

To the Planning Inspector**Re: "Regulation 19" consultation on CCC draft Local Plan**

My wife and I do not think Canterbury City Council's draft Local Plan is "sound", legally compliant or deliverable because of:

- INADEQUATE WATER SUPPLY
- INADEQUATE WASTE WATER MANAGEMENT/SEWAGE POLLUTION
- INADEQUATE ROAD INFRASTRUCTURE
- QUESTIONABLE DECISION MAKING WITHIN CANTERBURY CITY COUNCIL?
- INADEQUATE HEALTH SERVICE PROVISION
- DAMAGE TO COUNTRYSIDE LOCAL TO WHITSTABLE

All of the above points need thorough consideration and investigation

INADEQUATE WATER SUPPLY....

Southeast Water will struggle to provide water for the increased number of new homes in the draft Canterbury Local Plan. In recent years, bottled water has already had to be delivered to Whitstable residents when water supply failed to meet demand.

There is a proposal to build a new reservoir at Broad Oak in order to meet water supply demand. However, water supply for the new reservoir comes from sources that are polluted (the rivers Great Stour and Little Stour). Southeast Water has not clarified how chemical pollutants will be removed (in particular hazardous PFAS chemicals) to make reservoir water safe to drink.

Funding for construction of the reservoir is lacking (Southeast Water admitted in January 2026 that they do not have money to actually build the reservoir.) Thus is the reservoir actually deliverable?

WASTE WATER MANAGEMENT / SEWAGE

The addition of hundreds of new houses would lead to increased sewage effluent pollution on local beaches, in bathing waters and in local seafood.

In 2024 Southern Water installed a larger storm outfall at Swalecliffe. Although it is longer than the previous one, it does not overcome the problem that the sea is shallow and incoming tides and on-shore winds can bring the effluent back onto the beaches.

Southern Water has long term plans to increase treatment capacity at Swalecliffe Wastewater Treatment Works, but these will likely be insufficient to deal with the future levels of sewage. Thus the overall volume of effluent deposited in the local environment (including the marine SSSI) is likely to increase.

The coastal areas surrounding Whitstable currently experience numerous outpourings of not-fully-treated effluent after heavy rainfall, and these can result in people (swimmers and beach users) and pets becoming ill from infections such as E Coli. These areas rely on tourism and locally produced seafood (oysters) and will suffer with increased sewage pollution.

INADEQUATE ROAD INFRASTRUCTURE

Traffic modelling for the draft Local Plan has been inadequate and misleading. The level of proposed housing developments will lead to major traffic congestion and poorer road safety, particularly for pedestrians and cyclists.

Proper, independent traffic modelling needs to take place.

QUESTIONABLE DECISION MAKING WITHIN CANTERBURY CITY COUNCIL?

How/why did the council decide to include Brooklands Farm in the draft Local Plan, but exclude an alternative site for 2000 houses that the University of Kent wants to build on its land immediately to the north of the university? (This was Policy C12 in draft Local Plan 2024).

The university site is a more sustainable location, being close to the District's largest employment site and with excellent public transport links. There are frequent shuttle buses to/from the centre of Canterbury, and there is also a cycle-route to the City centre.

In the draft Local Plan consultation of 2024, more residents objected to the Brooklands proposal than objected to the University of Kent site C12.

An investigation is needed to establish whether CCC leadership is allocating sites where it is politically expedient for them.

INADEQUATE HEALTH SERVICE PROVISION

East Kent Hospitals Trust currently struggles to cope with demand. A Critical incident was declared at the QEQM Hospital in Margate in January 2026 due to the high demand,

The high level of Government-imposed housing targets for East Kent does not provide any new hospitals or significant increase in hospital capacity in this area.

DAMAGE TO COUNTRYSIDE LOCAL TO WHITSTABLE

The draft Local Plan would remove areas of well used open countryside with networks of footpaths which benefit residents' physical and mental health. The landscape of Brooklands Farm is diverse, unique and irreplaceable. It combines Ancient Woodland, traditional hedgerows, traditional cattle-pasture, open wheatfields and a brook.

The proposed development would destroy extensive habitat required by open-landscape species such as skylark and brown hare. There is no practical possibility of recreating this type of landscape elsewhere.

The proposed development would create a large number of flats and houses close to the Ancient Woodlands of Longtye Wood and Convicts Wood, which are both Local Wildlife Sites. At present they are almost totally inaccessible to the public, but in future wildlife would be severely impacted by the proximity of so many people, and by predation from dogs and cats. Nocturnal species such as bats and owls would also be adversely affected by widespread street lighting and noise. Urban development, would reduce natural beauty and biodiversity.

The proposed development would be about 300m from the West Blean and Thornden Wood SSSI at Woodside Wood, and easily accessible by way of underpasses under the A299 dual carriageway. The SSSI is likely to be damaged by substantially increased recreational use by residents, and wildlife is likely to be adversely affected by predation from dogs and cats.

It is vital that all of the above points are thoroughly considered and investigated before any decisions are made relating to Canterbury City Council's draft Local Plan.

From

Catherine Jones and Moira Poulton, [REDACTED]