

Canterbury District draft revised Local Plan

Alliance of Canterbury Residents' Associations

ACRA response to the Regulation 19 public consultation

May 2026

Executive summary

ACRA recognises that substantial work has gone into the draft Plan and that in some respects the draft has improved as a result in recent years.

Nonetheless, the draft Plan is overall not sound. Owing to major oversights, errors and omissions it fails on three main tests. These three tests are the subject of the three main sections of this ACRA submission to the City Council.

- Effectiveness by reference to deliverability
 - Barriers to timely completion of new housing units
 - Inadequate, missing and delayed infrastructure
 - Unrealistic Transport Strategy and Bus Action Plan
- Justification
 - A mistaken spatial strategy, given the amount of previously developed land overlooked for potential residential use and lack of ambition in pursuit of a “brownfield first” approach
 - Switching of major greenfield allocations near Canterbury
 - Dilution of environmental protection and climate action criteria
 - Significant policies and evidence not made public until the publication of the Regulation 19 consultation draft or afterwards
- Sustainability of development
 - Proposals for avoidable development on major greenfield sites East and South-West of the city of Canterbury
 - Unsustainable overall spatial strategy, given environmental harm entailed in the choice of greenfield allocations and lack of ambition in pursuit of a “brownfield first” approach

Introduction

ACRA recognises the substantial amount of work that has gone into the draft Plan. Officers have taken it through repeated rounds of consultation over several years. In a number of respects, the draft has improved as a result.

ACRA welcomes the 2025 deletion of the former Cooting Farm Garden Community allocation at Adisham, previously advanced as a freestanding settlement of some 3,200 dwellings. We also welcome the 2025 removal of the former Blean proposal, to develop land north of the University of Kent under previous Policy C12, which was supposed to comprise a mixed-use freestanding settlement of around 2,000 homes. Both were unsound proposals and it is right that they have fallen away. We furthermore welcome a few positive policy interventions (though fewer than in the last Regulation 18 consultation draft), such as the 20% biodiversity net-gain requirement under draft policy DS25.

It has been pleasing to see the City Council's recognition within this iteration of the draft Plan that at least some kind of stepped housing completions trajectory from 2025 through to the early 2030s. is necessary. Any realistic Local Plan must be grounded in the feasibility of delivery assumptions. Unduly ambitious delivery targets will otherwise lead inevitably to early non-fulfilment of both housing land supply and Housing Delivery Test criteria.

Nonetheless, the overall Regulation 19 draft still relies far too heavily on large, oddly located greenfield allocations around the city of Canterbury. The implicit intention is to expand the urban and suburban footprint of the city, yet there is no coherent, overarching masterplan for doing so. The City Council, tacitly the County Council too, appear naively to assume that the extra greenfield sites (beyond even those set out in the 2017 Plan not yet commenced) will deliver quickly. In reality, before any housebuilding can begin on them substantial off-site, as well as some onsite, new or expanded infrastructure will need to have been completed.

In this respect, it remains our view that in this Regulation 19 draft Plan the City Council still has not demonstrated that brownfield options have been exhaustively considered ahead of proposing release and development of a hotch-potch of additional greenfield sites. Nor has it demonstrated that construction and improvement of the infrastructure needed to support such major sites on the city's rural fringes could be brought forward in a timely and realistic manner.

Accordingly, ACRA does not consider the Plan yet to be sound. It is not sufficiently positively prepared, nor justified, nor effective. Therefore, we do not consider it ready

for submission to central government in its present form. We give more detail on the whys and wherefores in sections below.

Effectiveness, deliverability

Completion of new housing units under the 2017 Local Plan and beforehand

Since 2014 Canterbury district has seen annual additions to the housing stock averaging 492 per annum. Completions in the three years since 2021-22 have averaged 748¹. The peak figure during those three years was already reached in 2021-22, towards the end of the Covid pandemic, after an unsurprising dip in 2020-21. So, there is no convincing evidence of any continuing upward trend. Never in one year has the rate of new build reached the annual target figure set out in the current (2017) Plan of over 850. See Table 1 below.

Table 1
Annual housing completions Canterbury District 2014-15 to 2023-24
(Source: Kent Analytics, KCC)

Year	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24
Actual completions	285	276	404	446	405	528	330	785	693	767
10-year mean: 491.9					3-year mean: 748.33					

Table 2 below shows the achieved completions against the targeted 2017 Local Plan construction trajectory for the major strategic sites, together with prior accruals and completions on windfall sites. This analysis shows that from the adoption of the 2017 Local Plan until 2022/23 (the last year for which CCC has published data) Canterbury District has witnessed delivery of only some 54% of the City Council's target completions over the period as a whole, even including substantial contributions from non-strategic and windfall sites.

Table 2
Annual targets against actual housing completions Canterbury District 2015/16 to 2023/24

Site	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	023/24	TOTAL
Allocations from 2006 brought forward		5	28	106	159		40	40	189	567
Existing planning permissions 2015	182	247	270	274	153	30	30	27		1213
"Windfall" sites forecast	138	138	138	138	138	138	138	138	138	1242
1: South Canterbury			100	300	300	300	300	300	300	1900
2: Sturry / Broad Oak				140	150	150	150	150	150	890
3: Hillborough				80	130	90	70	70	70	510
3: Hillborough A E Estates				40	60	70	70	70		310

¹ Kent Analytics, Kent County Council – latest published data

4: Herne Bay Golf Course			30	80	80	80	80	100	20		470
5: Strode Farm				30	80	80	80	80	80		430
6: Greenhill				50	50	50	50	50	50		300
7: Thanet Way, Whitstable	20		95	95	95	95					400
8: North of Hersden				70	75	75	75	120	120		535
9: Howe Barracks, Canterbury			60	90	100	100	100	50			500
10: Ridlands Farm / Hospital				50	50	50	50	50	60		310
11A: Cockering Farm			30	100	100	100	100	100	100		630
11B: Cockering Road					50	90	90	90	80		400
12: Grasmere, Chestfield			20	100	100	80					300
ANNUAL TOTAL TARGETS	320	410	771	1743	1870	1578	1423	1435	1357		10907
ACTUAL ANNUAL TOTAL COMPLETIONS	594	422	1119	444	597	474	785	693	767		5895
% of ANNUAL TARGETS COMPLETED	185.6%	102.9%	145.1%	25.5%	31.9%	30.0%	55.2%	48.3%	56.5%		54.0%

Sources:

Target numbers are from 2017 Local Plan, Appendix 2

Completions are from the Canterbury District Housing Delivery Test Action Plan (2023 measurement) dated May 2025 (HDTAP)

Note that it is unclear to ACRA why the KCC Analytics completions data differs from that presented by CCC in its Housing Delivery Test Action Plan (HDTAP).

Table 3 below sets out the specific delivery record for each strategic site under the 2017 Plan. Despite the City Council's claims that progress has been made at most locations, in fact six of the 13 sites have no homes at all constructed up to 2023. Out of these six, one (Ridlands Farm) was completely abandoned as a project (though it is now effectively resurrected as an element of the proposed Merton Park greenfield allocation.) Another, Mountfield Park (now renamed "South Canterbury") has stalled for nearly ten years since outline planning permission was first granted, while two judicial review processes ran their course, but also thereafter following a revised planning consent granted in 2022. That has had serious consequences because it is by far the largest allocation under the 2017 Plan.

Table 3

Completions by strategic site, 2015 – 23 (according to HDTAP p.12, Table 3.2)

SITE	COMPLETIONS	
	QUANTITY	% OF TARGET
1: South Canterbury	0	0.0%
2: Sturry / Broad Oak	98	11.0%
3: Hillborough	32	6.3%
3: Hillborough A E Estates	0	0.0%
4: Herne Bay Golf Course	523	111.3%
5: Strode Farm	0	0.0%
6: Greenhill	66	22.0%
7: Thanet Way, Whitstable	104	26.0%
8: North of Hersden	0	0.0%

9: Howe Barracks, Canterbury	367	73.4%
10: Ridlands Farm / Hospital	0	0.0%
11A: Cockerling Farm	219	34.8%
11B: Cockerling Road	0	0.0%
12: Grasmere, Chestfield	21	7.0%
COMPLETIONS AGAINST TARGET OF 7,885 FOR PERIOD:	1430	18.1%

The achievement of just 18.1% new home completions over these eight years, compared with the delivery trajectory the City Council had expected or set itself constitutes a remarkable shortfall. That shortfall calls into question both the City Council's ability accurately to forecast completions and, perhaps more worryingly, the very fundamentals of the housing needs assessment and of the infrastructure delivery plan supposedly underpinning the 2017 Local Plan. The City Council has at no point beyond 2018 (by which year construction based on a backlog of planning consents granted up to 2015 had been exhausted) come even close to achieving the trajectory of housing completions foreseen over the 2017 Plan period. *Nonetheless, the City Council has consistently and significantly overstated the expected collective outturn and continues to do so to this day.*

