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To: Consultations
Subject: Draft Canterbury District Local Plan - Focused Consultation

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Canterbury Local Plan

Focused Consultation October 25

Merton Park Policy N1 (formerly C6)

I wish to object to the proposed Merton Park development for the following reasons:

Consultation Process and Available Information

While the opportunity to comment on the Council's proposed revisions to the draft Plan is appreciated the minimum effort appears to have been made to enable public awareness. I received an email because I responded to the previous consultation but for those not in that position and now directly affected by the revisions (especially access) there was nothing to bring it to their attention, other than word of mouth. I think this is far less than such an important consultation deserves. Furthermore, the consultation proposals contain little explanatory material/justification and, in the case of access, raise far more questions than they answer.

I think that the Council should have held a local exhibition with an opportunity for the public to discuss the proposals with officers. As it stands the Council will now consider comments and then decide on the submission version of the Plan. At that point positions will be entrenched leading into the public examination. That is not very helpful for anyone and shows that the consultation process has failed. I ask that after the Council has assessed comments received it enters into dialogue with local residents in order to better explain and justify how the Merton Park proposals are intended to work and enable residents to gain a more informed opinion about them. There should then be an opportunity for further comment.

It is contrary to the following adopted Local Plan policies

HD4 New Dwellings in the Countryside - The site falls within the countryside where this policy restricts housing development to small-scale exceptions

EMP12 Agricultural Land - The site consists of the high grade agricultural land that is protected under this policy

DBE9 Outdoor Lighting - The proposed development would have a large amount of external lighting which would be highly visible due to the elevated nature of the site and would be in conflict of this policy, particularly parts c, d and f. Other than upward sky glow it will not be possible to mitigate this.

Policy HE1 Historic Environment and Heritage Assets and Policy HE2 World Heritage Site and Buffer Zone, HE3 Significant Views of the City and World Heritage Site and Policy HE6 Conservation Areas - Development of the site would cause irreversible harm to the setting of the World Heritage Site and City Conservation Area contrary to the terms of these policies (paragraph 9.23 is particularly important in explaining the importance and sensitivity of views of the WHS)

Policy LB2 Areas of High Landscape Value - The site is within an AHLV and the nature and scale of the proposed development would have a significant impact upon historic setting and nature conservation interests bringing it into conflict with the policy

Policy LB10 Trees, Hedgerows and Woodland - the orchards make an important contribution to the amenity of the site and wider area and have a wildlife interest. The concept masterplan shows them to be replaced by housing development which brings them into conflict with this policy which requires development to retain trees

Policy QL11 Air Quality - the proposed primary access is to be from Wincheap via Hollow Lane. Wincheap already has air quality issues in this area which will be worsened by the development, whatever optimistic assumptions are made about encouraging walking, cycling and public transport.

Insufficient Evidence

The proposal is for a large-scale mixed use development that gives rise to a wide range of environmental impacts. It should be supported by properly undertaken assessments to determine the extent of these impacts, the scope for mitigation and the residual impacts/harms. These assessments should be in sufficient depth to enable informed discussion and decision making on whether the site should be allocated. It is not acceptable to propose to deal with issues through clauses in the draft policy to require such assessments at planning application stage as, by this time, the principle of development has already been established.

Sustainability Assessment

The SA is superficial for a development of this scale. This may be due to the lack of evidence that it is able to draw upon. If that is the case it should be robustly pointing this up. If it is not the case it should be making much crisper conclusions and citing the evidence upon which it is relying. For example, it claims that access "is considered

achievable from Hollow Lane and Nackington Road” but considered by who and based upon what?

Notwithstanding this, the SA does document several important areas of negative effects and uncertainties which undermine the Council’s claim (paragraph 3.19 of the consultation document) that Merton Park is a “highly sustainable and accessible location”. The number of currently adopted Local Plan policies that it contravenes also indicates that it is not sustainable.

