

16/05/2026

Name: Clare Morris

Address:

Email:

Regulation 19 representation – strategic objection to the Draft Canterbury District Local Plan

Subject: Regulation 19 Representation – Objection to the Overall Growth Strategy and Application of the Presumption in Favour of Sustainable Development

I am submitting this representation in response to the Regulation 19 consultation on the Draft Canterbury District Local Plan. This objection concerns the **overall growth strategy**, the **scale and distribution of housing**, the **use of the tilted balance**, and the **failure to base the Plan on genuine local need**. These issues affect the soundness of the entire Plan, not just individual allocations.

I do not consider the Plan to be **positively prepared, justified, effective, or consistent with national policy**, as required by the NPPF.

1. The housing target is inflated and not based on local need

1.1 The Plan relies on in-migration rather than local evidence

The Council's supporting documents repeatedly refer to population growth, labour force expansion, and attracting new households. This indicates that the housing target is designed to **bring new residents into the district**, rather than meet **local housing need**, contrary to NPPF 61 and 62.

1.2 There is no clear evidence of unmet local demand, and external demand distorts the picture

Market indicators do not show a shortage of homes, suppressed household formation, or rapid absorption of recent developments. Large sites such as Saxon Fields appear to have ongoing availability, raising questions about the necessity of allocating thousands more homes.

In addition, the district has previously experienced **external demand pressures** that do not reflect local need. For example, in 2016, housing at Howe Barracks in Canterbury was purchased by the London Borough of Redbridge, which then placed households from outside the district into those units. This demonstrates how **imported demand** can distort the local housing market and artificially inflate the apparent demand for housing in the area.

1.3 Previous new housing has not met local need

The Redbridge example also highlights a wider issue: **new housing does not automatically meet local need**, even when delivered as “affordable” or “social” housing. In that case, newly available homes intended to address local need were instead allocated to households from outside the district. This shows that simply increasing the number of dwellings does not guarantee that the resulting homes will be:

- affordable to local residents
- allocated to local households
- aligned with local income levels
- or suitable for local household structures

The Draft Plan does not explain how the proposed large-scale housing allocations will avoid repeating this pattern. Without clear mechanisms to ensure that new homes actually serve **local need**, the housing target cannot be considered justified under **NPPF 61 and 62**.

1.4 The housing target exceeds what the district’s constraints can support

Canterbury district is constrained by:

- a UNESCO World Heritage Site
- conservation areas
- Grade 1 agricultural land
- water scarcity
- sewage capacity limits
- air-quality issues
- limited transport corridors

The NPPF allows constrained areas to plan for **lower growth** where justified. The Draft Plan does not demonstrate why Canterbury district must grow at a rate far beyond its environmental and infrastructural capacity.

1.5 The Plan attempts to manufacture demand without a credible economic basis

The Council’s own economic evidence shows that Canterbury has **low average wages**, a **limited high-skilled employment base**, and a **small private-sector economy** dominated by education, health, tourism, and hospitality. Many residents commute out of the district for work, and the local labour market does not demonstrate the capacity to absorb a significantly larger working-age population.

Despite this, the Draft Plan seeks to **manufacture demand** by importing new households in the expectation that population growth will drive economic growth. This assumption is not supported by the evidence. Without a credible employment strategy or demonstrable job creation, it is unclear how attracting additional working-age residents would address the district’s economic challenges. Planning for population growth in the absence of corresponding employment opportunities risks increasing out-commuting, worsening congestion, and placing further pressure on already constrained infrastructure.

The Plan does not explain how the proposed scale of housing growth aligns with the district's economic realities, nor how it will ensure that new homes meet the needs of existing residents rather than relying on imported demand. This undermines the justification for the housing target under **NPPF 61, 62, and 11**.

2. The spatial strategy creates unsustainable patterns of growth

2.1 A continuous belt of development around Canterbury

Major allocations on all sides of Canterbury create a near-continuous belt of development. This fundamentally alters the character of a **historic cathedral city** with a small urban footprint and a sensitive landscape setting. Cumulative landscape and heritage impacts have not been assessed, contrary to **NPPF 187, 202, and 203**.

2.2 Over-allocation in other settlements

Villages and smaller settlements across the district are allocated housing numbers far beyond their size and infrastructure capacity. The Plan does not demonstrate that these locations are sustainable or that they can support the required transport, water, sewage, school, and health-care infrastructure.

2.3 Reasonable strategic alternatives were not assessed

The Sustainability Appraisal does not convincingly compare:

- new-settlement options
- brownfield intensification
- smaller, distributed growth
- reduced housing numbers based on constraints

The Plan appears to prioritise **land availability** rather than sustainability.

