

From: Karen McKane [REDACTED]
Sent: 15 May 2026 21:12
To: Consultations
Subject: The Draft Canterbury District Local Plan (2042/23) Regulation 19

--Email From External Account--

Dear Sir/ Madam

I am writing with a number of concerns regarding the above Local Plan.

The NPPF paragraph 36 states plans are 'sound' if they are effective (deliverable over the plan period)

On this basis I feel the Canterbury District Local Plan is unsound as there are already problems with current infrastructure (water supply and roads in particular) and no evidence that these can be remedied sufficiently to support the proposed growth in population. South East water has recently itself stated it is unable to meet the proposed increased demand (see [kentonline report 14 March 2026.](#)); the delivery of the proposed new reservoir at Broad Oak (policy R24) is questionable, with no funding identified and no realistic (safe, clean) water source yet identified to supply it (resident objections have raised multiple issues with water contamination of the proposed water source which have not been addressed). The A299, one of the main access roads for three proposed new developments in the Local Plan (W3, W4 and W7), is currently awaiting very serious repair work due to subsidence, including four overbridges, for which funding has not yet been secured nor a timetable identified (see [www.kentonline report 06 May 2026](#)). All of these issues call into question whether the Plan is sound.

The NPPF paragraph 36 also requires plans to be justified ("an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence").

I find the Canterbury District Local Plan seriously lacking in robust evidence in a number of areas. Specifically with respect to sites W4 and W7, the current traffic models are inadequate as they model the two roundabouts and pedestrian crossings separately. What is needed is modelling of the two roundabouts and pedestrian crossings together. There has also been no impact assessment undertaken to assess the capacity of the M2 to accommodate the proposed developments. Save Brooklands campaign team undertook freedom of information requests about this with both KCC (Freedom of Information request reference: 61278093) and National Highways (Freedom of Information request reference FOI2025/02145) which confirmed that neither agency has completed such an assessment.

In addition to the lack of evidence to reassure residents that traffic and safety issues raised are of no consequence I have also not seen adequate evidence to multiple issues raised by residents throughout the development of the Plan, whether relating to infrastructure, environmental impact, health concerns, flood risk and so on. This begs the question as to whether the Canterbury Local Plan development process has been legally compliant. The Statement of Community Involvement ('how we involve stakeholders and communities in the

planning decisions') appears to be nothing more than empty words. I have seen nothing that convinces me that resident concerns have been taken seriously. The repeated refrain in the 'Consultation Response summary' dated February 2026 and running to 142 pages is "The Council has considered these comments as part of its ongoing development of the Local Plan" or even just "Comments noted". The statement is completely inadequate, providing no evidence of relevant discussions or evidence to show how the (multiple) concerns raised were determined to be perhaps irrelevant or of insufficient importance, or how the issues raised were to be addressed. I see that I am not alone in thinking the whole process has been a charade. On page 26 of the Feb 2026 'Consultation Response summary' it is recorded that the Canterbury Society (via Jan Pahl) "*highlighted that members of the Canterbury Society felt that previous comments had no impact on the adopted Local Plan. They stated that this had resulted in widespread disillusion with the process of consultation, at least as far as the Local Plan is concerned....*" In what sense has the local plan process "involved communities in planning decisions?" Is it legally compliant to go through multiple rounds of consultation but to disregard comments and objections raised?

In the penultimate (2024) version of the Canterbury Local Plan two large development sites were proposed. Brooklands Farm (W4 in the final version) and the Blean (site C12 in the 2024 plan). Both sites were strongly opposed by local residents; the number of objections for Brooklands Farm/W4 being greater than the number of objections for the Blean/ C12. And yet the entire C12 site was removed while W4 remains in the Plan. The reasons for this major shift are not transparent; have not been justified, have not been evidenced. This decision appears at best arbitrary, at worst to have been influenced by Councillors protecting their own interests. While nobody wants to see building on any of these much loved green spaces, in Whitstable we are left wondering what influenced this decision, could there not have been some 'compromise' plan (some development on both sites, for example, rather than this 'all or nothing' approach), why development on the C12 Canterbury site was removed from the Plan (arguably with better infrastructure than Whitstable). The owners of the C12 land (University of Kent) are openly moving ahead with plans for development on the site anyway, contributing to the sense that the current Local Plan is meaningless and not fit for purpose.

The recent (05 May 2026) press statement from the Liberal Democrats would seem to confirm the view of residents that the serious, fact based objections they have raised have no influence whatsoever in the decision-making process as the outcome has been largely pre-determined along party political lines. The following is a short extract:

The Liberal Democrat Group has today (Tuesday 5th May) ended its coalition with the Labour Party on Canterbury City Council. This follows unacceptable demands from the Labour Party leadership over the operation of the planning committee including a requirement that councillors would either abstain or not vote against planning applications from the council or linked to housing sites listed in the Local Plan.

Liberal Democrat Group Leader Councillor Mike Sole said: "The Labour leadership asked the Liberal Democrat Group to accept conditions that were incompatible with the proper and independent operation of the planning process..... Planning decisions must be taken lawfully,

on their individual merits, and with an open mind. Members of the planning committee cannot be directed how to vote.....

The full statement can be read on the [Canterbury LibDem website: 'In support of local democracy'](#).

This brings the whole consultation process and the Local Plan itself into question.

For the reasons set out above I hope that independent scrutiny will reject the proposed Canterbury Local Plan as unsound and not being legally compliant.

Thank you for your attention to these concerns.

Yours sincerely

Karen McKane

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