

From: Les Bellchambers [REDACTED]
Sent: 20 October 2025 21:33
To: Consultations
Subject: Formal Objection to Draft Local Plan: Policy N1 (Merton Park) is Fundamentally Unsound on Transport Grounds

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Dear Planning Policy Team,

I am writing to submit a formal and detailed objection to the allocation of land at Merton Park (Policy N1 / SLAA151) within the Draft Canterbury District Local Plan. My objection is founded on the clear evidence that the allocation is unsound, specifically because its proposed transport strategy is not **justified, effective**, or based on a credible assessment of the development's impact on the local and strategic highway network.

The history of this allocation is critical. The council's own evidence, as outlined in the Focused Regulation 18 Topic Paper (August 2025), reveals that the original transport mitigation for a development of this strategic scale was predicated on the delivery of new A2 slip roads. The subsequent abandonment of this crucial infrastructure, following what the Topic Paper terms "significant concerns with the technical feasibility and deliverability" from National Highways and Kent County Council, removes the entire strategic premise upon which this quantum of development was originally considered acceptable. The justification for the allocation has not merely been altered; it has collapsed entirely.

The replacement strategy, which hinges on "extensive upgrades to walking and cycling routes" and a "bus-only connection," is a wholly inadequate and unrealistic substitute for strategic road infrastructure. To suggest that such measures can effectively mitigate the vehicle trip generation from approximately 1,930 new dwellings, a major regional sports hub, and associated local facilities is not a serious or evidence-based proposition. A development of this magnitude, located on the city's periphery, will inevitably generate a significant number of private car journeys for commuting, education, retail, and leisure purposes. These journeys cannot and will not be absorbed by the proposed sustainable transport measures alone.

This will place an intolerable and unmitigated burden on an already fragile and congested local road network. Roads such as Nackington Road, Hollow Lane, and Wincheap already experience significant peak-hour congestion, which will be severely exacerbated. This will lead to longer journey times for existing residents, a demonstrable negative impact on air quality in the surrounding area, and a significant decline in the quality of life for the local community. The plan is therefore not **positively prepared**, as it fails to propose a sustainable pattern of development, instead creating a car-dependent community with severe, negative externalities.

Furthermore, the plan's delivery strategy for even these inadequate measures is not **effective**. The policy's success relies on the complex and uncertain coordination of multiple developers across different land parcels (N1, N2, and Site 10) to deliver key infrastructure like the bus link. There is no single, robust delivery mechanism to guarantee these works are completed comprehensively and, crucially, *before* the occupation of new homes. The risk of housing being built and sold while the promised infrastructure remains undelivered is unacceptably high.

In conclusion, the transport strategy for Policy N1 is based on the failed logic of a withdrawn road scheme and has been replaced by an aspirational but ultimately undeliverable and inadequate set of measures. The policy fails the tests of soundness on multiple fronts. I strongly urge the council to recognise these fundamental flaws, find the policy unsound, and delete the allocation from the Local Plan.

Yours faithfully,

Les Bellchambers

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