

Revised Regulation 19 Representation

Canterbury District Local Plan 2024/25–2042/43

Representation to Regulation 19 Consultation

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1. Introduction

1.1. I object to elements of the revised draft Canterbury District Local Plan (Regulation 19) 2024/25–2042/43 on the grounds that parts of the Plan are not sound. In particular, the Plan is not justified, not effective, and not consistent with national policy in relation to infrastructure provision, transport, air quality, health infrastructure, affordable housing, and the allocation of several proposed development sites.

1.2. The revised spatial strategy represents a significant shift in development focus toward the southern and eastern parts of Canterbury, including expanded development proposals at Merton Park and land between the A257 and the railway line. These areas were previously identified as unsuitable or problematic due to concerns relating to transport impacts, accessibility, sustainability, and landscape impacts. However, the revised Plan does not provide sufficient strategic justification for this change in spatial approach, nor does it demonstrate that the cumulative impacts of concentrating development in these locations can be satisfactorily mitigated. The Regulation 19 Local Plan fails to meet the requirements of paragraphs 31 and 34 of the NPPF as it does not meet the objective of contributing to the achievement of sustainable development, nor setting out a coherent overall strategy for the pattern, scale and quality of development.

1.3. The Plan also relies heavily on assumptions regarding modal shift, transport mitigation, and infrastructure delivery that are insufficiently evidenced and, in several cases, dependent on interventions outside the direct control of the Council. There is insufficient evidence that the proposed infrastructure required to support growth—including healthcare provision, transport improvements, wastewater infrastructure, and public transport enhancements—will be delivered in a timely or effective manner.

1.4. Furthermore, the Plan does not adequately consider reasonable alternatives, including higher-density brownfield development opportunities within the urban area. Greater emphasis should have been placed on previously identified brownfield sites, including Wincheap Industrial Estate and central Canterbury locations capable of supporting higher-density development consistent with good urban design principles.

1.5. For these reasons, the Plan fails several of the tests of soundness set out in paragraph 35 of the National Planning Policy Framework (“NPPF”).

2. The Plan is Not Positively Prepared

Health and Social Care Infrastructure

2.1. Paragraph 20(d) of the NPPF requires strategic policies to make sufficient provision for health, social care, and other infrastructure. This includes ensuring no detriment to existing and new residents. The draft Local Plan does not demonstrate that adequate healthcare infrastructure will be delivered alongside the scale of growth proposed. No assessment relating to access to health and care services has been included in the Plan. The Health Impact Assessment also fails to adequately assess current health issues, access to services, and inequalities in health

2.2. The draft Plan proposes significant additional housing growth without clear, funded, and deliverable health infrastructure to meet the resulting demand. There is insufficient evidence within the Infrastructure Delivery Plan to demonstrate that necessary improvements to primary care capacity, hospital services, and social care provision will be delivered in step with development or simply met by provision of additional primary care estate. Current local services face additional funding cuts in line with national and local NHS proposals, and primary, secondary and social care services face recruitment problems

2.3. Existing healthcare services within Canterbury and East Kent are already under significant pressure. Current evidence demonstrates:

- high patient-to-GP ratios;
- ongoing workforce shortages;
- increasing waiting times for primary and secondary care services; and
- continuing pressures on acute hospital services.

2.4. Even without additional population growth services in East Kent, including Canterbury, will be under significant pressure from growing demand. East Kent Health Care Partnership serves a population of more than 720,000 including Canterbury. There will be a significant increase among people who are over 65, 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. This will place particular strains on GP, Community, A&E services and social care. East Kent also has 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.

2.5. Despite these existing constraints, the Infrastructure Delivery Plan does not identify clearly funded, phased, and deliverable healthcare interventions sufficient to accommodate

the planned population growth arising from the Plan period. Current NHS plans do not currently demonstrate how current waiting times, poor access, additional staff recruitment can be improved within the Plan's timeframe.

2.6. While the Sustainability Appraisal acknowledges that cumulative development may place pressure on healthcare and community services, the Plan does not include clear mitigation measures, delivery mechanisms, or implementation triggers to ensure adequate provision is delivered in parallel with development.

2.7. Furthermore, the plan does not address significant socio-demographic and, economic inequalities in the Canterbury district. While some factors are listed as contextual ones to influence policies on sustainable Design Strategy for the district there is no reference to these in the Plan nor clarity over specific policies to address, for example, deprivation and social inequality. In order to promote equality and inclusion, there should be early and continuous assessment of how policies impact all groups who are particularly at greater risk of disadvantage and social exclusion such as looked after children, homeless people and rough sleepers, refugees and asylum seekers.

2.8. Paragraph 96 of the NPPF states that planning policies and decisions should aim to achieve healthy, inclusive and safe places - which includes healthcare accessibility. The Plan therefore fails to demonstrate that development can proceed without significant detriment to existing and future residents and is consequently not positively prepared.

3. The Plan is Not Justified

Spatial Strategy and Site Selection

3.1. The revised Plan significantly alters the distribution of development compared with earlier draft versions of the Local Plan, including:

- removal of the large allocation at Blean;
- expanded development at Merton Park; and
- reinstatement of development proposals between the A257 and the railway corridor.

