that, taken as a whole, the draft Plan has been inadequately tested for deliverability. Many of its assumptions about strategic greenfield sites for housing are based on wholly inadequate analysis of environmental harm, risks to biodiversity, funding for and timing delivery of related critical infrastructure, and (linked to delivery of critical infrastructure) the feasibility of developer mitigation measures envisaged. We thus strongly doubt that, as now conceived, this draft Plan can be delivered.*
- We accordingly urge Canterbury City Council to:
 - Acknowledge that actual delivery in the early years of a revised Local Plan will fall short of the standard method target
 - Adopt a stepped trajectory, setting a number which could realistically be built
 - Avoid locking itself into unsustainable greenfield allocations, which stand little chance of becoming genuinely well planned or reliably delivered, by recognising the position will be reviewed within another five years
 - Meanwhile focus on maximising brownfield, change of use and smaller, deliverable sites and buildings for residential occupation, rather than relying excessively on large, infrastructure-dependent greenfield allocations, which recent experience suggests will not transpire to be workable sites for housing in the foreseeable future

Overarching matters

This consultation should not have been a “stand alone” focussed exercise. Very significant changes from 2024 mean it would have been far better, in terms of ensuring public confidence in the process, to have consulted on whole draft Plan again.

ACRA believes that this failure to consider the whole District impact of the changes undermines the basis of the previously consulted on elements, many of which are directly impacted by the amendments within this “focused” consultation. The removal of two significant allocations (C12 and C7) changes the whole balance of provision across the District and specifically around the city. So too, the changes to Merton Manor Park (C6) and road access arrangements into and out of it, which have knock-on effects across the whole south and south-east of Canterbury.

Bizarrely, the Council has offered no update of its proposed draft Transport Strategy to reflect major switches of strategic greenfield site allocations. Furthermore, without a convincing, fully revised Infrastructure Plan (s1.33) deliverability of the whole Plan is questionable. Poor infrastructure is the key constraint on development around the city.

Policies DS1 and DS2 are directly affected by changes, especially to social rent options. Yet these policies are not included in this “focused consultation”, with such “further amendments” deferred until the Regulation 19 consultation. Thus, any references to DS1 and DS2 in this document are impossible to comment on meaningfully.

The document specifies 12 evidence documents which have been updated but doesn’t provide links or summaries of changes for these. There is an additional “Focused Regulation 18 Topic Paper”. Are respondents seriously expected to have the time to find these documents and then work out what changes have been made and then comment within a six-week consultation period?

The Introduction to this consultation asserts that small and medium sized sites are required to “deliver quickly”, with no supporting evidence to that effect. In fact, these are precisely the size of sites which have been prevented from development by the issues affecting sewage treatment and discharges into the Stour and Stodmarsh catchment.

Overall, there is a lack of cohesion within the Plan. A piecemeal approach has again been taken to the individual site allocations with little or no explanation of the rationale.

There is no identification of sites which have been rejected for inclusion, meaning that residents cannot challenge those exclusions or suggest that alternative priorities might have been preferable to those put forward.

There is no credible explanation as to why the land north of the University has now been wholly excluded from consideration, having previously been allocated around 2,000 homes. Surely if the Council analysis previously indicated that the site could accommodate 2,000 homes then even if they have accepted the objections of local people, it might still be capable of providing, say, 200. Otherwise, one might conclude that their understanding of the geography of the District is so poor that they are capable of fundamentally failing to adequately assess the suitability of land proffered in response to the “Call for Sites”. That raises the possibility that the Council’s assessments regarding the viability of the whole Plan are questionable.

The Draft Plan does not reflect the laudable NPPF emphasis on and priority for provision of more social and affordable housing, the principle of “brownfield first”, or sustainable infrastructure.

In addition, as evidenced later in this document, adoption of superficially easy greenfield sites is fraught with problems relating to infrastructure and environmental impact which emerge later and create significant delays in the achievement of target delivery dates, as well as frequently leading to a watering down of planning requirements for such improvements.

