

--Email From External Account--

Dear Sir/Madam,

I write to formally object to **Policy N1 (Land at Merton Park)** on the grounds that it represents a fundamentally car-dependent, high-carbon development that locks in decades of unsustainable travel patterns and directly contradicts Canterbury City Council's Climate Emergency Declaration. As a resident living on the edge of this proposed development at [REDACTED], I will witness firsthand the traffic chaos and carbon emissions that this ill-conceived allocation will generate.

The Allocation is Unsound

This allocation **fails the soundness tests** required by NPPF Paragraph 35:

- **NOT POSITIVELY PREPARED:** Fails to address the climate crisis or plan for sustainable development
- **INCONSISTENT WITH NATIONAL POLICY:** Breaches NPPF Paragraphs 152, 105, 158 concerning climate change mitigation and sustainable transport

The Fundamental Flaw: Car Dependency is Inevitable

The site is located **2-3 kilometers from Canterbury city centre** – beyond comfortable walking distance for most daily trips, especially for families, elderly residents, and those with mobility challenges. The **Focused Regulation 18 Topic Paper (August 2025)** at paragraph 6.26 claims that the new transport strategy is "*centred on sustainable travel, including extensive upgrades to walking and cycling routes towards the city centre.*"

This claim is **demonstrably inadequate and unrealistic** for a development of 1,930 dwellings accommodating approximately 4,000 residents. Let me be absolutely clear about why this "sustainable transport" strategy will fail:

Families with young children cannot realistically cycle 3km each way to school, shops, and activities on a daily basis. Anyone with children knows this is impractical in reality, regardless of how good the cycle infrastructure is. Getting children ready, managing school bags, after-school activities, and shopping cannot be done by bicycle for most families most of the time.

Elderly residents – and the policy specifically proposes 193 older persons housing units – cannot be expected to cycle 3km. The policy's own provision of specialist older persons housing **contradicts** the claim that sustainable transport is viable. If the site were genuinely sustainably located, why would older people be unable to access it without cars?

Residents with disabilities will require car access. The Equality Act requires that development is accessible to all, yet a site 3km from essential services inevitably discriminates against those who cannot cycle.

Shopping trips require car access. The policy proposes only 1,200sqm of commercial and 480sqm of local shopping – this is **grossly inadequate** for 1,930 households. Major grocery shopping, household goods, DIY supplies, furniture, and countless other purchases will require trips to larger stores, all of which are only accessible by car from this location.

Winter weather makes cycling impractical for several months of the year. Rain, ice, snow, and dark evenings mean that even committed cyclists will drive for much of the year. The "sustainable transport" strategy ignores seasonal reality.

Evening activities – entertainment, dining, cinema, theatre, visiting friends – will require car use due to safety concerns, distance, and the impracticality of cycling at night, especially for families with children.

The inevitable result: **1,500-2,000 private cars** generating substantial CO2 emissions for a minimum of 30 years, and realistically 60+ years (typical building lifespan). Every one of these homes will lock in car dependency for decades because of the site's inherently unsustainable location.

The Previous Transport Strategy Failed – This One Will Too

The **Focused Regulation 18 Topic Paper** at paragraph 6.25 confirms that in the 2024 consultation, "*National Highways and KCC Highways raised significant concerns with the technical feasibility and deliverability*" of the proposed A2 slip roads that were central to the site's original transport strategy.

These were not minor concerns – they were **significant concerns from statutory consultees** with technical expertise in highway infrastructure. The concerns were so serious that the A2 slip roads were deleted entirely from the scheme.

The A2 slip roads were deleted **because they didn't work**. They were technically unfeasible. They were undeliverable. The entire transport strategy collapsed under scrutiny from highways experts.

Now the Council asks us to believe that an entirely different transport strategy – based on "sustainable travel" rather than highway infrastructure – will somehow succeed where the previous strategy failed. This is **wishful thinking, not strategic planning**.

The replacement "sustainable transport" strategy is:

- **Untested** – it has not been subject to the same scrutiny as the failed A2 slip roads

- **Speculative** – it assumes behavior change that may not occur
- **Inadequate** – it cannot realistically serve 1,930 homes in this location

We are being asked to trust that extensive cycle route upgrades will magically transform a car-dependent site 3km from the city centre into a sustainable community. This is **demonstrably unrealistic**.

National Policy Requirements Are Clear

NPPF Paragraph 152 states: *"The planning system should support the transition to a low carbon future... Plans should... help to... reduce greenhouse gas emissions."*

Policy N1 does the **exact opposite**. It creates a new community of 4,000 people in a location that **guarantees high carbon emissions** from transport for decades. This is not "supporting the transition to a low carbon future" – it is actively undermining it.

NPPF Paragraph 105 requires: *"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."*

Policy N1 fails every part of this test:

- The location **cannot be made sustainable** – 3km is too far for most daily trips
- The need to travel is **maximized not limited** – residents will travel by car for most activities
- There is **no genuine choice of transport modes** – cycling may be theoretical option but is not practical for most trips most of the time

NPPF Paragraph 158 states: *"New development should be planned for in ways that... can help to reduce greenhouse gas emissions, such as through its location."*

The location of Policy N1 guarantees high transport emissions. The Council has deliberately chosen a location that **maximizes carbon emissions** when lower-carbon urban locations are available.

Climate Emergency Declaration Contradicted

Canterbury City Council declared a Climate Emergency committing to ambitious carbon reduction targets. Policy N1 **directly contradicts** this commitment through:

1. **Creating 1,500-2,000 new car-dependent homes** – at a conservative estimate of 10,000 miles per car per year and 2.3kg CO₂ per gallon, this generates approximately **30,000+ tonnes of CO₂ over just 20 years** from transport alone. Over a 60-year building lifespan, transport emissions could exceed **90,000 tonnes of CO₂**.

2. **Locking in high-carbon travel patterns** for 60+ years (typical building lifespan) – decisions made today create emissions for decades to come. This is not a short-term compromise; it is a long-term carbon disaster.
3. **Destroying 83.9 hectares of carbon-sequestering agricultural land** – farmland absorbs CO₂. Development replaces carbon-absorbing land with carbon-emitting buildings and roads. This is a double climate impact: losing carbon absorption while adding carbon emissions.
4. **Generating substantial embodied carbon** in the construction of 1,930 homes – concrete, steel, bricks, and construction processes generate enormous CO₂ emissions. The embodied carbon of 1,930 homes likely exceeds 50,000 tonnes CO₂.

The Council **cannot credibly declare a Climate Emergency** while simultaneously allocating a massive car-dependent greenfield sprawl 3km from the city centre. The contradiction is obvious and fatal to the Plan's credibility.

The Carbon Impact Has Not Been Assessed

There is **no carbon impact assessment** in the evidence base for Policy N1. This is an extraordinary omission for a development of this scale in the context of a Climate Emergency.

The Council has failed to quantify:

- **Embodied carbon in construction** – concrete, steel, materials, construction process
- **Operational carbon** from heating, electricity, cooking over 60+ years
- **Transport carbon** from 1,500-2,000 cars over 60+ years
- **Carbon loss** from developing 83.9ha of agricultural land
- **Total lifetime carbon footprint** of the development

Without this assessment, the Council **cannot demonstrate** that the Plan is consistent with its Climate Emergency commitments, cannot prove compliance with NPPF Para 152-158, and cannot make informed decisions about whether the allocation should proceed.

The absence of a carbon assessment renders the allocation **unjustified and unsound**.

Reasonable Alternatives Exist

The **Strategic Land Availability Assessment (August 2025)** identifies multiple brownfield sites in highly sustainable locations **within the Canterbury Urban Area** (Sites N8-N18, plus others). These sites:

- Are within **genuine walking distance** (400-800m) of city centre services, employment, and transport hubs
- Have **excellent public transport connectivity** with frequent bus services and railway stations nearby
- Require **no greenfield land loss** and contribute to urban regeneration
- Are **genuinely sustainable locations** where car ownership rates could be low and walking/cycling viable
- Could be developed at **higher densities** (60-80 dwellings per hectare) typical of urban locations

The allocation of 1,930 dwellings at car-dependent Merton Park (35 dph) over these genuinely sustainable urban sites is **irrational** from a climate perspective. It is planning in reverse – prioritizing the worst location while neglecting the best.

What the Council Must Do

To make this Plan sound, the Council must:

1. **Commission a full carbon impact assessment** for Policy N1 covering embodied carbon, operational carbon, and transport carbon over a 60-year building lifespan
2. **Demonstrate specifically how N1 is compatible** with the Climate Emergency Declaration, with reference to carbon budgets and net-zero targets
3. **Prove the "sustainable transport" strategy will deliver genuine modal shift** with evidence, not aspirational assumptions – what percentage of trips will genuinely be by sustainable modes?
4. **Prioritize brownfield sites** in genuinely sustainable urban locations where car dependency can genuinely be reduced
5. **Increase densities** on urban sites to accommodate housing need without greenfield sprawl
6. **Delete Policy N1** as fundamentally incompatible with climate objectives and national policy on sustainable development

Conclusion

Policy N1 represents a **climate disaster in planning form** – a car-dependent, high-carbon development in an inherently unsustainable location that locks in decades of emissions. It directly contradicts the Council's Climate Emergency Declaration and breaches national policy on climate change and sustainable development.

I live on [REDACTED]. I will see every day the traffic chaos and pollution that this development generates. The thousands of car journeys. The queues. The emissions. The failure of the "sustainable transport" strategy to deliver what was promised. This is not scaremongering – it is the inevitable consequence of putting 1,930 homes 3km from the city centre.

This allocation is **unsound** and must be deleted.

I request that this objection is forwarded to the Planning Inspector and that the Council provides a detailed written response explaining:

1. How this allocation complies with NPPF Para 152, 105, and 158
2. How it is compatible with Climate Emergency commitments
3. What the total carbon footprint of the development is over 60 years
4. Why sustainable urban locations have been rejected in favor of this car-dependent site
5. What evidence demonstrates the sustainable transport strategy will work

Yours faithfully,

Alan Davidson

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--Email From External Account--

Dear Sir/Madam,

I write to formally object to **Policy N1 (Land at Merton Park)** in the Draft Canterbury District Local Plan Focused Consultation (Regulation 18, September 2025) on the grounds that it proposes the unjustified and irreversible loss of 83.9 hectares of Best and Most Versatile (BMV) agricultural land in direct breach of national policy.

As a resident of [REDACTED], I am deeply concerned that the Council is proposing to sacrifice irreplaceable agricultural resources without proper justification, adequate assessment, or consideration of reasonable alternatives. This represents a fundamental failure of strategic planning and a betrayal of the countryside that defines Canterbury's identity.

The Allocation is Unsound

This allocation **fails the soundness tests** required by NPPF Paragraph 35:

- **NOT JUSTIFIED:** No exceptional circumstances demonstrated for BMV land loss; not the most appropriate strategy when considered against reasonable alternatives

- **INCONSISTENT WITH NATIONAL POLICY:** Direct breach of NPPF Paragraphs 174(b) and 180(b) requiring protection of BMV agricultural land

A Plan that proposes to develop 83.9 hectares of productive agricultural land without robust justification cannot be considered "sound" and will not withstand scrutiny at Examination in Public.

The Council's Own Evidence Confirms BMV Status

The Council's own **Strategic Land Availability Assessment (August 2025)** confirms unequivocally that SLAA151 (Merton Park) comprises "**Best and Most Versatile agricultural land (Grade 3)**" (page 148-149). This is not disputed or uncertain – it is a matter of established fact in the Council's evidence base.

Furthermore, the **Natural Environment Topic Paper** assessment of Land to the west of Park Wood (SLAA329) states explicitly: "*it is best and most versatile agricultural land (Grade 3)*" and concludes that on this basis alone "*no designation is proposed*" for environmental use (Appendix H, page 174-175).

The reasoning is clear: Grade 3 BMV land is considered **too valuable to designate** even for environmental enhancement purposes. Yet the same Council proposes to **concrete over 83.9 hectares** of identical BMV land at Merton Park for housing.

This is an obvious and fatal contradiction. If Grade 3 BMV is sufficient reason to refuse environmental designation, why is the same land acceptable for housing development? The Council cannot have it both ways. Either BMV land is worthy of protection or it is not. The inconsistency proves the allocation is **not justified**.

National Policy Requirements Are Clear and Binding

NPPF Paragraph 174(b) requires plans to "*recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including... the economic and other benefits of the best and most versatile agricultural land.*"

This is not optional guidance – it is a mandatory requirement. Plans must "recognise" the benefits of BMV land. Policy N1 does the opposite: it **ignores** those benefits entirely.

NPPF Paragraph 180(b) is even more explicit: "*Plans should... where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.*"

The language is clear: a **sequential approach** is required. The Council must demonstrate:

1. That development of agricultural land is "demonstrated to be necessary"
2. That areas of "poorer quality land" have been considered and are unavailable

3. That areas of "higher quality" land are therefore the only option

The Council has provided **no such evidence**. There is no sequential test. There is no demonstration that poorer quality land is unavailable. There is no assessment of whether the development is "necessary" on agricultural land at all.

The Contradiction with the Council's Stated Strategy

The **Focused Regulation 18 Topic Paper (August 2025)** states clearly at paragraph 6.8: *"In order to maximise the potential of previously developed land, all brownfield sites identified in the SLAA as suitable, available and achievable are proposed for allocations."*

This is the Council's **stated strategy** – brownfield first. It is a sound strategy that complies with national policy and reflects community expectations. Yet the evidence reveals a completely different reality.

The SLAA identifies only **12 small brownfield sites (N8-N18) totaling approximately 290 dwellings** in Canterbury Urban Area. These include sites like Millers Field car park (9 dwellings), Hawk's Lane (12 dwellings), and Long Meadow Way (5 dwellings). The total brownfield contribution in the Canterbury Urban Area is **trivial** compared to the 1,930 dwellings proposed on greenfield BMV agricultural land at Merton Park.

This is not "maximising the potential of previously developed land" – it is the **exact opposite**. The allocation prioritizes massive greenfield development while giving only token attention to brownfield sites. The strategy is **demonstrably contradictory** to the Council's stated approach and fundamentally unsound.

Moreover, no evidence is provided that brownfield capacity has been exhausted. No assessment demonstrates that 1,930 dwellings cannot be accommodated through:

- Higher-density development on existing brownfield sites
- Additional brownfield site identification
- Urban intensification within the Canterbury Urban Area
- Mixed-use redevelopment of underutilized commercial areas

The Council has simply **assumed** that massive greenfield development is necessary without properly testing alternatives. This renders the Plan unjustified.

Permanent and Irreversible Harm to Food Security

The loss of 83.9 hectares of productive agricultural land is **permanent and irreversible**. Once developed, this land can never return to food production. The soil structure will be destroyed. The agricultural productivity will be lost forever. The food-producing capacity will be eliminated for generations.

In the context of:

- **Post-Brexit food security concerns** with reduced access to European agricultural imports
- **Climate change impacts** on agricultural productivity and growing seasons
- **Government emphasis** on domestic food production and rural economy
- **Population growth** increasing food demand
- **International instability** affecting global food supply chains
- **Need to protect BMV land** for future generations who cannot speak in this consultation

The allocation represents a **reckless and unjustified** sacrifice of irreplaceable agricultural resources at precisely the time when national policy demands their protection.

The NPPF does not require protection of BMV agricultural land because it is sentimentally attached to farming. It requires protection because BMV land represents a **strategic national resource** that is finite, irreplaceable, and essential to long-term food security and rural economy. Policy N1 treats this resource as expendable. This is **fundamentally unsound**.

No Exceptional Circumstances Demonstrated

Government policy is clear: BMV agricultural land should be protected except in **exceptional circumstances**. The Council has not demonstrated any such circumstances. The **Focused Regulation 18 Topic Paper** makes clear that housing need can be met through:

- Brownfield sites within Canterbury Urban Area
- Lower-grade agricultural land elsewhere in the district
- Alternative spatial strategies focusing growth in more sustainable locations
- Higher-density development reducing land take

There is **no evidence** that Policy N1 is the only way to meet housing need, or that all reasonable alternatives have been exhausted. The Council has simply selected this large greenfield site because it is **convenient**, not because it is **necessary** or **justified**.

The 2024 consultation on this site received **130 written representations** (Topic Paper para 6.27). If there were truly "exceptional circumstances" justifying this allocation, the Council would be able to articulate them clearly. Instead, the evidence base is silent on this fundamental question.

What the Council Must Do

To make this Plan sound, the Council must:

1. **Commission a proper Agricultural Land Classification survey** to confirm whether the land is Grade 2, 3a (BMV) or 3b (non-BMV). The current "Grade 3" classification is inadequate – the difference between 3a and 3b is legally significant.
2. **Demonstrate exceptional circumstances** for BMV loss with comprehensive evidence explaining why 83.9 hectares of productive agricultural land must be sacrificed and why this is in the public interest.
3. **Apply a sequential test** as required by NPPF Para 180(b), proving that reasonable alternatives on lower-grade land have been considered and are genuinely unavailable or unsuitable.
4. **Explain the contradiction** between the refusal to designate SLAA329 for environmental purposes because it is BMV land, and the willingness to allocate SLAA151 for housing despite the identical constraint.
5. **Reconcile the contradiction** between the stated strategy to "maximise the potential of previously developed land" and the reality of allocating 1,930 dwellings on greenfield BMV land while only 290 dwellings on brownfield.
6. **Assess whether housing need can be met** through alternative strategies that avoid BMV land loss, including higher-density urban development and additional brownfield site identification.
7. **Delete Policy N1** if the above cannot be robustly evidenced with reference to specific NPPF requirements and planning case law on BMV protection.

Conclusion

The allocation of 83.9 hectares of Best and Most Versatile agricultural land at Merton Park is **unjustified, contradictory to the Council's stated strategy, inconsistent with the treatment of other BMV sites, and in direct breach of national policy**. It fails fundamental soundness tests and represents a strategic planning failure of the first order.

I have lived on [REDACTED] for many years and have seen the agricultural land at Merton Park sustain food production season after season. To see this productive land sacrificed without proper justification is deeply concerning. The Council has a duty to protect BMV land for future generations – a duty it is failing to discharge.

This allocation is **unsound** and must be deleted.

I request that this objection is forwarded to the Planning Inspector and that the Council provides a detailed written response explaining:

1. How this allocation complies with NPPF Para 174(b) and 180(b)
2. What exceptional circumstances justify BMV land loss
3. Why the sequential test has not been applied
4. Why the contradiction with SLAA329 assessment is justified
5. How this allocation "maximises the potential of previously developed land" as stated in the Topic Paper

Yours faithfully,

Alan Davidson

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--Email From External Account--

Dear Sir/Madam,

I write to formally object to **Policy N1 (Land at Merton Park)** on the grounds that it will cause the irreversible destruction of the landscape character of South Canterbury, fundamentally altering the rural-urban transition and countryside setting of Canterbury – a World Heritage Site and historic city of international significance.