Irreparable Harm to the setting of the Cathedral World Heritage Site and City Conservation Area

Development of the site would lead to the loss of superb historic panoramic views of the Cathedral and City Centre CA in their valley setting and rural backdrop. The proposed viewing corridors would seriously diminish these views and appreciation of the Cathedral in its valley setting. Development would also destroy the rural backdrop to the Cathedral when viewed from across the valley and other important viewpoints such as the Dane Jon Mound and the Westgate Towers. The proposed viewing corridors can do nothing to mitigate this.

Unsuitable and Inadequate means of vehicular access for construction and occupation phases

Kent Design expects a development of this scale to be accessed by a local distributor road capable of catering for all vehicle types up to pantechicon. A typical carriageway width is 6.75m (within a range of 6m to 10.5m), with a typical verge width of 2m (range .5m to 5m) and a typical footway/cycleway of 3m (range 1.8m to 5m).

The consultation document states that the primary access to the site would be from Wincheap via Hollow Lane with Hollow Lane converted to one-way working between Wincheap and its junction with Hollowmede, and upgrades to Homersham including the creation of off-street parking bays.

Hollow Lane is, in origin, a country lane and is fundamentally not suitable for accessing a development of the scale proposed. The section between Wincheap and the junction with Hollowmede has a carriageway width varying between around 5.5m to around 4.3m with sections of on-street parking, no verges and footways of typically around 1.2m on both sides. There is also an entrance to the local primary school at the junction with Hollowmede. Predominantly terraced housing is set on both sides of Hollow Lane from the back edge of the footways i.e. there are no front gardens. There is, therefore, no scope for bringing it up to the design standards of a local distributor road. Furthermore, significantly increasing the volume and type of traffic on this road would cause considerable harm to the amenities and health of residents through increased noise, dust, air pollution and reduced pedestrian safety, even if traffic flow was restricted to

one-way. The implications for the current on-street parking are not mentioned in the consultation document but if, as seems likely, it would have to be removed what is the alternative arrangement? The section of Hollow Lane from the junction with Hollowmede to entry with the site would be two-way traffic but the carriageway width is only around 4.5m with restricted scope to widen it, let alone provide footways and verges.

The proposed traffic flow arrangements are obscure. In particular, it is not stated which way the one-way working on Hollow Lane would be. Depending upon whether it is one-way in or out it has different implications for local residents and the school to access their properties, the ability of traffic to avoid Wincheap and rat run through Hollowmede and residential roads through to Nunnery Fields. Neither is it clear how the one-way junction of Hollow Lane with Wincheap would interact with the Council's proposed junction arrangement at Cow Lane for the Wincheap one-way gyrator system. It is also questionable whether sufficient visibility is available at the junction to meet Kent Design standards.

The role of Homersham is equally unclear. It is not mentioned that it would be part of the primary access proposals yet it would have to be if Hollow Lane was converted to one-way working. Homersham appears to have been built as a major access road to serve up to 300 homes and is designed to discourage non-essential traffic. It follows a boulevard design concept with verges and footways, generous tree planting and traffic calming measures and is, in my view, the best designed suburban development in Canterbury. Any proposals to "upgrade" it to perform as a local distributor road would undermine its design principals and cause harm to the amenities of its residents.

The use of Hollow Lane and Homersham by construction traffic would be harmful, potentially dangerous and quite inappropriate. Bearing in mind that the construction period for a development of this scale would be in the region of 10 to 15 years it is quite unacceptable.

The consultation document does not provide any information on the effect of the traffic generated by the proposed development on the road network. This, of course, needs to be considered in conjunction with other proposals such as the Wincheap slip road, park and ride, the industrial estate proposals and the Wincheap one-way system. The Council should provide this in the form of the technical work but also a non-technical summary. As it stands, it is hard to see how the junctions at each end of Wincheap would not simply be swamped. Apart from anything else this would nullify the claimed benefits of the Wincheap one-way system.

