

Objections to draft Canterbury District Local Plan (2040)

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I Wish to make the following objections to the draft Local Plan:

Policy C6 and related supporting text - Land at Merton Park

In my view the site is fundamentally unsuitable for development and should be deleted for the reasons set out below.

Supporting Evidence

Without prejudice to this I think such a large scale proposal should be supported by an evidence base that covers all issues of principle in an attempt to demonstrate how they can be dealt with and that the concept is a viable one. This should preferably be brought together into one document for ease of understanding and would enable much more informed comment. Currently there is scant analysis or appraisal of the issues raised by the proposal, for example, in the SLAA.

Landscape impact

Although this site is currently within the Canterbury Area of High Landscape Value the Council's review of landscape designations (Canterbury District Local Landscape Designations Review and Recommendations LUC 2021) considers that it no longer meets the criteria for local landscape designation. That review does, however, highlight that the European Landscape Convention establishes that all landscape is of value and that the National Planning Policy Framework states that valued landscapes should be protected and enhanced. The NPPF does not define "valued landscape" but the report states that case law indicates that to be valued a landscape needs to have something special or out of the ordinary in terms of physical attributes rather than just popularity. In recognition of the importance of Canterbury's Stour Valley setting the Council commissioned a further report from LUC (Canterbury City AHLV Review for Local Landscape Designation 2021) to consider the value of landscape surrounding the City for its contribution to forming the rural setting of the City within the Stour Valley, including views of the Cathedral World Heritage Site. Merton Park falls within this review and in summary the report concludes that it does make important contributions. The Council appears to have accepted the report. This must surely indicate that the landscape is valued in NPPF terms and that the objective should be its protection and enhancement.

In the report Merton Park falls within area H4 Nackington Farmlands and it identifies that this area contains "Dramatic and surprising views from more elevated areas and along valleys and the North Downs Way to Canterbury and the Cathedral in its Stour Valley setting." It is clear from the report that views which enable an appreciation of the City and Cathedral in their wider, panoramic rural landscape setting should be highly valued and protected. The

report particularly mentions the area between Nackington Road and Stuppington Lane and views east of Stuppington Lane from the A2. These include views in the foreground across land to east of Stuppington Lane but, in my view, the report has not recognised the spectacular views that are available from within the land to the east of Stuppington Lane - I have attached a photo to illustrate this. The report does, though, rightly highlight the importance of this area, when viewed from the opposite valley slope, in providing part of the rural setting and backdrop to the City and Cathedral. Indeed, the photo that LUC chose for the front cover of the report illustrates this point.

The proposed Merton Park development lies between Nackington Road and the rear of Wincheap Primary School encompassing the areas referred to above. The draft policy (paragraph K) attempts to deal with the issue of views through incorporating "viewing corridors" within the development which, it claims, will preserve and enhance views towards the City and World Heritage Site. In my view this will actually have the opposite effect by severely reducing the views down to a small number of narrow angle corridors and destroying the panoramic views and appreciation of the City and Cathedral in its Stour Valley setting - not only from within and across the Merton Park site but also when seen from the opposite valley slope and other viewpoints such as New House Land and Iffin Lane.

The Merton Park proposal would therefore cause fundamental harm to the value of the landscape which cannot be successfully mitigated by viewing corridors. It is also contrary to draft policy DS22, in particular paragraphs 1, 2b, 2c and 2f.

Heritage

While the landscape containing Merton Park has intrinsic value its special attribute is its contribution to providing the elevated rural backdrop to the City conservation area and, in particular, the Cathedral World Heritage Site. WHS is one of the highest order heritage designations, in recognition of an asset's outstanding universal value. The landscape impact of the Merton Park proposal therefore needs to be assessed from a heritage policy perspective as well as a landscape one, following the policies set out in the NPPF - a careful consideration of the impact of a proposal on the significance of heritage assets and an evaluation of the degree of harm arising.

There is no such assessment in the Council's evidence base. The SLAA simply acknowledges that long distance views of the Cathedral are achievable from the site and that this needs careful consideration. This is completely inadequate. Based on the currently available information the proposals will inflict a high degree of harm on heritage assets that are of national and international significance

A heritage assessment should draw upon the Council's "Canterbury Conservation Area Appraisal Council February 2023" produced by Purcell. Section 4.6 "Setting, views and approaches" is of particular relevance. Part 4.6.1 highlights the importance of the green setting of the conservation area as a particularly important part of its special interest which has been retained over centuries of evolution and the importance of long-distance views of the city from its surroundings. Route 11 Hollow Lane and Wincheap on page 65 highlights long distance views of the Cathedral from Iffin Lane and includes a photo. Merton Park lies in the line of sight on the photo between Iffin Lane and the Cathedral and would seriously diminish, if not destroy, this view. In section 4.6.3 "Important Views and Landmark Buildings" part 14 "Fields North of Stuppington Lane", which is within the Merton Park proposed allocation, includes a photo and says "The foreground shows an open agricultural landscape to the south-east of the city, which forms an important part of the setting of the conservation area and should be retained as farmland." The Merton Park concept masterplan shows development in this area, which would be highly damaging and is in disregard of this conclusion.