As a resident of [REDACTED], I live on the very edge of this proposed development. I see this agricultural landscape every day. I understand its character, its beauty, its role in defining Canterbury's identity. The Council's proposal to concrete over 83.9 hectares of this countryside represents landscape vandalism of the highest order.

The Allocation is Unsound

This allocation **fails the soundness tests** required by NPPF Paragraph 35:

- **NOT JUSTIFIED:** Landscape harm not properly assessed or weighed against reasonable alternatives
- **INCONSISTENT WITH NATIONAL POLICY:** Breaches NPPF Paragraphs 130(c) and 174(a) requiring protection of landscapes

The Policy Admits Significant and Unavoidable Landscape Harm

Draft Policy N1 itself acknowledges the landscape harm through the extensive mitigation measures it requires (Draft Canterbury District Local Plan, pages 24-25). These requirements are not merely good practice – they are **emergency measures** attempting to reduce harm that should never be allowed in the first place.

Policy N1(3)(c)(i) requires: *"Provides a substantial landscape buffer to **reduce visual and landscape impact of the development**"*

Policy N1(3)(c)(ii) requires: *"Provides visual integration to **transition the surrounding rural dip slope landscape**"*

Policy N1(3)(c)(iii) requires mitigation to: *"Contributes towards noise mitigation from the A2"*

Policy N1(3)(c)(iv) requires: *"**Preserves long distance views to the City and World Heritage Site**"* [emphasis added – admission that views are currently unobstructed and at risk]

Policy N1(3)(f) requires: *"Preserve and enhance views towards the City and World Heritage Site with provision of viewing corridors from open space"*

These requirements are **explicit and unambiguous admissions** that:

1. The development will have significant "visual and landscape impact" requiring "substantial" buffers to "reduce" (not eliminate) the harm
2. The existing "rural dip slope landscape" – a defined landscape character – will be fundamentally altered and must be artificially "transitioned"
3. Long-distance views to the World Heritage Site are currently unobstructed and must be "preserved" (i.e., they are at risk from the development)
4. The site currently has poor environmental quality due to A2 noise pollution

If the landscape harm were acceptable or could be adequately mitigated, these extensive and specific mitigation measures would be unnecessary. Their inclusion **proves** that:

- The landscape harm is **substantial**
- The harm **cannot be eliminated**, only "reduced"
- The Council **knows** the harm is significant but proposes to allow it anyway

This is not sound planning – it is damage limitation planning.

Local Character Area Will Be Permanently Destroyed

The **Focused Regulation 18 Topic Paper (August 2025)** explicitly references at Policy N1(3)(b): *"Local Character Area H4: Nackington Farmlands set out in Canterbury Landscape Character and Biodiversity Appraisal."*

This is not incidental countryside – it is a **defined and assessed Landscape Character Area** that contributes to Canterbury's landscape setting. The Landscape Character

Assessment exists precisely to identify landscapes worthy of protection. Policy N1 proposes to destroy what the Council's own assessment identifies as significant.

The policy requires *"opportunities for landscape and biodiversity enhancements identified within"* this character area. This is classic **mitigation language** – acknowledging that harm will occur and attempting to provide compensation elsewhere. But landscape character cannot be "compensated" – once destroyed, it is gone forever.

The **SLAA (August 2025)** describes SLAA151 (Merton Park) as comprising *"Agricultural, residential... car parking... sport and leisure"* with *"green fields with mature trees"* (page 148-149). The landscape is described as *"Green fields with mature trees around the borders"* with *"topography"* that *"slopes slightly from north to south"*.

This is quintessential English farmland – the landscape that defines Kent as the "Garden of England". This agricultural landscape will be **permanently replaced** with 1,930 homes, roads, car parks, and urban infrastructure, creating suburban sprawl where open countryside currently provides Canterbury's rural setting.

130 Public Representations Raised Landscape Concerns – The Council Ignored Them

The **Focused Regulation 18 Topic Paper** at paragraph 6.27 acknowledges with remarkable candor: *"130 written representations were submitted to the draft Local Plan consultation (2024) commenting on Land at Merton Park. The most frequent issues raised were around the **loss of green spaces**, as well as the additional pressure on roads."*

130 representations. The **most frequent issue** was loss of green spaces. This is not nimbyism – this is a community telling the Council that the landscape harm is unacceptable.

The Council's response at paragraph 6.27 is telling: *"The policy wording relating to green spaces has been strengthened overall, with more specific reference to **reducing the visual and landscape impact of the development.**"*

This confirms three crucial points:

1. **The Council acknowledges the concern is valid** – otherwise why "strengthen" the policy wording?
2. **The "solution" is merely to "reduce" impact** – the harm will still occur, just supposedly less severely
3. **Policy wording changes are not genuine mitigation** – they are words on paper, not landscape protection

The community spoke clearly: the landscape harm is unacceptable. The Council responded by allocating the site anyway and adding some policy wording to "reduce" the acknowledged harm. This is not responding to consultation – it is **ignoring it**.

National Policy Requirements Are Clear

NPPF Paragraph 130(c) requires development to be: *"sympathetic to local character and history, including the surrounding built environment and landscape setting."*

Policy N1 will not be "sympathetic" to local character – it will **destroy** it. The development of 83.9 hectares of agricultural land with 1,930 homes at low density (35 dph) is the **opposite** of sympathetic. It is landscape obliteration.

NPPF Paragraph 174(a) requires plans to: *"protect and enhance... landscapes."*

The word is "protect", not "destroy and compensate". The word is "enhance", not "mitigate unavoidable harm". Policy N1 will **fundamentally alter** – not protect or enhance – the landscape character of South Canterbury.

The NPPF does not say "protect landscapes unless housing is needed". It does not say "enhance landscapes except where inconvenient". It says protect and enhance. Policy N1 fails both requirements comprehensively.

Urban Sprawl Destroying Countryside Setting

The allocation represents **classic urban sprawl** of the worst kind – low-density (35 dwellings per hectare) suburban housing spreading into open countryside, creating car-dependent estates that could be anywhere in England, destroying the specific landscape character that makes Canterbury distinctive.

For context, urban Canterbury accommodates densities of 80+ dwellings per hectare. Policy N1 proposes less than half this density, meaning the development will consume **more than twice the land** necessary if it were located in a genuinely urban location at urban densities.

The site is currently **outside the urban area** as confirmed by the Topic Paper's discussion of reviewing the Urban Area boundary (para 2.37). It forms part of the **countryside** – not the urban fringe, not peri-urban land, but actual countryside with agricultural use.

The **Focused Regulation 18 Topic Paper** at paragraph 6.24 notes that *"An area of land will continue to be safeguarded for healthcare development under Policy QL9"* adjacent to the site at Ridlands. This raises an obvious question: if land at Ridlands is so important and strategically located that it must be **safeguarded** for healthcare, why is the adjacent agricultural land of supposedly **lesser importance** suitable for destruction through housing development?

The answer appears to be: it isn't. The Council is simply treating open countryside as available for development without proper justification.

Cumulative Landscape Harm Creates Urbanized Corridor

Policy N1 cannot be considered in isolation. The cumulative landscape impact with surrounding major developments will create a **comprehensive urbanization** of the entire south-western approach to Canterbury:

- **CF1 South Canterbury** (4,000 dwellings) – currently under construction, already transforming landscape
- **N1 Merton Park** (1,930 dwellings) – this allocation, adjacent to CF1
- **N2 Langton Lane** (14 dwellings) – immediately adjacent to N1
- **N3 Thanington Recreation Ground** – Park & Ride facility with 300+ parking spaces replacing open recreation ground
- **CF1 Site 10 Ridlands** (310 dwellings adopted allocation)
- **CF1 Site 11 Cockerling Farm** (785 dwellings adopted, under construction)

The cumulative effect is **over 7,000 dwellings** in a continuous urbanized corridor extending deep into the countryside south-west of Canterbury. This is not strategic planning – it is **landscape obliteration on an industrial scale**.

No Cumulative Landscape Assessment has been conducted. The Council has no idea what the combined landscape impact will be. Each development is assessed in isolation, but the reality on the ground will be **continuous suburban sprawl** destroying the rural character that defines Canterbury's setting.

Harm to Canterbury's Historic Setting and Tourism Economy

Canterbury is a **World Heritage Site**. Its significance derives not just from the Cathedral and historic buildings, but from the **relationship between the historic city and its countryside setting**. This relationship has evolved over centuries and defines Canterbury's character.

Canterbury's identity and tourism appeal depend fundamentally on its **historic setting** – the contrast between the medieval city and its surrounding countryside. Approaching Canterbury from any direction, visitors experience the **gradual transition** from countryside to city, with the Cathedral visible across agricultural land. This experience is central to Canterbury's appeal.

Policy N1 will **erode this fundamental relationship** by extending suburban sprawl deep into the countryside. Views approaching Canterbury from the south will change from

rural farmland gradually transitioning to historic city to suburban housing estates surrounding the city.

The harm is **permanent and irreversible**. Once the landscape is developed, it can never be restored. Future generations will inherit a Canterbury surrounded by suburban sprawl, its countryside setting sacrificed for short-term housing delivery targets.

No Landscape and Visual Impact Assessment Conducted

There is **no Landscape and Visual Impact Assessment (LVIA)** in the evidence base for Policy N1. This is an extraordinary and fatal omission for a development of this scale in this sensitive location.

Without a professional LVIA conducted in accordance with Guidelines for Landscape and Visual Impact Assessment (GLVIA3), the Council **cannot demonstrate**:

- The magnitude and significance of landscape impacts on defined Landscape Character Areas
- Visual impact from key viewpoints including approaches to Canterbury, elevated positions, and the World Heritage Site
- Cumulative landscape effects with other developments in south Canterbury
- Whether claimed mitigation measures will be effective
- Whether harm can be adequately mitigated or is so severe that development should not proceed

The absence of an LVIA renders the allocation **unjustified and unsound**. The Council is proposing to transform 83.9 hectares of countryside without professionally assessing what will be lost.

What the Council Must Do

To make this Plan sound, the Council must:

1. **Commission an independent Landscape and Visual Impact Assessment (LVIA)** in accordance with GLVIA3 for Policy N1, covering magnitude and significance of impacts, viewpoint analysis, and mitigation effectiveness
2. **Assess cumulative landscape impacts** with all concurrent developments in south Canterbury (CF1, N2, N3, Ridlands, Cockering Farm)
3. **Demonstrate why landscape harm of this magnitude is acceptable** despite NPPF requirements to "protect and enhance" landscapes
4. **Explain the contradiction** between protecting SLAA329 from environmental designation due to its value, while destroying identical landscape at N1

5. **Consider alternative sites with lesser landscape sensitivity**, particularly brownfield urban sites that avoid countryside harm entirely
6. **Delete Policy N1** if landscape harm cannot be avoided or is not adequately justified against national policy

Conclusion

Policy N1 will cause the **irreversible and comprehensive destruction** of the landscape character of South Canterbury, breaching national policy requirements to protect and enhance landscapes. The Council's own policy wording admits significant harm, 130 representations objected on landscape grounds (the most frequent issue raised), no LVIA has been conducted, and cumulative impacts with surrounding developments have not been assessed.

I live on [REDACTED]. I see this landscape every day. I understand what will be lost. The Council proposes to sacrifice 83.9 hectares of Kent countryside – the "Garden of England" – for suburban sprawl that could be located on brownfield urban land at higher densities with no countryside harm.

This allocation is **unsound** and must be deleted.

I request that this objection is forwarded to the Planning Inspector and that the Council provides a detailed written response explaining:

1. How the acknowledged landscape harm complies with NPPF Para 130(c) and 174(a)
2. Why no LVIA has been conducted
3. Why 130 representations about landscape harm have been effectively ignored
4. What the cumulative landscape impact is with surrounding developments
5. Why countryside destruction is justified when brownfield alternatives exist

Yours faithfully,

Alan Davidson

--Email From External Account--

Dear Sir/Madam,

I write to formally object to **Policy N1 (Land at Merton Park)** on the grounds that the site selection process that led to its allocation was demonstrably flawed, irrational, and fundamentally inconsistent with the treatment of other sites. This inconsistency proves

that the Plan is not "justified" as required by national policy – it is not "the most appropriate strategy, when considered against the reasonable alternatives."

As a resident of [REDACTED] living on the edge of this proposed development, I have followed the Local Plan process through multiple consultation stages. The more I examine the evidence, the clearer it becomes that Policy N1's allocation cannot be rationally justified when compared to sites that have been rejected for lesser reasons.

The Allocation is Unsound

This allocation **fails the soundness tests** required by NPPF Paragraph 35:

- **NOT JUSTIFIED:** Site selection methodology is flawed, inconsistent, and irrational; not the most appropriate strategy when compared against reasonable alternatives
- **NOT POSITIVELY PREPARED:** Reasonable alternatives not properly or consistently assessed

The Fundamental Inconsistency: Sites Deleted for Reasons That Apply Equally to N1

The **Strategic Land Availability Assessment (August 2025)** and **Focused Regulation 18 Topic Paper (August 2025)** reveal an extraordinary pattern: multiple sites have been deleted from the Plan for constraints that **apply equally or to a lesser degree at Merton Park**, yet Merton Park remains allocated.

This is not just an inconsistency – it is proof that the site selection process was **arbitrary rather than evidence-based**.

Deleted Site 1: Land North of University of Kent (SLAA158) – 2,500+ dwellings

The **Focused Regulation 18 Topic Paper** at paragraph 2.34 states: "*Land north of the University of Kent site is no longer considered suitable for allocation due to concerns regarding provision of suitable access, impact on the highway network and impact on ecology, including the loss of ancient woodland.*"

Let us examine each constraint:

"Suitable access" – The University site was deleted because access was problematic. Yet Policy N1 has **identical access issues**. The **Topic Paper at paragraph 6.25** confirms that in 2024, "*National Highways and KCC Highways raised significant concerns with the technical feasibility and deliverability*" of the A2 slip roads that were central to N1's access strategy. These slip roads were **deleted** because they were undeliverable.

If undeliverable access is grounds for deleting the University site, why is it not grounds for deleting N1?

"Impact on the highway network" – The University site was deleted for highway network impacts. Yet N1 will generate traffic from **1,930 dwellings** (approximately 1,500-2,000 cars) onto local roads including Hollow Lane, Lime Kiln Road, and Stuppington Lane – all of which are already congested. The highway network impact of N1 is **substantial**, yet the site remains allocated.

If highway network impact is grounds for deleting the University site, why is it not grounds for deleting N1?

"Impact on ecology, including loss of ancient woodland" – The University site was deleted for ecological impacts. Yet the **Habitats Regulation Assessment Addendum (August 2025)** at Table C-1 (Appendix C) assesses N1 (Land at Merton Park, 83.9ha, SLAA151) for functionally linked land and notes it comprises *"large arable fields and several fields with fruit trees, and sports pitches"* with potential ecological value.

Policy N1 itself at Policy N1(3)(e) requires: *"Enhance the existing Stuppington Lane green corridor and provide further habitat, pollinator and ecological connectivity across the site and with the surrounding landscape, including enhancements to the potential habitat connectivity offered by the disused Elham Valley Railway line to the north of the site and Priority Habitats."*

This policy wording **admits the presence of Priority Habitats** on or adjacent to the site. Priority Habitats are protected under the NPPF and have equivalent status to Ancient Woodland in the ecological hierarchy.

If ecological impact including ancient woodland loss is grounds for deleting the University site, why is ecological impact including Priority Habitat loss not grounds for deleting N1?

The answer is obvious: the constraints are similar, but the decisions are opposite. This is irrational and arbitrary.

Deleted Site 2: Land North of Hollow Lane (SLAA259) – 420 dwellings

The **Focused Regulation 18 Topic Paper** at paragraph 2.36 states: *"Land to the north of Hollow Lane is also no longer considered suitable for allocation due to concerns regarding highway impact and the ability to achieve suitable access."*

This site is **immediately adjacent to Policy N1**. It is part of the same strategic location. It was included in the 2022 and 2024 draft Plans as part of the South West Canterbury strategic development area alongside Merton Park.

The **Topic Paper at paragraph 6.32** elaborates: *"The draft allocation relied on access via the proposed South West Canterbury link road which would have connected the site to the A28 through the adopted Cockerling Farm allocation (Site 11, Policy SP3), and to the adjacent proposed Merton Park (SLAA151) draft allocation through the widening of the*

A2 underpass on Hollow Lane, with onwards connection to the proposed A2 slips roads within the Merton Park site."

Paragraph 6.33 confirms: *"Representations to the Regulation 18 draft Local Plan (2024) from the developer of the neighbouring consented Cockering Farm development (CA/17/00519/OUT), have also highlighted viability and deliverability concerns with the connection to the A28."*

Let me be clear about what happened:

1. Both Hollow Lane site and Merton Park relied on the **same transport strategy** (A2 slip roads and link road)
2. This transport strategy was found to be **undeliverable**
3. The Hollow Lane site was **deleted** as a result
4. Merton Park was **retained** with a new "sustainable transport" strategy

This is the same constraint producing opposite outcomes. If the transport strategy failure is grounds for deleting the Hollow Lane site, why is it not grounds for deleting N1, which relied on the identical failed strategy?

The Council's answer appears to be: "we've developed an alternative sustainable transport strategy for N1." But this raises obvious questions:

- Why was no alternative strategy developed for the Hollow Lane site?
- Why is an untested "sustainable transport" strategy acceptable for 1,930 dwellings but not for 420 dwellings?
- If the sustainable transport strategy works for N1, why wouldn't it work for Hollow Lane?

The treatment is inconsistent and irrational.

Deleted Site 3: Land at Cooting Farm (SLAA262, 267, 268) – 3,200 dwellings

The **Focused Regulation 18 Topic Paper** at paragraph 5.35 records that Cooting Farm was removed from the 2024 draft Plan due to *"transport and landscape impacts."*

Paragraph 5.46 confirms: *"West of Aylesham was submitted under SLAA262, SLAA267 and SLAA268 and proposed for allocation in the 2022 Regulation 18 draft Local Plan as Land at Cooting Farm. However, the sites were not proposed for allocation in the Regulation 18 draft Local Plan 2024 due to transport and landscape impacts."*

Let us compare Cooting Farm with Merton Park:

Transport impacts – Cooting Farm was deleted for transport impacts. Yet N1 has substantial transport impacts as evidenced by the deletion of its original A2 slip roads

strategy due to "significant concerns" from National Highways and KCC Highways (Topic Paper para 6.25).

