
Consultation : Draft Canterbury District Local Plan 2042/43 Part 1 of 2

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Date Mon 18/05/2026 14:52
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Dear Canterbury City Council

I have the following comments and observations on the above Draft Local Plan, using your headings which have been shown in bold.

1.Spatial strategy for the district (page 6)

1. Paragraph 1.5 advises that High Speed 1 (HS1) serves the city ie Canterbury. HS1 provides a direct service between London St Pancras and Paris and is currently a non-stop service, pending the reopening of the international stations at Stratford, Ebbsfleet and Ashford. However, Canterbury is served by Southeastern Railways whose services include the "Javelin" high speed trains.

2. Paragraph 1.12 of the above advises that "Wherever possible, the council will prioritise the redevelopment of previously developed land and this plan includes a range a brownfield allocations as part of a brownfield-first approach." This is in line with paragraph 124 of NPPF December 2024 which advises that "... Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or "brownfield" land."

3. However the following paragraph 1.13 of the above **Spatial strategy for the district** notes that "...., the availability of such land is limited and, to meet the level of development set by national policies, further development on agricultural land is necessary."

4. In contrast, the NPPF December 2024, under paragraph 188 footnote 65, advises that "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality". In addition, paragraph 125 (b) notes that planning policies and decisions should "recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production."

5. Given the above NPPF requirements, to what extent have the proposed "agricultural land" strategic development sites in the Draft Plan (eg Policies W4 Brooklands Farm (page 121) and W7 Bodkin Farm (page 130), which I am aware have previously been cultivated, have been evaluated and prioritised for development? This comment is also relevant to the other strategic greenfield sites within the draft plan.

Food Security (UK Food Security Index 2024 published May 2024)

6. With respect to the use of agricultural land for food production, the above government publication is its first release of a new annual UK Food Security Index.

7. Under the heading (page 6) “Overall assessment of UK food security” and sub heading “Strong production and trade” it advises that “.... The UK maintains domestic production of all food available in the UK at around 60% of consumption and indigenous food at 73% (2022 figures) and continues to see rising productivity,...”. Interestingly, under page 7, it advises that food security in fruit is 17% and for vegetables 55%.

8. In short, the principal use of agricultural land for food production seems a prudent approach in these uncertain times given the increasing effects of climate change combined with political turmoil abroad potentially affecting food imports to the UK.

9. On a national perspective, there is an increasing dichotomy between the provision of solar panels on agricultural land versus the need to produce more food, both associated with improving our sustainability as a nation.

Canterbury District Settlement Hierarchy (page 15)

10. I note that Chestfield has not be included in the above Settlement Hierarchy and assume this is because it is considered to be part of the Whitstable urban area. However, you will know that it is flanked on its eastern side by farmland as is its southern flank. Prior to the recent development at Grasmere Gardens, it was also predominately flanked by farmland on its western side, the northern boundary being formed by the A2990, overall creating a semi-rural character.

11. You will also be aware that Chestfield has its own Parish Council who submitted their draft Neighbourhood Plan for consultation under Regulation 16 on the 16 April 2026, finishing on the 11 June 2026.

Housing Need Assessment to 2042/43

Policy SS3 - Development Strategy for the district (page 15)

12. Paragraph 1 states that "...the allocation of sites for a miimum of 23,085 new dwellings per year ...". The figure of 23,085 dwellings would however appear to be the cumulative housing requirement over the plan period 2024/25 - 2042/43 and not for each year of the plan period.

13. Paragraph 5 notes that land at South Whitstable has been identified for the delivery of two new coastal secondary schools with sixth forms at Whitstable and Herne Bay. You will be aware that both schools are proposed to be located adjacent to each other on the southern side of the A2990 and are associated with strategic development Policies W7 and HB5. However, the District wide key diagram on page 9 does not illustrate the development proposals, only the proposed secondary schools. On a detail point, both proposed schools are within the Greenhill ward ie Herne Bay.

14. You will appreciate that the requirement to meet such a housing need requires a very large annual financial investment over many years including planning expertise, land availability, materials, house construction and its subsequent maintenance together with the provision of upgraded or new infrastructure including Public Utilities associated with such developments to mitigate any adverse environmental, educational, medical and traffic, plus other effects due to the lack of existing infrastructure capacity to meet the needs of new development. Additionally with climate change in mind it is also important to ensure that any such developments are not only sustainable but resilient to deal with future climate demands and also meet net zero emissions by 2050.