The Town Centres Strategies discussed in s1.26 will be developed and agreed far too late for inclusion in this Plan, and there is no way for the public to respond to these meaningfully at this stage.

The draft Plan ignores the imminent reorganisation of Local Government in Kent, which will mean that new Authorities will be responsible for elements of planning activity at both strategic and local level. This needs to be addressed if the Plan is to be robust enough to survive until 2045.

Quantum of housing and Local Plan period

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 new 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.’

ACRA is unable to find guidance in the NPPF or PPG which requires the duration of a Local Plan to be at least 15 years.

The PPG² 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 learn the rationale for the 19 years proposed by CCC. On what basis does the Council presume to backdate the starting point to 2023 or 2024? The lengthy duration significantly increases the total volume of homes to be built, quite unnecessarily in our view.

Overall, although ACRA no longer advocates a direct challenge to the Standard Method of calculating the quantum of housing needed, we do believe that the history of build-out rates in the District³ indicates that there is not the demand for the quantity central government has assessed. Given that the draft Plan relies on critical infrastructure to be built after the partial completion of housing on allocated sites (indeed after up to as many as 1,000 units will have been sold or rented and occupied) and not beforehand, this creates a serious risk to the deliverability to the totality of the Plan. Across the environs of the city as currently delineated, it could leave existing residents with more housing surrounding them and using their roads, yet no enhancements or additions to infrastructure.

That would create an overall inferior cityscape and suburban fringe, damage the environment around the fringe of the city, and stand in complete contradiction to the stated aims of the draft Plan.

There is an alternative solution which could be pursued by CCC.

The current housing market is facing serious headwinds, with delivery rates falling nationally and the development industry itself warning of a prolonged slowdown. It is unrealistic to assume that Canterbury can double historic build rates simply because the standard method says so. As Inspectors have recently acknowledged elsewhere, including at Uttlesford and in their post-hearing advice on the South Worcestershire Development Plan, *the test of soundness is whether the plan is justified and deliverable, not whether it blindly allocates to match an undeliverable number.*

In the DLP examination case in South Worcestershire in June this year, the Inspectors concluded:

“Despite the Plan not providing for a 5-year housing land supply on adoption, we consider it pragmatic that it proceeds to adoption on this basis... We will not seek provision of further sites, in an attempt to boost supply in the short term, which would in any event demand more housing than is needed for this Plan. The Lichfield ‘Start to Finish’ report gives little comfort as to the value of providing more allocations to boost supply for the short term, given the lead-in times until delivery.”

This reasoning applies squarely to Canterbury. Rather than over-allocating unsustainable greenfield sites to chase a target which the market will not deliver, the Council should be producing a plan that is realistic in terms of phasing and timescales. A better approach is to adopt a *stepped housing trajectory*. This would front-load lower delivery rates in the early years, reflecting both the backlog of undelivered 2017 sites and current market conditions, whilst setting a blueprint as to how the Council currently envisages meeting housing numbers across the longer plan period, *According to such a blueprint, CCC would also recognise the position must be reviewed and refined further in not less than five years.*

2 <https://www.gov.uk/guidance/housing-supply-and-delivery>

3 See final section “Learning from previous mistakes” below.

Accordingly, the Council would not need immediately to commit to greenfield allocations, which are clearly a significant way off becoming well planned and deliverable sites. (See further our detailed comments on the proposed East Canterbury strategic allocation below.)

The pragmatic approach taken by Inspectors in the South Worcestershire case has since been explicitly endorsed by the Secretary of State for Housing and Planning in his letter to the Chief Executive of the Planning Inspectorate dated 9 October 2025.

In that letter, the Minister made clear that Inspectors should show flexibility where plans are otherwise capable of being found sound, including proceeding to adoption even where a five-year housing land supply cannot be demonstrated at the point of adoption, provided that the plan significantly boosts supply and meets needs across the plan period. The letter further emphasises that proportionate evidence and the use of stepped housing trajectories may be justified in such circumstances. In our view, this statement provides a clear ministerial direction that local plan examinations should favour realism and deliverability over rigid adherence to short-term supply tests.

