The Canterbury Society
Registered Charity Number 1160588
chair@canterburysociety.org.uk

May 2026

Consultations Team
Canterbury City Council
consultations@canterbury.gov.uk

Canterbury Society Response to the Regulation 19 Local Plan Consultation

Dear colleagues,

The Canterbury Society welcomes the opportunity to comment on the Regulation 19 Draft Local Plan.

Approach to this submission

This submission builds directly on our Regulation 18 response. At that stage, we raised concerns regarding infrastructure capacity, environmental constraints and the need for a more evidence-led approach to growth. We recognise that the Council has undertaken further work since then, including updates to the Infrastructure Delivery Plan, Sustainability Appraisal and Habitats Regulations Assessment. However, our review of the Regulation 19 evidence indicates that the central issue remains unresolved.

This representation is structured to assist the examination of soundness under paragraph 35 of the National Planning Policy Framework.

- Appendix A identifies the key Matters and Issues for Examination, framed to support a focused and effective examination process
- Appendix B provides detailed policy-by-policy commentary in response to the consultation questions
- Appendix C consolidates recommendations into a small number of themes to demonstrate that the issues identified are systemic rather than isolated
- Appendix D includes our Regulation 18 submission for reference and continuity

This structure is intended to separate detailed technical critique from the key examination questions, while making clear how the issues identified relate to the statutory tests of soundness.

Key soundness issue

The Society's primary concern is:

The Plan does not demonstrate, through quantified and proportionate evidence, that development can be delivered in alignment with infrastructure capacity, environmental constraints and regulatory limits.

This issue runs through the Plan as a whole and is not confined to individual policies. Recent delivery evidence and infrastructure constraints reinforce this concern. Past completion rates, delays to strategic sites, and the timing of critical infrastructure (particularly wastewater treatment and water supply) indicate that delivery is contingent on factors which are not yet resolved or secured. The Plan does not clearly demonstrate how these dependencies have been accounted for within the housing trajectory or how risks of delay will be managed.

In particular, the Plan:

- does not sufficiently evidence baseline infrastructure capacity, utilisation or residual headroom across key systems
- does not demonstrate that infrastructure will be delivered in step with development, with clear phasing, triggers or contingency
- relies on assumptions relating to behavioural change, viability and future mitigation which are not secured or evidenced at plan-making stage

As a result, the Plan does not demonstrate that it is:

- Positively Prepared, in that it does not show that needs can be met within constraints
- Justified, as the strategy is not supported by a robust and proportionate evidence base
- Effective, as deliverability is not demonstrated
- and in some areas, not fully consistent with national policy, particularly where regulatory or environmental limits apply

In parallel, the Plan does not demonstrate that it will deliver housing that meets local affordability conditions. The gap between identified need and the proposed tenure mix, combined with the operation of viability, introduces a material risk that the Plan delivers housing which does not meet the needs of the community it is intended to serve.

The Society recognises that plan-making operates at a strategic level and does not require full engineering resolution of all constraints. However, proportionate and place-specific evidence is still required to demonstrate a reasonable prospect that infrastructure capacity and environmental limits will not be exceeded.

Issues carried forward from Regulation 18

The concerns raised at Regulation 18 remain materially unchanged.

While the evidence base has evolved, the Plan continues to rely on:

- high-level or strategic modelling without demonstrating capacity at the level required to support allocations
- infrastructure planning frameworks which identify requirements but do not demonstrate delivery
- reliance on future funding, programmes and mitigation rather than confirmed and aligned provision

In key areas, including transport, water supply, wastewater and community infrastructure, the Plan does not demonstrate that constraints have been resolved at the plan-making stage.

Focus of our detailed representations

Our detailed representations focus on the following areas:

- **Infrastructure strategy and delivery** (Policies SS6 and DS15)
  Whether the Plan demonstrates that infrastructure will be delivered in step with development
- **Transport strategy and evidence** (Policies SS5 and DS17)
  Whether the Plan reflects observed travel behaviour and demonstrates that network capacity exists
- **Water supply and wastewater infrastructure** (Policy DS12)
  Whether development can be accommodated within known regulatory and environmental limits
- **Housing delivery and trajectory** (Appendix 6)
  Whether delivery assumptions are realistic and aligned with infrastructure provision
- **Monitoring and intervention** (Chapter 9)
  Whether the Plan includes mechanisms to identify and respond to emerging constraints
- **Affordable housing** (Policy DS1)
  Whether the policy aligns with identified need and provides certainty of delivery in the context of viability

Across these areas, the consistent issue is that the Plan identifies ambition but does not demonstrate deliverability.

The Society recognises the scale of work undertaken in preparing the Local Plan and supports the objective of planning positively for the district's future.

However, in its current form, the Plan does not demonstrate that development can be delivered in alignment with infrastructure capacity and environmental constraints. The issues identified are not isolated but systemic, and go to the heart of the Plan's soundness.

We therefore consider that further work is required to provide a clear, capacity-led and deliverable framework before the Plan can be found sound.

Yours sincerely,

Dave Wilson
Chair

Guy Mayhew
Deputy Chair

John Walker
Deputy Chair

Enc.
Appendix A: Key Matters and Issues for Examination
Appendix B: Formal Commentary by Policy
Appendix C: Schedule of Recommendations/Observations by Theme
Appendix D: Regulation 18 Submission

Appendix A: Key Matters and Issues for Examination

This appendix identifies the principal matters and issues arising from this representation which are considered central to the examination of soundness under paragraph 35 of the National Planning Policy Framework.
It is not intended to replicate the detailed submission, but to assist in focusing the examination on the key questions of infrastructure capacity, deliverability and alignment with growth.

Matter	Issue	Key Question for Examination
1. Spatial Strategy and Infrastructure Alignment (SS6)	**1.1** Growth vs infrastructure capacity	Has the scale and distribution of growth been informed by quantified infrastructure capacity, including baseline provision, utilisation and residual headroom across key systems?
	1.2 Deliverability of infrastructure strategy	Does Policy SS6 and the IDP demonstrate that infrastructure will be delivered in step with development, including clear phasing, triggers and contingency?
	2.1 Evidence base robustness	Has transport modelling (2019 baseline) been validated against observed data (2022–2025) and the Council's own Origin–Destination evidence, including the concentration of demand within peak periods and the dominance of inbound and cross-boundary travel patterns?
	2.2 Network capacity and headroom	Does the Plan demonstrate available network capacity and the ability to accommodate additional demand within already constrained peak periods, taking account of the network's radial structure and concentration of demand on key corridors and destination nodes?
2. Transport Strategy (SS5, DS17)	**2.3** Plan-level vs application-stage resolution	Are key issues (junction capacity, safety, local impacts) resolved at plan stage, or deferred to development management, and what are the implications for soundness?
	2.4 Deliverability of interventions	Are proposed transport measures (bus, park and ride, active travel) funded, deliverable, and supported by clear evidence that they will achieve the level of modal shift assumed?
	2.5 Alignment of strategy with travel behaviour	Do the proposed transport interventions (including modal shift, active travel and bus priority) align with the observed structure of travel demand, including concentrated inbound flows, cross-boundary trips and reliance on radial corridors?

Matter	Issue	Key Question for Examination
3. Water Supply and Wastewater	**3.1** Water supply capacity	Does the Plan demonstrate sufficient water supply, given evidence of no headroom and reliance on infrastructure not expected until the mid-2030s?
	3.2 Wastewater capacity	Is there a quantified understanding of flows, permit limits, headroom and exceedance points across the plan period, and how these align with the timing of housing delivery?
	3.3 Alignment with regulatory programmes	Is Local Plan growth aligned with WRMP and DWMP investment cycles, including confirmed schemes, delivery timing and funding, and what are the consequences if delivery is delayed?
4. Infrastructure Delivery Framework (DS15)	**4.1** Capacity vs funding approach	Does the Plan demonstrate infrastructure capacity, or primarily rely on mechanisms to fund infrastructure?
	4.2 Phasing and safeguards	Are there enforceable triggers linking development to infrastructure, including mechanisms to prevent development proceeding without capacity, and how are cross-site infrastructure dependencies coordinated and secured?
5. Monitoring Framework (Chapter 9)	**5.1** Monitoring capacity and performance	Does the framework monitor infrastructure capacity and headroom, rather than just development activity?
	5.2 Intervention mechanisms	Are there defined thresholds and triggers for intervention where infrastructure constraints emerge?
6. Housing Trajectory (Appendix 6)	**6.1** Realism of delivery	Are the assumed delivery rates, including sustained delivery in excess of 2,000 dwellings per annum, justified by past completion trends, lead-in times for strategic sites, and evidence of build-out rates?
	6.2 Alignment with infrastructure	Is housing delivery clearly linked to infrastructure capacity, phasing and dependencies?
	6.3 Delivery risk and flexibility	Does the trajectory include appropriate allowances for slippage, non-delivery and infrastructure delay, and is there a clear mechanism to respond if delivery falls below forecast?

Matter	Issue	Key Question for Examination
7. Climate and Water Efficiency (DS12)	**7.1** Water demand vs supply	Does the Plan demonstrate that water demand (including 110 l/p/d standard) aligns with available supply and infrastructure constraints?
	7.2 Carbon standards	Is “net zero carbon ready” clearly defined, measurable and enforceable?
8. Habitats Regulations Assessment	**8.1** Certainty of conclusions	Does the HRA demonstrate, beyond reasonable scientific doubt, no adverse effect on site integrity?
	8.2 Mitigation and in-combination effects	Are mitigation measures clearly identified, secured and tested at plan level?
9. Sustainability Appraisal	**9.1** Justification of strategy	Does the SA demonstrate that the chosen spatial strategy is the most appropriate when tested against reasonable alternatives, including the extent to which brownfield-led options have been fully and consistently assessed?
	9.2 Site selection consistency	Is there a clear and consistent methodology linking site appraisal to allocation decisions?
10. Affordable Housing (DS1)	**10.1** Alignment between identified need and tenure mix	Does Policy DS1 provide a tenure mix that is aligned with objectively assessed affordable housing need, particularly in relation to Social Rent?
	10.2 Certainty of delivery in the context of viability	Does Policy DS1 provide sufficient certainty that the intended affordable housing tenure mix, particularly Social Rent, will be delivered in practice, given the operation of viability provisions?
	10.3 Delivery alongside development (phasing and triggers)	Does the policy ensure that affordable housing, including Social Rent, will be delivered in step with market housing?
	10.4 Justification of overall provision levels	Is the proposed level of affordable housing provision (15%–30%) justified by the available evidence, including viability testing across different site typologies?

Matter	Issue	Key Question for Examination
11. Historic Environment (DS30)	**11.1** Plan-level assessment of heritage capacity and deliverability	Does the Local Plan demonstrate, at plan-making stage, that site allocations are capable of being delivered without unacceptable harm to heritage assets and their settings?
	11.2 Cumulative impacts and the World Heritage Sites	Has the Plan assessed and resolved cumulative impacts on the historic environment, including the World Heritage Site and its setting, at plan-making stage?
	11.3 Effectiveness of policy mechanisms in practice	Does the policy provide effective and reliable mechanisms to manage cumulative change to the historic environment?
Overall	Plan-wide deliverability	Does the Plan demonstrate, through quantified evidence, that infrastructure capacity exists or will be delivered in time to support the proposed growth?