Prospects for actual housing completions from 2025 onwards

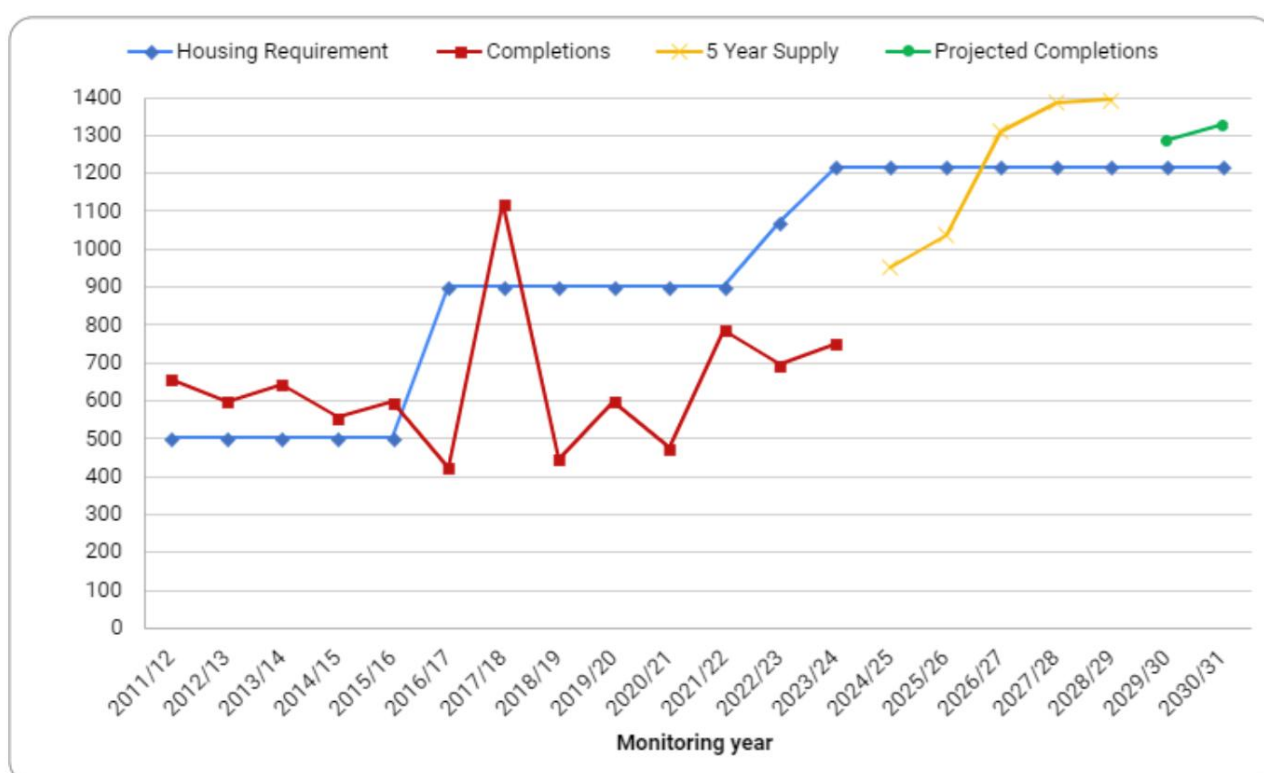
There seems little prospect of completions reaching the annual targets for delivery of housing set out in the latest draft revised Plan (Regulation 19 consultation draft 2026). Furthermore, there is no sign whatsoever of the 2024-25 target, suggested in the draft revised Plan, of 1,232 completions being achieved. It seems the inclusion of this elevated figure (apparently to be inserted retroactively, since adoption of the Plan will not occur until the end of 2026 at the earliest) is a ruse. Is it merely intended to reduce the need to achieve increased completions in subsequent years according to the compulsory formula?

It has seemed since 2018 that a very significant cause of the slow housing build-out rates in Canterbury District is the challenge of achieving nutrient neutrality in the Stodmarsh SSSI catchment of the Stour River basin. New housing in or in the vicinity of the city of Canterbury would impose substantial new nutrient loads on that catchment, barring the installation of on-site wastewater treatment plants and reed bed filtration ponds within housing estates, or a major upgrade to the Sturry Road sewage treatment works, or both.

The City Council's Housing Delivery Test Action Plan (May 2025, HDTAP) purports to assess the root causes of the persistent below-target construction rates since 2017. It does so, however, without even acknowledging that completion rates were relatively consistently in the range of 400-600 per annum (even in the Covid years) for the 20 years up to 2024. Nor does the so-called Action Plan acknowledge the reality of a huge mismatch recently between a big increase in the target figures emerging from the compulsory HNA calculation methodology on the one hand, and the complexion of housing need in the district in reality. The results from the

compulsory HNA calculations applied to Canterbury District are triggered partly by (now questionable) population forecasts emerging from the 2021 census (see paragraph 3.19 of the HDTAP) and partly by (equally questionable) statistics concerning average incomes of people currently living in the district. ACRA submits that a more accurate assessment of the types and numbers of new homes really capable of meeting the needs of the indigenous population would have emerged from an unbiased, completely objective evaluation of the data used to compile the City Council's own Housing Strategy, elaborated in 2025.

Table 4
Housing trajectory to date and expected based on paragraph 3.22 HDTAP



Key points to note in the HDTAP relevant to the Regulation 19 draft Local Plan under review are:

- Brownfield sites are “often build out quicker than greenfield” (paragraph 3.10). This makes the City Council’s failure to prioritise brownfield sites all the more disappointing
- The Stodmarsh nutrient neutrality imperative is disproportionately affecting brownfield developments – of which none are among the 12 strategic sites, and most are “windfall” sites (paragraph 3.13)
- Planning permissions granted in the three years 2021/22 to 2023/24 amounted to 6,303 dwellings against a housing delivery requirement using the central government calculation methodology of 3,186, suggesting that the completions problem is by no means attributable to a failure to grant planning consents (paragraph 3.25)

- Allocated sites have, however, simply not been built out on schedule. Of these:
 - None of Hillborough, Herne Bay Golf Club, Strode Farm, Greenhill, land North of Thanet Way, Grasmere (Chestfield) and land north of Hersden are in the Stodmarsh catchment, and thus not delayed by sewage treatment related constraints
 - Broad Oak has proceeded with a waste water package treatment plant on site
 - South Canterbury is behind schedule, according to the City Council because of a combination of “legal challenges, funding issues and a change in site strategy resulting in a redesign and need for a revised planning consent”
 - Ridlands Farm was reliant on the K&C Hospital relocating, which will not now happen
 - Thus, according to the City Council, the only strategic sites delayed mainly by the nutrient neutrality imperative at Stodmarsh are the two Cockerling Road sites and Sturry

The HDTAP goes on to claim (in paragraph 3.45) that “the main factors affecting determination (i.e. completions in line with targets) are

- legal challenges
- nutrient neutrality
- length of time to prepare S.106 agreements
- changes in viability requiring additional evidence and independent review
- complex interlinkage with infrastructure projects such as roads and railway infrastructure”

ACRA believes it is disingenuous for the City Council to point to “legal challenges” and long periods for “preparing S. 106 agreements” as generic causes of delays in housing completions. In fact, the two most important challenges it faced by far were successive judicial review applications to reverse outline planning consent for 4,000 new homes on Mountfield Park (now South Canterbury.) The second of these effectively succeeded (though it was settled) on the basis that the wastewater load from these homes would overwhelm the nutrient assimilation capacity of the Stour basin. And disagreements about whether and to what extent on-site wastewater treatment plants and filtration beds must be built and funded by developers were big factors in prolonging the time needed to finalise S.106 agreements in relation to this and other developments.

Thus, the willingness of developers to carry the cost burden of suitable wastewater treatment plants on-site, pending any major upgrade to Southern Water sewage works in the Stour basin, has become and continues to be a major impediment to residential unit completions on greenfield sites. In the case of brownfield sites and the change of use of city centre buildings to residential the barrier to completions where planning consent came after 2018 seems to remain absolute. Stour

Environmental Credits may in theory be purchased to enable remote mitigation, but in practice they are not being taken up on any but the smallest sites.

Furthermore, there is no evidence in the City Council's Local Plan Topic Papers that other factors causing delays to completions have been addressed by the City Council. Although the evaluation portions of the HDTAP sets out explanations for the causes of delays, the Action Plan itself (section 5 of HDTAP) provides neither timelines for the remedial measures nor any indication of their intended impact either individually or collectively. Although the measures mentioned are likely to be beneficial, there is no indication of budget, sources of funding, internal or external, nor of responsibilities for driving solutions forward. Nor does there appear to be any consideration of what other potential negative events might occur, which might precipitate compounding delays and thus need to be addressed through prevention, mitigation or adaptation.

In short, the HDTAP is insufficiently robust, given the Council's long record of failing to achieve completions even close to the annual targets required. Taken in sum, the abject record of completions against targets in recent years, combined with a dearth of convincing solutions going forward, suggest that there can be no confidence that the draft Local Plan as drafted could put an end to continuing serious hindrances to new housing delivery in the district.