Such an approach is both pragmatic and consistent with national policy, as the overall trajectory still demonstrates a credible route to meeting need across the Plan period, though recognising the reality that this will be reviewed as circumstances change. It would also help to avoid in Canterbury the situation now unfolding in Maidstone, where a district that had consistently exceeded its housing targets has suddenly found itself without a five-year housing land supply, following the adoption of an ambitious Plan that was, to all reasonable observers, completely unrealistic.

We therefore strongly urge Canterbury City Council to:

- *acknowledge openly that actual delivery in the early years will fall significantly short of the standard method target*
- *adopt a stepped trajectory that reflects what can realistically be built*
- *avoid locking itself into unsustainable greenfield allocations that stand little chance of ever becoming genuinely well planned or deliverable by recognising the position will be reviewed in five years, and in the meantime*
- *focus on maximising brownfield and smaller, deliverable sites rather than relying excessively on large, infrastructure-dependent greenfield allocations that experience shows are unlikely to deliver*

Brownfield site allocations

It is immensely disappointing that CCC has so conspicuously failed to propose any significant new brownfield site allocations.

In fact - assuming the “mixed” sites listed in Section 2 are almost wholly greenfield (which the Council ought to have clarified) - the “current” (i.e. previous Reg 18) allocations had a balance of 32.1% homes on Brownfield sites while new allocations only have 7% (seven percent) Brownfield. This wholly undermines the claim that the Council has been actively seeking such sites and provides evidence that the aims of the new NPPF have not been met.

The CCC call for sites in autumn 2024 was far from the proactive approach needed and was an important central Government requirement. ACRA provided CCC with a long list of

potential brownfield sites across the district in November 2024, justified by the CPRE analysis of brownfield opportunities in its response to the last public consultation on the DLP in June 2024. Almost none of those sites have been included.

Further, CCC has failed to propose, or even apparently consider, the opportunity for higher density residential development on key brownfield sites near the city centre and/ or along existing public transport corridors – notably on the Wincheap business estate, at Becketts House and on Military Road. This is a significant lost opportunity. The proposed development of the former Canterbury City Council offices and car park suggests a development of flats and houses providing only 180 dwellings. Given the site location, it should be possible to increase the proposed density to around at least 250 to 300 dwellings. The site is not bounded by existing housing along most of its boundary, so that there should be an opportunity for higher rise development - especially to the rear where the old car park sits.

A recent report by CPRE London⁴ identifies approaches to increasing dwelling density while delivering high quality housing. It suggests local authorities can aspire to 100+ dwellings per hectare as a base urban brownfield standard.

We are also concerned about failure now to really accelerate completion of Town and City Centre Strategies envisaged for Canterbury, Whitstable and Herne Bay, to coincide with this DLP consultation *These strategies should in our view include proactive programmes to facilitate and encourage change of use of existing commercial retail and office buildings to residential.*

Affordable housing and units for social rent

The specific addition of allocations for social rented housing (referenced in sections 1.12 through 1.22) is necessary and welcomed by ACRA, given the details within the HNA. However, within these sections, the draft Plan contains a series of implications that we believe are of significant concern.

Firstly, there is an assumption that housing for social rent is in some way inherently different from any other housing. It is not. ACRA does not, on principle, accept that the occupiers of socially rented accommodation should have to live in homes which are less well designed or built, or in an environment which is less habitable, or in areas without the infrastructure that other residents of our District enjoy.

How housing is paid for by its occupiers is a separate issue from its size and from how it is designed and built. So, for example, while the HNA identifies a need for 695 “affordable” new homes per year, within that number there will be a mix of housing sizes and locations required to meet the varying needs of individuals and families who qualify for social rent accommodation. In short, the draft LP is making a category error in assuming that properties for social rent are objectively different from any other housing.