Light Pollution

Apart from the street lighting and external lighting associated with domestic and business development the proposals include provision of a park and ride facility, new and improved rugby facilities and a football stadium which are all highly likely to be illuminated. Altogether this will amount to a major amount of external lighting on the valley slopes and plateau, which would be clearly visible and harmful from many points across the City, the opposite valley slopes and from the A2. It would be hard to mitigate this because the views would be from lower or equal levels. It would illuminate the valley slope and crest and undermine the rural backdrop to the night time views of the city. This harm should also be taken into account in landscape and heritage assessments and should be assessed as a cumulative impact with existing external lighting and from committed development such as at Thannington.

Informal Recreation

Apart from the statutory footpaths that traverse the site a network of informal paths around field and orchard perimeters has been established by local residents over many years. These informal paths are regularly used throughout the year. The area, as a whole, provides easy walking access into the open countryside. While the Merton Park proposals include green corridors within the development this is essentially only providing a walk through a housing estate, a much impoverished experience to what is currently available. Local residents wishing to walk in the countryside would, in practice, need to make a car journey which has environmental disbenefits or simply undertake less walking which has health disbenefits.

Loss of Agricultural Land

The SLAA records that the site comprises Grades 1 and 2 agricultural land which is the best and most versatile. NPPF policy requires the economic and other benefits of such land to be considered but there does not appear to be any evaluation of this.

Access

The access strategy and its implications are not well explained and are difficult to understand. Part 4c of policy C6 requires provision of a new access from and to the coastbound A2 carriageway to serve the site and the concept masterplan indicates a location near the existing layby. This appears to suggest that entry and exit from the site can only be possible in a coastbound direction and those wishing to go in other directions would need to exit the A2 to join the New Dover Road or U turn to access the A2 London bound carriageway. The other possibility is exiting via the proposed south west Canterbury link road but the timing of its provision is not clear and is reliant on the progress of other developments. In addition, the C6 concept masterplan shows a new junction off the A2 at the Stuppington Lane bridge but the policy does not seem to refer to this and it is not shown on the South West Canterbury SDA concept masterplan. This all needs further explanation so that more informed comment can be made.

In addition, the proposed route of the south west Canterbury link road appears to use Hollow Lane for a section between the existing built-up edge of Canterbury, presumably using the existing A2 underpass (but is it wide enough?), to a point just south of the A2 where it would swing into site C7. If this is correct the engineering implications of this need to be made clear so that informed comment can be made. Hollow Lane is a beautiful historic sunken lane route whose character is likely to be completely destroyed by any widening works and the access to site C7 would require extensive excavation due to level differences. In my view the proposal is highly damaging and unsuitable.

Policy C7 and related text - Land to the North of Hollow Lane

This is an elevated site forming part of the rural setting of the City and Cathedral. My landscape, heritage, light pollution, loss of agricultural land and access objections to Policy C6 also apply here.

In relation to landscape and heritage, the view from the site to the City and Cathedral and their rural setting is illustrated in the Canterbury Conservation Area Appraisal view 12 New house Lane on page 79. The text says that this view is a good example of showing the City and Cathedral in their rural setting and that the fore and middle ground should be retained as agricultural land. Development elsewhere should not harm the rural setting or compete with the Cathedral view. The concept masterplan shows development in the fore and middle ground with a viewing corridor looking towards the Cathedral. This would cause great harm to the rural setting. Any development that would interrupt the currently available panoramic views from the site of the valley slopes around the City and the Cathedral should be deleted.

Policy C19 Wincheap commercial Area

I do not object to the idea of a mixed use redevelopment, including housing. However, the policy proposes to retain and reformulate the current amount of business, commercial and leisure floorspace while adding approximately 1000 new dwellings. The concept masterplan provides no indication of how this might be achieved so it is currently difficult to know if it is viable and how it might be implemented within the plan timeframe. The proposal should be supported by a capacity study sufficient to demonstrate that a solution is possible including a broad layout and the parameters of building height that would be needed to accommodate all the development. It also needs to consider the land assembly issues. This would enable more informed public comment but is also essential to demonstrate that it is a viable housing proposal in order to defend the site's allocation against developers who would seek to criticise it in order to promote their own alternative sites.

Part 4b of the policy requires the development to facilitate delivery of the Wincheap gyratory system. I thought that this was to be delivered through a S106 agreement by the developer of a housing scheme in Thannington. If this is still the case, why is the requirement carried forward into this policy? In any case, I object to the gyratory scheme because its claimed benefits have never been demonstrated to Wincheap residents and businesses and the disbenefits to residents living on the south east side of Wincheap (having to drive around the gyratory system if wishing to travel in a northerly direction) were not recognised or taken into account. If delivery of the gyratory system is to be retained as part of Policy C19 the transport modelling and justification for it should be included in the evidence base in order that its claimed benefits can be tested through the remainder of the plan making process.