

Regulation 19 Submission to the Planning Inspectorate

From: Councillor James Flanagan [REDACTED] &
Councillor Peter Old [REDACTED] Canterbury City Councillors
for Chestfield Ward Date: May 2026

Subject: Draft Canterbury District Local Plan (2042/2043), Regulation 19

As councillors for Chestfield Ward, we submit comments on the Draft Canterbury District Local Plan 2042/2043 (the “Plan”) under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The comments in this representation reflect the views and concerns that have been raised with us by residents, and we are submitting these for the Planning Inspector to consider on behalf of residents we have spoken with, or who have contacted us, as their local representatives.

This submission focuses primarily on the South Whitstable Strategic Development Area and its individual sites, while also addressing broader district-wide issues that impact Chestfield ward.

The overriding concern raised with us by residents is that the Draft Local Plan, in its current form, does not consistently demonstrate conformity with the tests of soundness outlined in the National Planning Policy Framework (NPPF). This submission highlights key areas of concern, building upon views raised with us by residents previously advanced during the Regulation 18 stage. We are prepared to elaborate on these points as ward councillors at the Oral Examination if invited.

District-wide Issues

1. Population Growth and Elderly Care

The Plan projects 23,000 new homes by 2042/43, significantly exceeding the 2018-based Office of National Statistics projection of a 12,817 (+8%) increase in local population by 2040. A notable aspect of this demographic shift is the projected 38% increase in the 65+ age group by 2031, which will increase demand for social care and elderly residential capacity. Residents are concerned that, despite brief mentions, the Draft Local Plan lacks sufficient detail on how these critical needs will be met.

- Concerns and views raised with us by residents: The Draft Local Plan fails to

accommodation and care for the growing elderly population, thus demonstrating it is not justified. Further consideration is needed on meeting the accommodation needs of the 65+ population, including the types of accommodation and their provision mechanisms.

2. Affordability Crisis

Residents have raised with us their concerns that Canterbury faces a severe affordability crisis, with one of the highest house price-to-earnings ratios nationally. The Council's Draft Housing Strategy indicates that 90% of households cannot afford to purchase homes on the open market. While the Local Plan targets 30% 'affordable' homes for ownership, officers acknowledge that an income nearly ten times the district's median wage is required for eligibility. Residents are concerned that the Plan dilutes the Housing Needs Assessment's finding that 80% of rental housing need is for affordable or social rent, appearing to prioritise developer needs over resident needs.

- Concerns and views raised with us by residents: The Draft Local Plan has not been positively prepared to meet the area's objectively assessed needs and is not justified, as it fails to address the significant affordability challenges faced by the majority of local households. The Draft Local Plan should reflect the local housing affordability crisis and promote innovative shared ownership models to make housing accessible.

3. Water Supply Resilience

A further concern raised by residents is that the district has experienced severe water outages, leading to fines for South East Water. South East Water has expressed concerns about its ability to supply new homes, and the proposed reservoir at Broad Oak is not expected to be operational until 2035 at the earliest (Policy R24 of the draft Local Plan). The concerns for water supply were expressed in March 2026, prior to the launch of the Regulation 19 consultation, when the company's Director of Operations stated it will, "struggle to supply any housing growth above what's included in our water resource management plan." This was reported by the BBC:
<https://www.bbc.co.uk/news/articles/c78jp5xlemzo>

- Concerns and views raised with us by residents: The Draft Local Plan is inconsistent with sustainable development principles, as it proposes significant housing development without a guaranteed adequate water supply. In particular, it does not meet NPPF 20 (b) which states, "Strategic policies should set out an overall strategy

for the pattern, scale and design quality of places and make sufficient provision for...infrastructure for...water supply, wastewater, flood risk....". Housing development must be restricted or re-phased in the early years of the Plan until an adequate water supply can be assured.

The South Whitstable Strategic Development Area

4. The Green Gap Preservation

Residents are very aware that the South Whitstable Strategic Development Area is already undergoing substantial development. A particular concern of the residents we represent is that the long-standing Green Gap between Whitstable and Herne Bay, established and consistently protected since the 1997 Local Plan Inquiry, is at risk. Recent Planning Inspector decisions, including a 2015 refusal for a Bodkin Farm appeal and an April 2026 decision for planning application CA/24/01560¹, underscore the importance of this Green Gap in preventing coalescence and preserving the unique character of the two coastal towns. Residents are also concerned that continued development along the A2990 Thanet Way will create an undesirable continuous ribbon of development.

- Concerns and views raised with us by residents: The Draft Local Plan is inconsistent with sustainable development, as it threatens the integrity of the crucial Green Gap between Herne Bay and Whitstable. The Local Plan must explicitly renew the Council's commitment to maintaining the Green Gap to preserve the distinct character of the coastal towns.

