

Regulation 19 Representation

Canterbury District Local Plan

Resident Representation Submission

Prepared using publicly available Local Plan evidence documents

Submitted by:

Aaron Cranston

Address:

[REDACTED]

Email:

[REDACTED]

Telephone:

[REDACTED]

Soundness and Legal Compliance Objection

I object to the Draft Canterbury District Local Plan because I do not believe significant parts of the Plan are fully:

- positively prepared,
- justified,
- effective,
- or consistent with national policy.

I also have concerns regarding legal compliance, particularly in relation to cumulative environmental impacts, wastewater and water infrastructure, flood risk, and the reliance upon future mitigation within the Habitats Regulations Assessment ("HRA").

Introduction and Local Context

I have lived in Canterbury district all my life. I was born at Canterbury Hospital in 1993, have lived in different parts of the district, attended school and college locally, worked locally and later got married here.

Over many years, I have seen increasing pressure placed upon:

- roads and congestion,
- healthcare access,
- wastewater and sewage infrastructure,
- public services,
- and the gradual erosion of countryside and green space around parts of the district.

Living in Wincheap, I regularly experience existing congestion and infrastructure pressure around Canterbury city. I also regularly walk the surrounding orchards, fields and open spaces.

These landscapes contribute to biodiversity, local wellbeing, flood resilience and the remaining sense of openness around the city.

However, my objection is not limited to Wincheap alone. My concerns relate to the cumulative impacts of the proposed growth strategy across the district as a whole.

1. Housing Need, Demographics and Infrastructure Balance

I recognise the need for additional housing across Canterbury district, including:

- affordable housing,
- housing suitable for younger people and families,
- accessible housing,
- and accommodation suitable for an ageing population.

However, I am not convinced the submitted Local Plan fully reconciles the findings of the Housing Needs Assessment ("HNA") with the wider infrastructure and spatial strategy proposed.

The Council's own HNA identifies:

- substantial projected growth in the older population,
- increasing disability-related housing need,
- demand for adaptable and accessible homes,
- and the need for additional specialist older persons accommodation and care provision.

The HNA also identifies the importance of ensuring housing is appropriately connected to:

- healthcare,
- public transport,
- local services,
- and accessible infrastructure.

At the same time, significant parts of the Local Plan strategy remain heavily dependent upon:

- large-scale greenfield expansion,
- future transport modal shift,
- and infrastructure improvements which have not yet been fully secured.

There therefore appears to be a disconnect between:

- the demographic and accessibility needs identified within the HNA,
- and aspects of the spatial strategy and infrastructure assumptions underpinning the submitted Plan.

I am not convinced the Plan has fully demonstrated how these objectives will be delivered sustainably alongside existing infrastructure pressures already affecting parts of the district.

2. Transport and Infrastructure Concerns

The Council's own evidence acknowledges existing transport pressure and increasing traffic impacts associated with the proposed growth strategy.

The Air Quality Assessment identifies road traffic emissions as the principal mechanism by which the Local Plan may affect air quality, particularly along key routes including the A2, A28 and A299 corridors.

The Equality Impact Assessment and transport evidence rely heavily upon:

- modal shift,
- increased public transport use,
- active travel uptake,
- and reduced private car dependency.

While these aims are positive, I do not believe sufficient certainty has yet been demonstrated that they can realistically offset the cumulative traffic growth associated with the scale of development proposed.

The transport modelling itself acknowledges that it is strategic in nature and does not resolve detailed site-specific or junction impacts. Further assessment and mitigation would still be required at later stages.

The Health Impact Assessment also acknowledges that worsening congestion and reduced access to GP services may negatively affect health outcomes if infrastructure becomes overstretched.

Taken together, the evidence suggests that significant parts of the Plan remain dependent upon future infrastructure delivery and future behavioural assumptions rather than secured certainty at the point of submission.

3. Water Supply, Wastewater and Sewage Infrastructure

The Sustainability Appraisal consultation responses repeatedly acknowledge concerns regarding:

- wastewater treatment capacity,
- sewage infrastructure,
- Combined Sewer Overflows,
- water quality,
- and the ability of Wastewater Treatment Works to accommodate additional development.

The evidence also states:

“The need for provision of capacity at WwTW commensurate with new development is a Key Sustainability Issue.”