This error affects all the subsequent thinking on social housing.

s1.19 refers specifically, and ACRA believes it is right to do so, to the problems facing funders of social housing developments. However, it makes the assumption that “registered providers” will be able to take up social housing units that are built on new developments.

⁴ https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/02/DoubleTheDensityHalveTheLandNeeded_1.pdf

While the position will hopefully change within the lifetime of the plan, it is not the case at present that existing providers are in a position to expand their portfolios. The Plan does not, but should, consider how such housing units might otherwise be acquired for social rent. Without that forward thinking there is a risk that the 20% of homes for social rent will simply never be built because there is no market to buy them, which would of course directly affect the deliverability of the Plan.

ACRA considers that the proposed wording of sections 1.20 and 1.21 in particular is vague. It undermines the commitments contained in the main body of the LP previously consulted on, for example in sections 6 and 7 (District-wide strategic policies and Development Management policies, respectively). There are there no apparent limits on the extent to which “flexibility” in such policies is needed to mitigate an assumed impact on development viability.

Furthermore, these sections imply that a lower standard of design, environmental standards, and infrastructure provision is acceptable for social housing than for other housing types. We believe this to be wholly unacceptable.

Such thinking seems to stem from the concept that social housing will be provided in discrete geographical areas, as there is no other way in which the reduction in standards can be isolated from other areas of a development without the whole development having a net reduction in standards, which would clearly make the whole of sections 6 and 7 meaningless.

Geographical isolation of social housing in that way represents both bad urban planning and bad social policy, contrary to widely recognised good practice. That such thinking is being promoted (or even merely accepted) by a Council led by Labour and the Liberal Democrats is particularly shocking.

More likely is that housing for social rent will often be interspersed among larger developments, as other affordable housing already is and is clearly planned to be under the LP. If that is the case, then ACRA considers that the application of sections 1.20 and 1.21 would suggest a downgrading of the requirements of sections 6 and 7 of the previous draft across the whole of a development, since (for example) biodiversity net gain cannot be ghettoised to affect only one area and not another; nor can infrastructure needed for a growing population be confined only to those areas which don't contain housing for social renting.

All this stems from an unevidenced presumption by the Council that the viability of developments is negatively affected by the inclusion of properties for social rent. Rather than make this fundamental assumption, the Council should have either modelled the financial viability impacts of the mix implied by the HNA, or considered mechanisms by which housing for social rent might be bought from developers without negatively affecting overall viability – as, for example, it has done recently by negotiating the direct purchase of homes built for affordable use on new estates. It seems to have done neither of these things.

In summary: ACRA believes that sections 1.19 through 1.21 are badly thought through and badly drafted. They are highly likely to have the effect of diluting the very necessary requirements of sections 6 & 7 in ways which are unspecified and uncontrolled. That in turn renders useless the Local Plan as a coherent, consistent and enforceable mechanism for planning.

Local Plan Policies

Access to schools

There are five secondary schools in the area running between the A257 to the A28: Barton Manor & Barton Court to the west of the A257, and St Anselm's, Simon Langton Girl's and Simon Langton Boys off the Old Dover Road. In addition, there are two on the other side of the city (Canterbury Academy, Archbishop's). These schools already generate major traffic volumes which will not be alleviated by P&R, and the quantum of proposed housebuilding across this area can only exacerbate the challenges of traffic in the area. Nothing in the draft Plan seems to adequately address this impact.

South-West Canterbury (N1 – N3)

Sections 3.11 – 3.13 refer to healthcare site safeguarding, the last specifically in the context of the "South Canterbury" development. It ought by now to be obvious that there is no NHS funding for this, and to persist with the myth that it will be forthcoming in the life of the LP has the effect of excluding other potential uses for the land.

S3.16 proposes relocating a well-located sports ground in order to create a Park and Ride (P&R) site. There is a serious yet unanswered question about the volume of usage and appropriate location of P&R sites (see below), but ACRA considers that rather than close the existing site the expanding population of the City requires that it be retained and the planned facilities at Merton Park should be additional rather than replacements.

