

Submission for Reg 19 Draft Canterbury District Local Plan (2042/43) Consultation

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15 May 2026

Ref: Draft Canterbury District Local Plan (2042/43)

Policy DS15 Infrastructure Delivery and DS24 Sustainable Drainage and Water Quality

Thus submission demonstrates that Policy DS15 and Policy DS24 fail the soundness test as defined by the NPPF paragraph 36 in that neither policy is positively prepared in that they both fail to provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and neither policy is consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

1. Lack of Water Supply Capacity to support Local Plan

South East Water, the principal water provider for the district, has explicitly stated:

“We cannot accommodate additional growth beyond what was assumed in our Water Resources Management Plan (WRMP) 2024... in areas where we do not have a supply-demand surplus.” The district has already suffered two extensive and prolonged water outages within the last 12 months.

In March 2026, South East Water published supply-demand tables (see below) that clearly demonstrate that the housing growth proposed by the Local Plan exceeds their own WRMP supply capacity for 13 consecutive years from 2029 onwards. This data from SE Water clearly indicates that there will be inadequate water supply capacity for 10,412 new homes (or about 24,500 residents) over the lifetime of the plan.

Source	Local Planning Authority	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
WRMP24	Canterbury	1,647	1,653	1,320	1,088	968	898	732	732	733	733
LPA IDP	Canterbury	950	1,035	1,267	1,396	1,425	1,336	1,682	1,876	2,078	2,347
Percentage difference	Canterbury	-42.32%	-37.39%	-4.02%	28.31%	47.21%	48.78%	129.78%	156.16%	183.61%	220.18%
No. of new properties we can't currently accommodate						475	438	950	1,144	1,295	1,614

Source	Local Planning Authority	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	Total
WRMP24	Canterbury	733	734	734	734	735	735	735	736	736	736	20,651
LPA IDP	Canterbury	1,876	1,367	1,300	1,310	1,300	1,159	1,054	630	298	77	25,763
Percentage difference	Canterbury	155.81%	86.31%	77.10%	78.38%	76.93%	57.67%	43.32%	-14.37%	-59.52%	-89.54%	24.75%
No. of new properties we can't currently accommodate		1,413	633	566	576	565	424					

The provider makes clear that even this inadequate infrastructure delivery would depend upon unspecified, unfunded, and unprogrammed capital infrastructure upgrades. None of the projected investments in the Infrastructure Delivery Plan (IDP) are confirmed. It is all designated as 'tbc'.

NPPF paragraph 20 requires strategic policies to make sufficient provision for infrastructure, while paragraph 34 requires plans to set out infrastructure requirements

and how these can be expected to be funded. Paragraph 35 requires plans to be deliverable over the plan period.

A Local Plan dependent on infrastructure which the statutory provider clearly advises cannot be delivered is not effective and is not justified by the evidence.

This represents one of the most serious soundness failures within the submitted Plan.

2. Lack of wastewater treatment capacity to support Local Plan

A similar failure exists regarding wastewater treatment and sewerage capacity. Excessive spills from Combined Sewage Overflows (CSOs) in the district are well documented. Despite recent investment from Southern Water, the undertaker estimates that one CSO at Swalecliffe Sewage Treatment Works (STW) still spills 60 times per year. Southern Water published data shows that in February 2026 Swalecliffe No 1 CSO spilled 14 times in one month – one spill lasted for more than 28 hours.

The regulator has set a statutory target for spills from Swalecliffe No 1 CSO of 6 spills per year by 2027. The current rate published by Southern Water (60) is ten times that statutory target.

Neither policy DS15 or DS 24 offers a clear funded pathway to accommodate the scale of additional development proposed between 2026–2030 or addresses the acute problem of Southern Waters’s current inability to manage sewage treatment load without harmful discharges into the districts bathing waters, oyster fishery and the River Stour.

Policy DS24 and Policy DS15 completely fail to address the acute drainage, water quality and infrastructure fragility that are adversely affecting the district and its residents.

There is no credible evidence that wastewater treatment infrastructure can support the scale or timing of development proposed, nor any attempt to address the issue, or even acknowledge it.

This conflicts with NPPF paragraphs 20, 34 and 35, which require plans to be supported by deliverable infrastructure and realistic funding assumptions.

It also conflicts with paragraph 180, which requires planning policies to ensure that development does not contribute to unacceptable levels of water pollution or deterioration in water quality. This makes the Plan neither effective nor consistent with national policy.

This submission is also attached as a pdf.

Regards

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