15. On this basis is not clear to what extent the Draft Plan is maximising the use of the existing housing stock within the district (including long term empty housing and the conversion of commercial premises to residential use where appropriate) thereby making best use of what we already have. NPPF paragraph 125 (d) and Footnote 50 refer.

16. On a separate longer term point, it is not clear what the likely effects of the current Draft Plan development proposals could have on future Local Plan housing aspirations when they are considered again as part of the Local Plan process in about 5 years time and beyond. In short, to what extent are we constraining or creating disproportionate financial, environmental or other adverse effects on future

development proposals in the Canterbury district, possibly (and unwittingly) establishing unwelcome precedents or legacies which may prove difficult to resolve by future Local Plans?

Density of Populations in Canterbury District and adjoining Districts + Kent, SE England & England

17. Below is a table which sets out the density of persons per kilometre squared for Canterbury District together with its 5 adjoining districts plus the figures for Kent, SE England and England, in ascending density order. The data is based on Kent County Council, Kent Analytics Statistical Bulletin December 2023 “2022 Mid-year estimates : Total population in Kent”.

District	Persons / km2
Ashford.....	230
Folkestone and Hythe.....	310
Dover.....	370
Swale.....	410
England.....	440
Kent.....	450
SE England.....	490
Canterbury.....	510
Thanet.....	1,360

18. From the above density figures, Canterbury has the highest density, apart from Thanet where their density is some 2.6 times greater than Canterbury's. Ashford has the lowest density in Kent of 230 persons /km2, which is about half that of Canterbury's.

19. The effect of the high density in Thanet District can be seen by the coalescence of the coastal towns of Margate, Broadstairs and Ramsgate which I suggest should be avoided between Herne Bay and Whitstable by maintenance of the Green Gap, “**Policy DS 22 - Habitats, landscapes and sites of local importance**” paragraph 5 (page 280) refers.

20. Canterbury district's population density is broadly similar to SE England's but apart from Thanet, it is greater than its adjoining neighbours, in particular, Ashford, Folkestone & Hythe, Dover and Swale. In addition, Canterbury is home to the University of Kent and Canterbury Christ Church University where I estimate the combined University student population to be about 30,000.* Although not continuously resident in Canterbury, they do consume resources when they are. The adjoining districts do not have similar higher educational establishments within their bailiwick which when coupled with the World Heritage Site of the Cathedral complex and its associated tourism, Canterbury District's future development needs to be handled with the greatest of care in order to retain its unique character. In short, it would seem that in population density terms, Canterbury District is bearing more than its fair share of meeting the NPPF housing quota compared with the majority of its adjoining Districts.

*Based on The Sunday Times “Good University Guide 2023” figures for undergraduates and post graduates”

Draft Canterbury District Local Plan 2042/43 : Introduction and consultation (page 3)

21. The above "Introduction and consultation" page includes the following paragraph: *"Along with the Draft Canterbury District Transport Strategy, the plan sets out a "vision-led" approach to managing the impacts of*

growth on the transport network with a strategy that prioritises sustainable travel, such as walking, cycling and public transport."

Movement and Transportation Strategy for the district (page 19)

22. Paragraph 1.56 advises that *"High numbers of short trips in the urban areas are currently taken by private car, and there has been widespread feedback that the existing infrastructure for sustainable transport, such as for buses, cycling and walking, is currently not adequate to provide realistic alternatives for many residents - buses are regularly caught in the same traffic queues while cycling is not considered to be safe without segregated routes by many residents."*

23. Paragraph 1.60 advises that *"For the city of Canterbury, the council's Draft Transport Strategy (2026) focuses on the incremental upgrade and improvement of public transport services and active travel routes which, alongside measures to moderate vehicular pressure on the city centre, and a limited number of specific measures to support highways resilience, will lead to a significant reduction in the proportion of journeys by private car."*

Policy SS5 - Movement and Transportation Strategy for the district (page 20)

24. Paragraph 2. advises that *"A new bus-led sustainable transport strategy will ensure people have a high-quality sustainable transport options for travel that will reduce congestion, improve air quality and enhance the city centre environment and its heritage."*

Key infrastructure requirements include:

25. Paragraph 2(a) *"improved public transport connectivity across the district, with additional bus services, bus priority measures and enhanced park and ride infrastructure, and upgrades at railway stations in the district:"*

26. The above paragraphs 21 to 25 inclusive illustrate the council's proposal to shift the emphasis of the current Draft Plan from road building solutions towards a Public Transport-led (PT) approach with the benefits of lower traffic flows and improved air quality among other sustainable goals.