There is no detail under S3.19 as to how the roads listed might be improved, how that would be paid for, what capacity they would provide or what impact that would have on traffic flows.

Under site N3 there is a good example of why considering this iteration of the Plan in isolation is procedurally defective. The impact of new sites on existing sites is glossed over here, also in N5 and elsewhere (see comments on 3.27, below).

East Canterbury (N4 - N7)

ACRA is disappointed at the absence of a master plan to cover the four individual sites and their integration with the existing South Canterbury development.

The proposed developments are very large - much larger than the existing local estates - and will require new infrastructure on a grand scale. There are already problems caused by deficiencies in sewage capacity, water supply and electrical supply. The area already suffers from the A257 being obstructed by works associated with current developments, especially the digging up of the road outside Howe Barracks in recent years. The current infrastructure is simply not adequate for development, and the upgrading of such systems would create significant long-term disruption to traffic.

There are developments already ongoing at Howe Barracks (not yet completed) and others planned at St Martin's Hospital and in Littlebourne and beyond which will add to the traffic pressures on the A257. This will create more "rat-running" through Stodmarsh Road, Warwick Road to Spring Lane, St Augustine's Road, Pilgrim's Way / Barton Road and

Bekesbourne Lane. In short, the area needs infrastructure upgrades in advance of any further development.

Cumulatively, the draft Plan proposes adding 2461 homes to the area which

- a) has a very overloaded highway (A257) which is the main local route into and around Canterbury from the East, into which part of the major development will issue.
- b) has a small country lane (Bekesbourne Lane) into which traffic from the developments will issue if they wish to go in that direction, especially if they need to access Bekesbourne Station which is lauded as accessible in the plan
- c) includes mutually exclusive proposals to (1) connect the sites to Bekesbourne Station [N4 s 4) a) iv)] and at the same time to (2) block through traffic on Bekesbourne Lane at some unspecified point [N4 s4) g)]. This is utterly incoherent.
- d) has a narrow lane in Stodmarsh Road which is 30 mph restricted, heavily used as a rat run through Fordwich (blighting the whole route) and where lorries often get stuck.

We are particularly concerned at the misplaced reliance on a park and ride scheme as a catch-all solution. Such schemes tend to generate additional car trips rather than reduce them. The idea of an environmentally damaging new facility off Littlebourne Road is wholly inappropriate in a sensitive landscape setting. There is no evidential basis that it would reduce car use on the east side of Canterbury. Residents in Barton Ward believe that most traffic movements along the A257 are not heading in and out of the city centre, rather using the route as a means of accessing schools on the south side of the city, the two universities, the hospital, out of town shopping centres or the A28 both south-west and north-east bound. This informal evaluation of destinations suggests a P&R facility would anyway prove of little use for many motorists.

The A257 itself features no bus lane, which would be needed at the very least if the P&R were to have any chance of making a dent in traffic volumes. No transport modelling or route evaluation seems to have been done to allow the Council to assess the feasibility of a bus lane. It is clear to those living along Littlebourne Road, St Martin's Hill and Longport that there is unlikely to be space for road widening between the Howe Barracks site and St Augustine's Abbey.⁵

Bekesbourne station is a very small local station with limited services. It requires car transport to get there, and there is very little parking. If this is to turn into a commuter station, how will that be made possible? Have Network Rail or Southeastern been consulted about potential improvements to facilities and services?

Further, Bekesbourne Lane is very narrow and there are many places where two cars cannot easily pass safely side by side. Increasing traffic along this road will result in significant negative impacts on the housing along it. The last stretch of Bekesbourne Hill, towards Bekesbourne as it descends to join Station Road, is narrow, with high sides and on a bend. It is not suitable for large or steady traffic unless one at a time. Cycling on this unlit road is not safe. It is a country lane, with farm vehicles passing frequently. It would need, for example,

⁵ As CCC and KCC discovered to their cost in implementing the ultimately ineffective cycleway, starting at the Old Sessions House and finishing at the corner of Monastery Street.

widening and cycle lane provision, and possibly a bus lane, to make people confident to leave the car. None of that seems to have been considered in the site policies and would impact viability of the development if added to the policies.