ACRA evaluation of continuing impediments to housebuilding in Canterbury District

ACRA's own objective evaluation, based inter alia on intelligence from our various constituent residents' associations, suggests various circumstances and factors underlie the shortfall in housing completions in the last six or seven years:

- Delays so far in development of sites allocated under the current (2017) Plan, or since receiving outline planning permission as windfall sites, are partly owing to non-resolution of the burden of extra household sewage adding to already excessive nutrient loads in the River Stour basin, especially affecting Stodmarsh wetlands – from 2018 till 2025 (and continuing thereafter – see next point below).
- Examples of affected sites in and near Canterbury are:
 - Nasons former store buildings
 - Debenhams former store buildings
 - Beckett House and land and buildings behind it
 - Station Road West former temporary car park
 - Odeon Cinema site
 - St Martin's Hospital

Such delays continue now and seem likely to continue, still in part owing to the threat of extra household sewage adding to excessive nutrient loads in the River Stour basin, in spite of availability of a Stour Environmental Credits (SEC) scheme. Developers have clearly been unwilling to pay for the credits,

leading to SEC changing their pricing model as announced in February 2026². There is still no evidence at this stage that credits will be taken up, and so it seems the delays are likely to persist. Such delays will in due course affect also sites allocated under a new Plan and new windfall sites, so long as there is no major upgrade to the Southern Water treatment works off Sturry Road. This capacity and equipment upgrade is scheduled to be commissioned in 2030 at the earliest. Indeed, Southern Water has formally expressed the view to the City Council that it may not be able to fund the upgrade, if developers of large sites in the district (comprising more than about 300 dwellings, ACRA surmises) will be required to provide their own Waste Water Treatment Plant (WWTP) on site. According to submissions made during the 2025 Reg. 18 consultation period, Southern Water would then risk not receiving regulatory clearance for the capital expenditure needed. This uncertainty strikes at the heart of an increase in the statutory undertaker's planned sewage treatment capacity, essential if housing development is to proceed on any of the smaller sites identified in and around Canterbury in the Reg. 19 consultation draft Plan.

Examples of affected sites in and near Canterbury (in addition to those mentioned in relation to the point above) where no developer funded WWTP is envisaged are:

- Military Road former Council offices
 - Canterbury city centre car parks
 - Land off Bekesbourne Lane in Littlebourne
- Parallel and continuing delays in all residential development in the district attributable to shortages of skilled labour and cost increases of input materials since implementation of Brexit, exacerbated by setbacks during the Covid pandemic and by increased inflation following the Russian invasion of Ukraine, likely to be exacerbated by the impact of the USA - Iran war. Examples of incomplete or delayed sites in and near Canterbury suffering from this constraint seem to be:
 - Saxon Fields (Cockering Farm) in Thanington (still only 300 homes completed as of May 2026 out of an envisaged total of 630 due to have been built by the end of 2024 according to City Council targets)
 - Land off Cockering Road in Thanington (zero homes completed as of May 2026 out of an envisaged total of 400 due to have been built by the end of 2024 according to City Council targets)
 - Redrow estate in Hersden and land north of Hersden (the latter with zero homes completed as of May 2026)
 - Persimmon site off Sturry Hill (zero homes completed as of May 2026)

² <https://www.stourenvironmentalcredits.co.uk/news/stour-environmental-credits-unveils-more-flexible-purchasing-after-developer-feedback/>

- Relatively low demand in the district for the types of housing foreseen on large greenfield sites – notably three-, four- or five-bedroom detached houses – as opposed to social and affordable housing, mostly in smaller units. Good evidence for the mismatch between the low demand for such properties touted in the draft Local Plan for construction on the major greenfield allocations and the high demand for social and affordable housing in the urban areas of Canterbury, Herne Bay and Whitstable can be gleaned from the data and analysis set out in the draft City Council Housing Strategy 2026 – 2030. This draft Strategy was the subject of a public consultation by the City Council based on a detailed questionnaire between January and April 2026. The outcome of that consultation appears to have been buried or ignored by the City Council. It is bizarre that no final standalone Strategy has been published alongside the Regulation 19 version of the draft Local Plan. The detailed, objective evaluation of types of housing in most demand in the district by numbers and according to categories of the population set out in the draft Strategy stand in stark contrast to the artificial figures, emerging from use of the central government algorithm, used in the City Council Housing Needs Assessment (HNA) published in 2024 – the latter in turn underlying the allocations envisaged in the 2026 version of the draft Plan.

The proposed reliance on the East Canterbury Strategic Development Area indeed reinforces concern about low local demand for detached and even semi-detached houses. This is not a single strategic site but a collection of separate landholdings and allocations, which the draft Plan assumes will come forward collaboratively. It is noteworthy that the Council's envisaged timetable foresees delivery of housing on these allocated sites in parallel with, and for several years simultaneously with, the South Canterbury urban extension. The apparent intention is to mitigate impacts on the highways system and other stretched infrastructure to the east and south of the city, by adding extra developer funding. This would supposedly cover a new road bridge over the railway line to link the A257 with the A2050 near a new A2 junction just north of the village of Bridge, a new Park and Bus facility just off the 257 and new wastewater treatment facilities. That is a complicated and time-consuming proposition from the outset. ACRA feels that actually wrangling about S.106 commitments by developers is as likely to delay South Canterbury further as it is to unlock East Canterbury, given the negotiations and coordination required between various parties (at a time of local government reorganisation) behind the scenes. Experience elsewhere in East Kent, including at Chilmingdon Green in Ashford district, Otterpool Park in Folkestone and Hythe district, and Whitfield in Dover district, is that large ambitious schemes of this kind, involving cash constrained development entities, do not deliver at the pace initially claimed and often stall, if they even get started. We thus strongly doubt the biggest East Canterbury site, C15 "Land south of Littlebourne Road", will have delivered 50 homes within five years, as the draft Plan trajectory assumes.

Conclusion on housing completions:

As has been demonstrated by the failure of the 2017 Local Plan, large green field sites might look straightforward on paper but prove slow in practice. Brownfield sites, by contrast, will often already have much of the necessary infrastructure in place, particularly transport links, and so are far better placed to support earlier delivery. It is however the brownfield sites that are not being proactively worked up as allocations, on the often-mistaken belief that they will be too complicated or not sufficiently viable to deliver quickly.

The proposed early years trajectory for housing completions, taking allocations where building is not complete (in important cases not even started!) under the 2017 Plan, together with annual targets under the revised draft Plan is, in our view, wholly unrealistic. It is not credible to suggest that a combined delivery rate of 2,228 dwellings per annum could be achieved within less than five years of the likely adoption of a new Plan, when the recent delivery rate identified in the Meeting Development Needs Topic Paper is 761 dwellings per annum, and the actual annual mean number of completions achieved over the ten years to 2024 was 492. That would amount to a 193 per cent increase in housebuilding in the district at precisely the point when the industry is slowing output. Delivery on that scale has not previously been seen in Kent, not even in Medway, which is a much larger authority with substantial urban areas.

The figure of 2,228 will surely not withstand scrutiny at examination. A reality check is therefore urgently needed by the City Council, prior to submission of the draft Plan for inspection.

Improvement, renewal and construction of infrastructure

Failures or long delays to repair, renew and add to aging and inadequate infrastructure throughout Canterbury district have exacerbated, and seem sure to continue to exacerbate, serious delays in building out sites permitted for housing.

The draft Local Plan contains no contingency plan for any such delay caused by any one or more of multiple factors. It displays no resilience in terms of taking account of resulting shortfalls in house building completions, despite experience of such problems causing similar shortfalls during the past twenty years (and especially since 2017).

Water mains, gas mains and sewers date back to Victorian and Edwardian times in the towns and in many villages. Constant leaks and ruptures mean that frequent roadworks add to congestion on the road network and cause extra damage to road surfaces already poorly maintained.

Electrical supply capacity is severely constrained and requires significant and coordinated action to upgrade, often covering multiple adjacent allocated development sites. Nowhere does the draft Plan explain how such essential coordination is to be achieved, programmed or funded where there is interdependence across sites, as in, for example, the allocations to the south-west and east of the city..

Meanwhile, new road links and road improvements scheduled originally for early or middle parts of the current decade are simply not transpiring, because the delayed (and already costed) S.106 or CIL monies from delayed developments to fund them are missing. Meanwhile, prospective construction and commissioning costs spiral upwards as inflation remains at an elevated level

There is little reason to hope the failures and delays will end, just because there will be a revised Local Plan. Indeed, completion of the additional dwellings foreseen in the draft Plan would heap yet more pressure on the infrastructure and require additional major investment.

Here are fuller explanations of continuing inadequate, missing and delayed infrastructure by category:

- *Wastewater treatment and sewers:* As explained in the preceding section, household sewage discharged to public sewers from new housing developments will add to excessive nutrient loads in the River Stour basin. This means that developers will either have to pay for Stour Environmental Credits (or credits available as part of an equivalent national statutory scheme) or wait for a extra capacity to become available, once a major upgrade to the Southern Water treatment works off Sturry Road is commissioned. This will be 2030 at the earliest – but given regulatory and planning approvals for it have not yet been formally obtained and given the track record of completion of similar projects in the district the target date seems optimistic. In the meantime, developers seem unwilling to pay for credits in relation to sites already given planning consent for housing. Such unwillingness is likely to affect site allocations under a new Plan and new windfall sites too. This was confirmed in a summary, supplied to ACRA late last year after we requested it, of the Southern Water response to the City Council's 2025 Regulation 18 consultation.
- *Water supply:* According to the response submitted by SE Water to the City Council's 2025 public consultation on the draft Local Plan, their Water Resources Management Plan 2024 as approved does not provide for additional water resources adequate to supply all the new dwellings foreseen by the Local Plan for the years 2029 to 2041. (If the Local Plan did not envisage backloading of annual targets towards the end of the Plan period, the shortfall would begin earlier than 2029.) From tables used by SE Water in presentations in March 2026 to the Council Overview and Scrutiny Committee, it appears that the shortfall would preclude supply to more than 5,000 new dwellings according to current demand and leakage prevention projections and assuming availability of a new reservoir at Broad Oak from 2035. Of course, the shortfall would be much more serious and correspondingly put at risk the construction of another few thousand new homes if there will be a delay in completion and commissioning the new reservoir. Given the ambition of the Broad Oak project, the fact that at this stage SEW has not sought planning consent (and will not until 2028)³, approved final funding or agreed a programme of works calls into question the reliance on this source of supply. No construction work on the

3 <https://www.southeastwater.co.uk/about/our-plans/broad-oak-water/>

reservoir is planned until at least 2029. . The extremely complex piping, pumping and filling operations which will be required prior to commissioning it suggest that the risk of a substantial delay should be factored into any revision of the Local Plan. It has not been. We attach as Annex 1 a summary of the SouthEast Water response to the City Council's 2025 Regulation 18 Local Plan consultation, kindly prepared by SouthEast Water at the request of ACRA.

