

Draft Canterbury District Local Plan
Response to Focused Consultation 2025

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I welcome the opportunity to comment on the proposed amendments to the draft Canterbury District Local Plan. Having reviewed the Regulation 18 Focused Consultation document, topic papers and updated evidence base, I submit the comments, concerns and suggestions as detailed below. The response generally follows the survey questionnaire format but diverges in some instances to provide include comments on the general approach taken with this focused consultation.

In particular, although elements of the original evidence base have been updated, one gets little sense as to how the proposed alterations fit in with the overall spatial strategy and vision for Canterbury District. Although the proposals may plug some holes which have emerged due to comments on the original Regulation 18 draft Local Plan published in March 2024, they lack essential justification and evidence to support them. Therefore, the policies and proposed amendments risk demonstrable harm to the local transport network, natural environment and Kent Downs National Landscape to the detriment of sustainable development.

Response to survey questions:

Part 1: Aligning the local plan with new NPPF requirements.

Q1: Local plan period and housing needs

Although the amendment to the standard method of calculation has increased the local housing need figure for Canterbury District, local authorities can apply lower housing need figures or use an alternative approach. As noted in the Government response to the proposed reforms to the National Planning Policy Framework and Other Changes to the Planning System (2024/updated Feb 2025), this can be the case where there are local constraints on land and delivery. There are significant constraints to development in this district linked including but not limited to the designation of a significant portion of the district within the Kent Downs National Landscape, flood risks along the coast and river, large areas of high environmental and biodiversity value (e.g. ancient woodland, SSSI, Ramsar, SPA, SAC and national and local nature reserves) and limited transportation infrastructure. The updated Sustainability Assessments show that these factors are significant constraints to the feasibility of development of sites put forward in the Call for Sites. It seems reasonable therefore to justify a lower figure on this basis in order to ensure that development remains sustainable.

The importance of providing housing for all social and age groups is essential for supporting social cohesion and local communities. Shared housing can assist in keeping more people living in central areas, which supports local shops, services and sustainable transport. In addition to housing size and tenure, the supply of alternative/varied housing models (for example, HMOs, retired living and co-housing) can support the needs of various sectors of the population and provide opportunities for localised community hubs. In the context of Canterbury itself, there are 2 universities facing financial difficulties and student accommodation and HMOs should be accepted as an opportunity to provide young people with an opportunity to move out of home.

Q2: Affordable housing and social rent

I am concerned that the review period mirrors that of the existing 2017 plan. Consequently, there is a potential lack of master planning that might have been made if it had covered a longer period.

The affordable housing definitions set out by Government do not result in true affordability. It is vital that this is taken into account when policies designate housing tenure for development.

Policies should require greater cooperation between developers and registered providers regarding affordable housing prior to and at the time of the assessment of planning applications. Too often, affordable housing is permitted and then not delivered due to concerns about financial viability and lack of Registered Provider interest in the housing delivered. Policies should require/encourage housing association involvement in the design and planning process to ensure that vital affordable housing is actually delivered.

Q4: Water infrastructure and delivery

As noted in the focused consultation document, the state of water infrastructure and the role of the water industry has been subject to greater scrutiny. While Government considers reform of the industry, the Local Plan can and should play an important role in addressing the environmental consequences adding to the burden of aging and poorly maintained infrastructure as a result of increased development detailed in the plan. In addition to working in partnership

with the water authority, the Council could consider encouraging innovation and measures on-site to reduce water consumption and manage surface water on site, thereby reducing reliance upon the industry as the primary manager of water supply, drainage and flooding matters given their track record. This could be achieved by:

- Strengthening Policy SS1 to include improvements to water infrastructure generally. It is currently very focused upon Stodmarsh-related matters).
- Considering the incorporation of greater site-specific requirements into policies for specific allocation sites as appropriate (e.g. developments above a certain threshold or where environmental constraints/opportunities exist).
- Encouraging innovation which may improve management of water and drainage within the site. One such example is the concept of the “sponge city” put to use in China and Copenhagen, which seeks to allow absorption and retention of surface water to prevent repeated flooding and can be used for water recycling. This could alleviate stress on the local drainage infrastructure and thus reliance upon water authorities to manage surface water and promote resilience against flooding and drought. Encouraging such innovation to address climate change would be aligned with the aims of the NPPF and should form part of the strategic vision. It could also potentially help unlock sites for development without increasing flood risk elsewhere.