There is a Conservation Area at The Oast, on the corner of Stodmarsh Road and Littlebourne (directly opposite N4). This does not appear to have been considered.

The Lampen Stream runs across the downhill side of the land designated for site N4. This is a vital water supply for the internationally recognised RAMSAR site and national SSSI at Stodmarsh. This must be protected but the policies do not seem to recognise this. The Lampen Stream also feeds the part of the wetland which is protected from the Stour by the Lampen Wall. If this is also polluted, the whole site will be wrecked. This will be on top of whatever prevention works are being created by the South Canterbury Development.

Sections 3.27, 3.28 and 3.29 require (or presume) access to the South Canterbury development without any explanation or apparent consideration of whether that matches with their masterplans, funding model or s.106 obligations.

Within the individual East Canterbury site allocations, this disconnect is exemplified by a grossly inadequate assessment of arrangements to deal with foul water drainage from the sites. There seems to be an assumption that each larger site will create its own WWTP, rather than the sites cooperating to provide a single such plant to serve the whole of this area, or to share in solutions being developed for South Canterbury. Again, this is an example about why the piecemeal approach to this Local Plan and to the wider area planning is antipathetic to effective and efficient resource usage and infrastructure provision.

There is a lack of clarity about funding for, timing of, and the route for a new link road between A257 / Bekesbourne Lane and the A2 via the planned South Canterbury urban extension (site 1). As noted above, ACRA considers the provision of such a route to be essential at the earliest stage possible, and certainly not as late as the completion of 500 houses on site N5 [policy N5 5) c) refers].

ACRA completely rejects the proposal that completion of 1,000 homes on the westernmost site of the three is an adequate trigger for funding a link (including a bridge across the railway line). We suggest completion of 250 would be far more appropriate, and that to facilitate this it should be clear that site N5 must be developed before sites N4, N6 and N7. We also believe that developers of the sites allocated in Littlebourne (R7) and at St Martin's Hospital (CF2) should also incur funding obligations for this, as they will benefit.

There is no explanation of potential new routes for all of the extra traffic generated by the new sites to reach Sturry Road and the A28 towards Thanet. Without such provision, further overloading of the Canterbury ring road and disruptive congestion and pollution of rural lanes will be inevitable - at incalculable socio-economic and environmental cost.

Canterbury Urban sites (N8 - N18)

In general, these sites are small brownfield developments and ACRA welcomes them as an example of what could be achieved. In the case of the conversions of garage unit sites to housing, we think there are many more such sites across the city (and possibly in Whitstable and Herne Bay too) which the Council could and should have put forward.

Infrastructure Strategy

There is significant missing detail on the proposed infrastructure provision. It is unacceptable and naive to simply say an infrastructure strategy “will follow” in the light of magnitude of challenges faced and size and location of new greenfield sites proposed, which will have significant impact on travel movements around the City and District. The Plan is deficient in its assessment of the extent to which infrastructure of all types needs to be brought online earlier than the individual site allocation policies propose in order to avoid an aggregation of problems around capacity in all senses.

In passing, we wish to express ACRA's desire to see CCC rigorously enforcing conditions in planning consents, which require foul drainage works, necessary to prevent pollution of watercourses. Such works should be carried out in full prior to occupation of dwellings. We cite in support of this insistence an Inspector's decision earlier this year in favour of Wealden District Council and against a developer's appeal. The council declared:

"A planning inspector has now rejected the appeal and said that the council is entitled to impose conditions on occupation if there's evidence that foul drainage works are necessary to prevent pollution. The council is also allowed to refuse to remove the condition if it can show that the necessary works haven't been done, which is the case with the Horam development."*

Another serious concern for residents is the absence of provision in the draft Plan for the additional NHS facilities that will be needed to serve the increased population anticipated in the Draft Local Plan. Local facilities are already operating at full capacity as evidenced by long waiting times for routine treatment, heavily congested A and E departments / UTCs and the size of GP lists. The proposal for a site for a new hospital as part of a Merton Park development has been withdrawn.