The recommendations required to address these matters are consolidated in Appendix C.

THE CANTERBURY SOCIETY
PAST • PRESENT • FUTURE

Appendix B: Formal Commentary by Policy

Table of Contents

Chapter 1: Spatial Strategy

Policy SS5: Movement and Transportation Strategy for the district			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes

Soundness Commentary:

Policy SS5 sets out a strategy centred on modal shift, public transport enhancement and active travel. While consistent with national policy in principle, it does not demonstrate that the proposed approach is deliverable or capable of supporting the scale and distribution of growth (**Effective, Positively Prepared**). The policy therefore fails the tests of being Positively Prepared, Justified and Effective.

The strategy relies heavily on a reduction in private car use, but does not demonstrate that this level of behavioural change is achievable in the district context (**Justified**, **Effective**). The Council's own transport modelling confirms that these reductions are applied as assumptions rather than evidenced outcomes. The Do Something (DSx) scenarios apply a blanket 10% (DS2) and 20% (DS3) reduction in car trips and are explicitly described as tests of the "direction of travel… rather than predictions of what will definitively occur". There is no evidence presented that these levels of modal shift are realistic, deliverable, or supported by funded interventions (**Justified**, **Effective**).

The modelling also does not demonstrate that the strategy mitigates the impacts of growth. Under the growth scenario (DS1), the inclusion of Local Plan development "introduces additional traffic… leading to increased delays on links and higher LoS at junctions", with journey time increases observed across multiple routes including Routes 1, 2, 3, 8 and 12. Under the Transport Strategy scenario (DS2), the reallocation of road space and assumed modal shift results in traffic rerouting and increased pressure on key corridors, with significant journey time increases remaining. For example, Route 2 experiences increases of up to 80% in the AM peak and 92% in the PM peak, with similar increases on other routes including Route 12 (up to 53%). Even under the higher modal shift scenario (DS3), where a 20% reduction in car trips is assumed, significant delays persist and key corridors continue to experience substantial increases in journey times. This demonstrates that the strategy redistributes pressure within a constrained network rather than resolving underlying capacity limitations (**Effective**).

The transport modelling is presented as being based on a 2019 baseline. However, the underlying demand matrices are derived from the Kent Transport Model and adjusted using growth factors and a furnessing process, rather than being fully rebuilt from recent observed origin–destination data. The Plan does not set out when this data was last comprehensively refreshed. Given that key components originate from earlier survey programmes, there is a risk that the model reflects historic travel behaviour adjusted to match 2019 flows, rather than

Policy SS5: Movement and Transportation Strategy for the district			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes

current observed patterns (**Justified**, **Effective**).

This is significant in the context of observed network performance. Monitoring undertaken by Kent County Council (SMART-Lenz, 2022–2025) shows that approximately 25–26% of daily traffic occurs within a three-hour peak period, with sustained demand throughout the day. This indicates that the network already operates with limited temporal flexibility. The Plan does not demonstrate that additional trips can be accommodated within these peak periods or that the assumed modal shift would materially reduce demand (**Effective**, **Justified**).

The evidence base also does not establish existing network capacity or headroom (**Justified**). There is no quantified assessment of how much additional demand the network can accommodate, nor any identification of thresholds beyond which performance deteriorates. While the modelling identifies a number of network "hotspots", including the A28 Thanington Road corridor, Wincheap Roundabout, Sturry Road/Kingsmead Road and M2 Junction 7, these are described only as "a starting point for further investigation" rather than evidence of resolved capacity. Without a clear understanding of baseline capacity and future thresholds, it is not possible to conclude that the transport network can support the proposed level of growth (**Effective**, **Positively Prepared**).

This limitation is acknowledged in the Council's own evidence. At the Canterbury City Council Overview Committee on 5 March 2026, officers confirmed that the Regulation 19 transport evidence is based on a strategic model which "doesn't go into the micro looking at individual junctions", and that detailed issues such as junction capacity, pedestrian safety and local impacts are addressed at the planning application stage. Officers further accepted that there is a "disconnect" between plan-level modelling and development management assessment, and that sites considered to have the "potential to be acceptable in highway terms" may still need to "change significantly" or could "fail" if issues cannot be resolved (**Effective**).

The modelling evidence reinforces this position. It explicitly states that identified "hotspots" are indicative and require further work, and recommends additional micro-simulation (VISSIM) and junction modelling (LinSig) to assess performance and identify mitigation. This confirms that key elements of the transport strategy remain unresolved at plan-making stage, including how capacity constraints at critical junctions will be addressed (**Effective**, **Positively Prepared**).

In addition, the strategy depends on infrastructure and service improvements that are not secured or funded (**Effective**). Bus service

Policy SS5: Movement and Transportation Strategy for the district			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes

enhancements, priority measures, park and ride expansion and active travel schemes are identified, but many lack confirmed funding, delivery mechanisms or clear timescales. There is no defined linkage between infrastructure delivery and the phasing of development, and no trigger points linked to network performance or demand thresholds (**Effective**).

The evidence base does not adequately explain travel behaviour or how the network functions in practice (**Justified**). The Plan relies on long-standing assumptions that the majority of traffic is locally generated, including the widely cited estimate that approximately 87% of traffic on the A28 ring road has an origin or destination within the city. However, this metric is derived from historic modelling and reflects a broad classification of trip interaction with the city, rather than actual destination behaviour. It does not distinguish between trips terminating in the city centre, trips circulating within the network, or longer-distance movements passing through or across the district. In the absence of updated empirical validation, reliance on this assumption is not justified (**Justified**, **Effective**).

Observed evidence indicates a materially different pattern of network use. Analysis combining inbound traffic flows with inferred destination activity (based on car park occupancy change) shows that only 15.65% of inbound traffic results in a car park arrival. Even allowing for unobserved destination activity, this suggests that a substantial proportion of traffic is not explained by city centre destinations. The proportion is highly time-dependent, peaking at around 59% in the late morning but falling to near zero during the afternoon peak. This indicates that peak period congestion is dominated by movements that are not associated with city centre parking demand. The Plan does not explain this divergence or demonstrate how the transport strategy responds to these different demand profiles (**Justified**, **Effective**).

The Council's own origin–destination (OD) analysis from the DS1 model reinforces this position. It shows that traffic movements are highly concentrated and directional, with strong radial flows converging on a limited number of corridors and nodes, including New Dover Road / Old Dover Road, Sturry Road / Northgate, and Wincheap. Across multiple corridors, a small number of destination zones account for a large proportion of trips, often exceeding 40–50%, with origins extending beyond the district, including Thanet, Sandwich and the wider rural hinterland.

Combined, this evidence indicates that the network operates as a series of constrained radial corridors carrying a mix of local, cross-boundary and non-destination-based movements. The Council's own OD analysis shows strong directional flows converging on a limited number of nodes, with a significant proportion of trips originating outside the district. This is critical, as longer-distance and

Policy SS5: Movement and Transportation Strategy for the district			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes

cross-boundary trips are typically less capable of switching to walking, cycling or local bus services. However, the Plan applies modal shift assumptions uniformly across all trips, without distinguishing between trip types, distances or origins. It therefore does not demonstrate that the required behavioural change is achievable in practice (**Justified**, **Effective**).

In the absence of a clear and up-to-date understanding of travel behaviour, including the proportion of destination versus non-destination movements and the role of cross-boundary demand, the Plan does not provide a robust evidential basis for its transport strategy (**Justified**, **Effective**, **Positively Prepared**).

Taken together, the policy sets out a strategy based on assumed behavioural change and future infrastructure provision, but does not demonstrate that:

- sufficient transport capacity exists (**Positively Prepared**, **Effective**);
- the required modal shift is achievable (**Justified**, **Effective**);
- the transport strategy mitigates the impacts of growth rather than redistributing them (**Effective**);
- infrastructure will be delivered in step with development (**Effective**); or
- impacts can be mitigated at plan stage (**Effective**).

As a result, it is not demonstrated that the transport strategy can effectively support the proposed growth (**Effective, Positively Prepared)**. While some matters are appropriately addressed at application stage, the Plan does not demonstrate that there is a reasonable prospect that these issues can be resolved without undermining delivery.

Policy SS5: Movement and Transportation Strategy for the district			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes

Recommendations:

To make the policy sound, the Plan should:

- **R1)** Incorporate recent observed traffic data (including 2022–2025 monitoring) to validate modelling assumptions and demonstrate current network performance;
- **R2)** Demonstrate that assumed modal shift is realistic and deliverable, including how it will be achieved through funded and enforceable measures.
- **R3)** Provide a quantified assessment of transport network capacity, including peak-period constraints and clear thresholds for when impacts become unacceptable.
- **R4)** Identify mitigation for all forecast network “hotspots” and demonstrate that residual impacts are acceptable without reliance on unproven behavioural assumptions.
- **R5)** Set out a clear and deliverable infrastructure strategy, including funding, timing and alignment with the phasing of development.
- **R6)** Introduce enforceable triggers linking development to transport network performance and the delivery of required mitigation.
- **R7)** Demonstrate that the spatial distribution of development reflects realistic transport capacity constraints.

Without these changes, Policy SS5 relies on assumed behavioural change and unresolved mitigation, and does not demonstrate that the transport strategy will support the planned growth. It therefore fails the tests of Positively Prepared, Justified and Effective.

Legally Compliant	Yes

Legal Commentary:

No specific issues of legal compliance are identified.

Policy SS6: Infrastructure Strategy for the district			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

Soundness Commentary:

Policy SS6 is central to the soundness of the Local Plan as it is intended to demonstrate that infrastructure will be delivered in step with growth. It identifies a wide range of infrastructure requirements and refers to the Infrastructure Delivery Plan (IDP) as the mechanism for delivery. However, it does not provide sufficient evidence to demonstrate that infrastructure capacity exists or will be delivered in alignment with the scale and timing of development (**Effective**, **Positively Prepared**, **Justified**). As a result, the policy fails the tests of Positively Prepared, Justified, Effective and Consistent with National Policy.

The policy is framed around the assumption that infrastructure will be delivered “at the right time” to support growth. However, this timing is not defined and is not supported by clear evidence or enforceable mechanisms (**Effective**). The reliance on the IDP does not address this issue, as the IDP itself does not provide a robust, capacity-led or deliverable framework (**Effective**, **Justified**).

The Statements of Common Ground reinforce this position. While they demonstrate ongoing engagement with infrastructure providers and neighbouring authorities, they confirm that key strategic matters remain under development rather than resolved (**Effective**, **Justified**). In particular, transport impacts on the A2/M2 corridor are subject to further modelling, infrastructure requirements are not fully defined or costed, and several infrastructure areas rely on future programmes or strategies not yet complete at Regulation 19 stage. This introduces uncertainty as to whether infrastructure constraints have been fully understood and addressed in a way that ensures deliverability of the Plan (**Effective**). It also indicates that key elements of infrastructure provision have not been sufficiently defined at Regulation 19 stage to allow their impacts to be properly assessed and evidenced as deliverable through the plan-making process (**Effective**, **Justified**).

