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The current draft of the Canterbury district plan is "Unsound" and "Legally Non-Compliant" for these 3 reasons:

1. INCREASE TRAFFIC CONGESTION

The Council has abandoned the original relief roads plan for a "bus-led" strategy but the Council's Draft Transport Strategy (Table 5.1) admits this will leave the A2/A28 Wincheap interchange and M2 J7 severely congested. Canterbury City Council has not a signed legal agreement (Statement of Common Ground) with National Highways accepting the impending increase in traffic congestion that would be caused. Without this, the plan is legally non-compliant.

2. BROWNFIELD SITES not fully utilised

National policy dictates that all brownfield land must be used before destroying greenfield sites, but the Plan proposes to use the historic green setting of Canterbury to build low-density sprawl at Merton Park. Instead the plan should be aiming to regenerate the Wincheap Retail Estate, city-centre car parks, and vacant student housing into high-density, eco-friendly homes. The draft plan should plan to create accommodation in unused shops and commercial buildings in the city, that would reduce the traffic congestion coming from the proposed developments.

3. ECOLOGICAL CONCERNS - Habitats regulations not being adhered to

The Stodmarsh Nature Reserve is failing due to water pollution, but the Council's brand new March 2026 Habitats Regulations report (Para 5.5.22) explicitly admits they are "uncertain" if the environmental mitigation for these 1,950 homes can actually be delivered! Under UK planning law councils cannot legally approve a plan if you are "uncertain" about its environmental damage.

I do not consider that the draft Plan shows how development in the city can be made with adequate consideration to infrastructure capacity and environmental constraints.

- The huge size and location of proposed developments are too ambitious for the area.
- The Transport Strategy relies on reductions in car use without any clear evidence.
- The pressure on the water supply and wastewater services are already under pressure; numerous emergency water repairs have been causing chaos in the City in 2026.

I do not want to participate in the oral hearings.

Maria Pacan

