

Carmelo Somers



Saturday, 18 October 2025

To: Consultations Team and Planning Team

Canterbury City Council

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**Subject: Objection to Proposed Development on SLAA151 – Land at Merton Lane,
Canterbury**

Dear Planning Policy Team,

I am writing to formally express my concerns and objection to the proposed development on SLAA151 – Land at Merton Lane, Canterbury (Site Area: 99.03ha), as outlined in the Focused Regulation 18 Draft Local Plan (2025).

While I acknowledge the need for sustainable development and the provision of housing, healthcare, and educational facilities, I believe that the proposed development on this site poses significant environmental, ecological, and community risks that outweigh the potential benefits. I urge the Council to reconsider the allocation of this site for development, based on the following grounds:

1. Irreplaceable Biodiversity and Ecological Loss

The site currently comprises biodiverse orchards, agricultural land, and green spaces that support a wide range of wildlife, including pollinators, birds, and small mammals including **bats**. These habitats are vital for maintaining local biodiversity and ecological balance. Development would result in the irreversible loss of these ecosystems, undermining Canterbury's environmental commitments and biodiversity action plans.

Additionally, the site attracts migratory fauna and local species like the woodpecker, swifts, raptors, and a whole array of plants, hedgerows, insects, bees, wasps, and other pollinators

which we need for a health and sustainable local environment, as well as protected species. It's home to our local bat wildlife population. We see bats fly over our garden at dusk and I have seen them flying over the orchards, woods and fields up Stubbington Lane, Lime Klim Road and beyond on the proposed land for housing development.

Wincheap has enough pollution, traffic and homes already. Kent County Council are responsible for the road infrastructure which the planning department has made me aware of more than once. Where are the guaranteed plans that the correct highway infrastructure will be costed, paid for and implemented? Where is the public access and public infrastructure plans? What will stop our local roads becoming more of a drive-through and car park? Why hasn't KCC and Highways England effectively solved the heavy traffic flow up the A28 Ashford Road and Wincheap roundabout yet? Where are the clean (electric) mass public transport vehicles we were promised years ago when Canterbury City Council Planning development the Wincheap Industrial Estate? I went back to meetings then in the 90s and all the promises never came to fruition!

When I was a child living in the Canterbury district, we could play on some of the streets, we had more fields in the area which have already been built on (up by the old waterworks) which is a massive housing estate already. You are planning to remove the only little green space we have left which is free from pollution, traffic, noise, light pollution, wildlife and nature.

Furthermore, building homes on this land would only increase the flood risks. We have seen recently our local roads such as Oxford Road, Stubbington lane and York Roads become a river due to unseasonal weather changes and climate change. This would only further exacerbate this problem.

I have been walking on these green spaces and fields since my childhood (I'm born in the 1970s in Canterbury, so for more than 45+ years and have seen it build on in that time) and cycling through the lanes when they were much safer to do. The ill-thought-out **proposed Development on SLAA151 – Land at Merton Lane** plan, would remove the last vestige of green space we have left here in South Canterbury.

2. Climate and Air Quality Implications

The greenfield elements of SLAA151 play a crucial role in carbon sequestration, air purification, and temperature regulation. Replacing these natural assets with built infrastructure will increase carbon emissions and reduce the area's resilience to climate change. This contradicts the Council's climate emergency commitments and the broader goals of the UK's net-zero strategy.

3. Threat to Local Food Security

The agricultural land within the site contributes to local food production. In the context of increasing global food insecurity and supply chain vulnerabilities, preserving productive farmland is more important than ever. Once developed, this land will be permanently lost to agriculture.

4. Infrastructure and Traffic Concerns

The proposed development of approximately 1,370 dwellings, alongside commercial and institutional facilities, will place significant pressure on existing infrastructure. The removal of previously proposed slip roads raises concerns about traffic congestion, road safety, and accessibility—particularly given the site's proximity to the A2 and the already strained local road network.