In particular:

- **Infrastructure capacity and headroom**
  The policy lists infrastructure requirements but does not demonstrate:

Policy SS6: Infrastructure Strategy for the district			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

- existing baseline capacity (**Justified**)
- current utilisation level (**Justified**)
- residual headroom (**Justified**)
- the point at which infrastructure becomes constrained (**Effective**, **Positively Prepared**)

This is a critical omission across key sectors. Evidence from statutory providers indicates that:

- there is no available headroom in potable water supply, with planned growth exceeding WRMP24 assumptions and major new supply infrastructure not available until at least the mid-2030s (**Effective**, **Positively Prepared**)
- wastewater infrastructure operates within fixed regulatory limits, but no quantified headroom or alignment with housing growth is provided (**Effective**, **Justified**)
- there is no modelling of GP or primary care capacity (**Justified**)
- education provision is expressed in high-level terms without detailed capacity analysis (**Justified**)
- there is no quantified assessment of open space or community infrastructure requirements (**Justified**)

In transport terms, this absence of capacity evidence is also clear. As set out in the assessment of Policy SS5, observed traffic data indicates that demand is already highly concentrated within limited peak periods, and the Plan does not demonstrate that sufficient network headroom exists or that modelling assumptions reflect current conditions (**Effective**, **Justified**).

The policy therefore does not demonstrate a clear understanding of infrastructure capacity as required by national policy (**Justified, Consistent with National Policy**).

- **Reliance on the Infrastructure Delivery Plan**

The policy depends on the IDP to demonstrate delivery. However, the IDP:

- includes multiple schemes with undefined scope, cost or funding (**Effective**)
- uses broad timing categories without clear phasing (**Effective**)
- relies on future identification of infrastructure requirements (**Justified**)
- does not include enforceable delivery triggers linked to development (**Effective**)

Policy SS6: Infrastructure Strategy for the district			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

In addition, the IDP does not define capacity thresholds or performance baselines, including for the transport network, and is not linked to observed infrastructure behaviour (**Justified**, **Effective**). There is no clear evidence of how identified infrastructure responds to real-world demand conditions (**Justified**).
This represents a deferral of evidence rather than a demonstration of deliverability (**Effective**, **Justified**).

- **Delivery and phasing of infrastructure**
  The policy does not establish a clear relationship between development and infrastructure delivery (**Effective**). It does not define:
  - how infrastructure provision is linked to occupation (**Effective**)
  - what triggers will be used to control development (**Effective**)
  - what happens if infrastructure is delayed (**Effective**)

  There are no clear phasing mechanisms or contingency arrangements (**Effective**). While the transport strategy refers to a "vision and validate" approach, this relies on post-adoption monitoring and adjustment rather than setting out clear, pre-defined triggers or safeguards within the Plan itself (**Effective**).
  In transport terms, there are no triggers linked to network performance, traffic demand or peak period capacity, and no mechanism to respond if actual demand exceeds modelled assumptions (**Effective**).
  As a result, development may proceed without assurance that supporting infrastructure will be in place (**Effective**, **Positively Prepared**).
- **Reliance on future funding and coordination**
  The policy assumes that infrastructure will be delivered through a combination of:
  - developer contributions under s106
  - CIL funding
  - infrastructure provider investment

  However:
  - many infrastructure schemes are outside the control of the Council (**Effective**)

Policy SS6: Infrastructure Strategy for the district			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

  - funding is uncertain and not fully secured (**Effective**)
  - delivery programmes (such as water industry investment cycles and strategic highways schemes) are not aligned with the Local Plan trajectory (**Effective**, **Positively Prepared**)

  This introduces significant delivery risk which is not addressed in the policy (**Effective**).

- **Viability and infrastructure provision**
  The policy states that infrastructure requirements have been tested for viability and that deviations will only be accepted in limited circumstances. However, the wider policy framework of the Plan, in particular Policy DS15 (Infrastructure Delivery) and the operation of viability provisions (including those within Policy DS1), indicates that policy requirements are subject to viability assessment at application stage (**Effective**, **Justified**).
  Policy DS1 explicitly allows for viability considerations to influence delivery in accordance with Policy DS15, confirming that requirements are not fixed at plan stage but may be adjusted where viability constraints are demonstrated. However, the Plan does not define how competing requirements, including infrastructure provision, are to be prioritised in such circumstances (**Effective**).
  In the absence of clear prioritisation, safeguards or minimum delivery thresholds, this creates a risk that infrastructure provision is reduced or delayed where viability constraints arise (**Effective**, **Positively Prepared**).
  This introduces uncertainty as to whether infrastructure will be delivered in step with development, as delivery becomes contingent on viability rather than being secured through a plan-led, capacity-based framework (**Justified**, **Effective**).
- **Relationship between growth and infrastructure**
  The policy does not demonstrate that the scale or distribution of development has been informed by infrastructure capacity (**Justified**, **Positively Prepared**). There is no evidence that:
  - infrastructure constraints have shaped the spatial strategy (**Justified**)
  - alternative, infrastructure-led growth scenarios have been tested (**Justified**)

Policy SS6: Infrastructure Strategy for the district			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

In transport terms, the Plan does not clearly evidence the origin–destination composition of traffic, meaning it is not possible to determine how much demand is through-movement versus destination-based (**Justified**). This limits the ability to demonstrate that proposed interventions are appropriately targeted (**Justified**, **Effective**).
Instead, infrastructure is expected to respond to a predetermined level of growth (**Positively Prepared**, **Justified**).

- **Evidence maturity and unresolved strategic matters (SoCG)**
  The Statements of Common Ground indicate that several key infrastructure issues remain under active development, including:
  - further transport modelling on the A2/M2 corridor
  - reliance on infrastructure schemes not yet confirmed or funded through national programmes
  - infrastructure strategies (for example, sports provision) not yet complete at Regulation 19 stage

  While this is consistent with an ongoing plan-making process, it means that key elements of infrastructure delivery are not yet sufficiently defined to demonstrate that the Plan is deliverable (**Effective**, **Justified**). The SoCGs therefore evidence engagement, but do not demonstrate that strategic infrastructure constraints have been resolved or aligned with the scale and timing of growth (**Effective**, **Positively Prepared**).

Overall, Policy SS6 sets out infrastructure ambition without demonstrating infrastructure capacity or deliverability. It relies on future engagement, unconfirmed funding and undefined delivery mechanisms, and does not demonstrate that infrastructure will be provided in step with development (**Effective**, **Positively Prepared**, **Justified**). Taken together, the absence of clear evidence on infrastructure capacity, delivery, phasing and contingency introduces a level of uncertainty that undermines confidence in the Plan's overall deliverability.

Policy SS6: Infrastructure Strategy for the district			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

Recommendations:

To make the policy sound, the Plan should:

R8) Provide a quantified assessment of infrastructure capacity and headroom across all key sectors
R9) Demonstrate alignment between housing growth and infrastructure capacity, particularly for water supply, wastewater and transport network performance
R10) Reconcile modelled transport assumptions with observed network behaviour
R11) Include evidence on origin–destination patterns to support targeted intervention.
R12) Introduce clear phasing and occupation triggers linking development to infrastructure delivery
R13) Identify secured funding sources and delivery mechanisms for key infrastructure
R14) Include contingency planning where infrastructure delivery is uncertain or delayed
R15) Ensure that the spatial strategy is informed by infrastructure capacity rather than relying on post-adoption mitigation

Without these changes, the policy does not demonstrate that development will be supported by adequate infrastructure and therefore does not meet the requirements of soundness.

Legally Compliant	Yes

Legal Commentary:

No procedural or legal deficiencies are identified, however, the issues raised relate to the absence of sufficient evidence on infrastructure capacity, the lack of demonstrable deliverability and reliance on future mechanisms and assumptions which are matters of soundness rather than legal compliance.

Chapter 6: District-wide Strategic Policies

Policy DS1: Affordable housing			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes

Soundness Commentary:

Policy DS1 establishes the affordable housing requirement, including overall provision levels and tenure mix. While consistent with national policy in principle, it is not sound when assessed against the tests of Positively Prepared, Justified and Effective.

The most significant issue is the mismatch between identified need and the proposed tenure mix. The Housing Needs Assessment (2025) identifies that approximately 80% of affordable housing need is for affordable or social rent. However, the policy requires only 10% Social Rent, with 60% delivered as Affordable Rent. The Plan does not demonstrate that this tenure mix will meet identified need, particularly for households requiring Social Rent (**Justified**, **Positively Prepared**).

The policy also operates within a viability-led framework. Paragraph 6.7 and criterion 6 allow for the tenure mix and level of provision to be adjusted where viability constraints are demonstrated in accordance with Policy DS15. In such circumstances, the policy prioritises delivery of the overall affordable housing quantum over the tenure mix. This means that the delivery of Social Rent is not secured at plan stage and may be reduced at application stage (**Effective**).

As a result, affordable housing outcomes are dependent on site-specific viability rather than being fixed in relation to identified need. The Plan does not define how trade-offs between policy requirements will be resolved where viability constraints arise, which reduces certainty that the intended tenure mix will be delivered (**Effective**).

The policy also does not include clear mechanisms to secure delivery of affordable housing in step with development. There are no defined phasing requirements or safeguards to ensure that affordable housing, including Social Rent, is delivered alongside market housing (**Effective**).

Policy DS1: Affordable housing			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes

In addition, the Plan does not demonstrate that the chosen level of affordable housing provision (15%-30%) represents the most appropriate balance when tested against available viability evidence, particularly across different site typologies. This limits the justification for the policy approach (**Justified**).

More fundamentally, the policy risks delivering housing that does not reflect local affordability conditions. The evidence base identifies a high level of need for genuinely affordable housing, particularly Social Rent, yet the delivery mechanism is dependent on viability and market-led provision. In practice, this creates a risk that the Plan delivers a volume of housing that does not meet the needs of households it is intended to serve. While the operation of the land and development market is not controlled by the Local Plan, the Plan is still required to demonstrate that its policies provide a realistic prospect of meeting identified needs. This is not clearly evidenced.

Overall, the policy does not demonstrate that:

- tenure mix is not secured in a way that ensures identified need will be met in practice;
- Social Rent delivery will be secured;
- outcomes will be consistently delivered in the context of viability; or
- delivery will occur in step with development.

As a result, it is not demonstrated that the policy will effectively meet affordable housing needs over the plan period.