Landscape impacts – Cooting Farm was deleted for landscape impacts. Yet Policy N1 itself **admits significant landscape impacts** through the extensive mitigation it requires:

- *"Substantial landscape buffer to reduce visual and landscape impact"* (Policy N1(3)(c)(i))
- *"Visual integration to transition the surrounding rural dip slope landscape"* (Policy N1(3)(c)(ii))
- *"Preserve and enhance views towards the City and World Heritage Site"* (Policy N1(3)(f))

The Topic Paper at paragraph 6.27 confirms that 130 representations raised concerns about *"the loss of green spaces"* and that *"the policy wording relating to green spaces has been strengthened overall, with more specific reference to reducing the visual and landscape impact of the development."*

Both sites have transport and landscape impacts. Cooting Farm was deleted. Merton Park was retained.

Moreover, Cooting Farm was proposed as a **freestanding settlement** – a new community with its own identity, employment, and services. This is **more sustainable** than urban sprawl extending from Canterbury, because it creates a complete community rather than car-dependent dormitory suburbs.

The deletion of Cooting Farm while retaining Merton Park is **irrational** from a sustainability perspective. A freestanding settlement is strategically superior to greenfield urban sprawl.

Deleted Site 4: Canterbury Golf Club – 74 dwellings

The **Focused Regulation 18 Topic Paper** at paragraph 5.35 records that Canterbury Golf Club was removed due to *"ecology constraints and loss of sports facility."*

Let us compare with Merton Park:

Ecology constraints – Golf Club deleted for ecology. Yet N1 has ecology constraints including potential impact on functionally linked land, Priority Habitats (referenced in Policy N1(3)(e)), and biodiversity impacts requiring extensive mitigation.

Loss of sports facility – Golf Club deleted for loss of sports facility (golf course). Yet Policy N1 proposes to **relocate Canterbury Rugby Football Club** from its current Merton Park location to the new Sports Hub. This is effectively **loss of sports facility from its existing location**, requiring construction of replacement facilities.

Furthermore, Policy N3 (Thanington Recreation Ground) proposes to **remove sports pitches** to create a Park & Ride, with replacement provision in the N1 Sports Hub. This is direct **loss of sports facility**.

Both involve sports facility impacts. Golf Club deleted. Merton Park retained despite larger-scale sports facility relocations.

The inconsistency is glaring.

The Greenfield/Brownfield Contradiction

The **Focused Regulation 18 Topic Paper** at paragraph 6.8 states: *"In order to maximise the potential of previously developed land, all brownfield sites identified in the SLAA as suitable, available and achievable are proposed for allocations."*

This is the Council's **stated policy**: brownfield first. Yet the evidence reveals:

Canterbury Urban Area brownfield allocations (N8-N18):

- N8 Millers Field car park – 9 dwellings
- N9 Hawk's Lane – 12 dwellings
- N10 Military Road – 180 dwellings
- N11 Long Meadow Way – 5 dwellings
- N12 Bawden Close – 5 dwellings
- N13 Copinger Close – 6 dwellings
- N14 Jesuit Close – 6 dwellings
- N15 Suffolk Road – 5 dwellings
- N16 St Stephen's Road – 18 dwellings
- N17 Whitehall Close – 7 dwellings
- N18 Sussex Avenue – 21 dwellings

Total: approximately 274 brownfield dwellings in Canterbury Urban Area (excluding Military Road's 180, total is only 94 dwellings).

N1 Merton Park (greenfield): 1,930 dwellings

The brownfield contribution is **trivial** compared to the massive greenfield allocation. This is not "maximising the potential of previously developed land" – it is **tokenistic brownfield allocation while prioritizing massive greenfield sprawl**.

Furthermore, there is **no evidence** that brownfield capacity has been exhausted. No assessment demonstrates that 1,930 dwellings cannot be accommodated through:

- **Higher densities** on existing brownfield allocations (N8-N18 are low-density, could be intensified)
- **Additional brownfield site identification** (no evidence all brownfield sites have been assessed)
- **Urban intensification** within Canterbury Urban Area (car parks, underutilized commercial areas, etc.)
- **Mixed-use redevelopment** of employment areas with declining demand

The Council has simply **assumed** that massive greenfield development is necessary without testing brownfield alternatives. This is **not justified**.

The Spatial Strategy Contradiction

The **Focused Regulation 18 Topic Paper** at paragraph 5.48 sets out the spatial strategy: *"Canterbury Urban Area as the principal focus for development in the district."*

Policy N1 is **outside the Canterbury Urban Area**. The Topic Paper at paragraph 2.37 acknowledges this: *"By removing this site [Hollow Lane], the Canterbury Urban Area boundary in this area will be reviewed for Regulation 19 stage."*

If the Urban Area boundary needs to be "reviewed" to accommodate N1, this **proves** the site is currently outside the urban area. It is **countryside** being reclassified as urban to justify development.

This contradicts the spatial strategy. If Canterbury Urban Area is the "principal focus," development should be **within** the urban area, not in countryside requiring boundary changes to accommodate it.

Moreover, paragraph 5.48 states: *"No residential development will be allocated in the countryside."*

N1 **is** countryside. Agricultural land outside the urban area is countryside by definition. Changing the boundary line on a map does not change the physical reality that this is greenfield countryside.

The allocation violates the Council's own spatial strategy.

The Process Failures: Three Different Strategies

The evolution of Policy N1 reveals a chaotic process:

2022 Draft Plan – N1 (as Policy C6) allocated with A2 slip roads and South West Canterbury Link Road

2024 Draft Plan – N1 (as Policy C6) allocated with same transport strategy. National Highways and KCC Highways raise "significant concerns" about slip roads. 130 public representations object.

2025 Draft Plan – Slip roads deleted. New "sustainable transport" strategy introduced. Site remains allocated.

This is not refinement – it is fundamental change. The entire access strategy was found to be undeliverable and replaced with something completely different.

The new "sustainable transport" strategy has **not been subject to proper consultation.** The 2024 consultation was based on A2 slip roads. Objectors responded to that proposal. Now the proposal has fundamentally changed, but there is no fresh consultation on the revised strategy.

This is **procedurally unsound.** When a proposal changes fundamentally, new consultation is required. The Council cannot say "we consulted on the old strategy, received 130 objections, so we'll change the strategy and allocate anyway without consulting on the new approach."

The Logic Test

The inconsistencies prove one of two things:

Either: The Council's stated reasons for deleting sites are genuine, in which case N1 should also be deleted because it has similar or identical constraints.

Or: The constraints are not actually problematic, in which case the deleted sites should be reinstated because they have no worse constraints than N1.

The Council cannot have it both ways. If access problems justify deleting the University site and Hollow Lane, they justify deleting N1. If transport and landscape impacts justify deleting Cooting Farm, they justify deleting N1. If ecology and sports facility loss justify deleting the Golf Club, they justify deleting N1.

The only logical explanation for the inconsistent treatment is that **site selection was arbitrary rather than evidence-based.** Sites were selected based on convenience, land availability, or developer pressure rather than objective assessment against consistent criteria.

This renders the Plan **not justified** under NPPF Para 35.

National Policy Requirements Breached

NPPF Paragraph 35(b) requires that a Plan is: *"justified – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence."*

Policy N1's allocation is **not justified** because:

- Reasonable alternatives (deleted sites) have not been consistently assessed
- The evidence base applies different standards to different sites
- Sites with similar constraints receive opposite treatment
- The methodology is inconsistent and arbitrary

Strategic Environmental Assessment Regulations require that reasonable alternatives are identified and assessed. The inconsistent treatment of sites proves that alternatives have not been properly assessed against consistent criteria.

What the Council Must Do

To make this Plan sound, the Council must:

1. **Re-run the site selection process** with consistent methodology applied equally to all sites
2. **Explain in detail** why constraints justify deleting the University site, Hollow Lane, Cooting Farm, and Golf Club, but do not justify deleting N1 which has similar or identical constraints
3. **Apply consistent criteria** – if access problems are fatal for one site, they must be fatal for all sites with similar problems
4. **Properly assess brownfield capacity** before allocating massive greenfield sites
5. **Demonstrate** that 1,930 dwellings cannot be accommodated through brownfield/urban intensification
6. **Either:**
 - Delete N1 for consistency with treatment of other constrained sites, **OR**
 - Reinstate deleted sites because their constraints are no worse than N1's
7. **Consult properly** on the fundamentally changed transport strategy before proceeding with allocation

Conclusion

The site selection process that led to Policy N1's allocation is **demonstrably flawed, irrational, and inconsistent**. Sites with similar or lesser constraints have been deleted while N1 – with substantial access, transport, landscape, ecology, and infrastructure constraints – has been retained.

This is not evidence-based planning. This is not justified decision-making. This is arbitrary site selection that will not withstand scrutiny at Examination in Public.

I have lived on [REDACTED] throughout this Local Plan process. I have watched sites come and go through multiple consultations. The one constant is that Merton Park remains allocated regardless of how many times the strategy changes or how many objections are received. This suggests the decision to allocate was made first, and the evidence retrofitted to justify it.

A Planning Inspector will examine the deleted sites and ask: "If access problems justified deleting the University site, why don't they justify deleting Merton Park?" The Council has no coherent answer to this question.

This allocation is **unsound** and must be deleted.

I request that this objection is forwarded to the Planning Inspector and that the Council provides a detailed written response explaining:

1. Why University site deleted for access/highway/ecology but N1 retained despite similar constraints
2. Why Hollow Lane deleted for access/highway but N1 retained despite identical failed transport strategy
3. Why Cooting Farm deleted for transport/landscape but N1 retained despite both impacts
4. Why Golf Club deleted for ecology/sports loss but N1 retained despite both impacts
5. How this inconsistent treatment complies with NPPF Para 35(b) requirement to be "justified"

Yours faithfully,

Alan Davidson

--Email From External Account--

Dear Sir/Madam,

I write to formally object to **Policy N1 (Land at Merton Park)** on the grounds that it represents a grossly unbalanced and inequitable spatial strategy that concentrates a disproportionate and overwhelming burden of growth on South Canterbury, fundamentally altering the character of this area while other parts of the district avoid comparable impacts.

As a resident of [REDACTED] in the heart of South Canterbury, I am witnessing firsthand the transformation of this area into a construction zone and urban sprawl corridor. While South Canterbury bears the burden of thousands of new homes, other

areas of the district contribute minimally to meeting housing need. This is not strategic planning – it is the sacrifice of one community for the convenience of avoiding difficult decisions elsewhere.

The Allocation is Unsound

This allocation **fails the soundness tests** required by NPPF Paragraph 35:

- **NOT JUSTIFIED:** Spatial distribution of development is not evidenced, rational, or proportionate
- **NOT POSITIVELY PREPARED:** Fails to distribute development fairly across the district in accordance with sustainability principles

The Extraordinary Concentration in South Canterbury

The scale of development concentrated in South Canterbury is **unprecedented and overwhelming**. Let me set out the facts:

Policy N1 (Merton Park) – This Allocation:

- 1,930 dwellings (1,737 + 193 older persons)
- 11.5ha Sports Hub
- Primary school (3ha)
- Local Centre (1,680sqm commercial/shopping)
- Business space (4,000sqm)
- Healthcare facility
- Wastewater treatment works

Policy N2 (Langton Lane) – Immediately Adjacent:

- 14 dwellings
- Part of same strategic location

Policy N3 (Thanington Recreation Ground) – Immediately Adjacent:

- Park & Ride facility (500+ spaces)
- Loss of existing sports pitches

Policy CF1 (South Canterbury) – Adopted 2017, Under Construction:

- **4,000 dwellings** (Strategic Site 1)
- Secondary school

- Local centre
- Employment area
- Major infrastructure

Policy CF1 Site 10 (Ridlands) – Adjacent to N1:

- 310 dwellings (carried forward from adopted Plan)

Policy CF1 Site 11 (Cockering Farm) – Adjacent:

- 785 dwellings (adopted, under construction)

TOTAL SOUTH CANTERBURY STRATEGIC AREA: 7,039 dwellings + major infrastructure

Let me be absolutely clear about what this means: **over 7,000 new homes** in one contiguous area. This is not strategic distribution – this is **overwhelming concentration**.

To put this in perspective, 7,039 dwellings accommodating approximately **14,000-16,000 people** represents a population larger than many Kent towns. The Council is proposing to create a new town in South Canterbury in all but name, but without the infrastructure, employment, or sustainability characteristics that a new town requires.

Comparison with Other Areas of the District

The **Focused Regulation 18 Topic Paper (August 2025)** sets out the spatial strategy at paragraph 5.48:

"Canterbury Urban Area as the principal focus for development in the district. Whitstable and Herne Bay Urban Areas as the secondary focus... Proportionate development will be allocated at Rural Service Centres... A limited amount of growth will be allocated at Local Service Centres... No residential development will be allocated in the countryside."

Let us examine how this "proportionate" strategy translates into actual allocations:

Canterbury Urban Area (excluding South Canterbury strategic area):

The small brownfield sites N8-N18 total only approximately **274 dwellings**. Even including N10 Military Road (180 dwellings), the contribution is minimal.

Contrast: South Canterbury strategic area = 7,039 dwellings. Central Canterbury brownfield = 274 dwellings.

This is a ratio of **over 25:1**. For every dwelling on brownfield land in central Canterbury, there are 25 dwellings in South Canterbury greenfield sprawl.

Whitstable Urban Area:

The **Draft Canterbury District Local Plan** (pages 15-16, Table showing draft housing allocations) shows Whitstable allocations are significantly smaller in scale. While I cannot extract the exact total from the documents provided, it is clear from the Topic Paper that Whitstable is designated as "secondary focus" yet appears to take far less growth than South Canterbury.

Herne Bay Urban Area:

Similarly designated as "secondary focus" but the actual allocation quantum appears substantially less than South Canterbury.

Rural Service Centres:

Described as receiving "proportionate development... at a suitable scale which supports the function and character of the settlement." The quantum is modest by design.

Local Service Centres:

Described as receiving "a limited amount of growth." The quantum is minimal.

The pattern is clear: South Canterbury takes the overwhelming majority of growth while other areas contribute minimally. This is not "proportionate development" as claimed in the spatial strategy – it is **grossly disproportionate development**.

The Cumulative Infrastructure Impact

The concentration of 7,039 dwellings in South Canterbury creates **overwhelming cumulative pressure** on infrastructure that has not been adequately assessed:

Transport:

- 7,039 dwellings = approximately **10,500+ private cars**
- All using the same local road network: Hollow Lane, Lime Kiln Road, Stuppington Lane, South Canterbury Road, Wincheap approaches
- No strategic road infrastructure to accommodate this volume
- "Sustainable transport" measures inadequate for this scale
- **Gridlock is inevitable**

Education:

- 7,039 dwellings = approximately **14,000-16,000 people**
- School-age children (assuming 20% of population) = approximately **2,800-3,200 children**

- Primary provision: N1 proposes one 3FE school (630 pupils). CF1 includes primary provision. **Still insufficient for 2,800+ children**
- Secondary provision: CF1 includes one secondary school. **Capacity for all 2,800+ children? Evidence not provided.**
- Where will overflow go? Existing Canterbury schools already at capacity.

Healthcare:

- 14,000-16,000 people require **substantial GP provision**
- N1 proposes healthcare facility (minimum 1,200sqm). CF1 includes healthcare provision.
- Are these facilities adequate for 16,000 people? **No evidence provided.**
- Kent & Canterbury Hospital already at capacity. Adding 16,000 people will overwhelm services.

Water and Sewerage:

- 7,039 dwellings = enormous demand on water supply and sewerage network
- N1 requires new wastewater treatment works (critical dependency)
- Is capacity adequate for cumulative demand? **Not assessed.**
- Stodmarsh nutrient neutrality affects all sites – cumulative impact on mitigation requirements

Retail and Services:

- 16,000 people require shops, services, employment
- N1 proposes modest local centre. CF1 includes local centre.
- Are these adequate for 16,000 people or will residents travel to Canterbury city centre/out of area?
- If the latter, this contradicts sustainability principles and increases car dependence.

Open Space and Recreation:

- Policy DS24 requires substantial open space provision per dwelling
- 7,039 dwellings = huge open space requirement
- Will on-site provision be adequate or will pressure increase on existing facilities?

- Sports Hub at N1 serves rugby/football clubs primarily, not general population recreation needs

Emergency Services:

- Fire, ambulance, police must serve 16,000 additional people
- Response times through congested roads
- Nearest fire station location? Capacity? **Not assessed.**

None of these cumulative impacts have been comprehensively assessed. Each development is assessed in isolation, but the reality is **synergistic and cumulative impact** far exceeding the sum of individual developments.

The **Habitats Regulation Assessment Addendum (August 2025)** acknowledges in-combination effects for European sites, but there is no equivalent cumulative assessment for infrastructure, services, or community impacts.

The Inequity: Other Areas Avoid Impacts

While South Canterbury is transformed by 7,039 dwellings, other areas of the district avoid comparable burden:

Whitstable – designated "secondary focus" but appears to take substantially less growth than South Canterbury despite having:

- Town centre with services and employment
- Railway station with London services
- Coastal location with tourism economy
- Existing infrastructure

Herne Bay – designated "secondary focus" but appears to take substantially less growth than South Canterbury despite having:

- Town centre with services and employment
- Railway station
- Coastal location
- Existing infrastructure

Rural Service Centres – explicitly receive only "proportionate development... at suitable scale"

Central Canterbury – minimal brownfield development (274 dwellings) despite being the most sustainable location with:

- All services and employment within walking distance
- Excellent public transport including two railway stations
- Cultural and educational facilities
- Existing infrastructure at capacity but upgradeable

Why is South Canterbury required to accommodate 7,039 dwellings while central Canterbury accommodates only 274?

The answer appears to be: **convenience and land availability, not strategic planning.** South Canterbury has large greenfield sites available. Central Canterbury requires difficult urban intensification and brownfield remediation. The Council has chosen the easy option rather than the sustainable option.

This is **not justified** strategic planning. It is the path of least resistance.

The Character Impact: Sacrifice Zone

The concentration of 7,039 dwellings will **fundamentally and irreversibly alter** the character of South Canterbury:

Current character:

- Mix of residential areas, agricultural land, sports facilities
- Green approaches to Canterbury
- Semi-rural character transitioning to urban
- Distinct communities (Thanington, Wincheap, etc.)

Future character with 7,039 dwellings:

- **Continuous urban sprawl** from Wincheap to Cockerling Road to Merton Park to Ridlands
- No meaningful green separation
- Loss of agricultural land defining area character
- Coalescence of previously distinct communities into amorphous suburb
- **Permanent construction zone** from 2025-2042+ (17+ years of continuous construction)

The area becomes a **sacrifice zone** – transformed to accommodate district-wide housing need while other areas maintain their character.

This is profoundly inequitable.

The Precedent for Future Unbalanced Growth

If the Council is permitted to concentrate 7,039 dwellings in South Canterbury without proper justification, **what precedent does this set?**

Future Local Plans will ask: "Why can't we concentrate growth in one area again? Canterbury did it in 2025."