3. Brownfield land is underused

3.1 The brownfield register has not been fully utilised

The NPPF requires councils to prioritise brownfield land (NPPF 119). The Draft Plan does not demonstrate that all brownfield sites have been assessed or that regeneration opportunities have been maximised.

3.2 Greenfield release is not shown to be unavoidable

The Council has not provided evidence that brownfield capacity is exhausted or that alternative spatial strategies were properly considered.

4. The tilted balance is being misapplied

4.1 The presumption in favour of sustainable development is not a justification for excessive greenfield release

The tilted balance (NPPF 11d) applies only when the plan is out of date or when constraints do not outweigh benefits. The Draft Plan appears to use the tilted balance as a **policy shortcut**, rather than as a last-resort mechanism.

4.2 The tilted balance cannot override district-wide constraints

The presumption does not apply where heritage assets, protected landscapes, agricultural land of the highest quality, or critical infrastructure constraints are affected. These constraints are present across the district, yet the Plan does not demonstrate how they have been weighed.

5. The Plan is not positively prepared

5.1 Infrastructure cannot support the proposed level of growth

Across the district, infrastructure evidence is incomplete, outdated, or insufficient to support the proposed scale of development. Key issues include:

- water supply (not available until 2036)
- sewage capacity (already failing)
- transport congestion
- air-quality deterioration
- lack of school and health-care capacity

A positively prepared plan must align growth with infrastructure (NPPF 11). This Plan does not.

6. The Plan is not effective

6.1 The growth strategy is not deliverable

Given the scale of infrastructure required, the Plan is unlikely to be delivered within the plan period. The Infrastructure Delivery Plan is out of date, and key documents such as the Nutrient Mitigation Strategy are missing.

6.2 Viability is not demonstrated

The cumulative cost of infrastructure across all major allocations has not been fully assessed. Without clear evidence of viability, the Plan cannot be considered effective.

7. Legal compliance concerns

7.1 Consultation accessibility

The Regulation-19 process is highly technical, requiring residents to understand soundness tests and legal compliance. The Council has not provided accessible guidance, raising concerns about whether the consultation meets **NPPF 16(c)**.

7.2 Missing or outdated evidence

Several key documents required for SEA/HRA are missing or out of date, undermining the legal compliance of the Plan.

8. Failure to consider under-used existing housing stock and refurbishment options across the district

The Local Plan does not assess the potential contribution of **existing housing stock**, despite the NPPF requiring councils to make **as much use as possible of existing buildings** before releasing greenfield land (NPPF 119).

Across the district, there is a substantial supply of:

- older Victorian and Edwardian homes
- former student HMOs
- properties in need of refurbishment
- long-term vacant dwellings
- under-occupied homes
- small brownfield plots within existing settlements

These represent a **significant and immediate source of housing capacity**, yet the Plan does not consider:

- purchasing and refurbishing older stock
- bringing empty homes back into use
- converting HMOs back into family homes
- incentivising renovation
- using existing properties for affordable or social housing
- supporting smaller-scale infill and regeneration

This omission is relevant across the district, including in Canterbury, Whitstable, Herne Bay, Sturry, Blean, and the villages.

This is a soundness failure under **NPPF 61, 62, 119, 188, and 36**.

Conclusion

For the reasons above, the overall growth strategy in the Draft Canterbury District Local Plan is not justified, not effective, not positively prepared, and not consistent with national policy. The Plan does not demonstrate that the proposed level of housing growth is required to meet **genuine local housing need**, including the **affordability, tenure, size, and type** of homes required by existing residents. Nor does it show that the proposed homes will be **financially accessible, appropriately located, or suitable for the demographic profile** of the district.

The Plan also fails to consider the potential of **existing housing stock across the district**, including older properties, vacant homes, and under-used dwellings, which could contribute meaningfully to meeting local need without extensive greenfield release. This omission undermines the justification for the housing target and the spatial strategy.

Without addressing these issues, the Plan cannot be considered sound. I therefore request that the housing target and spatial strategy be fundamentally reconsidered, with full evidence provided and reasonable alternatives assessed.

Modification sought

I request that the Council:

- reassess the housing target based on **actual local housing need**, including the affordability, tenure, size, and type of homes required by existing residents
- demonstrate that the proposed housing mix reflects the needs of local people in terms of income levels, household size, age profile, and accessibility requirements
- **reconsider the spatial strategy to avoid excessive greenfield release**
- fully explore brownfield and regeneration options
- properly assess cumulative impacts
- and ensure infrastructure evidence is complete and up to date

Participation at examination

I would like to participate in the Examination in Public if the Inspector considers it necessary.