Policy DS1: Affordable housing			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes

Recommendations:

To make the policy sound, the Plan should:

- **R16)** Align the tenure mix more closely with identified need, including increasing the proportion of Social Rent, supported by clear evidence
- **R17)** Provide stronger policy clarity on the application of viability, including how and when deviations from tenure requirements will be accepted
- **R18)** Define how trade-offs between affordable housing and other policy requirements will be resolved where viability constraints arise
- **R19)** Introduce mechanisms to secure delivery of affordable housing in step with development, including phasing and occupation triggers
- **R20)** Demonstrate that the overall level of provision has been appropriately tested and optimised against viability evidence across different site types

Legally Compliant	Yes

Legal Commentary:

No specific issues of legal compliance are identified in relation to the policy itself.

Policy DS12: Net zero carbon ready and water efficiency			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

Soundness Commentary:

Policy DS12 establishes a framework for reducing carbon emissions and improving water efficiency. While it addresses relevant environmental objectives, it is not sound when assessed against the tests of justification, effectiveness and consistency with national policy.

The policy does not demonstrate that water demand arising from development can be accommodated within available supply, nor that carbon standards are defined in a way that is enforceable and deliverable over the plan period (**Effective**, **Justified**, **Consistent with National Policy)**.

The most significant issue relates to water efficiency. The policy requires residential development to meet the optional Building Regulations standard of 110 litres per person per day. This reflects a baseline regulatory requirement rather than the level of supply–demand constraint identified in the district (**Justified**). Evidence from the statutory undertaker indicates that there is no available headroom in the supply–demand balance, that planned growth exceeds WRMP24 assumptions, and that major supply-side infrastructure is not expected to be operational until at least the mid-2030s (**Effective**, **Positively Prepared**). The Plan does not demonstrate that a 110 l/p/d standard is sufficient to offset the scale of proposed growth within this context (**Justified**, **Effective**).

The policy does not sufficiently evidence the total water demand arising from development, nor does it demonstrate how reductions in per capita consumption translate into system capacity or headroom (**Justified**). There is no alignment between demand reduction, infrastructure delivery timelines, or water resource planning assumptions (**Effective**, **Justified**).

There is also no linkage between water demand and infrastructure provision. The policy does not require development to demonstrate that sufficient supply capacity exists, and does not link occupation or phasing to the delivery of water infrastructure (**Effective**). This is a critical omission given that growth is planned to come forward in advance of new supply schemes (**Effective**, **Positively Prepared**).

Policy DS12: Net zero carbon ready and water efficiency			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

In relation to carbon, the requirement for development to be “net zero carbon ready” is not clearly defined as a measurable or enforceable standard (**Effective**, **Consistent with National Policy**). The policy does not specify a measurable or enforceable standard and relies on supporting guidance and future verification. This introduces uncertainty and limits effective implementation (**Effective**). In addition, requirements such as EPC A rating, BREEAM ‘Excellent’ and whole-life carbon assessment are subject to feasibility and viability caveats, reducing certainty and consistency in delivery (**Effective**, **Justified**).

Overall, the policy sets out design expectations but does not demonstrate that water demand and carbon impacts can be managed within existing or planned infrastructure constraints (**Effective**, **Justified**). It therefore does not demonstrate that development is deliverable in environmental terms (**Effective**, **Positively Prepared**).

Recommendations:

To make the policy sound, the Plan should:

- **R21)** Align water efficiency standards with the level of water stress and demonstrate that proposed standards are sufficient at plan scale.
- **R22)** Quantify the relationship between development, water demand and available supply, including alignment with WRMP assumptions.
- **R23)** Link water demand to infrastructure provision through clear phasing and occupation triggers.
- **R24)** Provide a clear and enforceable definition of “net zero carbon ready”
- **R25)** Reduce reliance on open-ended viability and feasibility exemptions to improve certainty and deliverability.

Policy DS12: Net zero carbon ready and water efficiency			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No
Legally Compliant	Yes		
Legal Commentary:			
No specific issues of legal compliance are identified in relation to the policy itself.			

Policy DS15: Infrastructure delivery			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

Soundness Commentary:

Policy DS15 is the principal mechanism through which the Local Plan seeks to ensure infrastructure is delivered alongside development. While it establishes a framework for securing developer contributions, it is not sound when assessed against the tests of justification, effectiveness, positive preparation and consistency with national policy.

The policy does not demonstrate that infrastructure capacity exists or will be delivered in step with the scale and timing of development proposed (**Effective**, **Justified**, **Positively Prepared**). The Statements of Common Ground reinforce this concern. While they demonstrate engagement with infrastructure providers and other authorities, they confirm that key infrastructure issues remain under development rather than resolved at the Regulation 19 stage (**Effective**). This position was confirmed during the Canterbury City Council Overview Committee, where officers acknowledged that key infrastructure evidence at Regulation 19 stage is strategic in nature and does not resolve detailed capacity or deliverability issues (**Effective**). In relation to transport, officers stated that the strategic model "doesn't go into the micro looking at individual junctions" and accepted that there is a "disconnect" between plan-level modelling and the detailed assessment undertaken at planning application stage (**Effective**). While some matters are appropriately addressed at application stage, the Plan does not demonstrate that there is a reasonable prospect that these issues can be resolved without undermining delivery. Officers further confirmed that developments may need to "change significantly" or could "fail" if issues cannot be resolved at that stage. While expressed in transport terms, this reflects a broader approach within the Plan, whereby critical infrastructure constraints are not resolved at plan-making stage but deferred to later processes (**Effective**, **Positively Prepared**). This is equally evident in relation to water infrastructure, where capacity limits and delivery mechanisms are not demonstrated within the Plan (**Effective**, **Justified**).

Transport modelling on key corridors remains subject to further work, infrastructure requirements and mitigation are not fully defined or costed, and several infrastructure strategies rely on future programmes or evidence not yet complete (**Effective**, **Justified**). This indicates that infrastructure delivery mechanisms are not yet sufficiently certain or aligned with the Plan trajectory (**Effective**).

Policy DS15: Infrastructure delivery			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

In particular:

- **Lack of capacity-led evidence**
  The policy relies on the Infrastructure Delivery Plan (IDP), which does not sufficiently evidence baseline infrastructure capacity, residual headroom, or system tipping points across key sectors (**Justified**, **Effective**).
  - **Transport**
    This lack of capacity-led evidence is particularly evident in relation to transport.
    Observed traffic data collected by Kent County Council (SMART-Lenz, 2022–2025) demonstrates a consistently compressed demand profile. Across the dataset, the three busiest hours of each day account for approximately 26% of total daily inbound traffic (mean 26.0%, median 25.9%, with a narrow interquartile range). This indicates that demand is highly concentrated within a short peak period and that the network operates with limited temporal capacity and little flexibility to absorb additional trips (**Justified**, **Effective**).
    Further analysis of observed flows alongside inferred destination demand indicates a weak relationship between inbound traffic and local trip ends. This suggests that a significant proportion of movements are not explained by local destination demand and may comprise through traffic or redistribution within the network (**Justified**).
    However, the Plan does not demonstrate that these observed demand patterns have been understood or incorporated into the transport strategy (**Effective**, **Justified**). In particular, it does not provide:
    - an updated Origin–Destination understanding of traffic movements; or
    - evidence that additional trips arising from growth can be accommodated within already constrained peak periods (**Effective**, **Justified**).

    Instead, the evidence base relies on modelling derived from a 2019 baseline (Sweco), without demonstrating that these assumptions have been validated against current observed conditions (**Justified**).

Policy DS15: Infrastructure delivery			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

As a result, the Plan does not demonstrate that transport capacity exists, or that infrastructure interventions are aligned with the actual composition and timing of demand (Effective, Justified). This is a fundamental evidential gap, as it is not shown that the transport network can accommodate growth or that the strategy is appropriately targeted (**Effective**).
Further detail on transport evidence and implications is set out under Policy DS17.

- **Wastewater**
  For wastewater, Southern Water's Drainage and Wastewater Management Plan (DWMP) identifies existing and forecast capacity constraints across the Canterbury catchments, including treatment works operating at or approaching permitted limits, increasing flows driven by growth, and network pressures such as infiltration (**Justified**). However, the Plan does not present:
  - current flows against permitted Dry Weather Flow limits;
  - forecast flows over the plan period;
  - residual headroom;
  - or the point at which capacity is exceeded (**Justified**, **Effective**)
- **Potable Water**
  For potable water, South East Water's WRMP24 indicates a tight supply-demand balance within the relevant Water Resource Zone (WRZ8), with limited or no available headroom once uncertainty is taken into account (**Justified**). The Plan does not demonstrate that sufficient supply capacity exists to meet the proposed level of development, nor how this will be secured (**Effective**, **Positively Prepared**).

- **Deferral to post-adoption mechanisms**
  The policy defers key elements of delivery to post-adoption mechanisms, including a future Infrastructure Funding and Delivery Programme. The timing, funding and coordination of infrastructure provision are not defined at plan-making stage, and are instead left to future agreement (**Effective**). This represents a deferral of delivery detail rather than a demonstration of deliverability, creating a

Policy DS15: Infrastructure delivery			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

clear and unmitigated risk that infrastructure provision will not align with the scale and timing of development (**Effective**, **Positively Prepared**).

- **Absence of enforceable triggers**
  There are no clear or enforceable infrastructure triggers (**Effective**). Although the policy refers to managing occupation in line with infrastructure provision, it does not specify when infrastructure must be delivered relative to development (**Effective**).
  In transport terms, there are no triggers linked to:
  - traffic demand levels
  - network performance
  - exceedance of capacity assumptions

  This creates a risk that development proceeds ahead of infrastructure (**Effective**). No equivalent triggers are defined for water infrastructure, despite the existence of fixed regulatory limits on wastewater discharge and potable water supply (**Effective**, **Consistent with National Policy**).
- **Reliance on uncertain funding and viability**
  The policy relies heavily on developer contributions through Section 106 and the Community Infrastructure Levy. However, infrastructure delivery is subject to viability constraints, and significant elements of the IDP remain unfunded or "to be confirmed" (**Effective**, **Justified**). This means infrastructure provision is dependent on scheme viability rather than identified need (**Justified**).
- **Misalignment with regulated infrastructure systems**
  The policy does not account for the regulatory nature of key infrastructure systems (**Justified**, **Effective**):
  - Wastewater capacity is constrained by permit limits
  - Water supply is governed by Water Resource Management Plans
  - Transport outcomes depend on wider network behaviour and external investment

  There is no evidence that these frameworks align with the Local Plan trajectory, and no contingency where infrastructure delivery is delayed or does not perform as assumed (**Effective**, **Positively Prepared**).

