
Canterbury District Local Plan (Regulation 19) consultation - Objection

From Lucy Martin [REDACTED]
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Dear Sir/Madam

I am writing to formally object to the Regulation 19 Canterbury District Local Plan on the grounds that it is unsound, not justified by evidence, and inconsistent with national policy, particularly in relation to infrastructure, environmental protection, and proportionality of growth.

My objections are set out below.

1. Failure to Demonstrate Deliverable Water and Wastewater Infrastructure (Soundness & NPPF compliance)

There is no robust evidence that adequate water supply or wastewater capacity exists or will be delivered prior to occupation. We have only just come out of a hosepipe ban (February 2026), and sewage overflows are already happening during heavy rainfall. This suggests the system is already under strain.

In addition, South East Water itself has publicly stated that it may “struggle” to supply water for the 23,000 homes proposed in this Plan, following recent outages affecting parts of Canterbury, Whitstable and Herne Bay. That raises serious doubts about whether the level of growth is realistically deliverable.

Reliance on uncertain future upgrades, without clear timing or guarantees, means the Plan is not effective or justified.

2. Unjustified Scale of Housing Growth (Not “Justified”)

The scale of growth (23,000 homes) is disproportionate to identified local need (3,000 on the housing register). The Plan is not supported by proportionate evidence and risks speculative development rather than meeting local affordability needs.

3. Inadequate Transport and Safety Evidence (Not “Effective”)

The Plan is not supported by adequate or credible transport modelling, particularly in known high-risk and constrained areas:

- Chestfield roundabouts: No adequate cumulative assessment, particularly with proposed secondary schools.

- Borstal Hill roundabout: Existing injury record and acknowledged lack of safe pedestrian crossings, yet significant traffic increases are proposed.
- M2 Junction 7 (Brenley Corner): No clear evidence that the severe existing congestion has been properly modelled with proposed growth.

Without robust modelling and mitigation strategies, infrastructure cannot be considered deliverable, meaning the Plan is not effective.

4. Unresolved Public Health Risks – Water Quality (Not Consistent with National Policy)

The proposed Broad Oak reservoir and River Stour abstraction raise serious unresolved issues, including:

- treatment of pollutants such as PFAS (“forever chemicals”),
- lack of evidence on long-term water quality safety.

No detailed, evidence-based assessment has been provided to demonstrate compliance with public health or environmental protection requirements.

5. Increased Sewage Discharge and Coastal Impacts (Not Justified / Not Consistent with NPPF)

The Plan would significantly increase sewage discharges at Swalecliffe, without a clear environmental impact assessment, public health risk analysis, or mitigation strategy. This creates risks for bathing water quality, marine ecosystems and local fisheries.

The absence of clear evidence means the Plan fails both the “justified” and “consistent with national policy” tests.

6. Risk of Unlocking Further Unsustainable Development (Not Positively Prepared)

The Plan enables future infrastructure (including a potential A299 junction) that would open large areas of greenfield land for further development beyond what is currently assessed.

This creates long-term environmental risk, loss of countryside, and incremental development not fully assessed in the Plan.

Such an approach is not positively prepared and fails to provide a clear, controlled, and sustainable strategy for growth.

For the reasons outlined above, the Local Plan is not justified by evidence, not effective in ensuring infrastructure delivery, not consistent with national policy, particularly the NPPF and therefore unsound.

I respectfully urge the Planning Inspector to reject the Plan in its current form and require significant revision so that development is properly evidenced, infrastructure-led, and environmentally safe.

Yours faithfully,
Lucy Stevenson