3.2. However, the evidence base has not been comprehensively updated to justify this revised spatial strategy. In particular:

- no updated strategic transport assessment has been undertaken reflecting the revised distribution of growth;
- no clear assessment has been provided of cumulative impacts arising from concentrated development in South and East Canterbury; and

- insufficient evidence has been provided demonstrating that revised allocations represent the most sustainable reasonable alternatives.

3.3. Several proposed allocations were previously identified as unsuitable or problematic due to transport, accessibility, and sustainability concerns. The revised Plan does not adequately explain why these concerns no longer apply.

3.4. As identified in the sustainability assessment, the current plan is likely to result in adverse air quality effects due to increased vehicle movements

Affordable Housing

3.4. The Plan also fails to adequately address identified affordable housing needs within the district. The affordability ratio in Canterbury (9.37 – over 9 times the median wage) - higher than the England and Kent average.

3.5. The Council's own evidence in its 2025 housing needs update, identifies substantial affordable housing need, including significant demand for affordable and social rented homes. However, Policy DS1 proposes affordable housing requirements substantially below identified need, particularly on brownfield sites.

3.6. In addition:

- the proportion of social rented housing proposed is limited;
- student accommodation and other specialist housing developments are no longer required to contribute financially toward affordable housing provision; and
- the Plan does not sufficiently explain why lower affordable housing targets are justified.

3.7. As a result, the Plan is unlikely to meet identified housing needs or reduce existing inequalities relating to housing affordability. Thus the Plan fails to meet the requirement of NPPF paragraph 96 as it does not adequately address inequalities, deprivation and social exclusion.

4. The Plan is Not Effective

Transport Strategy

4.1. The absence of an updated and comprehensive transport strategy is a significant weakness in the revised Plan. The Regulation 19 draft sets out a big modal shift involving 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. The planned growth in housing in the plan would

need to lead to additional conversion in order to achieve the 20% conversion rate – approaching 30%. Evidence suggests that real conversion rates, even where policies aggressively tackle modal shift are between 10 and 15%. Therefore, the current plan proposals are likely to increase journeys taken by car and fail to produce anticipated benefits, reflecting the failure of similar transport policies to date in the 2017 Local Plan.

4.2. The revised spatial strategy introduces substantial additional development in areas already experiencing congestion, particularly:

- the A257 corridor;
- Spring Lane;
- Wincheap;
- the A28 corridor; and
- routes serving South Canterbury.

4.3. The Sustainability Appraisal itself acknowledges that growth at the scale proposed is likely to increase pressure on both the road network and public transport infrastructure.

4.4. The transport mitigation strategy relies heavily on:

- isolated park-and-ride expansion;
- unrealistic assumptions regarding modal shift;
- new distributor roads, including a new rail bridge; and
- future public transport improvements,

without sufficient evidence that these interventions are deliverable, funded, or capable of mitigating cumulative impacts. For example, local bus services are privately provided and there is no 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 leading to disjointed public service transport.

4.5. The Plan adopts a piecemeal approach to transport mitigation focused on individual site allocations rather than a comprehensive district-wide transport strategy.

4.6. The effectiveness of the proposed park-and-ride strategy is particularly uncertain. There is insufficient evidence demonstrating that the proposed interventions would significantly reduce congestion associated with:

- school-related travel;

- cross-city vehicle movements; or
- local commuting patterns.

4.7. Furthermore, several proposed transport interventions remain uncertain in terms of delivery, including:

- the proposed distributor road linking the A257 and A2;
- associated bridge infrastructure;
- wider junction improvements; and
- integration with the wider public transport network.

4.8. The Plan therefore fails to demonstrate that transport impacts can be effectively mitigated during the Plan period.

5. Air Quality

5.1. The Plan's air quality evidence relies heavily upon scenario-based modelling dependent upon substantial modal shift assumptions.

5.2. The March 2026 assessment represents a significant change from the earlier 2024 assessment, which identified that air quality objectives would continue to be exceeded at identified hotspots and that significant reductions in NO_x emissions (up to 16.4%) would be required to achieve compliance with national limits, let alone lead to reductions in NO₂ and particulate matter (PM_{2.5} and PM₁₀).

5.2. The Air Quality Assessment concludes that significant adverse effects can be avoided only under scenarios involving ambitious reductions in vehicle movements and substantial shifts toward sustainable transport modes, which as discussed above are not based on proven or effective strategies. In particular the assessment is based on a 20% reduction in the current level of car journeys which, as argued above would actually require the unrealistic reduction of nearly 30% by the end of the plan period.

5.3. No further modelling is provided to support the changed assessment and insufficient evidence has been provided demonstrating that:

- the required modal shift is realistic;
- the necessary behavioural changes can be achieved;
- supporting infrastructure will be delivered; or

- the Council possesses sufficient control over public transport provision to secure these outcomes.

5.4. The assumptions underpinning the preferred scenario appear particularly optimistic given Canterbury's existing transport network, development pattern, and reliance upon privately operated bus services.