Policy DS15: Infrastructure delivery			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

- **"Living document" approach to evidence**
  The IDP is presented as a "living document", which is appropriate for monitoring but does not address the requirement to demonstrate deliverability at plan-making stage (**Effective**). The policy therefore relies on future clarification rather than current evidence (**Effective**, **Justified**).
- **Water infrastructure constraints (wastewater and potable supply)**
  Water infrastructure operates within fixed regulatory and environmental limits. In Canterbury, these constraints are evidenced within statutory undertaker plans rather than being theoretical (**Justified**). Southern Water's DWMP identifies treatment and network constraints, including fixed Dry Weather Flow permits (e.g. 20,176 m³/day at Canterbury WWTW) and localised system pressures such as infiltration and surcharge (**Justified**).
  Despite this, the Plan does not sufficiently evidence utilisation or residual headroom, does not identify capacity at critical assets, and does not provide a defined programme of wastewater upgrades aligned to the timing of growth (**Justified**, **Effective**). Nor does it include phasing or occupation controls linking development to infrastructure delivery (**Effective**).
  A similar issue arises for potable water. The WRMP confirms limited headroom and reliance on major supply schemes not expected until the mid-2030s (**Justified**). The Plan does not demonstrate how supply will be maintained in advance of these schemes (Effective, Positively Prepared).
  As a result, while evidence confirms that water infrastructure is already operating under constraint, the Plan does not translate this into a capacity-led delivery framework or demonstrate alignment between growth and infrastructure provision (**Effective**, **Justified**).
- **Unresolved infrastructure positions (SoCG)**
  The Statements of Common Ground indicate that:
  - key transport impacts remain subject to further modelling
  - infrastructure schemes are dependent on funding and national programmes not yet confirmed
  - some infrastructure evidence will not be available until after submission

Policy DS15: Infrastructure delivery			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

While this reflects ongoing cooperation, it means that the infrastructure required to support development is not yet fully defined, secured or aligned with the housing trajectory (**Effective**, **Positively Prepared**).

As a result the policy establishes mechanisms for funding infrastructure but does not demonstrate that infrastructure capacity exists, or that it will be delivered in a timely and coordinated manner alongside development (**Effective**, **Justified**). In transport terms, the Plan does not demonstrate that modelling assumptions reflect observed conditions or that the network can accommodate growth in practice (**Effective**). This is particularly acute for water infrastructure, where capacity is constrained by regulatory limits and long-term investment programmes, and where the Plan does not demonstrate that these constraints can be resolved within the plan period or aligned with the housing trajectory (**Effective**, **Positively Prepared**).

Recommendations:

To make the policy sound, the Plan should:

R26) Provide a quantified, capacity-led assessment of infrastructure (baseline capacity, utilisation and residual headroom), particularly for:
- water supply (including supply-demand balance within Water Resource Zones);
- wastewater (including flows vs permitted limits and forecast exceedance);
- transport;

R27) Demonstrate that infrastructure provision aligns with the scale and timing of development, including:
- clear phasing;
- enforceable occupation triggers;

R28) Demonstrate alignment between:
- observed transport behaviour (including recent traffic data);
- modelled assumptions;

R29) Align growth with known infrastructure constraints, including:
- wastewater permit limits;
- water supply capacity;

Policy DS15: Infrastructure delivery			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

R30) Demonstrate alignment between Local Plan growth and water company investment programmes (DWMP and WRMP), including confirmed schemes, funding and delivery timelines;
R31) Define Infrastructure Funding and Delivery Programmes at plan stage, rather than deferring them to post-adoption;
R32) Introduce clear triggers linked to infrastructure capacity, including mechanisms to prevent development proceeding where capacity is not available;
R33) Provide contingency measures where infrastructure delivery is uncertain or dependent on external investment;
R34) Reduce reliance on viability-based reductions in infrastructure provision.

Legally Compliant	Yes

Legal Commentary:

The policy is legally compliant in procedural terms, but fails the soundness tests due to the absence of a capacity-led infrastructure evidence base and clear delivery mechanisms.

Policy DS17: Active and sustainable travel			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No
Soundness Commentary:			

Policy DS17 promotes active and sustainable travel through design-led requirements, including walking, cycling, public transport accessibility and reduced reliance on private vehicles. While aligned with national policy in principle, it is not supported by sufficient evidence to demonstrate that the approach is deliverable or capable of accommodating the scale of development proposed. The policy therefore fails the tests of being Justified, Effective and Consistent with National Policy.

The policy relies on a significant shift away from private car use but this is not supported by observed travel patterns, which show strong inbound and cross-boundary trip demand concentrated on a small number of corridors or how it will be delivered through funded and enforceable interventions (**Justified**, **Effective**). There is no quantified evidence of the scale of modal shift required, nor any assessment of whether the transport network can accommodate growth on this basis (**Justified**, **Effective**).

Observed evidence indicates that the network is already operating with limited capacity. Monitoring undertaken by Kent County Council (SMART-Lenz, 2022–2025) demonstrates a consistently compressed demand profile, with the three busiest hours of each day accounting for approximately 26% of total daily inbound traffic (mean 26.0%, median 25.9%). This indicates that demand is highly concentrated within a short peak period and that the network has limited temporal flexibility to absorb additional trips (**Justified**, **Effective**).

The Plan does not demonstrate that additional trips arising from development can be accommodated within these already constrained peak periods, nor that the assumed modal shift would materially reduce peak demand (**Effective**, **Justified**).

Further analysis of observed traffic flows alongside inferred destination demand (derived from car park occupancy changes) indicates a weak relationship between inbound movements and local trip ends. Destination activity is concentrated in a late morning to midday period, while inbound traffic remains elevated into the afternoon and evening. This divergence, when considered alongside origin–destination patterns

Policy DS17: Active and sustainable travel			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

showing strong inbound flows not aligned to local destination peaks, indicates that a significant proportion of traffic comprises movements or trips to dispersed or external destinations (**Justified**).

The Council's own origin–destination analysis from the Do Something (DS) 1 model provides further evidence of how the network functions in practice. This shows that movements are highly concentrated and directional, with strong inbound flows converging on a small number of destinations within Canterbury, particularly the New Dover Road/Old Dover Road corridor, Sturry Road/Northgate, Wincheap and the City Centre. Across multiple corridors, a small number of destination zones account for a substantial proportion of trips, in some cases exceeding 40-50% individually. Origins are similarly concentrated, with a significant proportion of trips originating from outside the district, including Thanet, Sandwich and the coastal belt, as well as from the rural hinterland.

This demonstrates that the network operates as a set of radial corridors funnelling demand into constrained nodes, rather than a distributed network capable of absorbing or dispersing additional demand. The Plan does not demonstrate how active travel or public transport interventions can materially alter these patterns, particularly for longer-distance and cross-boundary trips where modal shift is inherently more limited (**Justified, Effective**). The OD evidence therefore confirms that the policy's reliance on localised, design-led interventions is not aligned with the dominant structure of travel demand within the district (**Effective**, **Justified**).

Instead, the evidence base relies on transport modelling derived from a 2019 baseline (Sweco), based on assumed travel patterns and behavioural change. The Plan does not demonstrate that these assumptions have been validated against current observed conditions or that they reflect how the network is functioning in practice (**Justified**).

The policy also relies on infrastructure and services that are not secured (**Effective**, **Positively Prepared**). The requirement for development to be located within 400 metres of a "frequent bus service" is not supported by evidence that such services exist at the required scale or will be sustained over the plan period, and no mechanism is provided to secure long-term service provision (**Effective**, **Consistent with**

Policy DS17: Active and sustainable travel			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

National Policy). Similarly, interventions such as mobility hubs and enhanced active travel infrastructure are not defined in operational, funding or delivery terms (**Effective**).

Critically, the policy does not link development to infrastructure delivery (**Effective**). There are no enforceable triggers, phasing requirements or performance thresholds tied to network capacity or demand (**Effective**). Off-site mitigation is left to negotiation at application stage, rather than being defined through a coordinated, plan-led framework (**Effective**, **Positively Prepared**).

As a result, the policy describes a design-led approach to sustainable travel but does not demonstrate that:

- transport capacity exists to accommodate growth (**Effective**, **Justified**)
- modal shift assumptions are realistic (**Justified**)
- the transport strategy is aligned with the actual composition and timing of demand (**Justified**, **Effective**); or
- infrastructure and services will be delivered in step with development (**Effective**, **Positively Prepared**).

This represents a fundamental evidential gap, as the Plan does not demonstrate that its transport strategy is based on an accurate understanding of how the network is used (**Justified**, **Effective**).

Policy DS17: Active and sustainable travel			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

Recommendations:

To make the policy sound, the Plan should:

- **R35)** Provide a quantified assessment of transport network capacity, including peak-period constraints, baseline utilisation and available headroom, to demonstrate that growth can be accommodated.
- **R36)** Demonstrate that transport modelling assumptions reflect current observed conditions, including the Council's own Origin–Destination evidence on concentrated inbound and cross-boundary travel patterns.
- **R37)** Quantify the level of modal shift required to support the proposed growth and demonstrate that it is realistic, particularly in the context of longer-distance and radial trip patterns.
- **R38)** Demonstrate how the proposed active travel and public transport interventions will materially influence dominant travel patterns, rather than relying on generalised design principles.
- **R39)** Link development to clear, enforceable infrastructure delivery mechanisms, including phasing, occupation triggers and performance thresholds tied to network capacity.
- **R40)** Identify how public transport provision, particularly bus services, will be funded, delivered and sustained over the plan period.

Without these changes, the policy does not demonstrate that transport impacts will be effectively managed or that the network can accommodate growth.

Legally Compliant	Yes

Legal Commentary:

No specific issues of legal compliance are identified in relation to the policy itself.

Policy DS30: Historic environment and archaeology			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes

Soundness Commentary:

Policy DS30 sets out a comprehensive framework for the conservation and management of heritage assets, including designated and non-designated assets, conservation areas, archaeology and the UNESCO World Heritage Site. The policy is broadly consistent with national policy in principle. However, it does not demonstrate that the approach is justified or effective in the context of the Local Plan as a whole, as it relies on project-level assessment rather than plan-level evidence to demonstrate deliverability.

The policy is structured as a development management framework, requiring Heritage Statements and Heritage Impact Assessments to assess and mitigate impacts on a case-by-case basis (**Effective**). While this approach is consistent with national policy, it does not demonstrate at plan-making stage that site allocations are capable of being delivered without unacceptable harm to heritage assets or their settings (**Justified**, **Effective**).

The supporting Heritage Topic Paper reinforces this limitation. It identifies the presence of heritage assets and potential impacts but explicitly relies on high-level assessment and defers detailed evaluation to the planning application stage (**Justified**, **Effective**). As a result, the Plan does not demonstrate that heritage impacts have been resolved, or that development can be accommodated within the capacity of the historic environment.

The policy allows for both less than substantial harm and, in certain circumstances, substantial harm where this can be justified by public benefits (**Consistent with National Policy**). However, the Plan does not demonstrate that the scale and distribution of development proposed would avoid or appropriately manage such harm in practice (**Justified**). There is no quantified assessment of the capacity of heritage assets or their settings to accommodate change, nor any framework for assessing cumulative impacts across multiple allocations (**Justified**, **Effective**).

Policy DS30: Historic environment and archaeology			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes

Soundness Commentary:

In relation to the World Heritage Site, the policy requires Heritage Impact Assessments in line with UNESCO guidance and refers to the need to consider cumulative impacts on Outstanding Universal Value. However, the Plan does not demonstrate that such cumulative impacts have been assessed or resolved at plan-making stage (**Effective**, **Consistent with National Policy**). Instead, this is deferred to future assessment, which introduces uncertainty as to whether impacts can be mitigated.