With regard to water neutrality, the Ashford Borough Council Regulation 18 draft Local Plan states that the Levelling Up and Regeneration Act (LURA) 2023 requires certain Wastewater Treatment Works (within nutrient neutrality areas) to upgrade to tighter permits for nitrogen and phosphorus by 1 April 2030. Consequently, the need for mitigation for future housing developments connecting to upgraded Wastewater Treatment Works within the Stour catchment should reduce after 2030. This would apply to development in Canterbury District, but mitigation may still be required.

In addition, the proposed Nature Restoration Fund proposed in the draft Planning and Infrastructure Bill aims to ensure measures to address the condition of Stodmarsh Lakes. Nevertheless, a catchment-wide strategy is required to address the environmental and social consequences, the latter in relation to housing need and delivery. The inclusion of Policy C20 in the Regulation 18 draft Local Plan (2024) and the allocation of land for strategic wetlands to mitigate the impact of development upon Stodmarsh SPA/SAC is welcome so long as they are effective. However, Policy DS17 could include further design guidance and details of a mitigation hierarchy (including guidance of when mitigation credits can be considered).

Part two: Draft local plan policies for consultation Canterbury area

Q5. Deletion of the draft strategic development allocation at land north of University of Kent (policy C12)

This is generally supported.

Q6. Deletion of the draft strategic development allocation at land north of the Hollow Lane (policy C7)

This is generally supported given the potential impacts upon SSSI and comments from KCC ecology, which said that further development of Site 11 of SP3 was not acceptable. However, the connectivity problems will possibly arise with the Merton Park allocation.

Canterbury Area

Q7 Policy N1 Land at Merton Park

Insufficient information has been provided regarding the impact on:

- Traffic generation and Stuppington Lane
- A2 landscape visual impact and setting
- Heritage, including the setting of Canterbury town and the cathedral,
- landscapes impacts, including the loss of views from Bell Harry Tower on the Cathedral as mentioned in the World Heritage Site governing document.
- Light pollution from proposed sports facilities. There are already many sports grounds which already have capacity. For example, Canterbury Football Club is currently playing on Thanington Rec.

It is noted that the Policy calls for a new 3FE primary school. Given the delays to Thanington primary school, the policy should include provisions to secure reasonable delivery.

The Council should consider design measures which can secure appropriate density whilst balancing the impact upon the landscape and sightlines to the cathedral and city from the A2 and surrounding Stour Valley countryside. Emphasis should be placed upon identifying sightlines at the outset and protecting them. Protected views are not identified in the policy.

Q10. Policy N3: Thanington Recreation Ground

I strongly object and firmly oppose to the continued use of park-and-ride as a core element of Canterbury's transport strategy. Thanington Recreation Ground is an irreplaceable community facility and vital green space whose loss would directly contradict both national and local policies aimed at protecting open space. The site is not supported for development by the SHLAA, and there is clear and consistent opposition from the local community. Sacrificing this space for a park-and-ride facility is unjustified and deeply unpopular. More broadly, the park-and-ride model has repeatedly proven to be ineffective and counterproductive. Evidence shows that it does not reduce overall traffic levels but instead increases car journeys, entrenches car dependency, and causes environmental harm. Past proposals at Wincheap Watermeadows and Thanington Recreation Ground were both abandoned following widespread public backlash, demonstrating that such schemes lack local support and long-term viability. Reviving this approach now would be a costly repetition of previous mistakes and a waste of public resources. Rather than investing in outdated infrastructure, I urge the council to redirect funding towards genuinely sustainable transport alternatives—such as enhanced bus services, improved walking and cycling infrastructure, and demand management measures that support long-term behavioural change. These are the solutions that Canterbury needs to reduce car dependency, protect vital green spaces, and build a cleaner, more sustainable future for its residents.