The principle of proportionate, balanced distribution across the district will be lost. Strategic planning will be replaced by **expedient site selection** – find large greenfield sites and dump housing regardless of cumulative impact.

This is the opposite of sound strategic planning.

Community Cohesion Breakdown

A community cannot absorb 7,039 new dwellings (16,000 people) without **fundamental breakdown of social cohesion**:

- Existing residents overwhelmed by newcomers (16,000 new residents vs existing population)
- Services overwhelmed creating resentment
- Infrastructure failure creating daily frustration
- Continuous construction creating noise, dust, disruption for 17+ years
- Loss of countryside and character creating sense of loss
- **No sense of community identity** in what becomes generic suburban sprawl

The Council has a duty under **NPPF Para 92** to *"aim to achieve healthy, inclusive and safe places which... promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other."*

The overwhelming concentration in South Canterbury does the opposite – it creates an environment of resentment, competition for resources, and community breakdown.

National Policy Requirements Breached

NPPF Paragraph 11 requires plans to: *"positively seek opportunities to meet the development needs of their area."*

The word is "area" – meaning the **entire district**, not one concentrated location. The spatial strategy must distribute development across the area in accordance with sustainability principles.

NPPF Paragraph 20 requires strategic policies to: *"set out an overall strategy for the pattern, scale and design quality of places."*

An "overall strategy" must consider **district-wide distribution**, not overwhelming concentration in one location. The pattern must be balanced and justified.

NPPF Paragraph 35 requires the plan to be "**justified – an appropriate strategy, when considered against the reasonable alternatives.**"

A reasonable alternative would be: distribute 7,039 dwellings across Canterbury, Whitstable, Herne Bay and rural areas in genuine proportion to their size and sustainability. This has not been properly assessed.

What the Council Must Do

To make this Plan sound, the Council must:

1. **Justify in detail** why South Canterbury must accommodate 7,039 dwellings (7,039 as proportion of total district housing requirement = what percentage? Why is this percentage justified?)
2. **Assess cumulative infrastructure impacts** comprehensively across all concurrent developments in South Canterbury (transport, education, healthcare, water, emergency services, retail, open space)
3. **Demonstrate** why other areas of district cannot accommodate more growth:
 - Why Whitstable and Herne Bay (designated "secondary focus") apparently take less than South Canterbury
 - Why central Canterbury takes only 274 dwellings on brownfield when it is the most sustainable location
 - Why higher densities cannot be achieved on urban brownfield sites
4. **Assess community cohesion impacts** of concentrating 16,000 new residents in one area
5. **Consider alternative spatial strategies** that distribute growth more equitably:
 - Increase Whitstable allocation
 - Increase Herne Bay allocation
 - Increase central Canterbury urban intensification
 - Reduce South Canterbury to genuine proportion
6. **Delete Policy N1** and reallocate housing requirement more equitably across the district

Conclusion

Policy N1 is a key component of a **grossly unbalanced, inequitable, and unsustainable spatial strategy** that concentrates over 7,000 dwellings in South Canterbury while other areas avoid comparable burden. This concentration will:

- Overwhelm local infrastructure
- Destroy area character
- Create community cohesion breakdown
- Set precedent for unbalanced future growth
- Breach principles of proportionate, justified strategic planning

I live on [REDACTED] in South Canterbury. I am witnessing this area become a **sacrifice zone** for the district's housing need. While South Canterbury is transformed into continuous urban sprawl with 17+ years of construction chaos, central Canterbury accommodates only 274 dwellings. Whitstable and Herne Bay apparently take less despite being designated "secondary focus."

This is not fair. This is not justified. This is not sound planning.

An Inspector will ask: "Why should South Canterbury accommodate 7,039 dwellings while central Canterbury accommodates 274?" The Council has no coherent answer because there is no planning justification – only convenience.

This allocation is **unsound** and must be deleted. The spatial strategy must be fundamentally rebalanced.

I request that this objection is forwarded to the Planning Inspector and that the Council provides a detailed written response explaining:

1. What percentage of district housing need is in South Canterbury and why this is justified
2. What the cumulative infrastructure impact of 7,039 dwellings is
3. Why central Canterbury takes only 274 dwellings despite being most sustainable location
4. Why Whitstable and Herne Bay apparently take less than South Canterbury despite being "secondary focus"
5. What alternative spatial strategies distributing growth more equitably were assessed

Yours faithfully,

Alan Davidson

--Email From External Account--

Dear Sir/Madam,

I write to formally object to **Policy N1 (Land at Merton Park)** on the grounds that it will create an unacceptable public safety risk by overwhelming emergency service access routes, increasing response times to both the development and surrounding areas, and failing to demonstrate that life-threatening emergencies can be responded to within critical timeframes.

As a resident of [REDACTED], I am acutely aware of the existing traffic congestion on local roads and deeply concerned that adding 1,930 dwellings (approximately 4,000 residents plus 1,500-2,000 cars) will create dangerous delays in ambulance, fire, and police response that will cost lives.

The Allocation is Unsound

This allocation **fails the soundness tests** required by NPPF Paragraph 35:

- **NOT EFFECTIVE:** Does not address critical emergency service infrastructure requirements
- **NOT POSITIVELY PREPARED:** Fails to ensure safe community or plan for life-safety services
- **INCONSISTENT WITH NATIONAL POLICY:** Breaches NPPF Para 92 on safe places

The Critical Importance of Emergency Response Times

Emergency response times are not an abstract planning consideration – they are **literally a matter of life and death:**

Cardiac arrest: Brain damage begins after 3-4 minutes without oxygen. Survival rates drop approximately 10% for every minute of delay. After 10 minutes without CPR and defibrillation, survival is unlikely.

Stroke: "Time is brain" – every minute of delay results in loss of 1.9 million neurons. Rapid treatment within 1 hour dramatically improves outcomes. Delay = permanent disability or death.

Serious trauma: The "golden hour" principle – survival rates dramatically better if trauma victims reach hospital within 60 minutes. Ambulance response is first critical step.

House fires: Fire doubles in size every 60 seconds in a residential property. 3-4 minutes can mean the difference between containment and total loss. Delay = death from smoke inhalation or burns.

Violent crime: Serious assault, domestic violence, knife crime – immediate police response can prevent further harm or death.

These are not theoretical scenarios. They are daily emergencies across Kent. **Policy N1 will make every one of these emergencies more dangerous** by delaying response times.

The Access Constraints at Merton Park

Policy N1 proposes **1,930 dwellings** accessed via a limited number of routes from the existing road network. The **Draft Policy N1** (pages 24-26) sets out the access strategy:

Primary vehicle access from Policy N1(4)(c): *"Provide a local distributor road with segregated cycle corridor connecting to Site N4 and to the road network within Site 1 (Policy CF1) through the provision of a new bridge over the railway line. This corridor should serve as the primary vehicle access to the site."*

So the "primary vehicle access" is:

- A new distributor road
- Connecting to Site N4 (East Canterbury – not yet built)
- And connecting to Site 1/CF1 (South Canterbury – under construction)
- Via a **new bridge over the railway line** (major infrastructure, delivery uncertain)

This primary access does not exist yet and will not exist for years. In the meantime, how do emergency services reach the development?

Policy N1(5)(c) addresses this: *"The local distributor road connection to Site 1 (Policy CF1), must be fully operational prior to the occupation of 500 dwellings."*

This means **up to 500 dwellings (approximately 1,000 people) will be occupied before the primary vehicle access is complete.**

How will emergency services reach these first 500 dwellings? The policy does not say.

Secondary access routes serving the site during construction and early occupation will include:

- **Hollow Lane** (██████) – narrow, already congested, no footpaths in sections)
- **Lime Kiln Road** (congested approach to Canterbury East station)
- **Stuppington Lane** (narrow rural lane)
- **South Canterbury Road** via CF1 development (under construction, limited capacity)

These routes are **totally inadequate** for emergency service access to 1,930 dwellings.

The Existing Congestion Problem

I live on [REDACTED]. I experience the traffic conditions every day. Let me describe the reality:

Morning peak (7:30-9:00am): Hollow Lane is heavily congested with:

- Commuter traffic heading to Canterbury city centre and railway stations
- School run traffic (several schools nearby)
- Hospital traffic (Kent & Canterbury Hospital adjacent)
- Construction traffic (CF1 South Canterbury ongoing)

Evening peak (4:30-6:30pm): Similar congestion in reverse direction.

School times: Additional congestion spikes around school start/finish times.

Emergency vehicles attempting to reach Merton Park via Hollow Lane will encounter:

- **Queuing traffic** during peak times
- **Narrow sections** where vehicles cannot easily pull aside
- **Parked cars** reducing carriageway width
- **No hard shoulder or emergency access lane**

An ambulance responding to a cardiac arrest at Merton Park during morning peak could easily be delayed 3-5 minutes by congestion on Hollow Lane alone. **That delay could be fatal.**

The Cumulative Traffic Impact

Policy N1 will add approximately **1,500-2,000 private cars** to the local road network. The **cumulative traffic** from all concurrent South Canterbury developments is even worse:

- **N1 Merton Park:** 1,930 dwellings = 1,500-2,000 cars
- **CF1 South Canterbury:** 4,000 dwellings = 3,000-4,000 cars
- **N2 Langton Lane:** 14 dwellings = 10-15 cars
- **CF1 Site 10 Ridlands:** 310 dwellings = 230-310 cars
- **CF1 Site 11 Cockerling Farm:** 785 dwellings = 590-785 cars

Total: approximately 5,500-7,500 additional cars using the same local road network.

This volume of traffic will create:

- **Gridlock during peak times** on Hollow Lane, Lime Kiln Road, Wincheap approaches
- **Congestion spreading to secondary routes** as drivers seek alternatives
- **Parking overflow** on residential streets
- **Obstruction to emergency vehicle access** throughout South Canterbury

Emergency service response times will deteriorate **not just to Merton Park but to the entire South Canterbury area** including existing residents like myself.

No Emergency Services Assessment Conducted

There is **no emergency services impact assessment** in the evidence base for Policy N1. The Council has not:

- Consulted with Kent Fire and Rescue Service on access and response times
- Consulted with South East Coast Ambulance Service on capacity and response times
- Consulted with Kent Police on capacity and response requirements
- Modeled emergency vehicle journey times to the site under different traffic conditions
- Assessed cumulative impact of all South Canterbury developments on emergency services
- Demonstrated that national response time targets can be met

This is an **extraordinary and dangerous omission**. The Council is proposing to create a community of 4,000 people without any professional assessment of whether emergency services can reach them in life-threatening situations.

The Specific Risks to Vulnerable Groups

Certain groups within the proposed development will be **disproportionately at risk** from delayed emergency response:

Elderly Residents (193 Older Persons Housing Units):

Policy N1 proposes 193 older persons housing units. Elderly residents:

- Higher risk of cardiac arrest, stroke, falls, medical emergencies
- Require faster emergency response due to greater vulnerability
- Less able to self-evacuate in fire emergency
- May have mobility impairments preventing them reaching safety quickly

Policy N1 is concentrating the most vulnerable population in a location where emergency response will be delayed by traffic congestion. This is the opposite of safe planning.

Primary School (3FE = 630 Pupils):

Policy N1 proposes a 3-form entry primary school (630 pupils aged 4-11). School emergencies require immediate response:

- Fire evacuation (630 children evacuating)
- Medical emergencies (allergic reactions, injuries, medical conditions)
- Security incidents (lockdown situations)
- Serious accidents (playground, sports, etc.)

Fire and ambulance services must be able to reach the school site quickly without obstruction. Has this been assessed? **No evidence provided.**

Sports Hub (11.5ha with Stadium):

Policy N1 proposes a Sports Hub including:

- Rugby stadium
- Football stadium (Category C/Step 3 FA graded – capacity potentially 2,000+ spectators)
- Multiple sports pitches

Large sporting events create specific emergency service requirements:

- Medical emergencies in crowds (cardiac arrest, injuries)
- Crowd safety incidents
- Fire risk in stadium structures
- Need for rapid ambulance and police access during events

Sports stadium licensing requirements include **emergency evacuation and access plans**. How will these requirements be met with congested access roads? **Not assessed.**

Construction Workers:

During the construction phase (estimated 2032-2042 = **10+ years**), hundreds of construction workers will be on-site daily. Construction sites have:

- High injury rates (falls, machinery accidents, crush injuries, etc.)

- Need for rapid ambulance response to serious injuries
- Fire risk from construction processes

Emergency services must be able to reach construction sites quickly. The access constraints and traffic congestion will create dangerous delays.

The Fire Service Access Problem

Fire appliances are large vehicles requiring:

- **Adequate road width** for passage (minimum 3.7m)
- **Adequate turning circles** at junctions
- **No parking obstructions**
- **Direct access to buildings** for firefighting operations

Narrow sections of Hollow Lane, Lime Kiln Road, and Stuppington Lane may not provide adequate width for fire appliances, especially with parked cars. During emergencies, cars must pull aside – but where can they go on narrow roads?

Policy N1(4)(a) requires provision of walking and cycling routes including: *"A direct active travel corridor through the site between Site 10 (Policy CF1) and Hollow Lane"*

An "active travel corridor" suggests a route prioritizing pedestrians and cyclists. Will this provide adequate width and surface for fire appliances? **Not specified.**

The policy requires emergency vehicle access to be planned from the outset, but there is **no evidence** this has been done.

The Ambulance Service Capacity Problem

South East Coast Ambulance Service (SECAmb) operates ambulance services in Kent. National ambulance response time standards are:

- **Category 1 (life-threatening):** Mean average 7 minutes, 90th centile 15 minutes
- **Category 2 (emergency):** Mean average 18 minutes, 90th centile 40 minutes

Adding 4,000 residents at Merton Park plus 14,000+ in the wider South Canterbury area will **substantially increase demand** for ambulance services:

- More 999 calls
- More emergency hospital conveyances
- Greater pressure on limited ambulance resources

If ambulances are delayed reaching Merton Park due to traffic congestion, **they cannot reach other emergencies elsewhere**. The impact cascades across the entire service area.

Has the Council assessed:

- Current ambulance response times in South Canterbury?
- Predicted response times with N1 traffic generation?
- SECAmb capacity to serve additional 4,000 people?
- Cumulative demand from all South Canterbury developments?

No evidence provided.

The Kent & Canterbury Hospital Proximity is Misleading

Policy N1 is located adjacent to Kent & Canterbury Hospital. This might appear to be an advantage – hospital nearby for emergencies.

However:

- **A&E is located on the opposite side of the hospital** from Merton Park
- **Road access requires circumnavigating the hospital site** via congested roads
- **Hospital access roads are already congested** with patient/visitor/staff traffic
- **Ambulances must reach patients BEFORE conveying to hospital** – proximity of hospital does not help if ambulance cannot reach patient quickly

The hospital proximity is **not a mitigation** for poor emergency access to the development.

National Policy Requirements Breached

NPPF Paragraph 92 requires planning policies and decisions to: *"aim to achieve healthy, inclusive and safe places which... are safe and accessible."*

A development where emergency services cannot respond quickly is **not safe**. It fails the most basic requirement of NPPF Para 92.

NPPF Paragraph 110 requires that transport impacts are assessed including: *"any significant impacts from the development on the transport network... can be cost effectively mitigated."*

The impact on emergency vehicle access is a **transport network impact** that must be assessed. It has not been.

NPPF Paragraph 112 requires development to: *"give priority first to pedestrian and cycle movements... and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise... access to... services."*

"Services" includes emergency services. The layout must facilitate emergency access, not obstruct it.

What the Council Must Do

To make this Plan sound, the Council must:

1. **Commission professional emergency services impact assessment** covering:
 - Kent Fire and Rescue response times to all parts of development under various traffic conditions
 - SECAmb ambulance response times and capacity assessment
 - Kent Police response requirements
2. **Model emergency vehicle journey times** from nearest fire station, ambulance station, police station to furthest dwelling in development during:
 - Peak traffic
 - Average traffic
 - Construction phase traffic
3. **Demonstrate compliance with national response time standards** for Category 1 and Category 2 emergencies
4. **Secure emergency services consultation and approval** of access arrangements before allocation
5. **Require emergency vehicle access routes** that are:
 - Minimum 3.7m wide
 - Free from parking obstructions (enforceable restrictions)
 - Direct to all parts of development
 - Available from first occupation
6. **Assess cumulative impact** of all South Canterbury developments on emergency services covering entire area
7. **Delete Policy N1** if emergency service response cannot be guaranteed within safe timeframes

Conclusion

Policy N1 will create an **unacceptable public safety risk** by:

- Overwhelming access routes with 1,500-2,000 additional cars
- Creating traffic congestion delaying emergency vehicle response
- Concentrating vulnerable groups (elderly, children) in location with compromised emergency access
- Failing to demonstrate national response time standards can be met
- Providing no emergency services impact assessment

I live on [REDACTED]. I see emergency vehicles every day attempting to navigate congested roads to reach the hospital and surrounding areas. Adding 1,930 dwellings will make a difficult situation **dangerous**.

Someone will die because an ambulance was delayed by traffic congestion caused by this development. That is not hyperbole – it is statistical certainty. When response times increase, survival rates decrease. The Council will bear responsibility for those preventable deaths.

A development that cannot guarantee safe emergency service access should not be allocated. It is as simple as that.

This allocation is **unsound and dangerous** and must be deleted.

I request that this objection is forwarded to the Planning Inspector and that the Council provides a detailed written response explaining:

1. What emergency services impact assessment has been conducted
2. What response times can be guaranteed to all parts of development
3. Whether Kent Fire and Rescue, SECAMB, and Kent Police have approved the access strategy
4. How national response time standards will be met
5. What mitigation is proposed for cumulative South Canterbury emergency service impacts

Yours faithfully,

Alan Davidson

--Email From External Account--

Dear Sir/Madam,

I write to formally object to **Policy N1 (Land at Merton Park)** on the grounds that it will create an unacceptable public safety risk by overwhelming emergency service access routes, increasing response times to both the development and surrounding areas, and failing to demonstrate that life-threatening emergencies can be responded to within critical timeframes.

As a resident of [REDACTED], I am acutely aware of the existing traffic congestion on local roads and deeply concerned that adding 1,930 dwellings (approximately 4,000 residents plus 1,500-2,000 cars) will create dangerous delays in ambulance, fire, and police response that will cost lives.

The Allocation is Unsound

This allocation **fails the soundness tests** required by NPPF Paragraph 35:

- **NOT EFFECTIVE:** Does not address critical emergency service infrastructure requirements
- **NOT POSITIVELY PREPARED:** Fails to ensure safe community or plan for life-safety services
- **INCONSISTENT WITH NATIONAL POLICY:** Breaches NPPF Para 92 on safe places

The Critical Importance of Emergency Response Times

Emergency response times are not an abstract planning consideration – they are **literally a matter of life and death:**

Cardiac arrest: Brain damage begins after 3-4 minutes without oxygen. Survival rates drop approximately 10% for every minute of delay. After 10 minutes without CPR and defibrillation, survival is unlikely.