- *Electricity distribution and supply:* ACRA understands that an electricity supply will not be feasible for any new build projects of significant size on the south side of Canterbury until an additional distribution sub-station has been installed by UK Power Networks. The sub-station seems most likely to be built and connected within the boundaries of the South Canterbury urban extension (formerly known as Mountfield Park.) However, physical development on that site has been held up for more than nine years following a grant of outline planning permission. Completion of new housing on the site will be contingent not only on commissioning of a sub-station but probably also on UK Power Networks finishing a project to underground medium voltage transmission lines currently passing across the middle of it on pylons. That will not happen until 2028, possibly 2029 or later.
- *Roads:* Canterbury as a city suffers from chronic traffic congestion in peak periods, especially along the ring road and its feeder roads. (See evidence of this presented as early as 2018 by SWECO in a report from them on solutions to alleviate ring road traffic build-ups, commissioned by Kent County Council Highways Planning department. SWECO concluded that in some peak hours key ring road junctions were already operating at capacity.) Even though some of the greenfield sites around the city allocated under the current (2017) Local Plan have been developed or partially developed, the timeline for the completion and commissioning of new link roads or improvements to existing roads and junctions has in nearly all cases slipped substantially. Most of these new links and improvements are meant to be funded by developers under S.106 agreements.

Examples are:

- Howe Barracks link: expected 2022, currently at least four years behind schedule
- Sturry relief road: expected 2023, not even close to being fully funded according to the original route and new bridge scope; final planning consent not yet granted, no developer for one key site even identified, thus no S.106 agreement concluded, likely reduced scope and at least five years behind schedule
- Fourth A2 slip road at Wincheap: expected 2023, disputed planning consent, at least five years behind schedule Wincheap gyratory system: expected 2024, planning application not yet scoped, at least five years behind schedule
- New A2 junction north of Bridge: expected 2023 or 2024, no present prospect of planning application being submitted, let alone commencement of works; inconceivable prior to 2035, even then subject now to "vision and validate"

process to verify need, and contingent on completion of 1600 dwellings being occupied within the overall South Canterbury development, Junction improvements at Brenley Corner where the A2 meets the A299, close to the eastern end of the M2: developer contributions were scheduled to be paid by now, but the improvements have been put on hold by National Highways

In the revised Infrastructure Delivery Plan annexed to the Reg. 19 draft Plan there was a retreat (compared with the Reg. 18 2024 version) from deadlines for the completion and commissioning of new link roads or improvements to existing roads and junctions. These were replaced by vague timelines described as *short term* (very few of these!), *medium term* or *long term* (many of these). The effect is that, when combined with a vision and validate approach to demanding financial contributions from developers to mitigate adverse effects, residents are left with little certainty about how and when highway upgrades will be capable of being financed and brought into operation. The cumulative effect (when combined with a prospective failure of the Transport Strategy – see paragraph below) seems very likely to be a slide into completely unsustainable housing and commercial development (see final section of this paper), owing to deteriorating road congestion and correspondingly deteriorating air quality.

Draft Transport Strategy

In 2019 SWECO, transport and traffic consultants⁴, published a study, commissioned by Kent County Council as Highways Authority, on the future of the Canterbury city ring-road. SWECO found that, based on existing vehicle movements combined with those from housing developments foreseen under the current (2017) Local Plan “*the road network of Canterbury is at or near capacity*” and “*doing nothing is not an option.*” The consultants went on to make proposals for re-design of junctions, alterations to the layout of the ring-road and priority for more sustainable modes of transport. Since 2018 virtually no changes in these respects have been implemented, apart from construction of a very short and ineffective set of cycle lanes along Longport (A257, stopping short of Barton Court Grammar School).

Meanwhile, also since 2018, especially following the Covid pandemic and the shift to home working associated with it, there has occurred an evidently permanent increase in the proportion of parents doing school runs through Canterbury for their children by car. Furthermore, with the advent of repeated roadworks in and around the city to rectify failing gas and water mains, congestion continues to worsen or to last longer, and gridlock to transpire more frequently during extended peak hours.

4 PTV Vissim modelling of link and junction redesigns, Canterbury Ring Road” September 2019:
<https://democracy.canterbury.gov.uk/documents/s104887/Canterbury%20Ring%20Road%20Report.pdf>

An expectation in the Regulation 19 draft of a big modal shift (conversion of more than 20% of journeys currently taken by car in the district to journeys by public transport, on foot or on a bicycle, according to Jacobs scenario DS3 – see below) lies at the heart of the 2026 draft version of the proposed Transport Strategy. We reckon that with the addition of some 26,000 new homes under the current and new Local Plans, that will equate to a necessary conversion rate of around 28% by 2041 (if Plan housing delivery numbers would be achieved by then), just for journeys generated to stay static from today's levels. An assumption of modal shift is also baked into the travel plans and S.106 mitigation commitments for most of the biggest housing developments around Canterbury so far permitted under the 2017 Plan. Furthermore, the City Council relies on a similar assumption to underpin its conclusion that air pollution resulting from additional vehicle journeys into and across the city from and to new housing developments will not entail risks to human health. The air quality evidence produced by the City Council relies heavily on scenario-based modelling (DS1–DS3 in the Jacobs report), as set out in the Air Quality Assessment. The scenarios assess the impacts of proposed allocations alongside varying levels of modal shift, including a “visionary” 20% shift to sustainable transport in Scenario DS3. No specific modelling or analyses of air quality impacts were undertaken for this updated assessment, however. The last such modelling was undertaken in 2020, and while somewhat lower than pre-2020 pollution levels, actual measured air pollution in and around the city remains a significant concern in Canterbury.

Evidence from UK and international transport studies indicates that while infrastructure investment can support shifts towards active travel and public transport, outcomes are typically partial and variable, with full modal shift achieved only in very limited contexts. Significant and sustained shifts of this scale are generally associated with high-density urban areas with extensive public transport networks and demand management measures, such as London or Copenhagen, rather than smaller urban areas such as Canterbury. More importantly in such areas authorities have direct control over public transport unlike in Canterbury where the Council has no direct control of public transport - busses are privately owned and controlled and KCC has responsibility for public transport.

It is thus unsurprising that there is precious little evidence that modal shift is currently happening in Canterbury and little prospect that the immediate policies and measures CCC proposes will spur more. The 2026 draft Strategy isn't any tougher on congestion and its causes than the previous version in 2024. The Council has proposed a draft Strategy which is at the outset no more ambitious than the 2024 version. Indeed, overall, it evidences a decline in targeted sustainability by rowing back on modal shift expectations by percentage, predicting unreduced household trip rates and tolerating additional congestion at key junctions.

Turning specifically to public transport, the city council has dropped the aspiration stated in 2024 to match the London standard of service, which was in any case never going to be deliverable due to the absence of any viable or credible funding

mechanism. The draft Strategy no longer states who is meant to be in charge of upgrades to public transport services nor who will pay. If not explicitly housing developers, from where does the city council expect the money to transpire? In parallel with the draft Transport Strategy a “bus first” strategy is proposed. The aspiration is laudable, yet where is the evidence that Stagecoach as the current sole operator in Canterbury is prepared to invest money in improvements or move away from its rigid hub and spoke approach to routing all services in and out of a central bus station using large diesel vehicles?

The draft Strategy supposedly follows a 'Vision and Validate' approach: if vehicle mode share reductions are not achieved through measures such as improved bus services and reductions in city centre parking (to which the city council aspires) then a suite of other measures, such as restrictions on cars and other vehicles ring road signalisation, bus lanes that remove road space, tougher restrictions on on-street parking in residential roads, and potentially workplace car parking charges could be introduced.

ACRA believes that evident capacity constraints on the ring road mean more radical and determined measures of these types, together with progressive congestion or LEZ charges, should be introduced immediately by the city and county councils, irrespective of the availability of prior developer financial contributions. S.106 contributions will be piecemeal and staggered over time, while the need for change is immediate and the works involved would better be undertaken within a single project. In any case, a scheme could be carefully designed to become self-funding quite quickly, we believe. The county and city councils have failed to demonstrate how, in the absence of an ambitious scheme quickly to make the Canterbury transport system truly sustainable, the city could sustain traffic flows including the trip volumes modelled from new housing on the greenfield allocations proposed on the fringes of the city. ACRA presumes it is reliance on a diminution of such volumes by virtue of modal shift which leads to the City Council's optimism that flows could be sustained. We rather assess this as complacency.

Waiting to see what happens after further housing development is undertaken under a revised Local Plan invites ring road gridlock for prolonged periods of each day. An alternative scenario is that housebuilders realise that the road system and public transport provision combined cannot cope and shy away from developments around the city. The abject inadequacy of the Strategy *ab initio* thus goes to the heart of deliverability of the whole Plan.

For our further exploration of the ineffectiveness of the draft Transport Strategy, see Annex 3.

