
Response on the Draft Canterbury District Local Plan 2026

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This representation submits that parts of the draft Canterbury District Local Plan are unsound because they are not:

- justified by proportionate and up-to-date evidence,
- effective or deliverable over the Plan period,
- or consistent with national policy in the National Planning Policy Framework ("NPPF").

In particular, concerns relate to Policies W3 (Whitstable Urban Area), W4 (Brooklands Farm), W7 (Bodkin Farm), and Policy R24 (Broad Oak Reservoir).

1. Deliverability and Effectiveness – Policies W4 and R24

a. Brooklands Farm (Policy W4)

NPPF paragraphs 16(b) and 36(c) require Local Plans to be deliverable and effective over the Plan period.

Policy W4 requires the developers of Brooklands Farm to deliver a new junction between the A299 New Thanet Way and Chestfield Road / Radfall Hill prior to occupation of 50% of the proposed dwellings. The junction is intended to mitigate congestion on the local road network, particularly the A2990 Old Thanet Way corridor.

However, there is substantial uncertainty regarding whether this infrastructure can realistically be delivered.

The development is heavily dependent upon a major item of highway infrastructure that may be:

- financially unviable,
- technically constrained,
- or delayed indefinitely.

If the junction were not delivered, there is a realistic possibility that the development would stall before completion of the full allocation.

Concerns regarding deliverability are heightened by previous examples where mitigation associated with major housing developments has been delayed or not implemented in a timely manner, including the absence of the proposed bus service associated with

Whitstable Heights (planning application CA/15/01296), despite substantial occupation of the development.

There is also uncertainty regarding the long-term resilience of the A299 New Thanet Way corridor itself. Public reports have identified concerns regarding subsidence and the possibility of highway closures if major remedial funding is not secured.

The cumulative effect of these unresolved infrastructure uncertainties raises serious doubt as to whether Policy W4 is realistically deliverable over the Plan period, contrary to NPPF paragraphs 16 and 36.

b. Broad Oak Reservoir (Policy R24)

NPPF paragraph 20 requires strategic policies to make sufficient provision for infrastructure, including water supply infrastructure.

Southeast Water informed Canterbury City Council's Scrutiny Committee on 4 March 2026 that it may struggle to provide sufficient water supplies to support the scale of development proposed in the draft Local Plan. This was subsequently reported by KentOnline on 14 March 2026.

Policy R24 proposes a new reservoir at Broad Oak intended to support future water supply requirements. However, significant uncertainty remains regarding:

- funding,
- technical feasibility,
- water quality,
- and long-term deliverability.

It is understood that Southeast Water stated at a Canterbury Society meeting on 22 January 2026 that funding for the reservoir had not yet been secured.

In addition, the reservoir proposal appears dependent upon abstraction from the Great Stour as well as the Little Stour. The Council has not provided sufficient evidence regarding:

- baseline PFAS and other chemical contaminant concentrations,
- proposed treatment processes,
- treatment effectiveness,
- regulatory compliance,
- or long-term operational viability.

The Plan therefore does not currently demonstrate, through proportionate evidence, that the proposed water supply infrastructure is deliverable, effective, or capable of operating safely throughout the Plan period.

2. Lack of Adequate and Up-To-Date Evidence

a. Traffic modelling – Chestfield and Swalecliffe

Policies W3, W4 and W7 rely heavily upon strategic traffic modelling. However, the Council's own modelling documentation states that:

"Strategic modelling is not intended to determine the acceptability of individual development proposals."

The Plan therefore relies upon modelling that expressly disclaims suitability for determining detailed local junction impacts, despite major allocations depending upon constrained local junctions.

In particular, the modelling does not adequately assess the likely cumulative impacts associated with:

- two proposed secondary schools,
- increased pedestrian crossings,
- school-related peak-hour traffic,
- and localised congestion around the A2990 / Chestfield Road corridor.

Existing pedestrian crossings near the A2990 / Chestfield Road roundabout already generate congestion capable of blocking adjacent roundabouts at Chestfield and Swalecliffe during peak periods.

The proposed developments would substantially increase both vehicular and pedestrian movements in this constrained area. However, the likely cumulative impacts have not yet been fully assessed.

Furthermore, physical constraints surrounding the junction raise doubt regarding whether meaningful highway capacity improvements are achievable without substantial intervention.

The Council has therefore not demonstrated, through robust and proportionate evidence, that the proposed allocations can be accommodated without severe transport impacts.

b. Pedestrian safety

The draft Local Plan does not appear to contain adequate assessment of pedestrian safety impacts associated with the proposed developments.

At Clapham Hill, there is currently no pedestrian crossing over the A290 despite regular use by local residents, including school children accessing bus stops.

Policies W4, W5 and W7 would substantially increase traffic flows along this corridor. However, the Council has not demonstrated through safety audit evidence that pedestrians, including children and elderly residents, would be able to cross safely during peak traffic periods.

Similarly, Policy W7 is likely to increase use of Chestfield & Swalecliffe railway station by school pupils. The only pedestrian connection between the station platforms is a narrow pavement adjacent to a busy highway beneath the railway bridge.

The Plan does not appear to include adequate evidence assessing:

- projected pupil movements,
- pedestrian capacity,
- accident risk,
- or wider safety implications.