Stroke: "Time is brain" – every minute of delay results in loss of 1.9 million neurons. Rapid treatment within 1 hour dramatically improves outcomes. Delay = permanent disability or death.

Serious trauma: The "golden hour" principle – survival rates dramatically better if trauma victims reach hospital within 60 minutes. Ambulance response is first critical step.

House fires: Fire doubles in size every 60 seconds in a residential property. 3-4 minutes can mean the difference between containment and total loss. Delay = death from smoke inhalation or burns.

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- Predicted response times with N1 traffic generation?
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- Cumulative demand from all South Canterbury developments?

No evidence provided.

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"Services" includes emergency services. The layout must facilitate emergency access, not obstruct it.

What the Council Must Do

To make this Plan sound, the Council must:

8. Commission professional emergency services impact assessment covering:

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9. Model emergency vehicle journey times from nearest fire station, ambulance station, police station to furthest dwelling in development during:

- Peak traffic
- Average traffic
- Construction phase traffic

10. Demonstrate compliance with national response time standards for Category 1 and Category 2 emergencies

11. Secure emergency services consultation and approval of access arrangements before allocation

12. Require emergency vehicle access routes that are:

- Minimum 3.7m wide
- Free from parking obstructions (enforceable restrictions)
- Direct to all parts of development
- Available from first occupation

13. Assess cumulative impact of all South Canterbury developments on emergency services covering entire area

14. Delete Policy N1 if emergency service response cannot be guaranteed within safe timeframes

Conclusion

Policy N1 will create an **unacceptable public safety risk** by:

- Overwhelming access routes with 1,500-2,000 additional cars
- Creating traffic congestion delaying emergency vehicle response
- Concentrating vulnerable groups (elderly, children) in location with compromised emergency access
- Failing to demonstrate national response time standards can be met
- Providing no emergency services impact assessment

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This allocation is **unsound and dangerous** and must be deleted.

I request that this objection is forwarded to the Planning Inspector and that the Council provides a detailed written response explaining:

6. What emergency services impact assessment has been conducted
7. What response times can be guaranteed to all parts of development
8. Whether Kent Fire and Rescue, SECAMB, and Kent Police have approved the access strategy
9. How national response time standards will be met
10. What mitigation is proposed for cumulative South Canterbury emergency service impacts

Yours faithfully,

Alan Davidson

=====

--Email From External Account--

Dear Sir/Madam,

I write to formally object to **Policy N1 (Land at Merton Park)** on the grounds that it poses a direct and substantial threat to Canterbury's tourism economy – worth hundreds of millions of pounds annually – by degrading the setting and visitor experience of the World Heritage Site and historic city, thereby undermining one of the district's most important economic assets.

As a resident of [REDACTED] who has witnessed the steady flow of visitors to Canterbury over many years, I understand the critical importance of tourism to our local economy. The Council's proposal to sacrifice the countryside setting that makes Canterbury special – in pursuit of short-term housing delivery targets – represents a false economy that will damage long-term prosperity for the entire district.

The Allocation is Unsound

This allocation **fails the soundness tests** required by NPPF Paragraph 35:

- **NOT JUSTIFIED:** Economic impact of heritage harm not assessed against housing benefit
- **INCONSISTENT WITH NATIONAL POLICY:** Breaches NPPF Paragraphs 81, 189, 200 on economic development and heritage protection

Canterbury's Tourism Economy: The Scale of What's at Risk

Canterbury's tourism economy is **not a minor consideration – it is fundamental to the district's prosperity**. While I cannot extract precise figures from the documents provided, the scale is substantial:

Canterbury Cathedral and World Heritage Site:

- Attracts approximately **1-1.5 million visitors annually** (pre-pandemic levels)
- International tourist destination of global significance
- UNESCO World Heritage Site status since 1988
- One of Christianity's most important pilgrimage sites

Economic Value:

- Tourism supports thousands of jobs across hospitality, retail, transport, attractions, and services
- Hotels, B&Bs, restaurants, cafes, shops depend on visitor economy
- Cultural venues (Marlowe Theatre, museums, galleries) rely on tourist footfall
- **Estimated tourism value to Canterbury district economy: £300-400 million annually** (approximate based on typical heritage city benchmarks – Council should provide precise figure)

Employment:

- Tourism and hospitality sector employs significant proportion of Canterbury workforce
- Many local businesses exist primarily to serve visitors
- Seasonal and permanent employment depends on visitor numbers

Wider Economic Benefits:

- University of Kent benefits from Canterbury's international reputation
- Business investment attracted by quality of place and cultural offer
- Retail and leisure sectors sustained by both residents and visitors
- Property values supported by Canterbury's prestige and attractiveness

This entire economic ecosystem depends on one fundamental asset: Canterbury's status as a beautiful, historic city set in attractive countryside.

Policy N1 threatens this asset directly.

The World Heritage Site Setting: Currently Acknowledged Harm

The **Focused Regulation 18 Topic Paper (August 2025)** at paragraph 6.27 acknowledges explicitly: *"Significant concerns were expressed by Historic England around potential harm to the World Heritage Site, of which there are long-distance views to from the site."*

Let me emphasize: **Historic England – the Government's statutory advisor on the historic environment – raised "significant concerns" about harm to the World Heritage Site.**

Historic England does not raise "significant concerns" lightly. Their concern is based on professional assessment that **substantial harm will occur.**

The Council's response, per paragraph 6.27: *"The site promoter has subsequently undertaken additional heritage work, and the policy has been strengthened to include stronger protection for views to the World Heritage Site."*

This response is **wholly inadequate**. When Historic England raises significant concerns about harm to a World Heritage Site, the appropriate response is:

- **Delete the allocation, or**
- **Provide overwhelming evidence that harm can be eliminated (not just mitigated)**

Instead, the Council has:

- Retained the allocation
- "Strengthened policy wording"
- Hoped this addresses Historic England's concerns

This is not sound planning – it is wishful thinking.

The Policy Admits the Harm Through Its Mitigation Requirements

Policy N1(2)(f) requires: *"Assess Areas of Archaeological Potential and protect and enhance nearby heritage assets, including the setting of the World Heritage Site, in line with Policy DS26. The development layout should be structured and orientated to provide viewing opportunities to the World Heritage Site."*

Policy N1(3)(c)(iv) requires: *"Preserves long distance views to the City and World Heritage Site."*

Policy N1(3)(f) requires: *"Preserve and enhance views towards the City and World Heritage Site with provision of viewing corridors from open space."*

These requirements **prove** that:

1. **Long-distance views to the World Heritage Site currently exist from the site** – otherwise preservation would be unnecessary
2. **These views are at risk from development** – otherwise protection would be unnecessary
3. **The development layout must be carefully controlled** to preserve some views – admission that default development would harm views
4. **"Viewing corridors" are needed** – admission that most of the developed area will NOT have views to the Cathedral

Translation: The development will obstruct views that currently exist. Policy attempts to preserve a few viewing corridors, but most views will be lost.

This is **harm to the World Heritage Site setting by any reasonable definition.**

The Visitor Experience: Degradation from Rural to Suburban

Canterbury's appeal to visitors is not just the Cathedral and historic core – it is **the experience of approaching a medieval city set in beautiful countryside.**

Current experience approaching Canterbury from the south:

1. Leave M2/A2 at Junction 7 or travel A28 from Ashford
2. Pass through rural Kent countryside – the "Garden of England"

3. Views of Cathedral spire emerge across agricultural land
4. Sense of approaching historic city gradually revealed
5. Transition from countryside to historic urban form
6. Arrival at Canterbury – sense of place and occasion

Future experience with Policy N1 developed:

1. Leave M2/A2 at Junction 7
2. Immediately encounter suburban housing estates (South Canterbury, Merton Park)
3. **Views of Cathedral spire obscured by housing** or visible only between buildings
4. Travel through continuous suburban development
5. No sense of transition – just more suburbs
6. Arrival at Canterbury – **indistinguishable from any other town surrounded by housing estates**

The sense of occasion, the revelation of the Cathedral, the countryside setting – all degraded or lost.

This matters economically because **visitor experience drives tourism value:**

- Visitors choose Canterbury over other heritage cities because of its setting and character
- International tourists expect English countryside surrounding historic cities
- Photography and visual appeal are critical to tourism marketing
- Social media and review sites depend on beautiful approaches and views
- **Degraded setting = degraded experience = reduced visitor appeal = reduced visitor numbers = reduced economic value**

The UNESCO World Heritage Site Status at Risk

Canterbury Cathedral, St Augustine's Abbey, and St Martin's Church were designated a **UNESCO World Heritage Site** in 1988 on the basis of "Outstanding Universal Value" (OUV).

UNESCO Operational Guidelines state that World Heritage Site status can be **threatened or removed** if:

- The OUV is damaged

- The setting is degraded
- The attributes conveying OUV are harmed

Setting is a recognized component of OUV. The UNESCO guidance defines setting as including views to and from the site, the landscape context, and the relationship between the heritage asset and its surroundings.

Policy N1 will harm the setting through:

- Urbanizing 83.9 hectares of countryside forming part of the Cathedral's landscape setting
- Obstructing views from elevated positions and approaches
- Creating suburban sprawl where rural character currently exists
- Fundamentally altering the relationship between the historic city and its countryside

If Historic England has raised "significant concerns," UNESCO could raise similar concerns.

The ultimate risk: **Inscription of Canterbury on UNESCO's "World Heritage in Danger" list**, or even worse, **removal of World Heritage Site status**.

This would be **catastrophic for Canterbury's tourism economy:**

- Loss of international prestige and marketing appeal
- Reduced visitor numbers (particularly international)
- Damage to Canterbury's brand and reputation
- Economic impact of reduced tourism: hundreds of millions over time

Is the Council prepared to risk World Heritage Site status for 1,930 dwellings?

The economic calculation is clear:

- **Tourism value: £300-400 million annually = £6-8 billion over 20 years**
- **Housing value: 1,930 dwellings × £300,000 average = £579 million one-off**

Even a **10% reduction in tourism** due to setting degradation would cost £60-80 million annually – exceeding the housing value in 7-10 years.

This is a false economy of the highest order.

The Competitive Context: Other Heritage Cities Protecting Their Settings

Canterbury competes with other UK and European heritage cities for tourists. **Cities that protect their countryside settings maintain competitive advantage.**

York: Extensive greenbelt protection preserving countryside setting and views of Minster. Urban consolidation prioritized over sprawl.

Bath: World Heritage Site boundaries specifically include setting. Strict development control in surrounding countryside.

Durham: Cathedral and Castle World Heritage Site includes landscape setting as key attribute. Development strictly controlled.

Oxford: Greenbelt preventing coalescence and sprawl. View cones protecting approaches to dreaming spires.

Cambridge: Greenbelt and landscape setting rigorously protected.

These cities understand that heritage tourism depends on countryside setting. They prioritize long-term tourism economy over short-term housing delivery.

Canterbury appears to be doing the opposite – **sacrificing setting for housing**, thereby **undermining competitive position** against cities that protect their heritage assets.

International tourists choosing between Canterbury, York, Bath, Oxford will increasingly choose cities where the **countryside setting is preserved**, not those where **suburbs sprawl to the city walls**.

The Impact on Tourism Infrastructure Investment

Tourism infrastructure investment depends on confidence in Canterbury's long-term appeal and visitor numbers. Policy N1 undermines this confidence:

Hotel Development:

- Why invest in new hotels if visitor numbers may decline?
- Policy N19 proposes hotel at Spitfire Ground – will this be viable if tourism declines due to setting degradation?
- Existing hotels may see reduced occupancy and profitability

Restaurant and Hospitality:

- Visitor spend per head depends on overall experience quality
- Degraded setting = lower satisfaction = reduced spending
- Businesses may reduce investment or relocate

Cultural Attractions:

- Museums, galleries, theatres depend on tourist footfall
- Reduced visitor numbers = reduced revenues = reduced programming
- Canterbury's cultural offer could decline

Retail:

- City center shops depend on visitor spending
- Tourist-oriented retailers (gifts, crafts, books, etc.) particularly vulnerable
- High street vacancy rates could increase

The economic impacts cascade through the entire visitor economy ecosystem.

The Marketing and Brand Damage

Canterbury's tourism marketing depends on imagery of:

- Cathedral spire rising above medieval streets
- **Views across countryside to historic city**
- "Garden of England" rural setting
- Pilgrimage route through Kent countryside

How will Visit Canterbury market the city when approaches are dominated by housing estates? Current marketing imagery showing rural approaches will become **historical not current** – a reminder of what has been lost.

Social media and review sites will show:

- Photos of Cathedral surrounded by suburbs rather than countryside
- Negative reviews mentioning over-development and loss of character
- Comparisons unfavorable to other heritage cities that protected their settings

Brand damage is difficult to quantify but can be substantial and long-lasting.

National Policy Requirements Breached

NPPF Paragraph 81 states: *"Planning policies and decisions should... enable the sustainable growth and expansion of all types of business in rural and urban areas... and should enable the sustainable growth and expansion of all types of business... including the visitor economy..."*

Policy N1 does the opposite – it **constrains and threatens** the visitor economy by degrading the heritage asset on which it depends.

NPPF Paragraph 189 states: *"Heritage assets... are an irreplaceable resource, and should be conserved in a manner appropriate to their significance."*

The World Heritage Site setting is a **heritage asset**. Policy N1 will harm it. This breaches the fundamental principle that heritage is irreplaceable.

NPPF Paragraph 200 states: *"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance."*

Policy N1 does not "enhance or better reveal" the World Heritage Site significance – it **degrades and obscures** it through suburban sprawl and view obstruction.

NPPF Paragraph 201 addresses harm to designated heritage assets: *"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss."*

Historic England has raised "significant concerns" suggesting **substantial harm**. Has the Council demonstrated that:

1. The harm is "necessary" (no alternative sites available)?
2. "Substantial public benefits" exist?
3. These benefits "outweigh" the harm?

No evidence in the Plan addresses these requirements.

The Procedural Failure: No Heritage Impact Assessment

There is **no comprehensive Heritage Impact Assessment** in the evidence base for Policy N1 analyzing:

- Significance of World Heritage Site setting
- Contribution of the site's countryside character to setting
- Visual impact on views to and from Cathedral
- Impact on visitor experience and tourism
- Harm to OUV attributes
- Cumulative impact with other South Canterbury developments
- Economic consequences of heritage harm

Without a professional Heritage Impact Assessment, the Council cannot demonstrate:

- The extent of harm
- Whether harm is substantial or less than substantial
- Whether mitigation is adequate
- Whether public benefits outweigh harm
- Compliance with NPPF heritage policies

This renders the allocation **unjustified and unsound**.

What the Council Must Do

To make this Plan sound, the Council must:

1. **Commission comprehensive Heritage Impact Assessment** by independent heritage professionals covering:
 - World Heritage Site OUV and setting
 - Visual impact analysis with verified views and photomontages
 - Tourism economic impact assessment
 - UNESCO compliance review
2. **Obtain formal response from Historic England** confirming whether "strengthened policy wording" addresses their "significant concerns" – or whether they maintain objection
3. **Conduct tourism economic impact assessment** quantifying:
 - Current tourism value to Canterbury economy
 - Predicted impact of setting degradation on visitor numbers
 - Long-term economic cost of heritage harm vs housing benefit
 - Impact on tourism employment
4. **Consult with UNESCO World Heritage Centre** on potential impact on World Heritage Site status
5. **Demonstrate substantial public benefits** that outweigh acknowledged substantial harm to World Heritage Site setting per NPPF Para 201
6. **Consider alternative sites** that do not harm World Heritage Site setting, particularly brownfield sites in genuinely urban locations
7. **Delete Policy N1** if:
 - Heritage Impact Assessment confirms substantial harm

- Historic England maintains objection
- Tourism economic analysis shows harm outweighs benefit
- No substantial public benefits can be demonstrated

Conclusion

Policy N1 poses a **direct and substantial threat** to Canterbury's tourism economy – worth hundreds of millions of pounds annually – by degrading the World Heritage Site setting that makes Canterbury internationally significant.

Historic England has raised "significant concerns" about harm. The policy itself admits harm through the extensive mitigation it requires. The visitor experience approaching Canterbury will be degraded from rural countryside to suburban sprawl. The economic consequences could be catastrophic.

The arithmetic is simple:

- Tourism economy value: £300-400 million annually
- Housing value: £579 million one-off
- Even modest tourism decline costs more than housing value within years

The choice is clear:

- Protect Canterbury's greatest economic asset (heritage tourism), or
- Sacrifice it for short-term housing delivery

I have lived in Canterbury for many years and have seen the steady flow of visitors who come to experience a medieval city in its countryside setting. I have spoken with tourists who marvel at the Cathedral visible across fields. I have witnessed the economic vitality that tourism brings to our city.

Policy N1 threatens to destroy what makes Canterbury special. It is a false economy that will impoverish the district for generations.

Canterbury is not just any city – it is a **World Heritage Site of global significance**. It deserves planning that protects and enhances its Outstanding Universal Value, not planning that sacrifices it for convenience.

This allocation is **unsound** and must be deleted.

I request that this objection is forwarded to the Planning Inspector and that the Council provides a detailed written response explaining:

1. What Heritage Impact Assessment has been conducted

2. Whether Historic England has confirmed their "significant concerns" are resolved
3. What the tourism economic impact of setting degradation will be (£ quantified)
4. Whether UNESCO has been consulted on World Heritage Site impacts
5. What substantial public benefits outweigh substantial heritage harm per NPPF Para 201
6. Why Canterbury's greatest economic asset should be sacrificed for 1,930 dwellings

Yours faithfully,

Alan Davidson

--Email From External Account--

Dear Sir/Madam,

I write to formally object to **Policy N1 (Land at Merton Park)** on the grounds that Canterbury City Council has failed to demonstrate compliance with the **legal Duty to Cooperate** under Section 33A of the Planning and Compulsory Purchase Act 2004 concerning the strategic cross-boundary impacts of this major development, particularly in relation to transport infrastructure, environmental effects, and infrastructure delivery.

As a resident of [REDACTED], I recognize that this is not merely a technical procedural matter – it is a fundamental legal requirement that ensures strategic developments are properly coordinated across authority boundaries. Failure to comply with the Duty to Cooperate renders the entire Plan **legally unsound** and will result in rejection at Examination in Public.

The Allocation is Legally Non-Compliant

This allocation **fails the legal compliance test** required for Plan adoption:

- **DUTY TO COOPERATE BREACH:** Section 33A Planning and Compulsory Purchase Act 2004 not demonstrated
- **NOT EFFECTIVE:** Lack of constructive cross-boundary working on strategic matters means impacts inadequately addressed

The Plan **cannot be found sound** if it is **not legally compliant**. Duty to Cooperate is a **legal requirement**, not an optional policy consideration.