The policy relies on supporting guidance and development management controls, including design guidance and applicant-led assessment, to manage impacts. However, there is no evidence within the Plan that these mechanisms are sufficient to manage cumulative change or prevent incremental harm, particularly within sensitive areas such as the World Heritage Site and its setting (**Effective**). This reliance on downstream assessment reflects a reactive, case-by-case approach rather than a plan-led strategy.

Evidence from recent streetscape interventions within Canterbury demonstrates that, in the absence of a clear and coordinated policy framework, change occurs by default rather than by design. Correspondence between Kent County Council and Canterbury City Council shows that, without defined local guidance on heritage-sensitive design and replacement, statutory undertakers revert to standard solutions permitted under national frameworks. This has resulted in incremental and avoidable harm to the character and setting of the historic environment, including within the World Heritage Site and its Buffer Zone. This demonstrates that reliance on general policy and application-stage controls is not sufficient to manage cumulative change in practice (**Effective**, **Consistent with National Policy**).

Overall, Policy DS30 provides a framework for assessing heritage impacts but does not demonstrate that the Local Plan is deliverable in heritage terms. The issue is not that all impacts must be fully resolved at plan stage, but that the Plan does not demonstrate that there is a reasonable prospect that impacts can be mitigated without unacceptable harm.

Policy DS30: Historic environment and archaeology			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes

Soundness Commentary:

As a result, the policy:

- does not demonstrate that heritage impacts have been resolved at plan-making stage (**Justified**, **Effective**)
- relies on case-by-case assessment rather than a capacity-led framework (**Effective**)
- does not assess cumulative impacts, including on the World Heritage Site (**Justified**, **Effective**)
- depends on mechanisms that are not shown to be effective in practice (**Effective**)

Without these elements, Policy DS30 does not demonstrate that the Plan will conserve the historic environment while accommodating the proposed scale of growth, and therefore fails the tests of soundness.

Policy DS30: Historic environment and archaeology			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	Yes
Soundness Commentary:			
Recommendations:			
To make the policy sound, the Plan should: **R41)** Provide proportionate, plan-level evidence of heritage sensitivity and capacity for change to demonstrate that impacts have been properly assessed. **R42)** Demonstrate that site allocations are deliverable in heritage terms, with key constraints addressed at plan stage rather than deferred to application stage. **R43)** Assess cumulative impacts on the World Heritage Site and its setting, demonstrating that Outstanding Universal Value will be preserved. **R44)** Strengthen the relationship between Policy DS30 and site allocations by clearly defining how development parameters respond to heritage constraints **R45)** Reduce reliance on application-stage assessment by establishing how heritage impacts are addressed in principle through the Plan **R46)** Be supported by clear, up-to-date design and public realm guidance, and appropriate mechanisms (including Article 4 Directions where necessary), to ensure that routine works and incremental change do not result in cumulative harm to heritage assets and their settings **R47)** Demonstrate that heritage considerations have informed the spatial strategy and distribution of growth			
Legally Compliant	Yes		
Legal Commentary:			
The policy appears to be legally compliant.			

Chapter 9: Monitoring Conditions

Monitoring indicators			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

Soundness Commentary:

The monitoring framework sets out a range of indicators relating to development activity, policy compliance and wider trends. It broadly reflects a standard Authority Monitoring Report approach.

However, it is not sound because it does not provide a mechanism to assess whether the Local Plan is deliverable, particularly in relation to infrastructure capacity and timing (**Effective**, **Justified**). It therefore fails the tests of justification, effectiveness and consistency with national policy.

The central issue is that the framework monitors activity rather than capacity and system performance (**Effective**). It records outputs such as permissions granted or schemes delivered but does not assess whether infrastructure systems can accommodate development or whether they are operating within limits (**Effective**, **Justified**). Nor does it provide a reliable evidence base to inform plan review or future plan-making (**Effective**).

In particular, the framework does not include any indicators that measure infrastructure capacity, utilisation or residual headroom across key sectors, including potable water, wastewater, transport, health and education (**Justified**, **Effective**). This is a critical omission given that these systems operate within defined physical or regulatory limits (**Justified**). For example, wastewater is constrained by permitted discharge limits and network capacity, while transport evidence shows that approximately 25% of daily traffic is concentrated within a three-hour peak period (SMART-Lenz, 2022–2025), indicating limited available headroom (**Justified**). The monitoring framework does not track these constraints or how they change over time (**Effective**).

Monitoring indicators			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

There is also no linkage between infrastructure delivery and the housing trajectory (**Effective**). The framework does not test whether development is phased in line with infrastructure provision, nor does it assess whether infrastructure is delivered ahead of, or alongside, growth (**Effective**, **Justified**).

The absence of thresholds or trigger points is a further weakness (**Effective**). The framework does not define when infrastructure capacity is reached, does not identify failure scenarios, and does not set out what action should be taken if delivery falls behind (**Effective**). This means there is no mechanism to intervene, rephase development, or review the Plan if infrastructure constraints emerge (**Effective**, **Consistent with National Policy**). This limitation is particularly significant given the Plan's reliance on assumptions regarding infrastructure delivery and behavioural change, as without capacity-based monitoring there is no effective mechanism to identify or respond to failure.

The framework relies on external programmes, including water company Asset Management Plans and transport investment, but does not monitor whether these programmes deliver additional capacity or align with the Local Plan trajectory (**Effective**, **Justified**). Similarly, transport indicators rely on assumptions about behavioural change, such as modal shift and reduced car use, without monitoring network capacity, congestion thresholds or outcomes if those assumptions are not realised (**Effective**, **Justified**). While viability is monitored, this highlights the risk of reduced infrastructure provision without assessing the cumulative impact on capacity or identifying corrective action (**Effective**).
Overall, the monitoring framework does not address the known weaknesses in the Infrastructure Delivery Plan, including the absence of quantified capacity, headroom and delivery triggers (**Justified**, **Effective**). It tracks what is happening, but not whether it is sufficient (**Effective**).

As a result, the Plan cannot demonstrate that development will remain aligned with infrastructure provision over time, nor can it identify or respond to emerging constraints (**Effective**, **Positively Prepared**). This undermines the effectiveness of the Plan as a whole (**Effective**).

Monitoring indicators			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

Recommendations:

To make the policy sound, the Plan should:

- **R48)** Introduce capacity-based indicators for key infrastructure, including water supply, wastewater, health and education.
- **R49)** Establish baseline capacity and headroom metrics, and monitor changes over time.
- **R50)** Link monitoring directly to the housing trajectory, including whether infrastructure is delivered ahead of or alongside development.
- **R51)** Define trigger points and thresholds at which intervention is required, including review or rephasing of development.
- **R52)** Monitor infrastructure outcomes (for example additional capacity delivered), not just scheme progress.
- **R53)** Include contingency measures where infrastructure delivery is delayed or assumptions (such as mode shift) are not achieved.

Legally Compliant	Yes

Legal Commentary:

The monitoring framework meets the procedural requirements, however, while legally compliant in procedural terms, the framework is limited in its effectiveness.

Appendices

Appendix 6: Housing trajectory			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

Soundness Commentary:

Appendix 6 provides a comprehensive housing trajectory which demonstrates that overall housing supply exceeds the identified requirement across the plan period. It sets out a clear numerical framework for delivery, including contributions from allocations, permissions, and windfall development.

However, the trajectory is not supported by sufficient evidence to demonstrate that the proposed rate and distribution of development is deliverable alongside infrastructure provision (**Effective**, **Justified**). It therefore fails the tests of soundness, particularly the requirements for justification and effectiveness.

The trajectory assumes a rapid increase in delivery, with completions rising significantly above the annual requirement in the early and middle parts of the plan period, including sustained delivery in excess of 2,000 dwellings per year (**Justified**). This level of delivery is heavily reliant on large allocations and strategic sites, which are dependent on significant infrastructure provision (**Effective**).

The trajectory also includes a high level of completions in the first year of the plan period which does not appear to reflect actual delivery performance (**Justified**). This risks overstating the early supply position and creates uncertainty as to whether the overall housing requirement will be met in practice (**Effective**).

In particular:

- The trajectory does not provide evidence that the early years of supply are robust, particularly given reliance on large sites and allocations which typically experience lead-in times and delivery constraints (**Justified**, **Effective**).
- There is no allowance for slippage, non-delivery, or delays, which are common in strategic site delivery (**Effective**, **Justified**).

Appendix 6: Housing trajectory			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No

- The apparent surplus across the plan period is not supported by any sensitivity testing or contingency to demonstrate how supply would be maintained if delivery falls below assumed levels (**Justified**, **Effective**).
- The trajectory does not demonstrate how housing delivery aligns with infrastructure capacity, including wastewater, potable water supply, transport, health, and education provision (**Effective**, **Positively Prepared**).
- There is no identification of infrastructure dependencies for individual sites or phases of development (**Effective**).
- There are no phasing mechanisms or triggers linking development to the delivery of infrastructure (**Effective**, **Consistent with National Policy**).
- The trajectory does not account for known infrastructure constraints or timing issues, including reliance on major infrastructure expected to be delivered in the mid-2030s (**Justified**, **Effective**).
- The assumed level of windfall development is not supported by evidence demonstrating that it is achievable within infrastructure and environmental constraints (**Justified**, **Effective**).

As a result, the trajectory demonstrates theoretical housing supply but does not demonstrate that development is deliverable in practice or that infrastructure will be provided in step with growth (**Effective**, **Positively Prepared**).

Appendix 6: Housing trajectory			
Positively Prepared	**Justified**	**Effective**	**Consistent with National Policy**
No	No	No	No
Recommendations:			
To make the policy sound, the Plan should: **R54)** Provide a clear linkage between the housing trajectory and infrastructure capacity and delivery, including wastewater, water supply, transport, health, and education infrastructure. **R55)** Identify critical infrastructure dependencies for key sites and phases of development. **R56)** Introduce phasing mechanisms and occupation triggers to ensure infrastructure is delivered ahead of or alongside development. **R57)** Demonstrate that the proposed rate of delivery is achievable within known infrastructure and environmental constraints. **R58)** Provide sensitivity testing to assess deliverability under different infrastructure scenarios. Without these changes, the trajectory does not provide a reliable basis for demonstrating that the Local Plan is deliverable and therefore fails the tests of soundness.			
Legally Compliant	Yes		
Legal Commentary:			
Appendix 6 is legally compliant in that it provides a housing trajectory consistent with national guidance and supports the calculation of housing supply over the plan period.			

Sustainability Appraisal and Habitats Regulations Assessment

Habitats Regulations Assessment
Soundness Commentary:

The Habitats Regulations Assessment (HRA) is comprehensive in structure and applies recognised technical guidance, including appropriate screening criteria, dispersion modelling, and consideration of in-combination effects. The methodology is clearly set out and, in several respects, adopts a conservative approach to modelling assumptions.

