

LSRCA Reg 19 draft Local Plan consultation response

Response to consultation on Regulation 19 draft Local Plan.

Littlebourne and Stodmarsh Roads Community Association believes that the Soundness test of the Regulation 19 draft Local Plan is not met because the large proposed East Canterbury Strategic Development Area which consists of C15, C16 and C17 is itself unsound.

C15 and C16 are large greenfield sites, close to the very busy A257 which is a single carriageway with only one lane in each direction. The sites were assessed as unsuitable without the Eastern Movement Corridor (EMC) which formed part of the Regulation 18 draft Local Plan in 2022 (see SLAA 122 and SLAA302)

When the EMC was removed in the draft Local Plan 2024, these sites were removed from that iteration of the Local Plan.

C15 and C16 were reintroduced into the Focused Regulation 18 draft Local Plan in 2025, with the underpinning rationale that a vehicle connection between the A257 (Littlebourne Road) and the A2 at Bridge would alleviate traffic concerns and there would be improved walking and cycling routes and a new Park and Bus facility.

C17 is a small development between existing residential properties and has been refused planning permission in the past due to the unsustainable location. This was assessed as technically unsuitable in the SLAA (2025). It was included in Focused Regulation 18 Local Plan Consultation (2025) and remains in the Regulation 19 draft Local Plan with the rationale that it *could* (direct quote from SLAA346) benefit from the walking and cycling connections proposed as part of the development of C15 and C16.

Sustainability of development on major greenfield sites C15 and C16

The East Canterbury allocations are no longer tied to the delivery of an eastern city bypass (as envisaged in a 2022 version of the draft Plan). Instead, there is a much more limited, and not until 1000 homes have been built, link road from C15 to C16 to go over a new bridge into the South Canterbury urban extension (of 4000 homes, as yet not even started) to issue onto the A2050 (New Dover Road) and a new slip road to the A2, as well as some hoped for bus connections. This would result in the cars from 6,574 homes – 2,574 homes plus 4,000 homes – all issuing on to the A2050 (New Dover Road). Therefore, the original 2022 draft Local Plan justification offered for the sites by the city council in 2022, has been removed, leaving these allocations without a credible or deliverable access strategy. The funding and feasibility for the link road remain highly uncertain because of its reliance on developer funding, which will have to be settled agreed between different developers. In the meantime, how will the very substantial traffic impacts be addressed? There is no convincing assessment of this, nor the inevitable increase in traffic on the A257. Moreover, CF1 (which is implicated in the execution of the vision for CF15 and C16) was already granted outline planning

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permission in December 2022, without any condition for a bridge, a route or land to accommodate any through traffic from north of the railway line. On top of that, 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 and into CF1. There are considerable and expensive hurdles to be overcome. We are only too aware of the problems with the very delayed 'Spine Road' at the development on Littlebourne of the old Howe Barracks, and there are examples around the city of years of delays to the (still not fully financed) Sturry relief road and the extra A2 slip road at Wincheap, as well as the South Canterbury Development (CF1) which does not have a single home built as yet.

The lack of alleviation of traffic on the already busy A257 (which is blighted by lorries and ends in pinch points at the junction of Longport and Lower Chantry Lane, the junction of Lower Chantry Lane and the New Dover Road, and the junction of New Dover Road with the Canterbury ring road) has not been dealt with in the Regulation 19 draft Local Plan. The traffic locally is already due to increase because of sites already granted at St Martin's Hospital (200 homes, not yet started) and the completion of the Taylor Wimpey site at the old Howe Barracks, both a little further west on A257, as well as sites further east on the A257 at Littlebourne (300 homes) and others which are outside of the Canterbury District but will access the A257. There is no alleviation for the increase in the use of already busy 'rat runs' ie through Stodmarsh Road (no pavements) and Fordwich to get to the A28 Sturry Road.

The proposed alleviation is a new Park and Bus facility for 300 cars (which will not help through traffic, lorries or school runs) and improved walking and cycling connections. The distance from C15/C16 to Canterbury West station is just over/under 2 miles, and to the City Centre (the Parade) is over 1.5 miles. These are distances few people choose to walk unless it is for leisure.