The Legal Framework: What Duty to Cooperate Requires

Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Localism Act 2011) states:

"(1) Each person who is... a local planning authority... must cooperate with the other persons mentioned... in maximising the effectiveness with which activities within subsection (3) are undertaken.

(3) The activities within this subsection are—(a) the preparation of development plan documents,(b) the preparation of other local development documents,(c) activities that can reasonably be considered to prepare the way for activities within paragraph (a) or (b)...

(6) In particular, the duty... imposed on a person and another person... requires each person to—(a) engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and(b) have regard to activities of the other person so far as they are relevant to activities within subsection (3) undertaken by the person on whom the duty is imposed."

This is **not guidance – it is statute**. The words are **mandatory**: "must cooperate," "engage constructively, actively and on an ongoing basis."

NPPF Paragraphs 24-27 elaborate on the Duty to Cooperate, requiring:

- Strategic policy-making authorities to cooperate on strategic matters
- Joint working on strategic priorities that cross boundaries
- Production of Statements of Common Ground documenting cooperation
- Demonstrable outcomes from cooperation

The Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 4 requires Plans to demonstrate how the Duty has been complied with.

The consequence of failure: Under Section 20(5)(c) of the Planning and Compulsory Purchase Act 2004, an Inspector **must recommend non-adoption** if the Duty to Cooperate has not been complied with. Unlike soundness issues (which can be addressed through modifications), Duty to Cooperate failure is **fatal** to the Plan.

What Constitutes a "Strategic Matter" Requiring Cooperation

NPPF Paragraph 26 defines strategic matters as those which could include:

- *"the provision of infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*
- *"the strategic approach to the conservation and enhancement of the natural, built and historic environment"*

Policy N1 engages multiple strategic matters:

1. **Transport infrastructure** – Strategic Road Network (A2), cross-boundary traffic impacts, transport corridors
2. **Environmental impacts** – Stodmarsh SAC (crosses authority boundaries), air quality, water quality
3. **Water infrastructure** – Wastewater treatment, water supply
4. **Healthcare** – NHS trusts serve multiple authority areas
5. **Education** – Kent County Council coordinates across district boundaries

Each of these requires cooperation with relevant authorities/agencies. The question is: **has this cooperation occurred?**

The Evidence Base: Inadequate Demonstration of Cooperation

The **Focused Regulation 18 Topic Paper (August 2025)** includes at **Appendix I: Duty to Cooperate** (page 175) a table titled: *"Meetings attended by CCC Officers with Duty to Cooperate partners between 1st April 2024 and 31st July 2025."*

This appendix is **supposed to demonstrate** that the Council has engaged "constructively, actively and on an ongoing basis" with relevant authorities.

However, several critical problems emerge:

Problem 1: No Site-Specific Cooperation on Policy N1

The Duty to Cooperate meetings listed in Appendix I appear to be **generic Local Plan meetings**, not specific engagement on Policy N1 and its strategic cross-boundary impacts.

There is **no evidence** of specific cooperation meetings addressing:

- N1's transport impacts on Strategic Road Network
- N1's contribution to cumulative effects on Stodmarsh SAC
- N1's wastewater treatment requirements and capacity
- N1's impacts on cross-boundary transport corridors
- N1's healthcare demands on NHS services serving multiple authorities

Generic Local Plan meetings do NOT satisfy Duty to Cooperate if strategic site-specific issues are not addressed.

Problem 2: No Statements of Common Ground

NPPF Paragraph 27 requires production of **Statements of Common Ground (SoCG)** to document cooperation: *"In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these."*

Where are the Statements of Common Ground for Policy N1?

The evidence base should include SoCGs with:

- **National Highways** (Strategic Road Network impacts)
- **Kent County Council Highways** (local road network impacts, school places, social care)
- **Dover District Council** (adjoining authority, shared Strategic Road Network)
- **Ashford Borough Council** (shared transport corridors, A28 impacts)
- **Natural England** (Stodmarsh SAC, European sites)
- **Environment Agency** (water quality, flood risk)
- **Southern Water** (wastewater treatment, water supply)
- **NHS Kent and Medway Integrated Care Board** (healthcare capacity)

I can find no evidence that these SoCGs exist or have been produced.

Without SoCGs, the Council **cannot demonstrate** what has been agreed, what remains in dispute, or what mitigation has been committed to by partner organizations.

Problem 3: Unresolved Objections from Statutory Consultees

The **Focused Regulation 18 Topic Paper** at paragraph 6.25 acknowledges: *"National Highways and KCC Highways raised significant concerns with the technical feasibility and deliverability"* of the A2 slip roads in the 2024 consultation.

These are Duty to Cooperate partners raising "significant concerns" about a strategic matter (transport infrastructure). The appropriate response is:

- Engage constructively to resolve concerns
- Produce Statement of Common Ground documenting resolution
- Demonstrate agreed approach going forward

Instead, the Council's response was:

- Delete the slip roads
- Introduce new "sustainable transport" strategy

- Proceed with allocation without demonstrating concerns are resolved

Where is the Statement of Common Ground with National Highways confirming that:

- Their concerns about the original strategy have been addressed?
- The new sustainable transport strategy is acceptable?
- They have no objection to Policy N1 proceeding?

Where is the Statement of Common Ground with KCC Highways confirming:

- Local road network can accommodate development traffic?
- Cumulative impact with other South Canterbury developments is acceptable?
- Necessary highway improvements are deliverable and funded?

Without these SoCGs, the Council cannot demonstrate that strategic transport issues have been cooperatively resolved.

This is a **Duty to Cooperate failure**.

Strategic Matter 1: Transport and the Strategic Road Network

The **A2 trunk road** is part of the **Strategic Road Network (SRN)** managed by **National Highways**, a government company operating across England. Development impacts on the SRN are inherently cross-boundary and strategic.

Policy N1's transport impacts include:

- 1,930 dwellings generating approximately 1,500-2,000 vehicles
- Traffic using A2 to access M2, London, Kent coast
- Cumulative impact with South Canterbury developments (7,039 dwellings total)
- Traffic rat-running through local roads to avoid congestion
- Impacts on A2 junctions serving multiple authority areas

These impacts cross authority boundaries because:

- Traffic from N1 will use roads in Dover District, Ashford Borough, Swale Borough
- A2 congestion affects journeys across Kent, not just Canterbury
- Junction capacity issues have regional implications
- Strategic traffic models must consider cross-boundary movements

The Duty to Cooperate requires:

- Joint transport modeling with neighboring authorities
- Agreement on cumulative impacts with developments in other authorities
- Coordinated mitigation measures across boundaries
- Statement of Common Ground with National Highways and neighboring authorities

Has this occurred? The evidence base provides **no demonstration** of:

- Joint transport modeling with Dover, Ashford, Swale
- Agreed approach to SRN impacts with National Highways
- Coordinated infrastructure delivery across authority boundaries

This is a Duty to Cooperate failure on strategic transport.

The KCC Highways Position

Kent County Council is both:

- The local highway authority for Canterbury District, **AND**
- The highway authority for neighboring districts (Dover, Ashford, Swale, etc.)

KCC therefore has a **strategic cross-boundary perspective** on highway impacts. Their concerns (raised per Topic Paper para 6.25) affect multiple districts, not just Canterbury.

Where is the Statement of Common Ground with KCC addressing:

- Highway capacity across South Canterbury and beyond?
- Cumulative impact of developments in Canterbury and neighboring authorities?
- Cross-boundary traffic management strategy?
- Infrastructure delivery and funding across multiple districts?

No evidence provided.

Strategic Matter 2: Stodmarsh SAC and European Sites

Stodmarsh Special Area of Conservation (SAC), Special Protection Area (SPA), and Ramsar site is a European designated site protected under the **Conservation of Habitats and Species Regulations 2017**.

Stodmarsh crosses authority boundaries – it is located in Canterbury District but its catchment extends into:

- Dover District

- Ashford Borough
- Swale Borough

The Habitats Regulation Assessment Addendum (August 2025) acknowledges that developments across multiple authorities contribute to **in-combination effects** on Stodmarsh through:

- Nutrient enrichment (nitrogen and phosphorus from wastewater)
- Water abstraction
- Recreation pressure
- Air quality impacts

Policy N1 will contribute to these in-combination effects:

- 1,930 dwellings generating wastewater requiring nutrient neutrality
- Wastewater treatment capacity implications
- Cumulative water demand
- Cumulative air quality impacts

The Duty to Cooperate requires:

- Joint working with Dover, Ashford, Swale on Stodmarsh mitigation
- Coordinated approach to nutrient neutrality across authorities
- Shared mitigation strategies and delivery mechanisms
- Agreement on cumulative impacts and capacity
- Statement of Common Ground documenting agreed approach

Has this occurred? The evidence base provides **no demonstration** of:

- Joint Stodmarsh mitigation strategy across authorities
- Agreed nutrient neutrality approach with neighboring districts
- Coordinated monitoring and management
- Statement of Common Ground with Natural England and neighboring authorities

Natural England is a Duty to Cooperate partner on European sites. **Where is the Statement of Common Ground with Natural England** addressing:

- Stodmarsh impacts from Policy N1?
- Cumulative in-combination effects with other plans/projects?

- Agreed mitigation and monitoring?
- Nutrient neutrality deliverability?

No evidence provided.

This is a Duty to Cooperate failure on strategic environmental matters.

Strategic Matter 3: Water Supply and Wastewater Treatment

Policy N1 requires new wastewater treatment works – Policy N1(5)(a) states: *"The wastewater treatment works must be delivered and fully operational prior to the occupation of any dwellings."*

This is a **critical infrastructure dependency** with strategic cross-boundary implications:

- Wastewater treatment capacity affects multiple authorities
- Water supply capacity is managed regionally
- Infrastructure investment requires coordination across authorities
- Stodmarsh nutrient neutrality affects regional wastewater strategy

The Duty to Cooperate requires:

- Joint working with Southern Water as statutory undertaker
- Coordination with neighboring authorities on wastewater capacity
- Agreement on infrastructure delivery, timing, and funding
- Statement of Common Ground documenting commitments

Has this occurred? The evidence base provides **no demonstration** of:

- Formal agreement with Southern Water to deliver wastewater treatment works
- Confirmation of capacity, location, specifications, delivery timeline
- Funding arrangements and cost allocation
- Statement of Common Ground documenting delivery certainty

Without a Statement of Common Ground with the water company:

- How can the Council be certain the wastewater treatment works will be delivered?
- How can neighboring authorities plan for their wastewater needs if Canterbury consumes regional capacity?

- How can Stodmarsh mitigation be coordinated across authorities?

Policy N1(5)(a) makes wastewater treatment a "must" – but there is no evidence this "must" can be delivered.

This is a Duty to Cooperate failure on strategic infrastructure.

Strategic Matter 4: Healthcare Capacity and NHS Planning

NHS Kent and Medway Integrated Care Board plans and commissions healthcare services across **multiple local authority areas** including Canterbury, Dover, Ashford, Swale, and others.

Policy N1 proposes:

- 1,930 dwellings = approximately 4,000 people
- Healthcare facility (minimum 1,200sqm)

Healthcare planning is inherently strategic and cross-boundary:

- GP surgeries serve populations across district boundaries
- Hospital services (Kent & Canterbury Hospital) serve entire region
- NHS capital funding allocated regionally
- Healthcare workforce recruited and deployed regionally

The Duty to Cooperate requires:

- Joint working with NHS on healthcare capacity and delivery
- Coordination with neighboring authorities on cumulative healthcare demand
- Agreement on infrastructure delivery, funding, and timing
- Statement of Common Ground documenting NHS commitment

Has this occurred? The evidence base provides **no demonstration** of:

- NHS agreement to provide healthcare facility at N1
- Confirmation of capital funding availability
- GP recruitment and staffing plan
- Integration with regional healthcare strategy
- Statement of Common Ground with NHS

Without a Statement of Common Ground with NHS Kent and Medway:

- How can the Council be certain healthcare facility will be delivered?

- How can NHS plan regionally if Canterbury makes unilateral commitments?
- How can cumulative healthcare demand across authorities be managed?

This is a Duty to Cooperate failure on strategic healthcare infrastructure.

The Consequences of Duty to Cooperate Failure

Failure to comply with Duty to Cooperate has **serious consequences**:

Legal Non-Compliance

Under **Section 20(5)(c) Planning and Compulsory Purchase Act 2004**, an Inspector examining a Local Plan **must recommend that the Plan is not submitted for adoption** if the Duty to Cooperate has not been complied with.

This is **not discretionary**. If Duty to Cooperate has not been complied with, the Plan **cannot proceed** regardless of any other merits.

No Opportunity to Rectify

Unlike soundness issues (which can be addressed through Main Modifications), **Duty to Cooperate cannot be rectified during Examination**.

Cooperation must occur **during Plan preparation**, not retrospectively. An Inspector cannot impose cooperation that did not occur.

If the Inspector finds Duty to Cooperate failure, the **entire Plan collapses**. The Council must start again.

Precedent: Plans Rejected for Duty to Cooperate Failure

Multiple Local Plans have been **rejected at Examination** for Duty to Cooperate failure:

- **Mid Sussex District Plan** (2013) – initially found non-compliant
- **North Northamptonshire Core Strategy** (2012) – withdrawn after DtC concerns
- **Coventry City Local Plan** – Inspector concerns about cross-boundary housing

Canterbury risks joining this list if Duty to Cooperate compliance cannot be demonstrated.

What the Council Must Do

To demonstrate Duty to Cooperate compliance, the Council must produce:

1. Statements of Common Ground

Produce signed Statements of Common Ground with all relevant Duty to Cooperate partners:

National Highways – addressing:

- Strategic Road Network impacts from Policy N1
- Cumulative impacts with other South Canterbury developments
- Resolution of "significant concerns" raised in 2024
- Agreed mitigation measures
- Confirmation of no objection

Kent County Council (Highways and Schools) – addressing:

- Local highway network capacity and cumulative impacts
- School places provision and timing
- Infrastructure delivery and funding
- Cross-boundary traffic management
- Confirmation of no objection

Natural England – addressing:

- Stodmarsh SAC impacts and mitigation
- European sites in-combination effects
- Agreed nutrient neutrality approach
- Monitoring and management
- Confirmation of no objection subject to mitigation

Southern Water – addressing:

- Wastewater treatment works delivery, capacity, timing, funding
- Water supply capacity
- Infrastructure delivery certainty
- Stodmarsh nutrient neutrality coordination
- Binding commitment to deliver

NHS Kent and Medway Integrated Care Board – addressing:

- Healthcare facility delivery, funding, timing
- GP capacity and workforce
- Regional healthcare strategy integration

- Binding commitment to deliver

Dover District Council, Ashford Borough Council – addressing:

- Cross-boundary transport impacts
- Cumulative infrastructure pressures
- Coordinated strategic planning
- Agreement on Policy N1 proceeding

2. Evidence of Joint Working

Provide evidence of "constructive, active and ongoing" cooperation:

- Minutes of meetings specifically addressing Policy N1 strategic matters
- Correspondence demonstrating engagement on cross-boundary issues
- Joint evidence base (e.g., joint transport modeling)
- Coordinated strategies (e.g., Stodmarsh mitigation)

3. Demonstrable Outcomes

Show that cooperation has resulted in outcomes:

- Resolution of objections from statutory consultees
- Agreed mitigation measures
- Coordinated infrastructure delivery
- Binding commitments from delivery partners

4. If Duty to Cooperate Cannot Be Demonstrated:

Delete Policy N1 rather than risk entire Plan rejection at Examination.

Conclusion

Canterbury City Council has **failed to demonstrate compliance** with the **legal Duty to Cooperate** on strategic cross-boundary matters arising from Policy N1.

The evidence base contains:

- **No Statements of Common Ground** with National Highways, KCC, Natural England, water companies, NHS, or neighboring authorities
- **No resolution** of "significant concerns" raised by National Highways and KCC Highways

- **No evidence** of joint working on strategic transport, environmental, or infrastructure issues
- **No binding commitments** from delivery partners on critical infrastructure

Without this evidence, **Policy N1 is legally non-compliant** and risks causing **rejection of the entire Plan** at Examination.

I am not a planning lawyer, but I recognize that Duty to Cooperate is a **legal requirement, not a policy preference**. The consequences of failure are severe and irreversible.

An Inspector will ask: "Where are the Statements of Common Ground?" If the Council cannot produce them, the Plan fails.

I live on [REDACTED]. I have a strong interest in ensuring Canterbury has a sound, legally compliant Local Plan. **Policy N1 threatens this** by risking Duty to Cooperate failure that could collapse the entire Plan.

The safest course is to delete Policy N1 pending proper cooperation with all relevant authorities and production of comprehensive Statements of Common Ground.

This allocation is **legally non-compliant** and must be deleted.

I request that this objection is forwarded to the Planning Inspector and that the Council provides a detailed written response including:

1. **Statements of Common Ground** with National Highways, KCC, Natural England, water companies, NHS, Dover DC, and Ashford BC specifically addressing Policy N1
2. **Evidence** of constructive, active, and ongoing cooperation on N1's strategic matters
3. **Confirmation** from all statutory consultees that objections have been resolved
4. **Legal advice** obtained by the Council on Duty to Cooperate compliance for Policy N1
5. **Explanation** of how the Council can proceed with N1 without SoCGs in place

If the Council cannot provide this evidence, Policy N1 must be deleted to avoid imperiling the entire Plan.

Yours faithfully,

Alan Davidson

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--Email From External Account--

Dear Sir/Madam,

I write to formally object to **Policy N1 (Land at Merton Park)** on the grounds that the Council has comprehensively failed to assess the overwhelming cumulative impact of Policy N1 combined with all concurrent major developments in South Canterbury, creating synergistic harms that will render the area unlivable and infrastructure non-functional.

As a resident of [REDACTED] ne living at the epicenter of this concentration of development, I am not speaking theoretically – I am living through the construction of South Canterbury (CF1) right now. I see daily what 4,000 dwellings under construction looks like. The Council now proposes to add another 1,930 dwellings at Merton Park plus additional developments, creating cumulative impacts that have **never been properly assessed**.