However, the assessment does not consistently demonstrate, beyond reasonable scientific doubt, that the Local Plan will avoid adverse effects on the integrity of designated sites. In particular, there is a reliance on screening thresholds, background improvement assumptions, and deferred judgement, rather than a clear, plan-level conclusion supported by secured mitigation.
In particular:

- **Section 3.1 (Screening methodology)**
  The screening methodology broadly follows recognised guidance, including the use of distance and traffic thresholds. However, for certain sites (e.g. Lydden & Temple Ewell Downs SAC and Dover to Kingsdown Cliffs SAC/SSSI), the assessment relies on conclusions from the Dover Local Plan HRA and does not revisit these using Canterbury-specific traffic data. Given that no detailed traffic data was available for these locations, this introduces uncertainty into the screening conclusions and reduces the robustness of the evidence base.
- **Section 4.1 (Baseline conditions)**
  The HRA confirms widespread exceedance of nitrogen critical loads (CLo) across all identified ecological receptors. However, the subsequent assessment accepts additional nitrogen deposition from the Local Plan on the basis that contributions are below 1% of the critical load and therefore “de minimis”. This approach relies on proportional thresholds rather than demonstrating, in accordance with the Habitats Regulations, that additional loading will not adversely affect site integrity in already exceedant environments.
- **Section 5 (Modelling results and thresholds)**
  The assessment applies a 1% threshold of critical levels and loads to guide the identification of likely significant effects, which is consistent with established technical guidance. However, in practice, this threshold is used to support conclusions of no likely significant effect in circumstances where baseline nitrogen deposition already exceeds critical loads. The HRA does not clearly

Habitats Regulations Assessment

demonstrate, in these cases, why additional contributions from the Local Plan can be ruled out as having an adverse effect on site integrity, particularly when considered in-combination.

- **Sections 5.1.18–5.1.30 (In-combination effects)**
  The assessment identifies exceedances of the 1% threshold for NH_3 and nitrogen deposition at Stodmarsh under the in-combination scenario. These exceedances are acknowledged and referred to the Project Ecologist for further judgement. However, the HRA does not provide a clear, plan-level conclusion as to whether these effects can be ruled out as having an adverse effect on site integrity, nor does it identify any secured mitigation or policy response to address them.
- **Sections 3.2 and 5 (Future emissions assumptions)**
  While the modelling assumptions are conservative, the conclusions place weight on anticipated long-term improvements in background emissions, including those arising from national policy and vehicle fleet transition. As these factors are not controlled or secured by the Local Plan, they should not be relied upon to support conclusions on the absence of adverse effects.
- **Sections 5.1.22–5.1.30 (Nitrogen deposition conclusions)**
  The HRA accepts that nitrogen critical loads are already exceeded across the identified ecological receptors and that additional nitrogen deposition will occur as a result of the Local Plan. The assessment justifies these additional impacts on the basis that they are small (below 1% of the critical load) and would only delay background improvements by a matter of months. However, this reasoning does not clearly demonstrate, in accordance with the Conservation of Habitats and Species Regulations 2017, that additional loading will not adversely affect site integrity, particularly in environments where critical loads are already exceeded.
- **Sections 5 and 6 (Mitigation and conclusions)**
  The HRA identifies potential pathways for likely significant effects, particularly in relation to ammonia and nitrogen deposition, but does not demonstrate how these effects will be avoided through secured mitigation. Instead, the assessment defers to further “Project Ecologist” judgement, without identifying specific mitigation measures, testing their effectiveness, or linking them to enforceable Local Plan policies. As a result, the HRA does not clearly show how adverse effects on site integrity will be ruled out at the plan level

As a result, the HRA does not clearly demonstrate, beyond reasonable scientific doubt, that the Local Plan will avoid adverse effects on the integrity of designated sites. The reliance on thresholds, background improvement assumptions, and the absence of clearly secured mitigation means that the assessment falls short of the requirements of the Habitats Regulations and relevant national policy, including the National Planning Policy Framework.

Recommendations:

Habitats Regulations Assessment

To make this sound, the Plan should:

- **R59)** Provide a clear, plan-level conclusion within the HRA that adverse effects on site integrity can be ruled out, supported by evidence rather than reliance on screening thresholds or professional judgement alone.
- **R60)** Where nitrogen critical loads are already exceeded, explicitly demonstrate why additional loading from the Local Plan will not result in adverse effects on site integrity, including in-combination with other plans and projects.
- **R61)** Identify and secure specific mitigation measures within the Local Plan (or clearly linked policy mechanisms), including how they will operate, be delivered, and be enforced.
- **R62)** Test the effectiveness of mitigation measures within the HRA (Appropriate Assessment stage), rather than deferring this to later project-level assessment.
- **R63)** Avoid reliance on improvements in background emissions arising from national policy or vehicle fleet transition unless these are demonstrably certain and secured.
- **R64)** Ensure that all screened-out sites, particularly those relying on evidence from other plans, are supported by sufficient Canterbury-specific evidence or clearly justified on a precautionary basis.

Without these changes, the HRA does not provide sufficient certainty, beyond reasonable scientific doubt, that the Local Plan will avoid adverse effects on the integrity of designated sites. As such, the HRA does not adequately demonstrate, beyond reasonable scientific doubt, that adverse effects on site integrity can be ruled out. In its current form, this calls into question the Plan's effectiveness and its compliance with national policy and the Habitats Regulations.

Sustainability Appraisal of the draft Local Plan
Soundness Commentary:
The Sustainability Appraisal does not provide a sufficiently robust basis to justify the spatial strategy or demonstrate that the Local Plan is sound. Across the appraisal, there is a consistent pattern: significant effects are identified, but then moderated through assumptions, mitigation, or uncertainty. This weakens the overall conclusions. Instead of clearly demonstrating how impacts will be avoided or managed, the Sustainability Appraisal often assumes that future policy compliance or project-level controls will resolve them. This reliance on future mitigation is further weakened by the Plan's acknowledgement that developer contributions and policy requirements may be adjusted where viability constraints arise. In such circumstances, it cannot be assumed that mitigation measures identified in the Sustainability Appraisal will be delivered in full, or at the scale required to address the impacts identified. A central issue is the level of uncertainty that runs through the document. For each spatial option, the SA repeatedly notes that outcomes depend on the "exact location of development", the "quantum of growth", or the eventual design of sites. This is evident across multiple objectives, including flood risk (Objective 7), water resources (Objective 6), biodiversity (Objective 3), transport (Objective 13), and community infrastructure (Objective 14). At this stage in the plan process, that degree of uncertainty is problematic. The SA should be testing a defined strategy, not a series of broad scenarios. Related to this, the appraisal does not clearly distinguish between the spatial options. The Coastal, Rural and New Settlement options all produce very similar patterns of mixed minor positive and negative effects, with similar caveats about mitigation and uncertainty. Even where more significant risks are identified (such as increased car dependency in the rural option, landscape impacts, or pressure on water and wastewater infrastructure) these are not clearly weighed against alternatives in a way that explains why the preferred strategy performs better overall. There is also a clear reliance on mitigation as a substitute for evidence. For example, flood risk is assumed to be addressed through site-level Flood Risk Assessments; water supply issues are deferred to Water Resource Management Plans; biodiversity impacts are offset

Sustainability Appraisal of the draft Local Plan

through Biodiversity Net Gain; and health infrastructure is assumed to come forward through developer contributions. These may all be valid mechanisms, but the SA does not demonstrate that they are sufficient, deliverable, or aligned with the scale and timing of growth proposed.

The treatment of infrastructure and cumulative effects is particularly weak. The SA acknowledges key constraints (including water stress, lack of wastewater headroom, transport impacts, and pressure on health services) but does not sufficiently evidence them or test whether they can be accommodated. There is no clear link back to infrastructure capacity or delivery timing. This limits the SA's ability to support conclusions about sustainability in any meaningful way.

These issues are not confined to the site-level appraisal. The absence of a clear, consistent and evidence-led methodology in the SLAA Sustainability Appraisal directly undermines the robustness of the plan-level Sustainability Appraisal. If individual site effects are not consistently assessed, and if constraints are not clearly distinguished from mitigable impacts, then the cumulative and strategic conclusions drawn at plan level cannot be relied upon. In this respect, the weaknesses identified here translate directly into uncertainty in the overall spatial strategy.

Finally, there is an imbalance in how effects are presented. Housing delivery is consistently treated as a significant positive effect, based on meeting identified need. However, the SA itself notes that delivery rates would require a sustained uplift compared to historic trends, and that delivery is subject to uncertainty, particularly where infrastructure or new settlement delivery is required. These risks are not fully reflected in the scoring, which tends to overstate the certainty of positive outcomes.

Sustainability Appraisal of the draft Local Plan
Recommendations:

To make this sound, the Plan should:

- **R65)** Provide spatially specific testing of the preferred distribution, demonstrating how identified locations can accommodate growth in terms of infrastructure capacity, environmental limits, and cumulative impacts
- **R66)** Demonstrate, using quantified evidence, how the preferred spatial distribution aligns with available infrastructure capacity, including baseline provision, remaining headroom, and cumulative impacts on water, wastewater, health, and transport systems
- **R67)** Move beyond reliance on assumed mitigation and demonstrate that mitigation measures are viable, funded, and capable of being delivered at the scale and pace required to support the proposed growth
- **R68)** Provide a clear and transparent framework for comparing reasonable alternatives, demonstrating how the relative advantages and disadvantages of each option have been assessed and why the preferred option performs better overall
- **R69)** Align the conclusions of the Sustainability Appraisal with the findings of the Infrastructure Delivery Plan and Habitats Regulations Assessment, demonstrating how identified infrastructure constraints and environmental limits have been taken into account in assessing the sustainability of the preferred strategy and clearly explain how any identified constraints or uncertainties have been resolved, rather than deferred to later stages.

Without these changes the Sustainability Appraisal cannot be relied upon to justify the spatial strategy or demonstrate that the Plan represents the most appropriate strategy when considered against reasonable alternatives.

