

Draft Canterbury District Local Plan (2042/43) March 2026

Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2019 NPPF – Local Housing Need and the CCC District Plan

Regulation 19 examination representation

John Reilly

May 2026

Support for the Save the Blean representation

I support the Regulation 19 representation made on behalf of residents by Save the Blean relating to:

- 1. Soundness of the decision to remove former policy C12**
- 2. Strengthening policies for Environmental Protection and Biodiversity**

I endorse their statement and request (page 6 of their submission) “that the decision to exclude former Policy C12 from the 2026 Regulation 19 draft Local Plan clearly meets the test of soundness. It is fully justified by proportionate evidence and is both legally and procedurally compliant. Should the site promoters make representations to the Planning Inspector seeking to restore this proposal, we ask that, as an organisation reflecting the concerns of affected local communities, Save The Blean should be afforded the opportunity to appear and be heard at any hearing session relevant to that matter. We make this request pursuant to Section 15B of the Planning and Compulsory Purchase Act 2004 (brought into force on 20 March 2026 by SI 2026/169).”

General comment

The Canterbury District has conducted comprehensive consultation and is commended for the revisions of the plan, the deletion of C12 and an increase in Brown field and smaller sites. Nevertheless, there is potential for further brown field and vacant building development which would reduce the need for ‘green area’ building.

Implications of District population increase not addressed in the Plan

Recognising that the new methodology is mandatory the Plan fails to reflect on the reality of the implications and impact, for the District and the medieval centre of Canterbury, of an increase in population from c.162,000 to c.240,000 + i.e. an increase of nearly c.48%.

Student accommodation

Substantial changes in the student population are not considered in the Plan.

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

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 and the 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. The absence of such a plan is a defect.

Hospital

A critical cross-authority issue is hospital provision.

The three hospitals in East Kent cannot cope with demand. They are inadequate, outdated, not easily accessible, under special measures, increasingly unfit for an effective provision of services to the current population. 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 in health provision. The inspector must take account of this failure in reviewing the plans

The plan notes 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 an accessible site. An urgent, concerted, joint authority, approach for a new, fit for purpose, high quality, hospital should feature as a priority in the Plan. Its absence represents a serious flaw.

Water supply

There is 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**. There are doubts about the overall viability and funding of the project – no funding has been secured. The water board has

indicated that it will not meet the increased demand. It will not 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. It should be a requirement that all the required infrastructure should be in place before the housing is built. Canterbury experienced water outages in Seasalter, Herne, Broomfield, Beltinge, Sturry, Barton, Fordwich in summer 2025 and more recently in Blean and other parts of the District.

The Water Board has suggested that it will develop a desalination plant at Reculver. There is no evidence of ongoing work on this or reference to it in the District Plan. If the proposed BroadOak reservoir is predicted to be inadequate for the additional demand, the lack of significant additional water supply seriously undermines the viability of the number of additional houses envisaged and hence of the plan overall.

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 Inspector 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. This is not evident in the Canterbury District Plan https://assets.publishing.service.gov.uk/media/687dfcc4312ee8a5f0806be6/Independent_Water_Commission_-_Final_Report_-_21_July.pdf

Waste Water Treatment

Each of the larger sites proposed in the Canterbury Plan require the installation of a Water Treatment Plant but there is no reflection on 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? There is no consideration of this in the plan. 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 failure to address these issues compromises the soundness of the Plan.

The number and scale of new water treatment plants envisaged for the District is substantial, but there is no quantification and assessment of the cumulative implications, medium and long-term management and associated 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.

The June 2025 report 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”*

The Inspector cannot ignore this grave deficiency in the draft Plan, which depends on so many independent water treatment plants.

Housing on main sewer

All the Plan smaller scale housing projects will be connected to the main sewage system. The number is significant. There is strong, recent evidence in the District (frequent, long duration, sewage overflows), that the local sewage system cannot cope with the current housing stock. The system is, largely, old, in poor condition and prone to leakages. So far this year (as of 12 May 2026, 10:45) there has been **734 hours** of sewage overflows, from **19** CSO and numerous cases of individual houses and groups of houses suffering sewage overflows.

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 in advance of housing construction the system, already at over-capacity, will inevitably be overwhelmed with extreme 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.

If the Inspectorate ignores this it will be effectively complicit in the environmental, social, economic damage that will ensue.

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’**. There does not appear to be an up-dated integrated strategic plan for infrastructure to accompany the plan. The frequent references to infrastructure in the draft do not amount to a coherent plan. This undermines the validity of the Draft Plan 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 Inspector 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.

Request to be heard

I request the opportunity to make the case in support of these concerns to the Inspector.

John Reilly

12th May 2026