For our further explanation of the inadequacy of Air Quality Assessment used partly to justify the draft Transport Strategy, see Annex 4.

Conclusion on infrastructure and transport:

ACRA concludes that delivery of the draft Plan is seriously jeopardised by the likelihood that essential infrastructure will be missing and sustainable transport measures ducked during the Plan period. A good prospect of delivery of housing on the trajectory foreseen would require every element of the infrastructure improvements and additions to be delivered on time and on budget. It would also require all of the highways related mitigation, by way of capacity improvements and sustainable transport schemes suggested for funding by developers, to be commissioned on time, in parallel with more radical steps to drive modal shift. In the light of a heavy reliance on “vision and validate” as a tool to manage future unknown behavioural changes, the risk of a shortfall in timely completion of such mitigation is high. In practice, experience within Canterbury and across the construction industry as a whole shows that such a strategy, if we can call it that, bears no relation to the way in which housebuilding projects actually pan out. The draft Plan provides for no capacity “slack” or delivery slippage in any of the elements of infrastructure needed. It lacks any contingency allowance for the major cost elements, especially bus funding, highways improvements, water supply and sewage treatment. Any or all of these could be delayed, suffer cost overruns, be legally challenged, see developers failing to meet completion targets or challenge viability calculations mid-project, or run into changing regulatory and political conditions.

Justification

Significant policies, key revised strategies and some new evidence, written or gathered since September 2025, have not been made public by the City Council until the publication of the Reg. 19 consultation draft. The material has thus not been subject to adequate scrutiny from stakeholders, and they have been correspondingly given no opportunity to contribute criticisms or alternative ideas, given the restricted ambit of the Reg. 19 procedure.

Furthermore, Councillors in the cross-party Local Plan Working Group have not met to review changes to the draft Plan between the publication of the Reg. 18 consultation documents in 2024 and their meeting to decide to proceed to the Reg. 19 consultation stage in March 2026. This failure adds to the gravity of an absence of meaningful scrutiny or debate about the changes, omissions and additions in the meantime.

Major changes to allocated greenfield sites

As between the 2024 and 2025 draft versions, one large greenfield allocation to the North of the city was withdrawn, and new greenfield allocations to the East were added, despite similar sites having been withdrawn after a 2022 public consultation. Some other proposed greenfield development sites have been expanded in the 2025 draft version, notably in the vicinity of Whitstable.

In the case of the East Canterbury sites, the substitution was all the stranger, because similar sites (and more in the vicinity) had previously been put forward by an earlier council administration in 2022. At that time, they were firmly linked with an insistence on the necessity of a new by-pass to the East of Canterbury. When the new administration rejected the idea of a by-pass, it logically ditched the greenfield allocations to the East. Now, the draft returns the site allocations but without the traffic mitigation of a by-pass. This is illogical and is not in any sense supported or justified by traffic modelling.

We emphasise that ACRA did not support the allocation of large areas of farmland and open space to the North of the city for housing development. A full justification has been given for the withdrawal of that allocation, but no comparable justification has been provided for the reversal of the decision made by the City Council between 2022 and 2024 (after the installation of a new administration) to eliminate greenfield allocations on the East side of the city.

Lack of brownfield allocations and lack of affordable and social housing

Under paragraph 36(b) of the NPPF, a sound plan must be justified. Specifically, the chosen strategy must be an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence.

We are not convinced the City Council has properly tested a brownfield led and regeneration led strategy as a reasonable alternative before resorting to substantial further greenfield release. Its “brownfield first” claim is not supported by the evidence. Policies C8, C33 and HB2 do not allocate sites or quantify delivery but leave the relevant opportunity areas to be worked up later through development briefs or similar documents. This is all the more regrettable and unjustifiable in the case of major sites like the Wincheap Industrial Estate, the freehold of which is held by the City Council. Work by the estates function of the Council to buy out leases or refuse renewal of them and accordingly release land for residential construction could have begun many years ago. As far as we are aware no programme aimed at such release has yet been scheduled, let alone implemented. The Development Strategy Topic Paper indeed confirms that 16 Regeneration Opportunity Areas in Canterbury still await work. In other words, the supposed brownfield alternative has not been properly assessed before the strategic choice for further greenfield release was made.

The 2026 version of the draft Plan does not address significant inequalities in Canterbury either. The quotas for social and affordable housing is lower than that identified in the city council’s housing needs survey. The affordability ratio in Canterbury is one of the most challenging in England. The housing needs survey identifies that 80% of new housing would need to be affordable or for social rent while policy DS1 requires only 15% affordable housing on brownfield sites and 30% on all other sites, out of which only 10% will be for social rent. This represents a reduction in obligations on developers to make homes available for social rent from the 2024 Regulation 18 draft Plan. Developers of student housing will not be required to make a financial contribution in lieu, as they were in the 2024 Regulation 18 draft Plan. The revised policy DS1 is in our view unsuitable to meet local housing needs and the relaxation in obligations on developers to provide for affordable and social rent units since 2024 unjustified by any evidence provided.

Conclusion on brownfield development, regeneration and meeting housing needs:

We know there are several alternatives to greenfield sites in the vicinity of Canterbury, by way of achieving the annual figure for new dwellings set out in the Housing Needs Assessment, notably in respect of affordable and social units. The alternatives include not only redoubling efforts to identify suitable brownfield sites for residential development, but also taking initiatives to change the use of redundant commercial and retail buildings to residential, and resolutely increasing the density of housing on sites close to services and public transport (e.g. Wincheap industrial estate, Military Road former council offices and car park, Beckett House, Station

Road West.) The Council has apparently failed to consider such enhanced occupation density, nor has it at any time explained why such options have been ignored or ruled out.

Non-justification for dilution of sustainability requirements and relaxation of the infrastructure improvement timetable

Many changes made in the new 2026 published draft represent retreats from environmental protection measures, climate action initiatives, timely pursuit of related infrastructure enhancements and other pro-sustainability policies enshrined in the Regulation 18 consultation versions from 2024 and 2025 (the latter focussed rather than comprehensive.) Those changes are not adequately underpinned by evidence presented by the City Council as part of the new draft. Taken cumulatively, the retreats seriously weaken any claim that sustainability is at the heart of the draft Plan and some of them call into question its overall deliverability.

Here are some examples:

- Deletion of any reference to the UN Sustainable Development Goals as a foundation for the Plan policies (previously in the Introduction)
- In SS1 (Environmental Strategy) and DS25 (Supporting Biodiversity Recovery), cutting by 50% the requirement for Biodiversity Net Gain in respect of “non-major developments”
- In SS2 (Sustainable Design Strategy) and DS12 I(Net Zero Carbon Ready and Water Efficiency), removal of the previous requirement for developers to achieve a Net Zero carbon footprint for homes on their sites, and its replacement by a vague requirement for homes to be “net zero carbon ready”
- In SS5 (Movement and Transportation Strategy) removal of the previous policies regarding limitation of workplace parking and compulsory provision for goods transfer stations
- In SS6 (Infrastructure Strategy), policy clause 1, deletion of the previous paragraph envisaging completion and commissioning of necessary new infrastructure ahead of development of new housing sites
- In DS1 (Affordable Housing), insertion of a new clause 6.7 specifying that “viability issues” may be allowed to override the implementation of policies on minimum required provision for affordable housing
- In DS13 (Sustainable Design), deletion of a cross-reference to the City Council’s Sustainable Design Guidance SPD
- In DS15 (Infrastructure delivery), deletion of any mention of developers needing to demonstrate appropriate timing of infrastructure delivery and

prospective achievement of a 15-minute walking time to amenities and services

- In DS26 (Landscape Character), insertion of a possibility that developers may propose mitigation of harm to the landscape rather than being required to avoid harm
- In DS29 (Renewable and Low Carbon), significant dilution of the policy to prefer use of renewable and low carbon energy sources

And then further unexplained dilution of ambition and required mitigation in the major cases of the Transport Strategy, the Air Quality Assessment, the Infrastructure Delivery Plan and the Merton Park allocation policy:

- In the Transport Strategy, removal of any mention of achieving a service level for public transport in the district equivalent to that prevailing in London (as mentioned in the sub-section dealing with the Transport Strategy above)
- Also, in the Transport Strategy a slight reduction in the percentage modal shift assumed to occur, by way of justification for not introducing early radical measures to control and limit traffic flows; yet still no explanation of exactly how and why such modal shift is expected to transpire, given lack of evidence about recent switching rates or any proximate prospect of improvements in bus and train services (again see the sub-section dealing with the Transport Strategy above)
- In relation to the Transport Strategy, an inadequately researched and questionably updated Air Quality Assessment supposed in part to excuse a more radical approach to traffic reduction in the Strategy. (For our further explanation of the inadequacy of the Air Quality Assessment used partly to justify the draft Transport Strategy, and its incompatibility with the City Council's Sustainability Appraisal, see Annex 4)
- In the Infrastructure Delivery Plan, a retreat from deadlines for the completion and commissioning of new assets or improvements to existing assets (e.g. roads, junctions, sewers, drainage systems, wastewater treatment plants, water mains and water storage facilities), in favour of vague timelines described as *short term* (very few of these!), *medium term* or *long term* (many of these); the effect being that, when combined with a vision and validate approach to demanding financial contributions from developers to mitigate adverse effects, the District is left with little certainty about how and when better infrastructure will be capable of being financed and brought into operation, as outlined in the sub-section dealing with deliverability of infrastructure above
- In respect of the Merton Park greenfield allocation the amount of open space has been reduced. The size of the envisaged sports hub has also

been reduced. An envisaged hospital expansion site has been removed. There is no longer any representation of how views of Canterbury from parts of the site will appear after construction is underway. Opportunities for the creation of green corridors within the development seem to have diminished. And a Fast Bus link combined with a Park and Ride hub has been downgraded to a park and bus facility.