Public transport

There is no explanation of how upgrades in public transport services will be achieved, or who will pay. Housing developers will not pay long term to finance bus services, so where is the funding? It is a beautiful vision to have a Bus First aspiration, but where is the evidence that Stagecoach (the current sole operator in Canterbury) is prepared/has the ability to invest money in improvements or provide services that are more than a hub and spoke approach, routing all services in and out of a central bus station?

An expectation in the Reg 19 draft of a 20% 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) is an important assumption in the 2026 draft version of the proposed Transport Strategy. This is not a new idea. It has already been applied in justifications for managing traffic around Canterbury for most of the biggest housing developments so

Commented [1]: Isn't this the other way round – the modal shift assumption is at the heart of the draft LP?

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far permitted under the 2017 Plan. There is no evidence that this has occurred or shows sign of occurring, so this is not a sustainable basis on which to proceed.

There is little prospect that the policies and measures CCC proposes will alleviate the situation on A257. Overall, the plan now tolerates additional congestion at key junctions. The scenario of having the Bus Gate from C16 into Dorset Road and then using Spring Lane means that even if those buses can slowly get through the small roads in the Spring Lane Estate, queuing up with other buses that already use that route, they will rejoin existing pinch points on A257 and then the City 'ring road'.

Protection of Lampen Stream

In the consultation for Focused Regulation 18 draft Local Plan in 2025 Natural England (NE) included these observations:

- protection of the head waters of Lampen Stream is important as it feeds a designated site (both SSSI and RAMSAR).
- a wetland needs to be secured to help mitigate run off(which has been included in Reg 19 version)
- a Wastewater Treatment Works is proposed, so care must be taken over the Lampen Stream water quality
- potential impacts will need to be dealt with at planning permission stage (see p9 of the NE response dated October 20th 2025)

The reedbeds and wetland at Stodmarsh which are separated from the Stour by the Lampen Wall have been protected by this barrier from the damaging effects of the nutrient levels in the Stour. The Lampen Stream feeds these reedbeds and wetland, therefore the quality of the water is of high concern. Anything which imperils this will become an impediment at planning permission stage. Since these solutions are not in evidence currently, C15 is unsound.

Wastewater

The details as to who will manage the Waste Water Treatment Plant (WWTP), how integrity of the Lampen Stream into which run-off would naturally flow, how it will be guaranteed long term, 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 in the Reg 19 draft Local Plan.

Southern Water treatment works off Sturry Road has been for some time and still is at full capacity. No upgrades are scheduled to be commissioned in 2030 at the earliest. Therefore, the draft Local Plan specifies on site WWTP as a solution at many sites,

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including C15 and C16. However, Southern Water has formally expressed the view to the City Council that acquiring future funding for upgrading may not be obtainable if the developers of large sites in the district 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 would backfire onto smaller sites that still need the statutory undertaker to have capacity in order to proceed.

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 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. 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. If there is a delay in completion and commissioning the new reservoir, the shortfall would be much more serious and correspondingly put at risk even more of the envisioned construction. South East Water is still in preliminary stages and will not seek planning consent until 2028 and does not expect to start construction until 2029.

The risk of delays has not been factored into the Reg 19 draft Local Plan, therefore it is unsound.

C17 (Land at Seotamot)

This site has been refused planning permission in the past. It is still unsustainable and has been tagged on to C15 and C16 as part of the East Canterbury Strategic Development with loose wording that it could be connected to the Waste Water Treatment Works in C15/C16 'if feasible' (see p66 of DRAFT CANTERBURY DISTRICT LOCAL PLAN (2042/43) Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012 March 2026). The outline states that it should provide pedestrian and cycling access to C15. It does not mention lack of a continuous footway to and from the City on the A257 but would arise at planning permission stage.

The wastewater and fresh water supply issues described above apply to C17 as well.

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There is no demonstration in the plan that a site of 14 houses will be able to countenance the infrastructure costs necessary to achieve permission.

The deliverability of the site is therefore speculative and contributes to the unsoundness plan.

Final conclusion

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.

LSRCA believes the East Canterbury Strategic Development comprising sites C15, C16 and C17 is an ambitious but unevidenced vision, that the Reg 19 version of the draft Local Plan does not provide the means to solve the obstacles that are already foreseen, that the development will worsen the traffic issues and the vision is unrealistic. Since this strategic development is a major site within the plan, the Reg 19 draft plan is also overall unsound.