

**From:** Martin Cunnington [REDACTED]  
**Sent:** 20 October 2025 15:42  
**To:** Consultations  
**Cc:** [REDACTED]  
**Subject:** Canterbury district Local Plan

You don't often get email from [REDACTED] [Learn why this is important](#)

**--Email From External Account--**

Dear Canterbury City Council,

Further to the submission that I have made to the Canterbury district local plan, I would like to expand on the points that I have made concerning the planned housing development on Merton Park and the planned conversion of the Thanington Recreation grounds into a park and ride.

### **UNESCO World Heritage Site**

Canterbury classified as a World Heritage Site. Developments within a UNESCO World heritage site must not have a significant adverse impact on key views, such as wholly obstructing a landmark or dominating a panorama and should aim to preserve or enhance them. The proposed housing development at Merton Park would significantly obstruct the view of the cathedral from this part of Canterbury and deny many local residents the opportunity to walk on the site and enjoy the amazing views.

### **National Planning Policy Framework**

Section 198 of the National Planning Policy Framework states "planning policies and decisions should ensure that development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or wider area to impacts that could arise from the development". The effects of the additional traffic pollution that the proposed housing development will generate, could have a significant impact on the health of local residents and the children in the nearby Wincheap primary school. This is in an area of Canterbury that already has some of the highest levels of air pollution. The UKHSA states, "Air pollutants such as particulate matter, ozone, nitrogen dioxide and sulphur dioxide can have a variety of effects on health including making respiratory conditions worse (1). These pollutants can cause inflammation of the airways, leading to symptoms like coughing, mucus production, and shortness of breath. Studies have shown associations between nitrogen dioxide exposure and reduced lung development, as well as respiratory infections in early childhood (2)."

[Air pollution and airborne allergens - GOV.UK](#)

In addition, Asthma and Lung UK states "around two-thirds of people with asthma tell us poor air quality makes their asthma worse, putting them at risk of an asthma attack.

Air pollution can irritate your airways. It can also make your asthma symptoms like coughing, wheezing, breathlessness and chest tightness worse."

[Air pollution and asthma | Asthma + Lung UK](#)

The Local district plan should be including recommendations to significantly reduce air pollution levels, rather than increasing them through this proposed housing development at Merton Park.

Section 20 of the National Planning Policy Framework states that "policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for ...d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation. The proposed housing development at Merton Park will destroy a significantly biodiverse area of Canterbury that has thrived in the orchards, hedgerows, trees and fields that cover the Merton Park area. The impact of the proposed housing development will not be mitigated by the proposed green corridors.

The proposed football pitches, supports centre and housing development will also add significant levels of light pollution to the area. Contrary to Section 198 of the National Planning Policy Framework, the development will cause, not "limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation".

Section 8 of the National Planning Policy Framework states that sustainable development has three overarching objectives. The social objective is to "support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing". The withdrawal of the open spaces and social and sporting facilities from the Merton Park site and the Thanington Recreation Ground would not enable the City Council to meet this objective. This would also be a missed opportunity think about how the two sites could add to the Government's target of reducing childhood and adult obesity levels in the local area.

There are also significant concerns around the proposed access to the Merton Park site, both in terms of construction vehicles needed to use the site to complete the necessary works for the housing development and then for the significant increase in traffic using narrow lanes once people have moved into their new homes. It seems as though Section 109 of the National Planning Policy Framework has not been implemented when looking at the Merton Park site, where there is a requirement to consider transport issues at the earliest stages of the planning process.

### **Sewage capacity issues**

The data set out below shows that there is already a significant sewage capacity issue in the Wincheap area with 17 dumps/45 hours of sewage overflows into the Great Stour by Southern Water this year. This will only get worse with the proposed new housing developments.

[Top of the Poops | Constituency | Canterbury| Polluted by Southern Water](#)

In conclusion, whilst I recognise the urgent need for new housing in the Canterbury district to meet local demand and new Government housing targets, I would like to suggest that the Merton Park development is removed from the local plan and consideration is made for the housing to be moved back to the land next to the University of Kent. We have heard in the last few days that the University of Kent intends to go ahead and sell the land to developers for housing. The land that is being proposed for housing would not encroach on the Blean woods but would be utilising fields that have a lower level of biodiversity than Merton Park.

Best wishes

Martin Cunnington