5.5. There is also a significant inconsistency between the conclusions of the Air Quality Assessment and the Sustainability Appraisal, which identifies likely adverse effects arising, for example, from:

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): and

potential negative impacts from carried-forward policies, including development at Holmans Meadow Car Park

5.6. It concludes that cumulative development within the district and neighbouring authorities is likely to result in adverse effects due to increased vehicle movements.

5.7. Existing monitoring data demonstrates that air quality remains a significant concern within Canterbury, particularly along parts of the A28 corridor and within existing Air Quality Management Areas.

5.8. Paragraph 185 of the NPPF requires planning policies and decisions to contribute toward compliance with relevant air quality objectives and support improvements in air quality.

5.9. Given the reliance on uncertain mitigation measures and insufficiently evidenced assumptions regarding modal shift, the Plan does not demonstrate that these objectives will be achieved in practice. With changes in government policy on EVs targets and extension of deadlines for phasing out internal combustion vehicles it is not possible to have confidence in the proposed plan policies and impact on air quality.

5.10. The Plan is therefore not justified, effective, or consistent with national policy in respect of air quality.

6. Site-Specific Objections

Policy C10 – Merton Park

6.1. I object to the proposed allocation at Merton Park.

6.2. The proposed development would result in:

- significant loss of accessible green space;
- harm to biodiversity and landscape character;
- increased traffic congestion; and
- additional pressure on already constrained local road infrastructure.

6.3. The area currently functions as an important recreational and environmental asset for residents of South Canterbury, where access to open green space is already limited.

6.4. Proposed access arrangements via Hollow Lane and Homersham Road raise significant concerns regarding suitability, congestion, and highway safety.

6.5. The Plan also proposes that elements of open space provision could be delivered off-site. Given existing deficiencies in accessible green space within this part of Canterbury, this approach is not justified.

6.6. Furthermore, the site lies within an area previously identified as being of high landscape value. The evidence base does not demonstrate that landscape impacts have been adequately assessed or mitigated.

Policies C15 and C16

6.7. I object to Policies C15 and C16.

6.8. These sites were previously identified as unsuitable for development due to:

- limited accessibility;
- transport constraints;
- difficulties in providing suitable access; and
- landscape concerns.

6.9. The revised Plan does not adequately demonstrate that these concerns have been resolved.

6.10. The proposed mitigation strategy relies heavily on construction of a distributor road and associated transport interventions whose delivery remains uncertain.

6.11. The developments would also result in:

- loss of biodiversity;
- reduction in accessible green space;

- increased traffic movements;
- additional air quality impacts; and
- cumulative environmental harm when considered alongside nearby allocations.

6.12. The Sustainability Appraisal identifies significant negative impacts associated with these sites. The proposed mitigation measures do not adequately address these cumulative effects.

Policy C18 – Wincheap industrial estate

6.13. The policy proposal is to work with the promoters, key stakeholders and the local community, to produce a Supplementary Planning Document to masterplan and facilitate the site's delivery. Yet this site was identified for development in 2007 for 1300 dwellings but not yet progressed and a development plan published following local consultation. IN accordance with NPPF paragraphs 124 and 129, the site has potential to deliver significant housing gain to contribute to meeting local need. The site is accessible to the city centre, shopping and open space and is suitable for high density development. This could relieve pressure on nearby greenfield sites such as C10.

Policy C19 – Former Council Offices

6.13. Greater density should be considered on this central brownfield site.

6.14. The NPPF (paragraph 129) states that local planning authorities should support development that makes efficient use of land, especially brownfield sites (paragraph 124), The proposed density appears relatively low for a sustainable urban location within walking distance of services and public transport.

6.15. Higher-density development while maintaining appropriate design quality and landscaping, could contribute toward meeting housing need while reducing pressure for development on sensitive greenfield sites elsewhere in Canterbury.

7. Conclusion

7.1. The revised draft Canterbury District Local Plan fails several of the tests of soundness set out in paragraph 35 of the NPPF.

7.2. In particular, the Plan:

- is not justified due to insufficient evidence supporting the revised spatial strategy and mitigation assumptions;
- is not effective because key infrastructure delivery mechanisms remain uncertain;

- is not consistent with national policy regarding transport, air quality, health infrastructure, and sustainable development; and
- does not adequately mitigate significant cumulative impacts arising from concentrated development in South and East Canterbury.

7.3. Paragraph 110 of the NPPF states that planning should “promote sustainable transport modes” and “reduce congestion and emissions”. Furthermore, paragraph 114 states that In assessing sites that may be allocated for development in plans the planning authority should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be taken up;
- b) safe and suitable access can be achieved;
- c) any significant impacts... can be cost effectively mitigated...”

7.4 The Council should therefore:

- reconsider the proposed allocations at Policies C10, C15, and C16;
- undertake updated strategic transport modelling;
- provide clearer and deliverable infrastructure commitments;
- Undertake a thorough assessment of health and care needs and impact on current services with a full health impact assessment;
- strengthen affordable housing requirements;
- reassess cumulative environmental impacts; and
- place greater emphasis on sustainable higher-density brownfield development opportunities within the urban area.

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