This is particularly concerning given comments reportedly made by British Transport Police in relation to planning application CA/24/00224.

c. Flood risk and climate resilience

NPPF paragraph 161 requires plans to take full account of climate impacts including flood risk, water scarcity and coastal change.

The draft Plan does not appear to adequately assess the implications of:

- sea level rise,
- increased rainfall,
- tidal blocking,
- and coastal change affecting the Swalecliffe Brook catchment.

There are also concerns regarding factual inaccuracies within the Level 1 Strategic Flood Risk Assessment (January 2026), including descriptions of the Swalecliffe Brook catchment and the condition of its coastal outlet.

The Council has therefore not demonstrated that flood risks associated with climate change have been fully and accurately assessed.

3. Environmental and Ecological Impacts

a. Biodiversity and irreplaceable habitats

Policy W4 raises serious concerns regarding compliance with NPPF paragraphs 193(a), 193(b) and 193(c).

Brooklands Farm contains a diverse mosaic of habitats including:

- watercourses,
- damp lowland woodland,
- traditional pasture,
- hedgerows,
- and arable margins.

The proposed allocation would result in substantial loss and fragmentation of open countryside habitats supporting species associated with agricultural landscapes, including skylark and brown hare.

The development would also place substantial recreational pressure upon nearby ancient woodland and the West Blean and Thornden Wood SSSI.

The Council has not demonstrated, through appropriate evidence, that adverse effects upon:

- irreplaceable habitats,
 - protected landscapes,
 - woodland ecology,
 - or the SSSI,
- can be adequately avoided or mitigated.

Concerns include:

- increased recreational disturbance,
- predation from domestic pets,
- lighting impacts,
- noise disturbance,
- and introduction of invasive species through residential activity.

Given the irreplaceable nature of ancient woodland habitats, the precautionary approach required by national policy is particularly important.

b. Landscape character

Policy W4 also conflicts with NPPF paragraphs 135 and 187.

Brooklands Farm forms part of the wider setting of the Blean landscape and contains a distinctive combination of:

- ancient woodland,
- traditional hedgerows,
- pasture,
- arable farmland,
- and historic public footpaths.

The site contributes significantly to local landscape character and to the setting of the Blean Woods.

The proposed allocation would fundamentally urbanise this landscape and substantially diminish its rural character, visual quality and tranquillity.

The Council has not demonstrated that the proposed development would conserve or enhance the intrinsic character and beauty of the countryside as required by national policy.

4. Infrastructure, Health and Environmental Conditions

a. Wastewater and sewage infrastructure

Policies W4 and W7 would generate substantial additional wastewater flows requiring treatment at Swalecliffe Wastewater Treatment Works.

There is significant public concern regarding:

- existing storm overflow events,
- sewage discharges,
- marine pollution,
- and impacts upon bathing waters and coastal ecology.

Although infrastructure upgrades may be proposed, the Plan does not demonstrate that wastewater impacts can be fully mitigated throughout the Plan period.

Increased wastewater volumes also raise wider concerns regarding:

- coastal water quality,
- impacts upon marine habitats,
- and accumulation of chemical pollutants within the marine environment.

The Council has not demonstrated through robust evidence that the proposed scale of development would improve environmental conditions as required by NPPF paragraph 39.

b. Health infrastructure

There are also concerns regarding pressure upon health infrastructure within East Kent.

East Kent Hospitals Trust has publicly acknowledged significant operational pressures, including the declaration of a critical incident at QEQM Hospital in January 2026 and subsequent placement into an Intensive Recovery Programme.

The Plan does not clearly demonstrate how healthcare infrastructure capacity would expand sufficiently to accommodate the cumulative impacts of major housing growth across the area.

c. Loss of accessible countryside

Policies W4 and W7 would result in loss of accessible countryside currently used by local residents for walking, recreation and quiet enjoyment.

The affected landscapes provide opportunities for contact with nature, tranquillity and informal recreation which contribute positively to wellbeing and mental health.

The proposed replacement of extensive rural landscapes with urban development and semi-urban open space would substantially alter the character and recreational value of the area.

5. Sustainability of the Spatial Strategy

Policy W4 also raises concerns regarding compliance with NPPF paragraph 110.

National census data indicates high levels of car dependency in the Chestfield area, particularly for commuting towards Canterbury.

Compared with alternative locations previously considered through the Plan process, including land associated with the University of Kent, Brooklands Farm appears less sustainably located in relation to:

- employment,
- higher-order services,
- public transport accessibility,
- and opportunities for modal shift.

The evidence base does not adequately explain why alternative sites with potentially stronger sustainability credentials were excluded while infrastructure-constrained sites such as W4 were retained.

Conclusion

For the reasons set out above, Policies W3, W4, W7 and R24 are not currently justified, effective, or consistent with national policy.

In particular, the Council has not demonstrated through proportionate and up-to-date evidence that:

- critical transport infrastructure is deliverable,
- water supply infrastructure is deliverable and technically feasible,
- wastewater impacts can be adequately mitigated,
- severe transport impacts can be avoided,
- flood and climate risks have been fully assessed,
- or significant ecological and landscape harm can be prevented.

The cumulative effect of these unresolved issues means that the Plan does not currently satisfy the soundness requirements of the NPPF.

Accordingly, these policies should either:

- be removed from the Plan,
- substantially modified,
- or deferred pending further evidence regarding transport, water supply, wastewater capacity, flood risk, biodiversity impacts and infrastructure deliverability.

Regards,
Christine

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