If, however, the Council wishes to continue with this approach, it should consider a multi storey car park on an existing brownfield site. In addition, car parks need to be built upwards and integrated with a bus hub/service in Wincheap with excellent connections to cycle routes (on the A roads and all new development).

Rural area

General concerns regarding Policies N31 and Policy N32 (including the potential cumulative impact of the two sites)

These proposals amount to a huge increase to the housing allocation by CCC for Chartham Parish (which had been set at 14 dwellings when preparing the Neighbourhood Plan). This therefore presents a serious challenge to the draft Chartham Neighbourhood Plan's aims and strategies. The work on this document is well progressed, and the document has general local support. The inclusion of these sites should therefore have taken into account evidence compiled for the neighbourhood plan and should have involved more local consultation.

The allocations, individually and cumulatively, also give rise to the need for a detailed transport assessment for the area. There are already considerable transport pressures on the rural country lanes in and around Chartham arising from previous and current developments. When permission was granted for the development at St Augustine's, a larger housing allocation was rejected and access was restricted from certain roads to control the impact upon the settlement of Chartham and local country lanes. An example was the installation of this road sign on Station Road as seen in the below image, which aimed to prevent traffic from the A28 cutting through Chartham to the development. Similar concerns would apply to these allocation sites.



In addition, I believe that the Transport Assessment for the development at Cockering Road (Site 11 in Adopted Local Plan) failed to take account the bottleneck impacts upon the junction between Cockering Road and The Downs at Chartham despite the fact that KCC identified that traffic needed to be considered. In my opinion, this is already leading to adverse effects upon

highway capacity and safety in Chartham. Similarly, cycle routes to be delivered as part of previous developments were omitted as phased development progressed.

Thus, local residents consider the local roads are already under pressure, and this would be exacerbated by the proposed allocations. The character of the country roads, the absence of pavements and the lack of parking at the train station would ensure reliance upon private vehicles. This was highlighted when local community plans to introduce a “walking bus” to the primary school were set aside due to concerns about safety.

Moreover, it is unclear that the transport and highways implications of the proposals have been adequately considered in the context of the proposed development in the wider local area. The Regulation 18 draft Local Plan and focused consultation identify considerable additional development to Chartham and the area southwest of Canterbury. The proposed south west link road is no longer included in the Local Plan. Thus, the potential transport implications are considerable and yet there is no updated transport information provided as part of this focused consultation. This should have been an essential part of the consideration before these sites were put forward. Similarly, there should have been an updated Transport Assessment and Local Cycling and Walking Infrastructure Plan (LCWIP).

It is further noted that neither site scored well in the updated Sustainability Assessment prepared by WSP, and this does little to reassure local residents about the proposed allocation of 330 houses in this area.

It is understood that the Chartham Primary School is at capacity and would not be able to accommodate the additional dwellings. There is already pressure for primary school places in the local area as reported in relation to the recent announcement that the new primary school at Thanington would not be delivered until 2030. This requires further consideration in these site allocations.

Q.38 Policy N31: Chartham Papermill

I have previously expressed concern about the appropriateness of the proposed classification of Chartham as a Rural Service Centre. Although I don't agree that Chartham is a Rural Service Centre, development of this scale and this location will make it possible to be one through the inclusion of much needed services and amenities within the site. The provision of large areas of green space is welcome. However, the benefits of development will be limited without corresponding “upgrades” to the transport and highways infrastructure to encourage walking and cycling (e.g. provision of pavements and cycle routes). It is unclear as to how Station Road could be widened and appropriate measures to support walking and cycling beyond the site boundaries incorporated into the scheme.

Chartham Papermill is vacant brownfield land, and therefore the potential for redevelopment is accepted. However, the scale of the development proposed is concerning particularly in light of the lack of information provided within this consultation process. The Focused Topic Paper and proposed policy text do not paint a clear picture of how the development of this scale can be delivered. Although the focused topic paper indicates that a site-specific flood risk assessment has been submitted by the promotor of the site which suggests that less of the site falls within Flood Zone 3B (the reason for the exclusion of this site in the 2024 draft), this information has not been published. Thus, the proposal doesn't tie up with the updated SFRA, and there are no

comments from the Environment Agency. Therefore, there is insufficient information to allow proper consideration of whether and how development may be accommodated on site and the potential flood risk.