5. Community and Recreational Value

The site currently accommodates valued community assets, including the Canterbury Rugby Football Club and the Kent MS Therapy Centre. Any disruption or relocation of these facilities could negatively impact community wellbeing and access to essential services and recreational opportunities. Furthermore, removing the orchards, hedgerows and fields would have a detrimental impact on the bird biodiversity, local and migratory, insects and pollinators, and air quality. Once this biodiverse land is lost, all the nature fauna and flora, trees and local wildlife habitat will be lost forever. This would do irreparable damage to our local environment. Are we not just stewards of this and should be protecting it? Not just for ourselves, but for future generations to come. Canterbury has plenty of brown land sites it can build on.

6. Availability of Alternative Brownfield Sites

Given the mixed classification of the site, with substantial greenfield components, I urge the Council to prioritise brownfield redevelopment opportunities within Canterbury. This approach aligns with national planning policy and would help protect our remaining green spaces from unnecessary development.

7. Incompatibility with Sustainable Development Goals

The proposed development risks undermining several Sustainable Development Goals (SDGs), particularly those related to sustainable cities and communities, climate action, and life on land. A truly sustainable local plan must balance growth with environmental protection and long-term community resilience.

8. Supporting legal and policy grounds

Failure to Meet NPPF Soundness Tests

- The proposal is not justified, effective, or consistent with national policy (NPPF para 35).

- There is no publicly available comparative evidence showing this greenfield site is preferable to brownfield options.
- Infrastructure dependencies are not proven deliverable within the plan period.
- The allocation conflicts with NPPF paragraphs 8, 152, and 174.

Loss of Best and Most Versatile (BMV) Agricultural Land

- The land is likely Grade 2 or Grade 3a farmland. Under NPPF paragraph 174(b), local plans should avoid the loss of BMV unless demonstrably necessary.

Biodiversity Net Gain Non-Compliance

- The requires major developments to secure at least a 10% biodiversity net gain, assessed using Defra Metric 4.0.
- The draft policy lacks an ecological baseline, quantified BNG calculation, or credible mitigation delivery plan.

Flood Risk and Water Management

- No published Strategic Flood Risk Assessment demonstrates flood risk can be mitigated, contrary to NPPF paragraphs 159–169 and Planning Practice Guidance
- (Flood Risk and Coastal Change, para. 30).

Transport and Air Quality Failures

- Without a Transport Assessment, safe and suitable access cannot be demonstrated (NPPF paragraph 111).
- The plan fails to model or mitigate the impact on the Air Quality Management Area of Wincheap, contrary to the Environment Act 1995.

Heritage and Landscape Impact

- The site lies close to the Canterbury World Heritage Site and conservation areas.
- Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council must give special regard to conserving settings.
- No Heritage Impact Assessment has been published as required by NPPF paragraphs 199–208.

Procedural Deficiency – Incomplete Evidence Base

- Under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council must publish proportionate supporting evidence.
- The absence of ecological, transport, and flood-risk data prevents meaningful consultation and may render the process deficient.

Climate-Change Duties

- Under Section 19(1A) of the Planning and Compulsory Purchase Act 2004, local plans must include policies to mitigate and adapt to climate change.

- The Merton Park policy provides no clear strategy for carbon reduction, low-carbon travel, or resilience measures.

Cumulative Impact and Strategic Assessment

- The Council has not assessed the cumulative impact of multiple large allocations around Canterbury, contrary to the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633).

Conclusion

In light of the above, I respectfully request that Canterbury City Council reconsider the proposed allocation of SLAA151 for development. I urge the Council to explore more sustainable alternatives that do not compromise our natural heritage, biodiversity, and community assets.

Thank you for considering this representation. I would welcome the opportunity to engage further on this matter.

I ask that you acknowledge receipt of this object and confirm in writing that it will be considered in preparing the final plan.

Yours sincerely,

A black rectangular redaction box covering the signature of Carmelo Somers.

Carmelo Somers

CC: Kent Wildlife Trust; Local MP, Local Counsellor.