
Draft Feedback – Objection to Merton Park (Policy N1)

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Date Mon 22/09/2025 22:39
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I wish to object to the proposed allocation of 1,930 dwellings at Merton Park.

At the outset, the main concern for local residents is the significant uncertainty this proposal introduces.

Past experience in Kent shows that large schemes of this scale are often beset by delays, missed deadlines, and piecemeal delivery, with promised infrastructure either slow to appear or never fully realised. This risks leaving communities living for years beside half-finished estates and incomplete facilities, with long-term negative impacts.

1. Deliverability Concerns

- Mountfield Park was approved in 2016, yet no homes have been built. Chilmington Green near Ashford, planned for up to 5,750 homes, has progressed very slowly with schools and community facilities still missing more than a decade later.
- These examples highlight the risks of large, strategic sites. They are vulnerable to market cycles, developer priorities, and infrastructure delays. Plans must demonstrate a supply of deliverable sites for the first five years (NPPF 77) and developable sites for years 6–10 and beyond (NPPF 78).

2. Infrastructure Limitations

- Healthcare: The Canterbury hospital redevelopment remains unfunded and uncertain. Local GP practices are already at capacity, with no clear plan to manage the additional demand. Strategic policies must make sufficient provision for health, education, transport and community facilities (NPPF 20).
- Sewage and Drainage: Southern Water's network is already under strain, with frequent discharges into rivers and coastal waters. Without guaranteed upgrades, almost 2,000 new homes would further increase pollution and flood risk.
- Schools and Community Facilities: While a school, sports hub and community centre are proposed, there is no binding timetable or enforcement. Experience elsewhere in Kent suggests these facilities often lag behind housing. Strategic policies for large-scale development must be set within a clear vision, supported by infrastructure, and look ahead for at least 30 years (NPPF 22).

3. Roads, Footpaths and Transport

- Roads in South Canterbury are already under strain, particularly South Canterbury Road, Nackington Lane, Hollow Lane and Lime Kiln Road.
- Lime Kiln Road is especially unsuitable as it is narrow and in part forms a footpath. It cannot safely accommodate additional traffic.
- Stuppington Lane and the footpaths along it are valued local routes for walkers and dog walkers. Closing it to through-traffic and rerouting vehicles risks undermining this important community amenity.
- With the A2 slip road cancelled, traffic will be funnelled onto inadequate local routes. The proposed "fast bus link" remains aspirational, with no evidence of funding or operator. Development should only be permitted where safe and suitable access can be achieved (NPPF 110), and should be refused if there is an unacceptable impact on safety or the cumulative impacts on the road network would be severe (NPPF 111).

4. Loss of Farmland, Green Space and Wildlife

- The fields around Stuppington Lane are part of Canterbury's rural setting and also productive farmland. At a time when food security is a national issue, it is unwise to permanently lose this land. Planning policies should recognise the benefits of the best and most versatile agricultural land (NPPF 145).
- These green spaces also support biodiversity, from hedgerows and pollinators to bats and farmland birds. Narrow landscaped buffers will not compensate for this loss. Plans should identify, map and safeguard ecological networks and wildlife-rich habitats, and secure measurable net gains (NPPF 186, 187).
- The orchards and fields here offer uninterrupted views of Canterbury Cathedral, a perspective captured in many historical paintings. These views are of cultural and heritage value. Great weight must be given to conserving designated heritage assets and their settings (NPPF 207), and any harm must be weighed carefully against public benefits (NPPF 210).

5. Cumulative Impact

- Whitstable and Herne Bay are already earmarked for almost 5,000 new homes, including 3,200 at Bogshole.
- Adding nearly 6,000 more across South Canterbury would create pressures far beyond the current capacity of the district's roads, healthcare and sewage systems.
- The Local Plan has not convincingly demonstrated that these combined allocations can be accommodated sustainably, contrary to the requirement in NPPF 20 for strategic policies to make sufficient provision for infrastructure.

Conclusion:

The allocation of Merton Park would create prolonged uncertainty and disruption for local communities, with no assurance that critical infrastructure will be delivered in step with housing. Local roads, including South Canterbury Road, Nackington Lane, Hollow Lane and Lime Kiln Road,

are already unsuitable. Healthcare and sewage services are stretched, and farmland and green space of both practical and heritage value would be lost.

This allocation does not meet the NPPF tests of soundness. It is not justified by proportionate evidence, not effective in terms of delivery, and not consistent with national policy.

I therefore request that Merton Park be removed from the Local Plan. Instead, the Council should focus on smaller, deliverable brownfield and town-centre sites where new housing can be provided more sustainably, without undermining food security, damaging rural communities, or eroding Canterbury's historic and natural environment.

Regards,

Raymond Shuai
(Canterbury Resident)