I am also concerned about the need for sewage treatment facilities in this flood zone and the potential harm to the Stour chalk stream, an ecologically rare habitat. There have been sea trout in the river, but the existence of barriers, culverts, hatches and sluices impede their journey as they migrate upstream to spawn. This should be taken into account as there have been problems with the existing weir. It has also affected the native habitat by silting up downstream.

There have been a mill or mills at Chartham for several hundred years, and this is the opportunity to remove existing manmade structures, soften the banks and enhance the immediate river environment such as the feeder stream at Horton Brook. Thus, design guidance/briefs should also be included in the policy wording. If not included in the policy, I would strongly recommend an SPD and hope that the Council would consider design charettes or other engagement with the local community to ensure high quality design which balances development with social and environmental considerations important to this riverside site.

In addition, given the location and flooding history, the policy should ensure that innovative measures are designed into the site to address flood risk for future occupiers and the surrounding area in general (see comments on water infrastructure and delivery).

Q.39 Policy N32: Land at Rattington Street

Although a small portion of this site has been put forward for housing development in the draft Chartham Neighbourhood Plan, a much larger allocation on this land was excluded from an earlier draft version of the Local Plan by CCC due to multiple concerns, including the impact upon highways, the ancient woodland/local natural environment, source protection zones and drainage/sewage infrastructure, water and electricity supply, etc. Given the measures previously required to address traffic and highways impacts arising from St Augustine's upon Chartham Village, this shows that potential traffic generation and highways safety matters require early consideration. KCC's refusal to reduce the speed limits along Rattington Street despite the need to accommodate pedestrians is leading to further danger.

Although the Focused Topic Paper states that further information has been submitted to overcome KCC Highways concerns, I do not see this evidence in the published papers. Connectivity to services outside the site is poor due to the lack of pavements and speed of traffic, and it's not clear how this would be addressed.

The allocation of this enlarged site also poses serious risk to the local natural environment. The "masterplan" does not provide convincing evidence that the ancient woodland can be adequately protected as an island surrounded by development. Ancient woodlands are irreplaceable habitats, and the understory is just as important, if not more so, than the trees. Therefore, the simple provision of green space around the ancient woodland and within the 15m buffer zone would not be sufficient to protect this valuable resource. This requires much more consideration.

In line with the above, there has been concern about surface water management in this site, and the introduction of development associated with 170 houses would certainly increase concerns

about the impact of heavy rainfall upon the ancient woodland, the local area and Stour chalk stream (due to the slope of the land).

The proposal also challenges the analysis set out in the draft Neighbourhood Plan. An intrinsic feature of Chartham Parish is the pattern of scattered settlements, of which there are five. The site allocation would infill the gap between three of these creating a single, larger settlement. This goes against national and local policy to respect the character and pattern of development of the local area.

I note that Chartham Parish Council has held two public consultation exercises to prepare its response to the focused consultation. This attracted more than 100 residents, with much negative feeling about this allocation site. Local concerns have been set out by the Parish Council, and these should be given considerable weight.

Q. 41 Policy N34: Barham layby

The site is within the Kent Downs National Landscape. The replacement of woodland and hedges along the A2 in this nationally important landscape with a 20 lorry car park is taking paradise and putting in a parking lot. The associated facilities and lighting would have a further harmful impact upon scenic quality of the National Landscape as is visible in other similar developments in the local area (for example Sevington). Although the need for lorry rest areas is acknowledged, this does not seem to be an appropriate location given the constraints.

Alternatively, the Council could promote the use of lorry logistics apps to use underused industrial estate carparks and agricultural distribution centres on a pay per slot for the 11-hour slots required by law.

Districtwide strategic

Q.42: Policy N35: Gypsy and traveller accommodation

It is unclear whether this takes into account existing potential windfall sites which have not been regularised. There should be clarification on this point.

Some of the proposed sites are in the local nature network and/or ancient woodland, and account must be taken of the potential impact upon biodiversity and the local natural environment.

