

[REDACTED]

18th May 2026

I am writing to object to the current incarnation of Canterbury City Council's draft local plan, on the grounds that it fails to comply with the National Planning Policy Framework (NPPF). I am citing just three areas that are of particular concern to me as a local resident, but I know there are many more, which I hope other objectors will highlight.

Firstly: the draft local plan fails to comply with paragraph 20 of the NPPF which, amongst other things, refers to water supply, stating that: *Strategic policies should set out an overall strategy and make sufficient provision for infrastructure for water supply*. With areas of Whitstable having been badly affected by a failure in fresh water supplies in 2025, this is an area of particular concern to me.

At the Canterbury City Council Scrutiny Committee meeting on 4th March 2026 Southeast Water stated that it would struggle to provide water for the increased number of new homes in the draft Canterbury Local Plan. This was reported by Kent Online (part of the Kent Messenger Group) on 14th March 2026.

Policy R24 of the draft Local Plan proposes to build a new reservoir at Broad Oak near Canterbury (something that has been mooted for over fifty years) in an attempt to provide water to cope with the proposed population expansion. However, the new reservoir would use polluted The plan is to fill the reservoir with water pumped from the rivers Great Stour and Little Stour, both of which are polluted. Southeast Water will not answer questions about how they propose to remove chemical pollutants (in particular hazardous PFAS chemicals) from these rivers in order to make the water safe to drink.

It is worth noting that at a meeting of the Canterbury Society on 22nd January 2026, representatives of Southeast Water stated that they do not have money to actually build the reservoir. In view of this, the lack of a plan to deal with river pollution and everything that has gone before, I seriously doubt that the proposed reservoir will ever be built.

Secondly: The draft local plan does not comply with NPPF Policy 39, which requires Local planning authorities *to secure developments that will improve the social conditions of the area*. It fails particularly with regard to the health of the people of Whitstable.

The NHS here is in crisis. The local hospitals trust is being overwhelmed by the increased workload caused by new housing developments in East Kent. In January this year, a Critical incident was declared at the Queen Elizabeth the Queen Mother Hospital in Margate, which serves the people of Whitstable, due to high demand for its services. As from April the East Kent Hospitals Trust has been placed on an Intensive Recovery Programme in an attempt to tackle the ongoing challenges.

The high level of Government-imposed housing targets for East Kent do not provide any new hospitals or even any significant increase in hospital capacity. In respect of health, social conditions are worsening as a result of increasing housing developments.

An ongoing, very concerning issue is the presence of sewage effluent on beaches, in bathing waters and seafood. All the developments proposed for Whitstable will increase the amount of sewage effluent pollution, making use of an outdated system which is already overwhelmed whenever there is just moderate rainfall. Although Southern Water may look to increase treatment capacity at their Swalecliffe sewage works, the overall volume of effluent deposited in the local environment is very likely to increase. Treated effluent may have E Coli and similar biological hazards removed, but it still contains other waste products and probably hazardous chemicals that will be washed back into the shore area by incoming tides and onshore winds. Again, this will cause an even greater worsening of social conditions and, to the shame of the authorities, the likely impacts have never been properly investigated or evaluated.

Another social condition that will undoubtedly be adversely affected by these proposals is mental health and wellbeing. The policies W4 (Brooklands) and W7 (Bodkin Farm) in the draft local plan would remove areas of valued open countryside with networks of rural foot and cycle paths where local residents and visitors alike find peace, tranquillity and an escape from the pressures of everyday life. Residents find these areas and their wildlife beneficial for their mental health. The draft local plan aims to replace these mostly natural amenities with urban development containing few small, semi-urban parks and much reduced natural beauty and biodiversity – the type of environment that so many people have sought to escape by moving to Whitstable. There would be no alternative rural footpaths for local residents within easy walking distance. Just another way that the plan will bring reduced social conditions for local residents.

Lastly: policy W4 would be contrary to NPPF paragraph 135 which states that '*Planning policies should ensure that developments: a) will add to the overall quality of the area. b) are visually attractive and c) are sympathetic to local character*'

In addition, it doesn't comply with paragraph 187 which states '*Planning policies and decisions enhancing valued landscapes.... (in a manner commensurate with their statutory status or identified quality in the development plan) and b) recognising the intrinsic character and beauty of the countryside*'.

The Canterbury Local Plan of 2017, which is still in place, identified Brooklands Farm, Longtye Wood and Convicts Wood as part of the Blean Woods Area of High Landscape Value (AHLV). This followed extensive evaluation in the 1990s. These fields have been farmed for thousands of years and now Canterbury City Council propose to remove the AHLV protection, purely based on erroneous comments in a report they commissioned, as it happens when they decided they wanted to build a housing estate on Brooklands Farm (*Canterbury District Local Landscape Designations Review and Recommendations*, 2021).

The landscape of Brooklands Farm is unique and irreplaceable. It combines Ancient Woodland, traditional hedgerows, traditional cattle-pasture, open wheatfields and a characterful brook, almost all of which can be enjoyed from the two public footpaths that cross the farm. The proposals of the local plan would see a drastic reduction in the overall quality of this largely unspoilt area, would be at best visually mediocre and would destroy the unique local character of the landscape.

David Hancock