

Objection to Canterbury City Council Local Plan – Regulation 19 Consultation

Dear Sir/Madam

We, object to the proposed Local Plan on the grounds that it is unsound and not legally compliant.

1. Failure to Meet the Test of Soundness

- **Not Positively Prepared** – The housing and employment targets are based on outdated or inflated projections, failing to reflect current demographic and economic trends and the existing local housing market (Whitstable – has several empty new dwellings). There are obvious mistakes in the Draft Regulation 19 Local Plan that undermines public trust in the Local Authority providing a sound local plan for example:

Draft Canterbury City Council Local Plan 2042/43
Regulation 19 March 2026, Page 13 –

“Policy SS3 - Development Strategy for the district:

1. Between 2024/25 and 2042/43 provision is made through the granting of planning permission and the allocation of sites for a **minimum of 23,085 new dwellings per year** including affordable housing, older persons housing and a range of sizes and types of housing to meet local needs.” **23,085 new dwellings per year are not required this is the total for the whole plan period.**

Draft Canterbury City Council Local Plan 2042/43
Regulation 19 March 2026, Page 119 –

South Whitstable Strategic Development Area- Indicative Concept Masterplan – **Omission of W9 strategic site**

- **Not Justified** – The plan does not adequately consider reasonable alternatives, particularly those that would protect greenfield and biodiversity-rich sites. The Draft Local Plan fails to consider reasonable alternatives, especially brownfield options and any alternative Traveller’s sites other than Golden Hill. Council Officers admitted in Overview Committee minutes that the two sites at Golden Hill W6 and W9 were the only ones that came forward in the call for sites for travellers. However, there is no evidence in the Evidence documents that any other reasonable alternative new sites have been considered or assessed as new. The Local Plan evidence documents only considers additional traveller provision on existing sites. The Canterbury City Council Draft Housing Strategy only states that existing travellers’ sites will be expanded a contradiction with the Draft Local Plan.

- **Not Effective** – The infrastructure delivery plan is vague, with no binding commitments to fund or deliver essential transport, water/sewage, healthcare, and education facilities before development occurs with Canterbury City Council relying on Section 106 and Community Infrastructure Levy Funding. Developers can and have renege in other Local Planning Authorities and this risks noncompliance with paragraph 34 of the National Planning Policy Framework,

Facts –

Southeast Water has stated that they will struggle to supply water to housing growth outside their management plan and that their management plan is not in line with the housing need across Canterbury over the Local Plan period to 2042 – this is contrary to paragraphs 162 and 188 Chapter 14 National Planning Policy Framework.

Southern Water regularly discharges untreated sewage into the sea and local waterways. This will only increase with new housing developments' These discharges are not compliant with paragraph 109 or 170e of the National Planning Policy Framework.

The Draft Local Plan assumes delivery of required water supply and required sewage needs for new housing will occur, but offers no confirmed funding, sequencing, or implementation strategy.

2. Community Impact

1. Inadequate Community Engagement

Despite statutory requirements under the Planning and Compulsory Purchase Act 2004 (as amended) and the Statement of Community Involvement, the consultation process has not meaningfully incorporated the views of residents. **Feedback provided during earlier Regulation 18 stages has been disregarded, with no clear evidence of how community concerns have shaped the plan.**

2. Lack of Transparency in Decision-Making

The plan fails to provide a transparent audit trail showing how public responses were considered. **This undermines public trust and does not meet the principles of openness and accountability expected of local authorities.**

3. Failure to Address Locally Identified Needs

The proposed allocations and policies do not reflect the priorities identified by the community, including protection of green spaces, flood risk, drainage, surface water,

sewage, transport – access and impacts highways safety contrary to adopted standards and visual impact.

The inclusion of Travellers sites at W6 and W9 will provide an **overbearing impact** and loss of residential amenity for residents in Golden Hill and harm **the character and appearance** of the area, contrary to design policy in the Draft Local Plan Policy DS6 b. **This disconnect risks delivering a plan that is unsustainable and not locally supported.**

4. Non-Compliance with National Policy Requirements

The National Planning Policy Framework (NPPF) emphasises early, proportionate, and effective engagement with communities. **The current process falls short of these requirements, potentially rendering the plan unsound under the tests of “justified” and “effective.”**

We therefore request that the Local Plan be withdrawn or amended and be revised to incorporate genuine community input and considers:

- Reducing reliance on greenfield development
- Guarantee infrastructure before housing growth.
- Fully explores and prioritises brownfield sites.
- A further round of meaningful consultation be undertaken before submission to the Planning Inspectorate.
- A clear, published record be provided showing how each key community concern has been addressed.

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