Developers do not provide long term revenue for the additional services that will be needed. Known manpower constraints suggest that the extra clinical staff will not be readily available.

In summary, the deliverability of sustainable sites will be impossible if infrastructure is not provided at an early stage. Future development plans, mitigation measures and related timetables relating to individual sites in Canterbury District will need thorough review, to ensure this is achieved.

Wastewater

The implied reliance on Wastewater Treatment Plants (WWTPs) on greenfield sites is a major concern in terms of deliverability, as evidenced by recent progress updates from the South Canterbury development, where sewage treatment options have still not been finalised.

It is established fact that the main WWTP at Sturry Road, and the related local sewage infrastructure, is already at virtually full capacity with a very high risk of spillages into the River Stour at times of exceptional wet weather, which is increasing in frequency.

Serious questions have to be asked of Southern Water's contingency plans and longer term strategies to cope with the housing expansion set out in the Draft Local Plan, and yet we know that Southern Water is not envisaging a build-out of sewers for the planned amount of housing, precisely because they do not believe that it will be built. This total disconnect between the Local Plan and wastewater treatment provision adversely affects the

deliverability of the Local Plan, not least because, if progress of developments relies on on-site WWTPs, then that is likely to impair the financial viability of a site.

Fresh water

Although the Broad Oak Reservoir (policy R17) is now in the early stages of planning by South-East Water, they do not expect to provide water from it until 2037⁶, which is of course towards the end of this Local Plan period. Again, given the existing issues around supply volumes, this suggests that there may not be sufficient water provision capacity to meet the planned housing numbers. The Council may have considered this in its scheduling of developments, but it is not clear from the Local Plan that this has been done at all, or if it has been updated as South-East Water's planning evolves.

Park and Ride sites

The Council is proposing an additional P&R site off the A257, which will create a total of four P&R services around the city. There is no evidence within the Plan of projected usage or costs, yet it is already known that the Council is struggling to subsidise the existing services. (For more on our doubts about an A257 P&R facility specifically, see our points on the East Canterbury proposed strategic allocation above.)

The Council has failed to undertake a Transport Assessment of the proposed Thanington P&R site. This must be done before the Plan is considered for regulation 19 review in order to avoid the possibility that such a transport Assessment judges the site to be unsuitable for a P&R operation.

As three of the proposed P&R sites are to the south of the City and there are plans both to upgrade junctions off the A2 and create a link road between the A257 and South Canterbury, it would make more sense economically and in terms of space allocation to combine the proposed new P&R sites at Thanington and Littlebourne Road (A257) with the expanded P&R at Roman Road (South Canterbury). Subject to modelling, we suggest that journey times would barely be affected while the economic and environmental benefits would be significant.

It is naive in the extreme to place so much reliance on park and ride services to solve pressing problems of additional congestion on the historic urban and suburban road network in and around Canterbury.

Park and ride services follow inflexible city centric routes. The services are hampered by the limited provision of dedicated bus lanes. Time saving is only marginal because of notorious heavily congested pinch points, for example on Military Road, along Rhodus Town and on St Martins Hill. The new purported "solutions" suggested in the Draft Local Plan, without any updated draft Transport Strategy, imbue us with no confidence.

6 <https://www.southeastwater.co.uk/about/our-plans/broad-oak-water/>

Transport overall

There is no evidence of serious follow-through on the Council's stated "bus first" strategy. The Canterbury Alliance for Sustainable Transport (CAST) made this clear in its response to the June 2024 consultation, stressing that such a strategy can only succeed if backed by concrete measures: reallocating road space, prioritising walking, cycling and public transport, and securing funding through tougher parking controls and road use charging (for example initially, through introduction of a LEZ). Without these interventions, "bus first" remains a slogan rather than a deliverable plan.