The consultation document focuses on proposed cycle and pedestrian connections but in reality Merton Park would be a car dependent development (as noted in the SA) and once built out would be likely to generate in the order of 1600 vehicle movements in the peak hours through junctions that are already stretched and have physical constraints that limit expansion. For example, the right turn lane into Homersham cannot be extended.

Overall, it seems that the access proposals are ill-conceived and reliant on seriously compromising Kent Design standards to the detriment of local residents and all users of Wincheap. It is incumbent upon the Council to demonstrate how they think the arrangements would work and what the effects would be. The current lack of information is disappointing, to say the least, and this should be put right before the Council agrees the submission version of the Plan. There should also be an opportunity for the public to comment on that information before a decision on submission.

Harm to a valued landscape

I have commented on this before and those comments still stand. Essentially the current adopted Local Plan and subsequent studies commissioned by the Council show that the landscape has a special role in contributing to the historic rural setting of the WHS and City. This shows that it should be considered as a valued landscape in NPPF terms and the harm created by the proposed development assessed accordingly. Such assessment should be reflected in the SA and used to determine the suitability of the site for development.

Loss of a valued amenity area for informal recreation

Again, previous comments stand but in summary the area is valued and used extensively by local people for informal recreation, both on designated footpaths and a network of informal ones. Its value lies in its intrinsic beauty and feeling of being in open countryside yet immediately accessible from the urban area. While the proposals include provision for walking routes these will essentially be paths through housing estates and sports facilities. They may replicate the amount of current walking routes but they will offer a seriously diminished quality and appeal much less to local people to the detriment of their health and wellbeing. The loss of the orchards would also be a loss of a habitat for wildlife, particularly birds. The Council should undertake a proper assessment of the wildlife value of the site and the likely effect of development at this stage in the plan making process.

Loss of best quality agricultural land

The majority of the site is highest grade agricultural land and the proposal would lead to a significant irreversible loss. This should be properly reflected in the SA and the Council's final decision on the allocation. Previous comments stand.

Considerable harm to the night sky through light pollution

The site forms part of the Stour Valley slopes and consists of rising ground leading to a plateau beyond Stuppington Lane. The presence of development on it will be clear at

night-time due to external lighting. This would not only be street lighting but security lighting for commercial and community uses and floodlighting for the sports facilities. This will be visible from locations below the level of the site and from similar levels on the opposite side of the valley. Mitigation measures are only going to help reduce the amount of upward light spillage and will not reduce the effect of illuminating the valley slope and crest. This would seriously harm the nighttime appreciation of the City and WHS in its rural setting. It would also cause disruption to wildlife and puts a question mark against the reality of seeking biodiversity enhancement. Previous comments stand.

Policy N1 Objections in Detail

Without prejudice to the above objections in principle:

Para 1 b) The provision for new allotments has not been carried forward. There is no explanation given for this and unless there has been a change in the level of demand in the last year I object to its omission.

Para 1. b) (3)

The proposal to re-locate Thannington Recreation Ground facilities within this site is too far removed from the community which it is supposed to serve. It will lead to more and longer car journeys and disadvantage those who do not have access to a car.

Para 1. c) This appears to require the provision of a new football stadium. However, the need for a stadium is not caused by the Merton Park development and so its delivery cannot be required through planning permission. A planning application could, however, make land provision for a new stadium and the policy should be reworded accordingly

Para 2. a) This is very vague. The matters which need coordination should be specified

Para 2. c) The requirement for a net density of 45 dph is very high for a suburban development and at odds with the objective of a high quality built environment. It references Policy DS6 which in 6. (b) has an expectation of around 35 dph in urban areas. There is no explanation/justification given for 45 dph so I assume it is a mathematical calculation to simply fit the amount of housing into the site. A density of 35 dph seems much more appropriate to a site on the edge of the urban area and the policy, including total site capacity, should be amended accordingly.

Para 5) a) The requirement for on-site waste water treatment works to be delivered at the earliest possible stage is vague and impossible to determine. The requirement should be related to the occupation of a set number of dwellings, as are other facilities in this part of the policy.

Kind regards

Mike Ebbs