These are illustrations of environmentally detrimental changes and dilution of related infrastructure requirements in the Regulation 19 draft Plan and associated documents. The list above covers deterioration of environmental protection demands and of related mitigation obligations expected to be imposed on developers generally, as well as some particular to the Merton Park allocation. But it does not cover all unexplained dilutions of such demands and obligations set out in the various policies proposed for all other individual allocated sites.

Sustainability of development on major greenfield allocations

Given their sheer scale, combined with the factors we have identified above relating to dilution of environmental and climate protection criteria and hindrances to the installation of necessary infrastructure, we suggest that building houses on the greenfield sites proposed in the Regulation 19 consultation draft Plan making up the East Canterbury and Merton Park allocations cannot be classified as sustainable development. In addition to the Plan's failure to demonstrate the adequacy of current infrastructure, the prospects for commissioning of additional infrastructure needed to serve thousands of new homes on the fringes of the city, and the adequacy of the proposed Transport Strategy, several other issues arise:

- The isolation of the sites:
 - The East Canterbury allocations are no longer tied to the delivery of an eastern city by-pass (as envisaged in a 2022 version of the draft Plan). Instead, they are presented on the back of a much more limited and long to be delayed link road and bridge across the Canterbury East railway line, passing through the South Canterbury urban extension (as yet not even started) towards the A2 near the village of Bridge, supported by some kind of "bus and ride" connections. These modifications firstly strip away the original justification offered for the sites by the city council in 2022 (that an Eastern by-pass would absorb all the traffic from them not bound for the city or for the East coast of Kent), and more significantly leave these allocations without a credible or deliverable access strategy. Funding and feasibility for the link road remain highly uncertain and distant because of its reliance on developer funding, and no convincing assessment has been produced of how the very substantial traffic impacts in the meantime will be addressed. Supposedly an interior road will take the site traffic through both C15 and C16 to site CF1 towards the A2050 and the A2, but only after 1,000 homes are occupied. Note that outline planning permission for CF1 was already granted in the December 2022, without any specific provision for a bridge or a route or land to accommodate this through traffic. Most alarmingly, the ability to commission such a link will be dependent upon Network Rail agreeing to a bridge being built over the railway line at the south side of C16.
 - At Merton Park, the removal of an A2 eastbound off-slip and on-slip makes the allocation even less defensible, intensifying highways and

air quality impacts which ACRA believes are unacceptable. It is almost inconceivable that ingress to and egress from this very large housing site should be solely via Merton Lane onto Nackington Road to the East, or via Hollow Lane onto residential streets off Wincheap to the West. And yet it will be. Hollow Lane and Merton Lane are just narrow, winding country roads. Bizarrely the draft Transport Strategy claims on page 16 that the allocation can be "... highly sustainable and accessible ...". We note the City Council removed the extra proposed site west of Hollow Lane from the draft Plan in 2025, avowedly because of concerns about the impact of extra traffic flowing onto the A28. Now most of the traffic from the remaining 2,000 or so new homes not heading East onto Nackington Road, which is a B road, will find its way onto the A28 as it will offer the only practical route towards the A2. We further note that the supporting traffic survey only covered major routes. No analysis of traffic trends on relevant minor routes such as Downs Road, New House Lane, Merton Lane, Iffin Lane and Hollow Lane is offered. Not even Nackington Road vehicle numbers are covered. We believe these omissions lead to an understatement of actual recent increases in trip rates around and through the proposed allocation.

- Housing development would have an adverse impact on designated Landscape Character Areas, as well as on the rural setting of the Patricbourne Conservation Area and the listed Jacobean manor house located beyond the end of Spring Lane
- The scale of development applied for is out of character with the extremely modest rural and suburban services nearby and around three kilometres distant from main services and amenities in the centre of Canterbury
- Development would entail loss of best and most versatile agricultural land
- Provision foreseen for drainage and wastewater from the various sites has not been proven to obviate risks of pollution to chalk streams and risks of adding to the nutrient load affecting Stodmarsh wetlands, By admission of the city council itself in the Sustainability Appraisal it produced last year, the sites named Merton Park, land south of Bekesbourne Lane and land south of Littlebourne Road (on which in sum around 4,000 new homes are proposed) score extremely badly (red colour) in terms of:
 - Biodiversity
 - Geology
 - Landscape
 - Land use
 - Groundwater impact and water generally
 - Flood risk

(See Development Strategy Topic Paper (2026) Appendix C - Summary of SLAA and SA Outcomes).

The so-called East Canterbury Strategic Development comprises two large sites and one small site. In the 2025 Regulation 18 consultation, there were four separate sites but one (Land at Hoath Farm) has been absorbed into another site:

- Land South of Littlebourne Road C15 (previously N4 plus N6)
- Land South of Bekesbourne Lane C16 (previously N5)
- Land at Seotamot C17 (previously N7)

Despite this, the sites have been allocated in the Regulation 19 version of the Local Plan, on the assumptions that transport can be addressed and a wastewater treatment works will resolve other site challenges.

In terms of the water issues, both foul water and fresh water, little attention is given to drainage or supply in the rather vague specifications for C15/C16/C17 in the Regulation 19 version, other than saying a wastewater treatment works must be provided for C15 and C16, possibly in combination. (C17 is added as 'if feasible' to be connected). The details as to who will manage the wastewater treatment works, how integrity of the Lampen Stream into which run-off would naturally flow, will be guaranteed, and whether there is a medium-term or long-term requirement to connect to Southern Water, once its Sturry Road sewage treatment works has been upgraded, is not even mentioned.

Taken together, the restored East Canterbury allocations and the continued promotion of Merton Park reflect a spatial strategy that is neither sustainable nor strategic. Instead of addressing long-term land pressures through an integrated approach, which maximises brownfield capacity and prioritises multi-functional benefits from land, the city council has fallen back on large, car-dependent greenfield schemes. The continuing reliance on greenfield allocations in the draft Plan at this Reg. 19 consultation stage inevitably means eventually more roads and certainly more travel by car, whereas instead development should be directed to locations where buses, trains, walking and cycling are the first choice – which is exactly what a genuine brownfield first strategy would achieve.

Given that we find neither the East Canterbury nor the Merton Park allocations can be classified as sustainable development, ACRA still does not consider the spatial strategy underpinning the whole draft Plan to be sound.

Instead of persisting with its spatial strategy, the City Council should therefore immediately accelerate the production of relevant urban development briefs, SPDs or equivalent evidence for the Regeneration Opportunity Areas and other key brownfield locations, so that these can be examined as part of the Local Plan evidence base. That work should then inform proposed modifications to the Plan. With a more realistic early years requirement, and with review already built in within five years, it would be entirely reasonable for the Council to modify the strategy

further. It could remove some greenfield allocations if the brownfield evidence shows they are not needed to support sound, deliverable, sustainable housing.

Conclusion

ACRA submits that the Regulation 19 consultation draft Plan is overall not sound. Owing to major oversights, errors and omissions it fails on tests of: effectiveness by reference to deliverability; justification; and sustainability of development according to the proposed spatial strategy.

The draft Plan relies too heavily on large, oddly located greenfield allocations around the city of Canterbury. The implicit intention is to expand the urban and suburban footprint of the city. Yet there is no coherent, overarching masterplan for doing so. Before any housebuilding can begin on such greenfield sites, substantial new or expanded infrastructure will need to have been completed. Yet the City Council has not demonstrated how and when construction and improvement of the infrastructure needed to support such major sites on the city's rural fringes could be brought forward. Furthermore, the City Council has not satisfied us that brownfield options had been exhaustively considered, ahead of its alighting on the notion of a release and development of a hotch-potch of greenfield sites. The new sites are supposedly to be added on to very large areas of the city fringes already allocated for residential development from 2016 onward, on most of which land no construction has even begun ten years later.

The City Council has not properly tested a brownfield led and regeneration led strategy as a reasonable alternative, before resorting to substantial further greenfield release. Nor has the City Council put forward allocations suitable for provision of affordable, rental and social housing, in which categories the most pressing demand among people currently resident in the district is concentrated. Therefore, ACRA suggests that this draft of the Local Plan not be submitted to central government for inspection as it stands. We suggest that, instead, the City Council should take a few months to conduct a full review of the potential for a regeneration led spatial strategy and for development (through acquisition if need be) of land on which lower cost housing could viably be constructed.

Peter R. Styles

Vice Chair of the ACRA Committee

With thanks for their much-appreciated input, research and editing to the Business Secretary of the ACRA Committee, the Chair of the Canterbury Society, and other members of the Local Plan sub-group of the ACRA Committee

18 May 2026

ANNEX 1

SE Water summary for ACRA of its submission to Canterbury City Council in response to the 2025 Regulation 18 Consultation on the draft Local Plan

On Mon, 29 Dec 2025 at 16:50, Nick Price <nick.price@southeastwater.co.uk> wrote:

Good afternoon, David.