Particularly worrying is the failure to capture the vision, defined in the draft Canterbury District Transport Strategy, proposed in March 2024 for the bus network to be the major provider of Canterbury's transport needs as described in The Canterbury District Bus Strategy dated 3 May 2024.

A failure to follow through and reinforce the bus strategy limits the Council's opportunities for giving pedestrians, cyclists and users of public transport greater priority along the city's road system.

An incremental approach to the overall Canterbury District Transport Strategy would be in line with the Department for Transport and Highways 'vision and validate' approach to transportation planning, which states that public consultation about a vision should continue right up until the final submission of a Local Plan application.

Department for Transport guidance material emphasises that it is important to test or evaluate a vision to see how plausible it is. However, the only reference in this Regulation 18 consultation to the Transport Strategy is a brief mention of its 'next update' (para 3.8). The Transport Strategy's section on Measuring Success refers to its extremely ambitious targets but there is no further information at this stage about how these targets are being monitored to find out to what extent the vision described is being achieved or will need to be adapted in the future.

Learning from previous mistakes

It is vital that the progressive development of this Draft Local Plan is informed by an integrated and transparent process of learning from failures and mistakes of former years, as exemplified by the following:

- Delay to the South Canterbury urban extension (formerly Mountfield Park) owing to inadequate anticipation of *inter alia* wastewater treatment, electricity cable undergrounding, and electricity supply challenges.
- Delay to parts of Saxon Fields (Thanington urban extension around A2 junction with A28) owing to inadequate anticipation of controversy about necessary of required infrastructure (that is the new junction, A2 off-slip, Wincheap P&R expansion, Wincheap gyratory system) including the failure of the developer to build the promised WWTP on Cockering Farm site, which has been replaced by a simple pumping station. In this instance there have been many trigger points missed or refused by the developers, with several attempts to renegotiate previously agreed planning requirements and agreements.
- The failure, mentioned previously, to capture the vision of the draft Canterbury District Transport Strategy (March 2024) for the bus network to be the major provider of Canterbury's transport needs.

- The allocations around Sturry have been nothing short of disastrous, with progress stalled by unresolved access problems and transport mitigation measures that have proven wholly unviable. This area continues to remain problematic, with significant housebuilding (now added to in this iteration by policy N33) along the A28 east of Sturry with no improvements at all planned to the road capacity in that area.
- Slow build out of the Howe Barracks site and inadequate preparations for completing the link road from the A257 to Military Road. This seems to have completely ignored the magnitude of difficulty in widening the carriageway near the Canterbury County Court buildings and complications in constructing a signalled junction between the main entrance to the site and the A257

All five cases have led to concomitant delays in construction of junction improvements, new relief roads, new link roads and related infrastructure. Again, all this suggests a want of forward strategic planning in the Council and a lack of enforcement. Taken together all this seriously inhibits the Council's aim to achieve the required housebuilding numbers and thus affects the deliverability of the whole Plan.

The cumulative effect of the delays and inadequate contingency planning is that there is a growing risk that Canterbury will pass down to future generations partially built out housing estates on greenfield sites involving substantial harm to the environment, loss of agricultural land and woodland, loss of amenity, loss of open space, but with only very limited infrastructure improvements or additions to essential services to underpin the developments.

Stefan Colley, Chair ACRA

20th October 2025

About ACRA

The Alliance of Canterbury Residents' Associations (ACRA) is a coalition of fifteen resident and community groups dedicated to representing the collective views and interests of our members on the key issues shaping the future of Canterbury.

Our committee is composed of two nominees from each affiliated residents' or community association in and around Canterbury, together with a representative from Bridge Parish Council.

We work collaboratively with local government at all levels, the Canterbury Alliance for Sustainable Transport (CAST), The Canterbury Society, and other community-based organisations to ensure that residents have a strong and informed voice in civic life.

ACRA aims to influence decision-making through the preparation and submission of clear, evidence-based advice and comment to relevant authorities. We are committed to ensuring that the community's perspective is heard on matters ranging from civic life, planning and housing to environmental sustainability, transport, and local governance.