Sustainability Appraisal of the Strategic Land Availability Assessment
Soundness Commentary:
The Sustainability Appraisal of the Strategic Land Availability Assessment (2026) does not provide a sufficiently robust or transparent basis for informing site selection within the Local Plan. While it compiles a large volume of environmental and spatial data, the methodology and presentation limit its effectiveness as a decision-making tool. However, the core issue is not the identification of constraints, but the absence of a clear and consistent method for evaluating their significance or influence on site selection. The appraisal presents environmental information but does not apply a clear analytical framework to determine how that information influences site suitability or selection. In particular: ● The scoring system identifies uncertainty (eg. “+ / - / ?”), particularly in relation to transport, flood risk and environmental effects. However, it does not clearly explain how that uncertainty is resolved, weighted, or incorporated into decision-making. In many cases, uncertainty is deferred to later assessment (such as Transport Assessments at application stage), rather than being addressed at plan-making stage. This limits the ability of the Sustainability Appraisal to provide a robust and consistent basis for comparing sites. ● Similar constraints (for example proximity to ancient woodland, Local Wildlife Sites, flood zones, or Source Protection Zones) appear across many sites, yet result in inconsistent overall conclusions. For example, SLAA362 (Land at Long Meadow Way) and SLAA365 (Land at Jesuit Close) are both located within 2,000m of West Blean and Thornden Woods SSSI and within areas of ecological sensitivity (including GCN amber areas). However, the former is assessed as having significant negative effects on biodiversity, while the latter is assessed as only minor negative, with no clear explanation for the difference in magnitude. Similarly, SLAA368 (Land at Military Road) and SLAA370 (Land at St Stephen’s Road) both experience surface water flood risk, yet the former records significant negative effects on flooding while the latter records significant positive effects. The appraisal does not explain how these differing conclusions are reached. ● Significant negative effects are frequently identified for biodiversity, flood risk, landscape and heritage, but are often implicitly assumed to be mitigable without evidence or defined mitigation measures ● Transport impacts are not consistently resolved within the Sustainability Appraisal. In a number of cases, including the Park and Ride sites, the appraisal identifies uncertainty and explicitly defers detailed assessment to future Transport Assessments at planning application stage. While other sites include high-level judgements on accessibility, there is no consistent approach to demonstrating deliverability or network capacity at plan-making stage. This limits the ability of the appraisal to robustly compare sites or confirm that proposed allocations are deliverable in transport terms.

Sustainability Appraisal of the Strategic Land Availability Assessment

- Flood risk and water environment constraints (including FZ2/FZ3, surface water risk and SPZ1) are identified but not clearly used to constrain or rule out development options
- There is no clear distinction between absolute constraints and those capable of mitigation, which weakens the credibility of the assessment. For example, SLAA387 (Land at Wincheap Park and Ride) is located within Flood Zones 2 and 3, within Source Protection Zone 1, adjacent to a waterbody, and overlaps with a Local Wildlife Site and Local Nature Reserve. These are significant environmental and policy constraints. However, the appraisal treats these as effects to be balanced rather than constraints that may limit or preclude development, and does not explain how they would be mitigated.
- The appraisal does not provide a consistent comparative framework to explain why some sites are preferred over others with similar or lesser constraints
- Cumulative effects are not meaningfully assessed, particularly where multiple sites interact with the same environmental or infrastructure constraints

As a result, the Sustainability Appraisal does not demonstrate how the SLAA has been filtered or refined to produce a justified set of site allocations. The link between the SA findings and the Plan's spatial strategy is unclear.

Sustainability Appraisal of the Strategic Land Availability Assessment
Recommendations:

To make this sound, the Plan should:

- **R70)** Define and apply a clear and consistent methodology for how positive, negative and uncertain effects are weighted and translated into overall conclusions, including how mixed scores are resolved
- **R71)** Clearly distinguish between constraints that may preclude development (e.g. Flood Zone 3, SPZ1, Scheduled Monuments, access constraints) and those that are capable of mitigation, supported by evidence
- **R72)** Resolve key uncertainties at plan-making stage, particularly in relation to transport access, flood risk, and ecological impacts, rather than deferring these to planning applications
- **R73)** Provide a transparent and consistent comparative framework that explains why sites with similar constraints result in different overall conclusions
- **R74)** Assess cumulative impacts across sites and demonstrate how these interact with shared environmental and infrastructure constraints, particularly where multiple allocations interact with the same biodiversity, water environment, or infrastructure constraints
- **R75)** Clearly demonstrate how the Sustainability Appraisal findings have influenced site selection, including how sites have been filtered, rejected, or preferred
- **R76)** Demonstrate how site-level appraisal outcomes have informed the spatial strategy and overall Sustainability Appraisal conclusions

Without these changes, the Sustainability Appraisal of the Strategic Land Availability Assessment does not provide a sufficiently robust or justified basis for comparing sites or supporting the selection of allocations within the Local Plan.

Appendix C: Schedule of Recommendations/Observations by Theme

This appendix consolidates the detailed policy-level recommendations set out in the main body of this submission into four overarching themes reflecting the key tests of soundness. The purpose of this structure is to demonstrate that the issues identified are not isolated to individual policies, but represent systemic weaknesses in the Plan's evidence base, delivery framework, and spatial strategy. Each recommendation is reproduced verbatim and grouped to show how, taken together, they point to fundamental concerns regarding whether the Plan is justified, effective, and Positively Prepared.

Theme 1: Absence of a capacity-led evidence base

The Plan does not sufficiently evidence baseline capacity, utilisation or headroom across infrastructure systems, and does not demonstrate that growth can be accommodated within environmental or network limits.

R1) Incorporate recent observed traffic data (including 2022–2025 monitoring) to validate modelling assumptions and demonstrate current network performance
R3) Provide a quantified assessment of transport network capacity, including peak-period constraints and clear thresholds for when impacts become unacceptable.
R8) Provide a quantified assessment of infrastructure capacity and headroom across all key sectors
R9) Demonstrate alignment between housing growth and infrastructure capacity, particularly for water supply, wastewater and transport network performance
R10) Reconcile modelled transport assumptions with observed network behaviour
R11) Include evidence on origin–destination patterns to support targeted intervention.
R21) Align water efficiency standards with the level of water stress and demonstrate that proposed standards are sufficient at plan scale.
R22) Quantify the relationship between development, water demand and available supply, including alignment with WRMP assumptions.
R26) Provide a quantified, capacity-led assessment of infrastructure (baseline capacity, utilisation and residual headroom)
R28) Demonstrate alignment between observed transport behaviour and modelled assumptions
R29) Align growth with known infrastructure constraints
R35) Provide a quantified assessment of transport network capacity, including peak-period constraints, baseline utilisation and available headroom
R36) Demonstrate that transport modelling assumptions reflect current observed conditions
R41) Provide proportionate, plan-level evidence of heritage sensitivity and capacity for change
R48) Introduce capacity-based indicators for key infrastructure
R49) Establish baseline capacity and headroom metrics, and monitor changes over time

R54) Provide a clear linkage between the housing trajectory and infrastructure capacity and delivery
R57) Demonstrate that the proposed rate of delivery is achievable within known infrastructure and environmental constraints
R60) Where nitrogen critical loads are already exceeded, explicitly demonstrate why additional loading will not result in adverse effects on site integrity
R64) Ensure screened-out sites are supported by sufficient Canterbury-specific evidence
R66) Demonstrate, using quantified evidence, how the preferred spatial distribution aligns with available infrastructure capacity

Theme 2: Failure to secure infrastructure delivery and phasing
The Plan does not demonstrate that infrastructure will be delivered in step with development, with no clear phasing, triggers, funding certainty or contingency.

R5) Set out a clear and deliverable infrastructure strategy, including funding, timing and alignment with the phasing of development.
R6) Introduce enforceable triggers linking development to transport network performance and the delivery of required mitigation.
R12) Introduce clear phasing and occupation triggers linking development to infrastructure delivery
R13) Identify secured funding sources and delivery mechanisms for key infrastructure
R14) Include contingency planning where infrastructure delivery is uncertain or delayed
R19) Introduce mechanisms to secure delivery of affordable housing in step with development
R23) Link water demand to infrastructure provision through clear phasing and occupation triggers.
R27) Demonstrate that infrastructure provision aligns with the scale and timing of development
R30) Demonstrate alignment between Local Plan growth and water company investment programmes (DWMP and WRMP), including confirmed schemes, funding and delivery timelines
R31) Define Infrastructure Funding and Delivery Programmes at plan stage
R32) Introduce clear triggers linked to infrastructure capacity
R33) Provide contingency measures where infrastructure delivery is uncertain or dependent on external investment
R39) Link development to clear, enforceable infrastructure delivery mechanisms
R50) Link monitoring directly to the housing trajectory
R51) Define trigger points and thresholds at which intervention is required
R52) Monitor infrastructure outcomes (for example additional capacity delivered), not just scheme progress.
R53) Include contingency measures where infrastructure delivery is delayed or assumptions are not achieved.
R55) Identify critical infrastructure dependencies for key sites and phases of development.
R56) Introduce phasing mechanisms and occupation triggers

Theme 3: Over-reliance on assumptions, viability and mitigation
The Plan depends on unproven behavioural change, viability-led reductions, and mitigation that is not secured or tested at plan stage.

R2) Demonstrate that assumed modal shift is realistic and deliverable
R4) Identify mitigation for all forecast network “hotspots”
R17) Provide stronger policy clarity on the application of viability
R18) Define how trade-offs between affordable housing and other policy requirements will be resolved
R20) Demonstrate that the overall level of provision has been appropriately tested and optimised against viability evidence
R24) Provide a clear and enforceable definition of “net zero carbon ready”
R25) Reduce reliance on open-ended viability and feasibility exemptions
R34) Reduce reliance on viability-based reductions in infrastructure provision.
R37) Quantify the level of modal shift required
R38) Demonstrate how the proposed active travel and public transport interventions will materially influence dominant travel patterns
R40) Identify how public transport provision will be funded, delivered and sustained
R58) Provide sensitivity testing to assess deliverability under different infrastructure scenarios.
R59) Provide a clear, plan-level conclusion within the HRA that adverse effects on site integrity can be ruled out
R61) Identify and secure specific mitigation measures within the Local Plan
R62) Test the effectiveness of mitigation measures within the HRA
R63) Avoid reliance on improvements in background emissions unless demonstrably certain
R67) Move beyond reliance on assumed mitigation and demonstrate that mitigation measures are viable, funded, and capable of being delivered

Theme 4: Spatial strategy not justified by evidence or constraints
The Plan does not demonstrate that the scale and distribution of growth has been informed by infrastructure capacity, environmental limits, or robust site selection.

R7) Demonstrate that the spatial distribution of development reflects realistic transport capacity constraints.
R15) Ensure that the spatial strategy is informed by infrastructure capacity rather than relying on post-adoption mitigation
R42) Demonstrate that site allocations are deliverable in heritage terms
R43) Assess cumulative impacts on the World Heritage Site and its setting

R44) Strengthen the relationship between Policy DS30 and site allocations
R45) Reduce reliance on application-stage assessment
R46) Be supported by clear, up-to-date design and public realm guidance
R47) Demonstrate that heritage considerations have informed the spatial strategy
R65) Provide spatially specific testing of the preferred distribution
R68) Provide a clear and transparent framework for comparing reasonable alternatives
R69) Align the conclusions of the Sustainability Appraisal with the findings of the Infrastructure Delivery Plan and Habitats Regulations Assessment
R70) Define and apply a clear and consistent methodology for Sustainability Appraisal
R71) Clearly distinguish between constraints that may preclude development and those capable of mitigation
R72) Resolve key uncertainties at plan-making stage
R73) Provide a transparent and consistent comparative framework
R74) Assess cumulative impacts across sites
R75) Clearly demonstrate how the Sustainability Appraisal findings have influenced site selection
R76) Demonstrate how site-level appraisal outcomes have informed the spatial strategy