Apologies for the delay in getting back to you. We were rather busy in the build up to Christmas! I have set out below the key points from our response to the CCC Focused Local Plan consultation on 23 October 2025:

- We reminded CCC of how we account for planned housing growth through the Water Resources Management Plan (WRMP) process. Our most recent WRMP was published in October 2024 (WRMP24) and covers the 50 year period from 2025-2075. Further information is available on our website: <https://www.southeastwater.co.uk/about/our-plans/future-water/>
- We also made reference to our current Business Plan for the 2025-2030 period and our commitment to play an active role in managing the impact of growth and new developments on water supply requirements and the needs of the environment. Our latest Business Plan is saved here: <https://www.southeastwater.co.uk/about/our-plans/business-plan-2025-2030/>
- We highlighted that in some areas where we supply we may not be able to accommodate additional growth beyond what was assumed in our most recent WRMP24. In the Canterbury area we currently lack available headroom in our supply-demand balance, and so it is difficult to accommodate any growth exceeding our WRMP24 forecast assumptions at certain times during the entire planning period. This is because our WRMP24 was developed to balance supply and demand based on the growth forecasted and provided to us as we were developing our WRMP24.

- In order to assess the impact of growth beyond our current WRMP24 forecast, we highlighted that we would need to recalculate our demand forecast and rerun our decision-making process. This would help us identify additional interventions, such as new supplies, transfers, or increased demand reduction programs, which would not be known until we complete the work for our next plan, WRMP29.
- We made CCC aware that the housing numbers proposed in its latest IDP in the period 2029-41 are considerably higher than we have in our WRMP24 forecast. We therefore need to deliver planned new connectivity between Maidstone and Ashford and our new strategic solution to deliver a reservoir in Broad Oak to create the additional surplus necessary to accommodate the additional growth. These schemes are included in our latest Business Plan and are being progressed as quickly as possible but Broad Oak Reservoir will not be complete until at least 2035.
- We also highlighted the need to consider any local infrastructure requirements needed to support new developments and committed to engage with the local authority and developers at the earliest possible date to ensure these are planned for in a timely fashion.
- We provided an updated on schemes in East Kent that we committed to deliver in our Business Plan from 2025-2030 to provide additional supplies (e.g. Broad Oak Reservoir), resilience benefit, water quality improvements, sustainable abstraction investigations and alternative supplies provision.
- In relation to demand management we emphasised that our plans to maintain secure supplies are dependent on reducing consumption which needs a joint effort from water companies, the Government, local authorities, developers and other stakeholders. We do not feel the current draft local plan is suitably ambitious to adequately address water scarcity in the South East, and made reference to an industry report published last year, which aims to inform the Government's roadmap for water-efficient new homes: <https://www.futurehomes.org.uk/future-homes-hub-water-efficiency-report>
- In relation to the protection of groundwater sources we urged that future planning should take into account the Environment Agency's groundwater source protection zones (SPZs) to safeguard drinking water. Development within these areas must mitigate pollution risks. The South East region is already classified as water-stressed, which renders the protection of these sources even more critical to secure future drinking water supplies in the region and prevent any loss due to contamination. Over 70 per cent of the water we supply comes from groundwater sources (over 250 boreholes and wells).

I hope the above summary is helpful and if you have any further questions please let me know.

Kind regards

Nick

From: **ACRA Canterbury** <acra.canterbury@gmail.com>

Date: Tue, 30 Dec 2025 at 11:38

Subject: Re: CANTERBURY CITY COUNCIL DRAFT LOCAL PLAN

To: Nick Price <nick.price@southeastwater.co.uk>

Dear Nick very many thanks for this very helpful response

Best wishes,

David

ANNEX 2

Access to health services for an increased local population

As detailed in the main body of our submission, the Regulation 19 draft Local Plan proposes significant housing growth in Canterbury District at an annual rate of completion far higher than at any time in the past. Regrettably, in relation to health service provision, the City Council provides no evidence of a clear, properly funded and deliverable infrastructure plan that would meet the service demands consequential upon the unprecedented rise in the local population. This is in spite of the City Council itself explicitly anticipating that the most significant rise in numbers will be in the elderly population group, whose demands on health services are the greatest of all.

It is vital that, in order to be judged fit for purpose, any health infrastructure delivery plan clearly demonstrates how necessary improvements in primary care capacity and in hospital and community services duly integrated with social care provision will be delivered. Analysis is required of how the improvements would match the pace of a build-out of new homes, according to their location and the location and size of existing healthcare facilities. Canterbury City Council appears to have made no attempt to do this in the process of elaborating this draft Local Plan.

In fact, there has been very little NHS service improvement in Canterbury District nor in neighbouring districts over the last fifteen years. Most notably there have been no significant additions to primary and secondary care capacity, despite a succession of public consultations. These consultations included the possibility of a major reconfiguration of hospital specialisations, and consequent swapping of use of related buildings, decommissioning of facilities and/ or potential construction of new buildings across East Kent. No significant changes or additions have in fact transpired.

The continuing inertia has resulted in exceptionally long treatment waiting times, overcrowded A&E departments and pervasive corridor waiting for emergency admissions, to the extent that overall performance of the East Kent Hospital Trust is now ranked within the lowest five trusts in the whole of England.

The position in respect of primary and community services is no better. Evidence from Kent and Medway NHS confirms significant and worsening pressures, including high patient-to-GP ratios, workforce shortages, which contribute to delayed hospital discharges due to bed blocking.

East Kent HCP serves a population of more than 720,000. The highest increase is among people who are over 65. The number of people aged over 65 is forecast to increase by 58 per cent by 2036, with the number of people aged over 85 expected to increase by 131 per cent during the same time. (They place the greatest strain on GP, community and A&E services and social care).

East Kent suffers increasing rates of hypertension, diabetes and chronic kidney disease. This contributes to increased demand for health and social care services, including a six to seven per cent yearly increase in the number of patients going to hospital for urgent or emergency care. (This is irrespective of population growth).

The East Kent Hospitals Trust sits well down towards the bottom of 105 hospital trusts in England for performance and 114th out of 118 for meeting elective waiting time targets (14% below the national average).

A shortage of skilled clinical staff has to be another major consideration when assessing the deliverability of this Plan. As yet, there is no evidence that clinical staff in sufficient number and with the requisite skills will be available to support the extent of and target dates for the new housing developments now being proposed by the City Council.

It is important to highlight that the draft Local Plan is therefore not yet compliant with the National Planning Policy Framework, and its requirements set out in paragraphs 8(b), 20(d) and 34, that strategic policies plan positively for health and social care infrastructure and ensure that development is supported by adequate provision.

The draft Plan fails in this regard.

It is ineffective, because:

- Healthcare delivery mechanisms in the district are left uncertain for the Plan period
- It does not ensure due support for the health and well-being of existing and additional communities in the district

ANNEX 3

Draft Transport Strategy and draft Bus Action Plan

Introduction

Although they are presented as separate policies, the Transport Strategy and the Bus Action Plan (BAP) are inter-dependent. Both need to succeed for the achievement of the overall aims of the Local Plan. Not least, the location of proposed developments across the District, and especially to the south and east of the city, makes their successful delivery crucial to the Local Plan's growth ambitions.

However, neither document demonstrates sufficient clarity in terms of timescales, funding, responsibilities or outcomes to give confidence in the deliverability of these plans. Without that, there can be no certainty of the outcomes being properly monitored, managed, adapted or achieved. Thus this foundation aspect of the Local Plan cannot be considered effective, justified or sound.

Modal shift: an aspiration with no foundation

The Transport Strategy fails to provide evidence of the large-scale modal shift required to achieve the targets.

No modal shift scheme has yet been trialled, yet new developments across the district are projected to have their transport impact significantly reduced by these untested mechanisms. The plans state that the schemes require a high level of permanent subsidy from developers, for which there is no precedent. Such funding is almost certainly not going to come from S.106 or CIL schemes which are time limited and dependent on successful completion and sales of housing. Yet how it is to be generated is an issue on which the Strategy is wholly silent.

Highways capacity

The draft Strategy fails to set out sufficiently robust or definite road schemes, to allow vehicular access into and from the major greenfield allocations around the city of Canterbury in a manner which would avoid overburdening existing minor roads and key city junctions. It asserts without evidence, and in the face of current experience, that existing physical capacity combined with an entirely unproven propensity for residents to take a significant proportion of new trips by sustainable means will result in its aims being achieved. This is a wholly inadequate basis on which to justify development of more than 5,000 additional homes predominantly clustered to the south and east of the City, in an area already subject to regular road traffic congestion, and on top of the not yet started construction of 4,000 additional homes within the South Canterbury urban extension (formerly known as Mountfield Park.)

As an example, the Merton Park development site (Policy C10) is characterised as “self-servicing” thanks to supposed intelligent planning. This concept would necessitate the majority of daily travel needs being capable of fulfilment entirely within the housing estate, thereby reducing the number of car journeys in and out of it. However, even if the design could possibly meet this aspiration once extra schools, a community hub and shops are built and operational, the aspiration alone could not justify in the meantime overlooking an obvious need for higher capacity connections to the existing road network. Using the Council’s consultants’ (Jacobs’) model trip rate of 0.37 per dwelling each evening suggests at least 715 trips in a period of a few hours. These vehicles could exit the estate via only three roads, of which only one (Hollow Lane) connects directly to the A road network. Massive additional pressure on its junction with the A28 would surely ensue.

Travel demand and modelling of car trip rates

The draft Strategy does not envisage any attempt limit the total number of trips made to and from new dwellings compared with current average rates. That could have been part of the ambition, for example by a policy of obliging developers to guarantee provision of on-site amenities and creation of on-site sustainable transport hubs up to a specified service level. The draft Strategy aims to contain and limit traffic congestion only by virtue of changes in the mode by which trips are made.