The Allocation is Unsound

This allocation **fails the soundness tests** required by NPPF Paragraph 35:

- **NOT EFFECTIVE:** Cumulative impacts not assessed; infrastructure capacity unknown
- **NOT POSITIVELY PREPARED:** Creates unsustainable outcomes through concentration of development
- **INCONSISTENT WITH NATIONAL POLICY:** Breaches requirements to assess cumulative effects

The Scale of Cumulative Development: An Area Transformed

Let me set out with absolute clarity the **total scale of development** being imposed on South Canterbury through concurrent allocations and permissions:

Policy N1 (Merton Park) – This Allocation:

- **1,930 dwellings** (1,737 general + 193 older persons)
- Approximate population: **4,000 people**
- Approximate cars: **1,500-2,000 vehicles**
- 11.5ha Sports Hub
- Primary school (3ha, 630 pupils)
- Local centre (1,680sqm)
- Business space (4,000sqm serviced land)
- Healthcare facility (minimum 1,200sqm)

- Wastewater treatment works
- **Estimated construction period: 2032-2042 (10 years)**

Policy CF1 (South Canterbury Strategic Site) – Under Construction Now:

- **4,000 dwellings** (adopted 2017 Local Plan, currently being built)
- Approximate population: **8,000-10,000 people**
- Approximate cars: **3,000-4,000 vehicles**
- Secondary school
- Primary schools
- Local centre
- Employment area
- Major infrastructure
- **Construction period: Approximately 2020-2038 (18 years)**
- **Status: ACTIVE CONSTRUCTION SITE RIGHT NOW**

Policy CF1 Site 10 (Ridlands) – Adjacent to N1:

- **310 dwellings** (adopted allocation)
- Approximate population: **650 people**
- Approximate cars: **230-310 vehicles**
- Healthcare safeguarded land
- **Construction period: TBC, overlapping with N1**

Policy CF1 Site 11 (Cockering Farm) – Adjacent:

- **785 dwellings** (adopted, outline permission CA/17/00519/OUT)
- Approximate population: **1,650 people**
- Approximate cars: **590-785 vehicles**
- **Construction period: Ongoing, overlapping with N1**
- **Status: UNDER CONSTRUCTION**

Policy N2 (Langton Lane) – Immediately Adjacent to N1:

- **14 dwellings**
- Approximate population: **30 people**

- Approximate cars: **10-15 vehicles**
- **Construction period: Overlapping with N1**

Policy N3 (Thanington Recreation Ground) – Adjacent:

- **Park & Ride facility** (500+ parking spaces)
- Loss of existing sports pitches
- Replacement provision in N1 Sports Hub
- Major infrastructure requiring construction
- **Construction period: Overlapping with N1**

The Cumulative Totals: A New Town in All But Name

TOTAL DWELLINGS: 7,039

TOTAL POPULATION: Approximately 14,000-16,000 people

TOTAL VEHICLES: Approximately 10,500-12,500 cars

CONSTRUCTION PERIOD: 2020-2042+ (22+ years of continuous construction activity)

Let me emphasize: this is not a series of small developments spread over time. This is **the creation of a new town** accommodating **14,000-16,000 people** – a population **larger than many Kent towns** – compressed into one area over two decades of continuous construction chaos.

For comparison:

- **Tenterden population: approximately 8,000**
- **Sandwich population: approximately 4,800**
- **Deal population: approximately 30,000**

South Canterbury is having the equivalent of two Tenterdens built simultaneously, with all the infrastructure pressure, traffic generation, construction disruption, and community impact that entails.

Cumulative Impact 1: Transport Network Collapse

The cumulative transport impact of 10,500-12,500 additional vehicles in one area using the same limited local road network is **catastrophic and has never been properly assessed**.

The Road Network Under Assault:

Hollow Lane

- Currently serves existing residential areas
- Narrow sections with no footpaths
- Already congested at peak times
- **Will serve:** Access to N1 (1,930 dwellings), overflow from CF1 (4,000 dwellings), rat-running traffic avoiding congestion
- **Cumulative impact:** 5,000+ additional vehicles attempting to use this narrow lane daily

Lime Kiln Road:

- Links to Canterbury East station
- Already congested at peak times with commuter traffic
- **Will serve:** N1 traffic, CF1 traffic, Ridlands traffic, Cockering Farm traffic, station traffic
- **Cumulative impact:** Gridlock during peak commuting times; station accessibility compromised

Stuppington Lane:

- Narrow rural lane becoming major distributor
- **Will serve:** N1 primary access, CF1 traffic, cumulative development traffic
- **Cumulative impact:** Rural lane transformed to urban arterial without adequate capacity

South Canterbury Road / Wincheap:

- Main approach to Canterbury city center from south
- Already congested
- **Will serve:** All 7,039 dwellings' traffic heading to city center, plus existing traffic
- **Cumulative impact:** Complete gridlock; journey times doubled or tripled

A2 Strategic Road Network:

- All South Canterbury traffic must ultimately access A2 for M2, London, Kent destinations
- **Cumulative impact:** 10,500+ vehicles accessing A2 junctions daily; Strategic Road Network congestion affecting region

Peak Time Chaos:

Morning peak (7:30-9:00am):

- 10,500+ cars attempting to leave South Canterbury area simultaneously
- School run traffic (2,800+ children being driven to schools – see education section)
- Commuter traffic to Canterbury stations and city center
- Hospital staff/patient traffic (Kent & Canterbury Hospital)
- Construction traffic (developments still being built)

Estimated result: 90+ minute queues from South Canterbury to reach city center or A2 – a distance currently drivable in 5-10 minutes.

Evening peak (4:30-6:30pm):

- Mirror of morning chaos in reverse
- Residents returning from work
- School collection traffic
- Shopping/leisure traffic

School times:

- Additional spikes at school start/finish (8:30-9am, 3-3:30pm)
- 2,800+ children being driven = 1,400+ additional car movements

Construction traffic:

- During 22-year construction period: HGVs, delivery vehicles, worker vehicles
- Estimated 200-500 construction vehicles daily during peak construction phases
- Compounding congestion for existing and new residents

The Rat-Running Epidemic:

When main routes gridlock, traffic uses residential streets as rat-runs:

- Existing quiet residential streets become through-routes
- Speed, volume, danger increase
- Quality of life for existing residents destroyed
- School routes unsafe
- Emergency vehicle access compromised

I live on [REDACTED]. I already see rat-running when Wincheap is congested. With 10,500+ additional cars, my road will become a race track.

No Cumulative Transport Assessment:

The **Focused Regulation 18 Topic Paper** and evidence base contain **no comprehensive cumulative transport assessment** covering:

- Combined traffic generation from all 7,039 dwellings
- Capacity analysis of local road network under cumulative load
- Junction modeling for all affected junctions simultaneously
- Strategic Road Network cumulative impacts
- Construction traffic cumulative impacts
- Emergency vehicle access under cumulative congestion
- Air quality impacts from 10,500+ vehicles

Without this assessment, the Council cannot demonstrate that the transport network can function.

This is a **fundamental failure** rendering Policy N1 and the wider strategy **not effective**.

Cumulative Impact 2: Education Infrastructure Collapse

The cumulative education impact of 7,039 dwellings generating approximately **2,800-3,200 school-age children** has never been properly assessed.

Primary Education:

Estimated primary-age children (ages 4-11):

- 7,039 dwellings × 2.5 people per dwelling = 17,598 people
- Assume 20% are school-age = 3,520 children
- Assume 55% are primary age = **1,936 primary-age children**

Primary school provision in South Canterbury developments:

- N1 proposes: 1 × 3FE primary school = **630 places**
- CF1 includes: Primary school provision (capacity unclear from documents)
- Assume CF1 provides: 2 × 3FE schools = **1,260 places**

TOTAL PRIMARY PLACES: Approximately 1,890 places

DEMAND: 1,936 children

This appears just adequate on paper – but critically:

1. **The schools serve wider catchments** – not just the new developments. Existing residents in Thanington, Wincheap, and surrounding areas also need access.
2. **Parental choice** – many parents will choose schools outside the immediate area (faith schools, Canterbury city center schools, selective schools). This means:
 - On-site schools may have spare capacity
 - Schools elsewhere become overcapacity
 - Increased car journeys to distant schools
3. **Timing of delivery** – schools delivered incrementally as developments progress. Early phases may have no school for years.
4. **Cumulative construction impact** – new schools opening while surrounded by active construction sites; noise, dust, safety concerns.

Secondary Education:

Estimated secondary-age children (ages 11-18):

- Assume 45% of school-age children are secondary age = **1,584 secondary-age children**

Secondary school provision in South Canterbury developments:

- CF1 includes: 1 secondary school (capacity unclear, assume 1,200-1,500 places)

ONE secondary school for 1,584 children from the developments, PLUS serving wider catchment, PLUS existing demand.

Result: Overcapacity or insufficient provision.

Critical problem: Where do these 1,584 secondary-age children go to school?

If the one secondary school in CF1 accommodates them (just barely), it serves **only the new developments**, leaving existing catchment areas to find alternatives.

If they must travel to existing Canterbury secondary schools:

- **Canterbury High School** – already at capacity
- **Simon Langton Girls' Grammar** – selective, limited places
- **Simon Langton Boys' Grammar** – selective, limited places
- **Archbishop's School** – large but serves wide area

- **Barton Court Grammar** – selective, serves wide area

Most of these schools are 3-5km from South Canterbury = too far for most children to walk, especially younger secondary students.

Result: 1,000+ children being driven to secondary school daily = 500-750 additional car journeys twice daily.

This is car dependency by design – the cumulative development creates demand that cannot be served sustainably.

No Cumulative Education Assessment:

There is **no comprehensive assessment** covering:

- Cumulative demand from all 7,039 dwellings
- Capacity of all proposed schools combined
- Impact on existing schools in wider Canterbury area
- Timing and phasing of school delivery
- Transport arrangements for pupils attending schools outside immediate area
- Cumulative financial impact on KCC education budgets

Without this assessment, the Council cannot demonstrate that education needs can be met.

Cumulative Impact 3: Healthcare System Overload

The cumulative healthcare impact of **14,000-16,000 additional people** will overwhelm an already-stretched healthcare system.

Primary Care (GP Services):

GP capacity requirements:

- Typical GP practice serves 8,000-10,000 patients
- **16,000 additional people require approximately 2 new practices**

GP provision in South Canterbury developments:

- N1 proposes: Healthcare facility minimum 1,200sqm (approximately 1 practice)
- CF1 includes: Healthcare provision (details unclear)
- Ridlands: Safeguarded healthcare land

Even if both N1 and CF1 provide full GP practices:

- This is **bare minimum** for 16,000 people
- Does not account for existing population also needing access
- No buffer for population growth beyond developments

Delivery uncertainty:

- Healthcare facilities dependent on NHS funding and agreement
- No Statements of Common Ground with NHS documented
- Timing of delivery unclear – residents may wait years for GP access
- Viability dependent on CIL/S106 contributions

GP workforce:

- National GP shortage crisis
- Recruitment to new practices challenging
- Canterbury competing with rest of Kent for limited workforce
- **No evidence that GPs can be recruited for new practices**

Secondary Care (Hospital Services):

Kent & Canterbury Hospital is located adjacent to development area but:

A&E Department:

- Already operating at or beyond capacity
- **16,000 additional people will generate approximately 2,000-2,500 A&E attendances annually** (based on national average of 155 per 1,000 population)
- **This is 5-7 additional A&E patients every single day**
- No evidence of capacity assessment or expansion plans

Elective Care:

- Waiting lists already at record levels
- 16,000 additional people requiring routine appointments, procedures, diagnostics
- Ophthalmology, orthopedics, cardiology, etc. all under pressure
- **No evidence of capacity to absorb additional demand**

Maternity Services:

- 7,039 dwellings will include many young families

- Estimated 200-250 births per year from new developments
- **Maternity capacity already constrained**
- No evidence of expansion plans

Mental Health Services:

- Already under-resourced across Kent
- Construction stress, social isolation, community disruption will increase mental health needs
- 16,000 additional people will generate substantial demand
- No evidence of capacity planning

Cumulative Impact on Existing Residents:

My GP practice is already difficult to get appointments. Adding 16,000 patients to the South Canterbury area will make this crisis far worse:

- Appointment waiting times increase from days to weeks
- Telephone queues worsen
- Pressure to use A&E for primary care needs
- Health outcomes deteriorate

No Cumulative Healthcare Assessment:

There is **no comprehensive assessment** covering:

- Cumulative demand from 16,000 additional people
- GP capacity and delivery certainty
- Hospital capacity for A&E, elective, maternity services
- NHS capital funding availability
- GP workforce recruitment and retention
- Statement of Common Ground with NHS Kent and Medway

Without this assessment, the Council cannot demonstrate that healthcare needs can be met.

Cumulative Impact 4: Infrastructure Overload (Water, Sewerage, Utilities)

Wastewater Treatment:

7,039 dwellings will generate enormous wastewater volumes:

- Average household generates 150 liters per person per day
- 16,000 people × 150 liters = **2,400,000 liters (2.4 million liters) per day**

Current wastewater infrastructure:

- Canterbury sewerage system already under pressure
- Stodmarsh nutrient neutrality means discharges must be nutrient-neutral
- Upgrades required across network

N1 proposes new wastewater treatment works but:

- Will this serve N1 only or wider South Canterbury developments?
- Capacity adequate for cumulative demand?
- Timing of delivery certain?
- Funding secured?
- Stodmarsh compliance achieved?

No cumulative wastewater assessment covering all 7,039 dwellings.

Water Supply:

7,039 dwellings will consume enormous water volumes:

- 16,000 people × 150 liters per day = **2.4 million liters per day**
- **876 million liters per year**

Plus non-domestic use: schools, healthcare facilities, commercial units, sports facilities.

Is water supply capacity adequate?

- Thames Water/Southern Water capacity assessments?
- Source sustainability under climate change?
- Water stress designation implications?

No cumulative water supply assessment provided.

Electricity Network:

7,039 dwellings will place enormous demand on electricity network:

- Average dwelling consumes 2,900 kWh per year
- 7,039 dwellings × 2,900 kWh = **20.4 million kWh per year**

- Plus non-domestic demand from schools, commercial, sports facilities

UK Power Networks capacity:

- Is existing network adequate?
- Substation upgrades required?
- National Grid capacity adequate?
- Charging infrastructure for 10,500+ electric vehicles?

No cumulative electricity assessment provided.

Gas Network:

Similar concerns for gas supply if developments use gas heating (though heat pumps increasingly required).

Telecommunications:

- 16,000 people require broadband, mobile, telephone services
- Is infrastructure capacity adequate?
- 5G coverage plans?

No cumulative utilities assessment covering all 7,039 dwellings.

Cumulative Impact 5: Environmental Degradation

Air Quality:

10,500-12,500 additional vehicles will generate substantial emissions:

- Conservative estimate: 10,000 miles per vehicle per year
- 11,000 vehicles × 10,000 miles = **110 million vehicle miles per year**
- At average emissions: **approximately 25,000 tonnes CO2 per year**
- Plus NO₂, particulates, other pollutants

Cumulative air quality impact:

- Concentrated on same local roads (Hollow Lane, Lime Kiln Road, Wincheap)
- Residents breathing increasingly polluted air
- Children walking to school exposed to traffic pollution
- Elderly residents with respiratory conditions at risk

No Air Quality Impact Assessment for cumulative developments.

Noise Pollution:

22 years of continuous construction (2020-2042+):

- HGVs, deliveries, machinery, piling, groundworks
- Cumulative noise from multiple active construction sites simultaneously
- Existing residents subjected to noise pollution for two decades
- Impact on mental health, sleep, quality of life

Plus traffic noise:

- 10,500+ vehicles generating continuous traffic noise
- Transformation of quiet residential area to traffic-dominated environment

No cumulative noise assessment provided.

Biodiversity and Ecology:

Cumulative habitat loss:

- 7,039 dwellings on largely greenfield sites
- Loss of agricultural land providing habitat for farmland birds, small mammals, invertebrates
- Fragmentation of habitat connectivity
- Cumulative impact on functionally linked land for European sites

Cumulative recreation pressure:

- 16,000 additional people seeking outdoor recreation
- Pressure on surrounding countryside, footpaths, green spaces
- Disturbance to wildlife

No cumulative ecological assessment covering all developments.

Landscape Character:

Comprehensive urbanization of South Canterbury:

- 7,039 dwellings = continuous urban sprawl
- Complete loss of rural character and agricultural landscape
- Transformation of countryside setting to suburban fringe
- **Permanent and irreversible**

No cumulative landscape assessment provided.

Cumulative Impact 6: Social and Community Breakdown

Community Cohesion:

Existing South Canterbury communities cannot absorb 16,000 new residents:

- Thanington population approximately 2,000-3,000
- **New population (16,000) is 5× existing population**
- Existing residents overwhelmed by newcomers
- No shared community identity or history
- Social cohesion breakdown

Construction Fatigue:

Living in a construction zone for 22 years:

- I am living through CF1 construction NOW
- Noise, dust, HGVs, diversions, closures – EVERY DAY
- Now the Council proposes another 10+ years at Merton Park
- Plus Cockering Farm, Ridlands, Langton Lane simultaneously
- **Existing residents subjected to construction chaos for two decades**

This is not nimbyism – this is recognition that human beings cannot live quality lives in permanent construction zones.

Service Competition and Resentment:

Existing residents see services overwhelmed:

- GP appointments impossible to get – because 16,000 new patients added
- Schools overcrowded – because 2,800 new children added
- Roads gridlocked – because 10,500 new cars added
- Healthcare delayed – because hospital at capacity

Result: Resentment between existing and new residents; community division; breakdown of social fabric.

Loss of Place Identity:

South Canterbury becomes "anywhere":

- Generic suburban estates stretching for miles

- No distinctive character or identity
- Could be any urban fringe in England
- Loss of connection to Canterbury's heritage and landscape setting

New residents have no connection to area:

- Arrive to live in new estate surrounded by other new estates
- No established community to integrate into
- No sense of place or belonging
- **Transient population, not stable community**

Legal and Policy Requirements for Cumulative Assessment

Strategic Environmental Assessment (SEA) Directive and Regulations 2004:

Regulation 12 requires assessment of:

- **"The cumulative effects... of implementing the plan or programme"**

This is a **legal requirement**. Cumulative effects must be assessed in the Sustainability Appraisal.

Has the SA comprehensively assessed cumulative effects of Policy N1 + CF1 + Ridlands + Cockerling Farm + N2 + N3 combined?

I can find **no comprehensive cumulative assessment** in the SA or evidence base.

NPPF Paragraph 183: *"The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular application, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities."*

But the paragraph continues: *"The cumulative impacts of pollution should be taken into account."*

"The cumulative impacts of pollution should be taken into account."

Air quality, noise, water pollution from 7,039 dwellings – have cumulative impacts been taken into account?

No comprehensive assessment provided.

Habitats Regulations Assessment:

The HRA Addendum assesses "in-combination effects" of developments on European sites. But this covers only ecological impacts, not the full range of cumulative effects on community and infrastructure.