27. I feel that this is a very positive step which I agree with in principle but I am not fully convinced of its robustness and suggest that there are some issues which need to be addressed if it is to be a success, as discussed below:

The proposed Modal Shift from car to PT, cycling and walking.

(a) One issue would seem to be the difficulty of persuading the public in general to use sustainable modes of transport especially for short journeys after having so many years of having the convenience of using a car. However in some cases, walking or cycling may not be feasible options for various reasons including advanced age, those with disabilities or other factors. In this situation taxis or possibly use of an autonomous vehicle could be an option in the future.

(b) I note that the council under Policy SS5 (page 20) paragraph 2, items (f) to (g) inclusive will promote the use of Park and Ride / Bus facilities but feel that the promotion of such sustainable options needs to be given very wide coverage and done in parallel with other authorities including KCC, bus operators and the like plus the media in all its forms in order to get your message across.

(c) A further difficulty could be in the programming and delivery of the PT-led approach in that it relies to some extent on the local bus company to provide additional bus services and Southeastern rail to arrange the upgrading of railway stations in the district. They are private companies who have their own operational requirements: as such their cooperation in the phasing and delivery of their elements of the PT-led proposals would seem crucial to its success.

(d) In the event of the introduction of the PT-led proposals such as the reduction of car parking spaces or the reallocation of road space plus other capacity restraints proving too onerous for some drivers, they may then

decide to divert to the Westwood Cross Shopping Centre where there is free car parking space for about 1500 cars or to some other retail centre instead of heading for Canterbury.

The Development of a New Town

28. Perhaps this is a matter for future Draft Local Plans, but it is, I suggest, something that should at least be considered as a possible option to the rather ad hoc approach to housing development allocations in Herne Bay and Whitstable being focussed generally on the corridor between the A2990 and A299: Duncan Down, Strode Farm and Hillborough being exceptions, although these sites are located adjacent to either the A2990 or A299.

29. The development of such sites potentially puts pressure on the existing infrastructure, including drainage systems (surface water and sewage), educational facilities, hospital and dental services, plus raising highway capacity issues and the like which have either to be upgraded or new systems installed causing disruption to existing residents during the construction phase or phases for larger sites. The provision of any necessary educational or medical facilities plus their staffing does not always occur in parallel with the progress of development, which can be another concern for existing residents.

30. The concept of new towns has been established for many years, Crawley being an example in West Sussex and Milton Keynes in Buckinghamshire. However, emerging new town sites are in progress: examples in Kent being Ebbsfleet Valley and Otterpool Park, near Hythe, the latter receiving outline planning permission in April 2023.

31. From a national perspective, the Government is currently consulting on seven proposed locations in its New Towns Draft Programme, none of which are in Kent although Thamesmead was historically part of the county. The consultation commenced on the 23 March 2026 and ends on the 19 May 2026. The assessment methodology included the requirement that new towns needed to feature at least 10,000 new homes, with the prospect for further expansion. This minimum level of provision is to ensure that the resulting new towns are sustainable: this is covered in the Government's statement issued on the 23 March 2026 under Chapter 2. "New Towns Programme : The Case for New Towns" second paragraph.

32. My point is that in essence, the draft Local Plan housing proposals mostly involve the creation of urban extensions to existing communities in Canterbury, Whitstable and Herne Bay, possibly meshing with previous urban extensions, Policy C10 "Land at Merton Park" abutting Policy CF1 "Site 10" is an example. However, although some of the proposed strategic sites are relatively large they do not meet the minimum scale of 10,000 homes to be considered as forming sustainable communities and are likely to rely heavily on the existing infrastructure (in its widest sense), depending on the level and capacity of the existing facilities / services. NPPF paragraphs 77 and 77(b) refer.

Regards

C Brown

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