The modelling report commissioned by the Council from Jacobs admits that traffic resulting from the developments proposed will create increased congestion in key locations across the city. These, it accepts, require mitigation works to avoid such impacts being classed as “severe”, which is unacceptable in terms of the NPPF. Yet it avoids any detailed consideration of when such works would be required, or how they would be paid for, and of how the cumulative impact would be managed over time. It simply uses the “vision and validate” concept to kick that can down the road.

Moreover, the robustness of the transport evidence base used by CCC is questionable. In particular, the origin–destination modelling appears to rely heavily on historic PTV Visum - derived patterns (dating back to earlier baseline assumptions) which are then iterated through scenario testing. This produces a

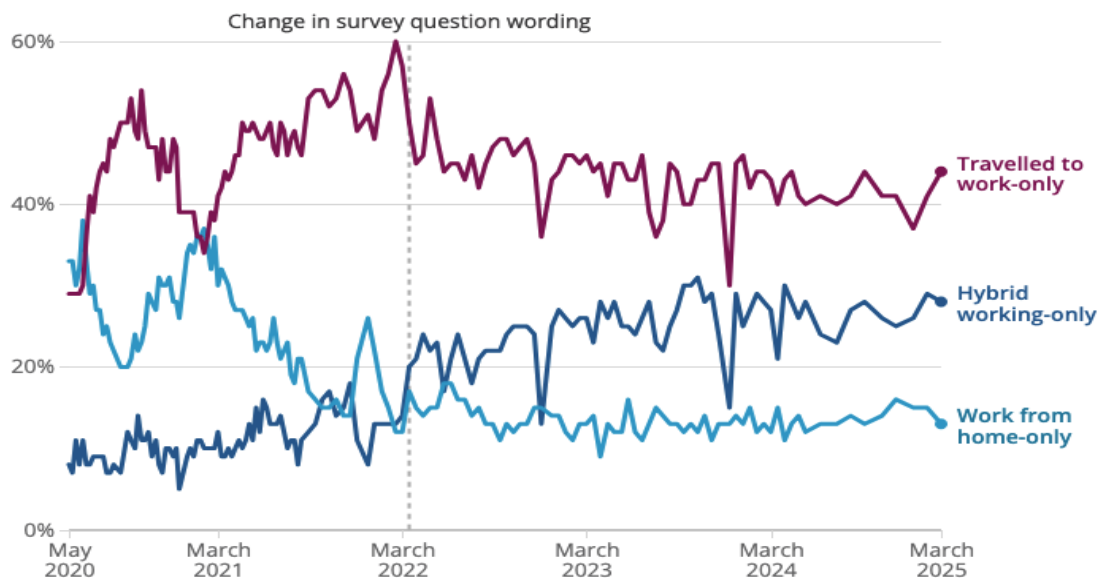
consistent directional pattern in the model, but without clear validation against recent observed data when compared against SMART-Lenz monitoring (2022–2025), there is a notable divergence, particularly in terms of peak compression and sustained daytime demand.

The concern is not the modelling approach itself, but that the Plan does not clearly demonstrate that the assumptions underpinning it reflect how the network is currently operating in practice.

Furthermore, the Strategy appears to rely in part on a hope of an increase in working from home, to reduce journeys to work. Yet ONS evidence suggests that since 2021 the number of journeys to work has reverted to close to pre-pandemic levels, as the chart below entitled “Figure 1” shows.

Figure 1: The proportion of workers engaged in hybrid working has increased since the early days of COVID-19 pandemic

Percentage of working adults by working arrangement, Great Britain, May 2020 to March 2025



Source: Office for National Statistics

Bus Action Plan (BAP)

The draft BAP fails to provide any specific or credible evidence as to how new capacity will be created in the bus network. Nor does it provide any indication of how the target levels of service or subsidy which are explicit in its aims are to be funded.

The BAP lists nine schemes costing between £0.25 million and £1 million each, and eight costing at more than £1 million each. It provides no detailed budgets or completion timetables for any of them. The combined value of investment needed to bring the BAP to fruition is likely to be in the range of £20 – 60 million, according to

ACRA estimates. Yet the City Council has failed to demonstrate any guaranteed sources of funding for such massive programme.

Nationally, there are no precedents for the scale of public transport improvements required by this Plan, not at least on the part of municipal authorities unprepared to tap major new sources of income from schemes such as congestion charging (London) or a workplace parking levy (Nottingham).

All three of the flagship bus schemes described – Fast Buses to Mountfield Park and Merton Park, and the City Hopper Scheme – will suffer from technical design difficulties associated with congestion and restricted road space near the city centre and an unwillingness of the City Council (or apparently the County Council) to re-allocate such road space in the early years of the Plan period.

Funding

The Transport Strategy and BAP seek to rely on three main funding streams:

- S.106 and CIL payments, which are time limited and reliant on developments achieving construction milestones. These milestones have, as demonstrated elsewhere in our response, proven mostly impossible to fulfil as planned in Canterbury District. Nor does the City Council consider what impact such high levels of transport related funding might have on the viability of developments, or on the balance between this strategy and other expectations set out in the overall Local Plan. Without such analysis the Council cannot demonstrate that this fundamental element of a sustainable and deliverable strategy is achievable or will be effective.
- Congestion charging⁵ on vehicles using the inner ring road on a contingent basis and at some future unspecified date. A draft scheme ought to have been included within the draft Transport Strategy and publicly consulted on already, if it could possibly be convincing. Without that, it becomes a non-credible solution.
- Central government funding for bus improvements. Such funding has to be bid for and is outside the City Council's control. It will remain so once local government reorganisation is complete, and the district is part of a much larger Unitary Council with broader geographic responsibilities. It will then also sit under a county-wide mayor specifically tasked with creating and implementing strategic transport policies, including measures for the provision of bus services.

Overall, funding for both the draft Transport Strategy and the draft Bus Action Plan is thus highly uncertain. Accordingly, the City Council cannot demonstrate that

5 Bus Action Plan section 6.11, table 6.4

upgraded bus services, of the type and quality on which it relies to make its touted Transport Strategy work, will ever be delivered.

ANNEX 4

Doubts about air quality in the city of Canterbury

The March 2026 Air Quality Assessment included in the draft Local Plan package of documents represents a change from the City Council's earlier 2024 assessment. That document stated a likelihood that air quality objectives would continue to be exceeded at identified hotspots on the city ring road and some routes leading to it. It found that significant reductions in NO_x emissions (up to 16.4%) would be required to achieve compliance with national limits, let alone desirable reductions in emissions of NO₂ and particulate matter (PM_{2.5} and PM₁₀). The updated 2026 assessment magically presents a more positive conclusion, suggesting that with transport interventions and modal shift, development foreseen in the draft Local Plan would not result in significant adverse effects. This conclusion is highly dependent on the assumptions underpinning Jacobs Scenario DS3, in particular the achievement of a 20% modal shift and accordingly substantial reductions in traffic flows (e.g. reductions exceeding a figure of 1,000 movements in AADT – annual average daily traffic - on key corridors such as the A28 and A2050).

Furthermore, there is a clear inconsistency between the Air Quality Assessment and the Sustainability Appraisal. The Sustainability Appraisal identifies that the Plan's housing, retail and employment growth is likely to have adverse effects on air quality, including:

- Site-specific significant negative effects at locations within the Canterbury Air Quality Management Area (AQMA), including SLAA099 (43–45 St George's Place) and SLAA368 (Land at Military Road)
- Potential negative impacts from carried-forward policies, including development at Holmans Meadow Car Park

- A conclusion that cumulative development within the district and neighbouring authorities is likely to result in adverse effects due to increased vehicle movements

While mitigation is referenced, it is not clearly defined or secured.

Currently it is only possible to undertake a partial assessment of current air quality levels in Canterbury as much of the publicly available data remains out of date. However, based on 2024 data for NO₂. Unadjusted diffusion tube data shows four sites on the A28 within 10% or just exceeding current national limits (CA27 and 41 in Wincheap, CA01 in Broad Street and CA 26 Military Road). All other sites record levels of between 21.2 µg/m³ and 35.2µg/m³, which although below current upper limits in England, they remain significantly above the 10 µg/m³ level recommended by the World Health Organization for the protection of human health. With respect to PM₁₀ and PM_{2.5} monitors installed by the city Council record levels in excess of WHO levels by up to a factor of three. Local monitoring data indicates that only a limited number of sites meet these more stringent guideline levels, and particulate matter concentrations remain a concern at five of the six roadside monitoring station locations.

The draft Plan's air quality strategy is overly dependent on ambitious and insufficiently evidenced assumptions regarding modal shift. Without clear, deliverable, and funded interventions to secure switches to public transport and active travel, there is a significant risk that air quality will not improve as predicted, particularly in identified hotspots and AQMAs. Paragraph 185 of the National Planning Policy Framework requires that planning decisions sustain and contribute towards compliance with relevant limit values and support improvements in air quality. Given the reliance on optimistic modal shift assumptions, the lack of clearly defined mitigation, and the identified adverse effects in the Sustainability Appraisal, ACRA believes the City Council has failed to demonstrate that the Plan will permit achievement of these objectives in practice.

As stated in the main body of this ACRA submission, there is insufficient evidence to demonstrate that such a level of modal shift is realistic or deliverable within the Plan period.