These concerns are particularly important given ongoing public concern across Kent regarding sewage discharges, environmental resilience and long-term water resource pressures.

The evidence base repeatedly refers to future upgrades and mitigation, but I do not believe sufficient certainty has yet been demonstrated regarding the timing, delivery and long-term effectiveness of the required infrastructure improvements.

4. Flood Risk and Climate Resilience

The Sustainability Appraisal site assessments confirm that parts of proposed allocations, including land associated with the Wincheap Park and Ride allocation, fall within Flood Zone 3 and functional floodplain areas.

The site assessments also acknowledge:

- flood constraints,
- ecological concerns,
- Local Wildlife Site impacts,
- and the need for mitigation and Exception Test justification.

The wider evidence base acknowledges increasing pressure associated with:

- climate change,
- rainfall intensity,
- and long-term flood resilience.

I do not believe the Plan has sufficiently demonstrated that the cumulative scale and location of growth proposed is fully compatible with long-term climate resilience and sustainable development principles.

5. Biodiversity, Greenfield Development and Environmental Impacts

The HRA assesses multiple internationally and nationally important environmental sites potentially affected by the Local Plan, including:

- the Blean Complex SAC,
- Ramsar sites,
- wetland habitats,
- and functionally linked ecological land.

The Sustainability Appraisal and consultation responses also acknowledge repeated concerns regarding:

- biodiversity fragmentation,
- habitat loss,
- water quality,
- ecological connectivity,
- agricultural land loss,
- and cumulative environmental impacts.

I am concerned that the Plan remains heavily reliant on greenfield development and countryside release across multiple parts of the district. While some brownfield development is proposed, substantial growth continues to be directed toward greenfield sites despite repeated evidence identifying environmental and infrastructure constraints.

As someone who regularly experiences the landscapes surrounding Canterbury, I believe insufficient weight has been given to:

- countryside character,
- ecological connectivity,
- floodplain function,
- agricultural land,
- and the long-term value of accessible green space.

6. Health and Public Services

The Equality Impact Assessment and Health Impact Assessment acknowledge:

- healthcare access concerns,
- infrastructure pressure,
- air pollution impacts,
- and the need for improved transport and public services.

However, many of the positive outcomes identified rely upon future infrastructure expansion and successful transport changes which have not yet been fully secured.

There remains a risk that existing residents experience worsening congestion, healthcare access and infrastructure strain before mitigation measures are delivered.

Conclusion

I recognise the need for housing delivery and future planning within Canterbury district. However, I do not believe the submitted Local Plan has yet demonstrated that the proposed scale, location and delivery assumptions of growth are fully sustainable, environmentally justified or realistically deliverable.

The Council's own evidence repeatedly identifies:

- transport pressure,
- wastewater concerns,
- flood risk,
- environmental constraints,
- biodiversity impacts,

- infrastructure strain,
- and reliance upon future mitigation and infrastructure delivery.

There also appears to be insufficient alignment between:

- the demographic and accessibility needs identified within the Housing Needs Assessment,
- and aspects of the submitted spatial strategy, infrastructure assumptions and greenfield-led growth approach.

I therefore request that the Planning Inspector carefully examines:

- cumulative infrastructure impacts,
- wastewater and water supply capacity,
- transport deliverability,
- flood resilience,
- environmental impacts,
- housing mix and demographic suitability,
- and whether greater prioritisation of brownfield development and infrastructure-led growth should take place before substantial further greenfield release occurs.

I would also wish to participate in the examination hearing sessions should the Inspector consider my representations raise matters requiring further discussion.

Evidence Base Documents Referenced

- Housing Needs Assessment (HNA)
- Transport Modelling Report
- Air Quality Assessment
- Habitats Regulations Assessment (HRA)
- Sustainability Appraisal (SA)
- Sustainability Appraisal Consultation Responses Appendix
- Equality Impact Assessment (EqIA)
- Health Impact Assessment (HIA)
- Strategic Flood Risk Assessment (SFRA)
- Sustainability Appraisal Appendix G Site Assessments
- Modern Economy Needs Study
- Infrastructure Delivery Plan
- Strategic Land Availability Assessment (SLAA)
- Natural Environment Topic Paper
- Open Space Strategy
- Regulation 19 Submission Guidance

Submitted respectfully by,

Aaron Cranston