5. Cumulative Traffic Impact

Several residents have expressed the view that traffic modelling for individual sites within the South Whitstable Strategic Development Area has been conducted in isolation, failing to assess the cumulative impact of all proposed developments (e.g., Grasmere Pasture, Whitstable Heights, Land South of Thanet Way, Bodkin Farm, and Brooklands Farm) on the

¹ Land at Old Thanet Way, Whitstable, Kent, CT5 3JB, Change of use of land from part storage to stationing of 'self-storage' containers together with associated hard surfacing area. Refused on 21 October 2025, and an appeal since dismissed.

Paragraph 19 of the Appeal Decision states: "The proposal would therefore result in significant harm to the character and appearance of the area, including the Herne Bay and Whitstable green gap. It would significantly affect the open character of the green gap and lead to a material expansion of and coalescence between existing settlements. It would therefore conflict with Policies DBE3, OS6 and OS7 of the CDLP. In addition, by virtue of this harm to the character and appearance of the area the proposal would not meet criterion (b) of Policy EMP4 and therefore would not be an appropriate employment site in this regard."

local transport network. Their concern is that the absence of cumulative impact analysis is critical for understanding overall traffic conditions, road safety, and congestion.

In particular, residents have cited the Bodkin Farm and Brooklands Farm sites, where the impact on the Chestfield Road, Reeves Way and St John's roundabouts, traffic levels on the A2990, and the increased footfall from pedestrians using crossings on the A2990 have not been adequately considered or modelled. Furthermore, they are concerned that the safety of schoolchildren using the narrow pathway under the railway line between the Chestfield Road and St John's roundabouts, as well as crossing the A2990 from Tankerton/Swalecliffe to reach the proposed school at Bodkin Farm, has not been addressed in the draft Local Plan.

Consequently, residents we have spoken to are concerned that this does not comply with NPPF item 102 (a) which states, "The safety of children and other vulnerable users in proximity to...railways and other potential hazards should be considered in planning and assessing proposals for development." They have also questioned the evidence to suggest that NPPF item 115 (d) has been met, which states, "any significant impacts from the development of the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach."

In addition, we have been informed that the prolonged impact of construction traffic from these multiple sites, particularly along Chestfield Road and South Street, will significantly affect residents for several years, given that proposed slip roads on the A299 will not be delivered until 50% of the proposed Brooklands Farm development is built.

- Concerns and views raised with us by residents: The Local Plan is inconsistent with sustainable development due to insufficient traffic modelling that fails to account for the cumulative impact of all proposed developments. Further traffic modelling must be undertaken to assess the cumulative impact of all proposed developments across the South Whitstable Strategic Development Area, with a particular focus on modelling of the Chestfield Road, Reeves Way and St John's roundabouts, the impact of increased pedestrian footfall across the A2990 on traffic congestion, and the safety of schoolchildren accessing the proposed school at Bodkin Farm on foot.

6. Flooding and Sewage Infrastructure

Site W4 (Brooklands Farm) and Site W7 (Bodkin Farm) border or incorporate the Swalecliffe Brook, a known source of flooding in low-lying London clay areas. Flash flooding along Radfall Road near the A299 underpass is also a recurring issue.

Residents are concerned that the local sewage network is already at or near capacity, particularly as Southern Water has confirmed that the public sewer at Swalecliffe lacks capacity for further uncontrolled foul connections and that proposals for up to 1,400 dwellings at Brooklands Farm will necessitate wastewater network reinforcement. Despite indications of future investment, current capacity limitations mean sewage discharges into the sea at Swalecliffe persist, posing concerns for the marine SSSI. Some residents have commented that the Draft Local Plan lacks detailed discussions with Southern Water to address these critical capacity issues.

- Concerns and views raised with us by residents: The Local Plan is inconsistent with sustainable development and fails to demonstrate how it will meet NPPF requirements to reduce flooding impact and manage sewage infrastructure effectively. It therefore does not comply with NPPF item 39 which states, “Local planning authorities should...secure developments that will improve...environmental conditions of the area.” The Draft Local Plan must provide clear evidence of detailed discussions with Southern Water and outline concrete plans to address and upgrade the sewage network capacity across the local area to prevent increased pollution and flooding risks.

7) Biodiversity concerns

Residents have expressed concerns for the loss of biodiversity, particularly at the Brooklands Farm site. The existing site is home to a wide range of wildlife and biodiversity, including ancient woodland, habitats and hedgerows, as well as a variety of bird species including skylarks, herons and redwings. Some residents have therefore commented that the Brooklands Farm site would not comply with NPPF item 193 (b) which seeks to minimise the impact on biodiversity and natural habitats.

We urge the Planning Inspector to consider the concerns and views of residents we represent carefully, including the suggested modifications to ensure the Local Plan is sound and sustainable for the Canterbury District.