Part 3: Sustainability appraisal And impact assessment

Habitats regulations assessment.

Sustainability appraisal of the draft local plan.

Sustainability appraisal of the strategic land availability assessment.

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

General Comment on focused consultation

Loss of rural/farm land - Many of the proposed sites are in within rural settlements or on farmland, and the policies/allocations do not take sufficient account of the impact upon the rural landscape or views to the Cathedral and Canterbury from its Stour Valley setting. This has already been

eroded by existing development, for example in Thanington. It should be the founding block on which development is made.

Loss of a historic sense of place of Canterbury – Canterbury has a long-standing and important history as a centre of pilgrimage. The Local Plan should seek to preserve this significant historic quality whilst accommodating necessary development. The use of LIDAR, as has been used for assessing existence of buildings, should facilitate this.

Rural lanes – There is insufficient protection of the nature, quality and appearance of local rural lanes. Policy T16 of the adopted Local Plan ensures their protection given their importance to landscape amenity, nature conservation and heritage matters. A similar policy would be welcome but doesn't appear. It's important that their character is taken into consideration in transport assessments to ensure that safe active transport is guaranteed whilst preserving the landscape quality.

Impact of development upon local chalk streams, including the Great Stour and its tributaries (e.g. the Lampen Stream) – Account needs to be taken upon the lakes at Stodmarsh which are fed by the Lampen Stream. They are currently the only undamaged habitat there, but this is likely to change unless the combined impacts of currently passed and new development are taken into account.

Infrastructure - The Consultation notes that infrastructure plans will be prepared and published with the Regulation 19 draft. However, an update should have been included with this consultation given the considerable changes already known (e.g. deletion of south west link road, bus hub at Wincheap, delays to school delivery, etc.). The infrastructure plan should also reflect that walking and cycling should be higher in the sustainable transport hierarchy.

Sustainable development - With devolution the importance of a clear and functional local plan for the urban centres of Canterbury district: Herne Bay, Whitstable, Canterbury is sensible. This isn't it. It pushes through inefficient use of the Garden of England to make developers-dream homes. It puts parking lots on the paradises of Thanington rec and a lorry park with the potential to become another Sevington (with no lighting constraints or design) replacing woodland. The edge of road woodland at Barham is a particular loss:

Transportation and highways impacts - As noted, there is insufficient information within this consultation to understand the transportation and highways impacts. This applies to individual proposed allocations and the cumulative impacts. Given the loss of the south west link road and the significant increase of development to the south west of Canterbury, updated transport assessment should have been provided but are absent.

With insufficient detail of undescribed infrastructure (funding, timing or route), this consultation does not tackle car dependency. There is no explanation of how traffic from the proposed allocated sites would reach Sturry Road or the A28 towards Thanet without either overloading the city's ring road or funnelling additional congestion onto rural lanes which are already under pressure. This doesn't comply with section 9 (Sustainable Transport) of the NPPF.

Non-delivery of cycle routes in the past few years has undermined efforts to improve connectivity and sustainable transport. Measures to ensure delivery should be included in the new local plan. If the Council is serious about the bus first strategy for this Local Plan, safe pedestrian and cycle

routes must be prioritised along with cycle parking designed in around transport hubs as part of the transport infrastructure policy/plan, which could assist in unlocking funding.

Need for design briefs - Design briefs would prevent problems arising from unfulfilled back of the envelope master plans, such as that experienced at Thanington. Lessons should be learnt from the experience of losses of:

- a car park designed into the Saxon Fields development and
- an interconnecting road between the two application sites,
- a health centre that failed to materialise because the developer failed to inform the health commissioning teams,
- multiple cycle routes,
- views of Canterbury and the Cathedral from the rural hinterland,
- threat to pre-existing open space,
- threat to local natural environment/biodiversity.

Views of Canterbury and its Cathedral - The draft Local Plan 2024 and this focused consultation fail to identify views from the surrounding countryside which contribute to the setting and appreciation of the city and cathedral. This has been eroded over time by developments and existing views should be protected (as noted in the LUC landscape & biodiversity) to ensure that these are taken into account during design development.