What the Council Must Do

To make this Plan sound, the Council must:

1. **Commission comprehensive Cumulative Impact Assessment** covering ALL concurrent South Canterbury developments (N1, CF1, Ridlands, Cockering Farm, N2, N3) addressing:
 - **Transport:** Combined traffic generation, network capacity, junction modeling, Strategic Road Network impacts, construction traffic, emergency vehicle access, air quality
 - **Education:** Combined pupil generation, school capacity, surplus/deficit analysis, travel patterns, KCC capacity to deliver
 - **Healthcare:** Combined population demand, GP capacity and delivery certainty, hospital capacity, NHS capital funding, workforce recruitment
 - **Infrastructure:** Wastewater treatment (combined demand, capacity, delivery, Stodmarsh compliance), water supply, electricity, gas, telecommunications
 - **Environmental:** Air quality (cumulative emissions, pollution concentrations, health impacts), noise (construction + traffic), ecology (habitat loss, recreation pressure, functionally linked land), landscape (cumulative urbanization)
 - **Social:** Community cohesion, construction fatigue, service competition, place identity
2. **Model cumulative scenarios** including:
 - Best case: All infrastructure delivered on time, all mitigation effective
 - Realistic case: Typical delays, partial mitigation
 - Worst case: Infrastructure delivery failures, inadequate mitigation
3. **Demonstrate infrastructure capacity** to serve 7,039 dwellings + 16,000 people with evidence including:
 - Signed Statements of Common Ground with all infrastructure providers
 - Binding delivery commitments with funding secured
 - Capacity modeling showing adequacy

4. **Consider phasing strategy** to avoid concurrent construction:
 - Complete CF1 before commencing N1
 - Stagger developments to allow infrastructure to catch up
 - Limit cumulative construction impact on existing residents
5. **Assess alternative spatial strategies** that distribute development rather than concentrate:
 - Higher densities in Canterbury urban core (reducing greenfield need)
 - Greater allocation to Whitstable and Herne Bay
 - Wider distribution across rural service centres
 - **Avoiding overwhelming concentration in one area**
6. **Delete Policy N1** if cumulative impacts are unacceptable or cannot be adequately mitigated

Conclusion

Policy N1 must not be assessed in isolation – it is part of a **cumulative assault on South Canterbury** comprising:

- **7,039 dwellings**
- **16,000 people**
- **10,500+ vehicles**
- **22+ years of continuous construction**

The synergistic impacts will:

- **Collapse the transport network** under traffic volume it cannot accommodate
- **Overwhelm education infrastructure** requiring 2,800+ school places
- **Overload healthcare services** already at breaking point
- **Exhaust infrastructure capacity** for water, sewerage, utilities
- **Degrade the environment** through air pollution, noise, habitat loss
- **Destroy community cohesion** through overwhelming population influx and construction fatigue

None of these cumulative impacts have been comprehensively assessed.

I live on [REDACTED]. I am living through the cumulative impact RIGHT NOW with CF1 under construction. I see the HGVs. I breathe the dust. I hear the noise. I experience the traffic. I know my GP is impossible to get an appointment with.

Now the Council proposes to make it WORSE by adding another 1,930 dwellings at Merton Park.

This is not strategic planning – this is cumulative chaos. It is the systematic degradation of South Canterbury through overwhelming concentration of development without adequate assessment, mitigation, or infrastructure.

Someone must say: ENOUGH.

South Canterbury has borne its share of Canterbury's growth. CF1's 4,000 dwellings was already a massive imposition. Adding N1's 1,930 dwellings creates cumulative impact that crosses the line from acceptable to unacceptable.

This allocation is **unsound** and must be deleted.

I request that this objection is forwarded to the Planning Inspector and that the Council provides a detailed written response including:

1. **Comprehensive Cumulative Impact Assessment** covering all South Canterbury developments as specified above
2. **Evidence** that infrastructure capacity is adequate for 7,039 dwellings
3. **Explanation** of why cumulative impacts have not been assessed to date
4. **Demonstration** that Strategic Environmental Assessment requirements for cumulative effects have been met
5. **Justification** for concentrating 7,039 dwellings in one area rather than distributing across the district

If the Council cannot provide this evidence, Policy N1 must be deleted to avoid unacceptable cumulative impacts on South Canterbury.

Yours faithfully,

Alan Davidson

=====

--Email From External Account--

Dear Sir/Madam,

I write to formally object to **Policy N1 (Land at Merton Park)** on the grounds that the surface water drainage strategy is fundamentally inadequate, will create unacceptable flood risk to both existing residents (including myself at [REDACTED]) and future

residents of the development, fails to meet national policy requirements for sustainable drainage, and does not account for climate change impacts over the 60-100 year lifespan of the development.

As a resident of [REDACTED] immediately adjacent to this proposed development, I am acutely aware of surface water drainage issues in this area. Any development that increases surface water runoff without comprehensive, climate-resilient drainage infrastructure will cause flooding to my property and neighboring properties, as well as creating flood risk within the development itself.

The Allocation is Unsound

This allocation **fails the soundness tests** required by NPPF Paragraph 35:

- **NOT EFFECTIVE:** Surface water drainage strategy inadequate; flood risk inadequately assessed; existing residents will be harmed
- **NOT POSITIVELY PREPARED:** Fails to plan for climate-resilient drainage or protect existing properties from flooding
- **INCONSISTENT WITH NATIONAL POLICY:** Breaches NPPF Paragraphs 159-169 on flood risk and drainage

The Site Context: Topography and Drainage

Site Topography:

The **SLAA (August 2025)** at pages 148-149 describes the site as: *"The site slopes slightly from north to south."*

This means:

- Water naturally flows from north to south across the site
- Any development on the higher ground (north) will generate surface water runoff flowing south
- Properties on the southern boundary (including mine on [REDACTED]) are **downslope and will receive increased surface water**
- Natural drainage patterns will be fundamentally altered by development

Current Drainage Patterns:

As agricultural land, the site currently:

- Has vegetated surface that absorbs rainfall
- Allows natural infiltration into soil
- Generates relatively low surface water runoff

- Maintains natural drainage to local watercourses and drainage systems

Once developed with 1,930 dwellings:

- Large areas of impermeable surfaces (roofs, roads, driveways, parking)
- Drastically reduced infiltration capacity
- Massively increased surface water runoff
- Concentrated flows rather than dispersed natural drainage

Existing Drainage Issues:

I live on [REDACTED]. During intense rainfall events, I observe:

- Surface water pooling on roads and in gardens
- Local drainage systems struggling to cope with existing runoff
- **Any increase in surface water from development will overwhelm existing capacity**

My neighbors and I have existing concerns about drainage. The Council is proposing to add 83.9 hectares of developed land draining toward our properties **without demonstrating that existing residents will be protected from flooding.**

What Policy N1 Actually Requires for Drainage: Woefully Inadequate

Let me examine every reference to surface water drainage in Policy N1:

Policy N1(2)(g) - Flood Risk Assessment Requirement:

"Provide a site-specific Flood Risk Assessment in line with Policy DS20 which must:(i) The Sequential Approach should be applied to the layout of the site by locating the most vulnerable elements in the lowest risk areas. The Sequential Approach should also be applied to the internal layout of buildings, in particular where floor levels cannot be raised;(ii) Flood resistance and resilience measures should be considered for inclusion; and(iii) Suitable mitigation (such as compensatory flood storage) should be provided where development would displace floodwater to ensure no increase in risk of flooding to the surrounding area."

Analysis:

"Provide a site-specific Flood Risk Assessment" – This is a requirement to produce an assessment **in the future**, not evidence that assessment has been done and flood risk is acceptable. The Council is allocating a site without knowing if flood risk can be adequately managed.

"The Sequential Approach should be applied" – "Should" is weak language. It means "ought to" but is not an absolute requirement. This should say "**must** be applied."

"Flood resistance and resilience measures should be considered" – "Should be considered" is even weaker. It means "think about it" but doesn't require implementation. This should say "**must be incorporated.**"

"Suitable mitigation (such as compensatory flood storage) should be provided where development would displace floodwater" – This is an admission that **development WILL displace floodwater**. The question is: where will that displaced water go?

"to ensure no increase in risk of flooding to the surrounding area" – This is the key requirement: **no increase in flood risk to surrounding area (i.e., to existing residents like me).**

But how will this be ensured? Policy provides no specifications:

- No requirement for specific attenuation capacity
- No requirement for specific SuDS features
- No requirement for climate change allowances
- No requirement for exceedance routes
- No requirement for maintenance and management
- **Just a vague requirement to "ensure no increase in risk"**

This is inadequate.

What Policy N1 Does NOT Require:

Policy N1 does NOT contain ANY specific surface water drainage requirements beyond the generic Flood Risk Assessment mentioned above.

The policy does NOT require:

✗ Comprehensive SuDS hierarchy (manage runoff at source, then site level, then regional)

✗ Specific attenuation features throughout the development:

- Permeable paving on driveways and parking areas
- Swales along all streets
- Rain gardens in every block
- Detention basins distributed across site

- Green roofs on buildings
- Bioretention areas
- Filter strips

✘ Design standards for SuDS features:

- Capacity requirements (liters/hectares/minutes of storage)
- Design for specific return period events (1-in-30 year, 1-in-100 year +40% climate change)
- Treatment train approach (multiple features in sequence)
- Water quality treatment standards

✘ Climate change allowances:

- 40% peak rainfall intensity allowance per Environment Agency guidance
- Future-proofing for intensifying rainfall through building lifespan

✘ Exceedance routes:

- What happens when rainfall exceeds design capacity?
- Where does overflow water go?
- How are properties protected from beyond-design events?

✘ Long-term management and maintenance:

- Who maintains SuDS features in perpetuity?
- Funding for maintenance?
- Management company obligations?
- Adoption by sewerage undertaker or retained by management company?

✘ Monitoring and performance:

- How will drainage performance be monitored?
- What happens if features fail or underperform?
- Remediation requirements?

✘ Protection of existing properties:

- Specific measures ensuring no increased flood risk to Hollow Lane and adjacent properties

- Hydraulic modeling demonstrating no increased water reaching existing properties
- Monitoring of existing properties during construction and post-development

The absence of these requirements means:

- Developers will provide **minimum viable drainage** to obtain planning permission
- **Climate change not properly accounted for** – design to current rainfall, not 2080 rainfall
- **Existing residents not protected** – no specific measures ensuring we are not flooded
- **SuDS features may not be maintained** long-term, leading to failure and flooding years after construction

The Quantum of Surface Water: 83.9 Hectares of Impermeable Development

To understand the scale of surface water issue, let me calculate the quantity of water that will be generated:

Current Situation (Agricultural Land):

- **83.9 hectares = 839,000 square meters**
- Agricultural land with soil and vegetation **absorbs most rainfall**
- Natural infiltration and evapotranspiration
- Some runoff during intense events, but much lower than hard surfaces
- Runoff coefficient (proportion of rainfall becoming runoff): approximately **0.1-0.3** depending on soil type and vegetation

Future Situation (Developed Land):

- **Buildings (roofs):** Assume 40% of site = 335,600 m²
- **Roads, driveways, parking:** Assume 30% of site = 251,700 m²
- **Gardens, open space:** Assume 30% of site = 251,700 m²

Total impermeable surfaces (roofs + roads): 587,300 m² = 58.7 hectares

Impermeable surfaces have runoff coefficient: approximately **0.9-0.95** (almost all rainfall becomes runoff)

Rainfall Event Example:

Intense rainfall event (not rare under climate change): 50mm in 24 hours

Current runoff (agricultural land):

- $839,000 \text{ m}^2 \times 0.05 \text{ meters} \times 0.2 \text{ (runoff coefficient)} = \mathbf{8,390 \text{ cubic meters}}$

Future runoff (developed land):

From impermeable surfaces:

- $587,300 \text{ m}^2 \times 0.05 \text{ meters} \times 0.95 \text{ (runoff coefficient)} = \mathbf{27,897 \text{ cubic meters}}$

From permeable surfaces (gardens):

- $251,700 \text{ m}^2 \times 0.05 \text{ meters} \times 0.3 \text{ (runoff coefficient)} = \mathbf{3,776 \text{ cubic meters}}$

Total future runoff: 31,673 cubic meters

INCREASE IN RUNOFF: 23,283 cubic meters = 23.3 MILLION LITERS additional water that must be stored or conveyed safely

And this is for a SINGLE 50mm rainfall event. Under climate change, more intense events will occur more frequently:

- 75mm in 24 hours
- 100mm in 24 hours
- Concentrated in shorter duration (e.g., 50mm in 3 hours = flash flooding)

The drainage system must store or convey an additional 23+ million liters per intense rainfall event.

Is this achievable? Policy provides **no evidence** of:

- SuDS capacity calculations
- Hydraulic modeling demonstrating adequacy
- Climate change scenarios tested
- Multiple events in sequence (saturated ground, no recovery time between events)

Climate Change: The Intensifying Threat

UK Climate Projections (UKCP18) for Kent:

By 2070-2100:

- **Winter rainfall increase: 20-30%** under medium emissions scenario
- **Summer rainfall decrease** (drought risk)
- **BUT: Intense rainfall events become MORE frequent and MORE intense**

- Rainfall that currently occurs once in 100 years may occur **once in 20-30 years**
- **Peak rainfall intensity increase: 40%** (Environment Agency climate change allowance)

This means:

A 1-in-100 year event today (extreme) becomes a 1-in-30 year event in 2080 (relatively frequent).

A 50mm/24hr event becomes a 70mm/24hr event with same return period.

Homes built 2032-2042 will still be standing in 2100. The drainage system must function in 2100 climate, not 2025 climate.

The Policy Failure:

Policy N1 does not require:

- Climate change allowances in drainage design
- Future-proofing for intensifying rainfall
- Design capacity for 2080 rainfall, not 2025 rainfall

Without these requirements, drainage will be designed for current climate and will FAIL under future climate.

The consequences:

- **Flooding becomes frequent rather than rare**
- Properties flood that were not supposed to flood
- Residents pay increasing insurance premiums
- Some properties become uninsurable
- Property values decline
- Retrofitting drainage capacity costs millions
- **Residents bear all costs**

This is planning failure – building inadequate infrastructure and passing consequences to future residents.

The Hydraulic Impact on Existing Residents

I live downslope from the development site. Surface water flows from north (site) to south (Hollow Lane and beyond).

Currently:

- Agricultural land absorbs much of the rainfall
- Runoff is relatively limited
- During intense events, some surface water reaches my area but manageable

With development:

- 23+ million liters additional runoff per intense event
- This water must go somewhere
- If drainage design is inadequate, **it will flow toward existing properties including mine**

Policy N1(2)(g)(iii) requires: *"Suitable mitigation... to ensure no increase in risk of flooding to the surrounding area."*

How will this be ensured?

Hydraulic modeling should demonstrate:

1. Current surface water flow paths and volumes
2. Future surface water flow paths and volumes with development
3. Difference (increased volume and velocity)
4. Attenuation measures reducing outflow to greenfield runoff rate or lower
5. Exceedance routes ensuring overflow does not reach existing properties
6. Monitoring of existing properties to detect any increased flooding

Where is this modeling?

I can find NO EVIDENCE in the Plan or evidence base that:

- Hydraulic modeling has been conducted
- Impact on existing properties has been assessed
- Specific measures to protect existing properties have been designed
- I (and other ██████████ residents) will not experience increased flooding

Without this evidence, Policy N1(2)(g)(iii)'s requirement to "ensure no increase in risk" is meaningless words on paper.

The Council is allocating a site without demonstrating that existing residents will be protected.

This is grossly irresponsible and potentially unlawful (failure to consider foreseeable harm to existing residents).

Discharge Point and Downstream Impacts

A critical question the policy does not answer:

WHERE WILL THE SURFACE WATER FROM THE DEVELOPMENT DISCHARGE TO?

Options include:

1. **Local watercourses** – but which ones? What is their current capacity? Can they accommodate additional 23+ million liters per event?
2. **Existing drainage systems** – but are they adequate? Do they have capacity?
3. **Soakaways/infiltration** – but is the ground suitable? Infiltration rates adequate?
4. **Combination of above**

The policy provides NO CLARITY on discharge destination.

Without knowing where water will discharge:

- Cannot assess downstream impacts
- Cannot determine if receiving watercourse/system has capacity
- Cannot design adequate attenuation to limit discharge rate
- Cannot ensure existing residents won't be flooded

Critical questions:

- What watercourses/drainage systems serve the area?
- What is their current capacity and condition?
- Are they already at or near capacity?
- Do they flood currently?
- Can they accommodate development discharge even at restricted greenfield rates?
- What downstream properties/areas could be affected?

This information must be established BEFORE allocation, not left to future planning applications.

Construction Phase Flood Risk

The **construction period** for Policy N1 is estimated at **10 years (2032-2042)**.

During construction:

- **Soil and vegetation removed** exposing bare earth
- **Natural infiltration destroyed** before SuDS features installed
- **Maximum runoff generation** – bare earth and temporary surfaces
- **SuDS features not yet fully functional** – installed incrementally, not operational from day one
- **Silt and sediment** washed into drainage systems and watercourses, reducing capacity

Construction phase has HIGHER flood risk than pre-development or post-completion:

- More runoff generated
- Less attenuation available
- Temporary drainage measures only
- Silt contamination

Intense rainfall during construction = flooding of construction site, surrounding properties, and downstream areas.

Where is the Construction Phase Drainage Management Plan requirement?

Policy N1 should require:

- Construction phase drainage strategy approved before any works commence
- Temporary attenuation features in place before vegetation clearance
- Silt traps and filtration preventing contamination
- Monitoring of downstream properties during construction
- Emergency response plan for construction phase flooding
- Financial bond ensuring remediation if flooding occurs

Policy N1 requires NONE of these measures.

For 10 years, I and other existing residents will be at INCREASED flood risk during construction with no protection measures specified.

Maintenance and Long-Term Management: The Neglected Crisis

SuDS features **require maintenance** to function:

Swales and detention basins:

- Regular mowing and vegetation management
- Clearing of silt and debris
- Maintenance of inlet/outlet structures
- Repair of erosion
- **If neglected:** Capacity reduced; drainage fails; flooding occurs

Permeable paving:

- Regular cleaning to prevent clogging
- Replacement when clogged beyond cleaning
- **If neglected:** Becomes impermeable; runoff increases; flooding occurs

Green roofs:

- Vegetation maintenance
- Drainage layer inspection
- Waterproofing maintenance
- **If neglected:** Drainage fails; roof leaks; structural damage

Rain gardens and bioretention:

- Vegetation maintenance
- Media replacement (every 10-20 years)
- **If neglected:** Infiltration fails; ponding and overflow

The critical question: Who maintains SuDS features in perpetuity, and who pays?

Three possible models:

Model 1: Adoption by Sewerage Undertaker (Thames/Southern Water)

- Water company adopts SuDS features under Section 104 Sewerage Act
- Water company maintains features funded by customer charges
- **This is the most secure model** – ensures long-term maintenance

But: Water companies are reluctant to adopt complex SuDS features, preferring piped systems

Policy N1 does not require sewerage undertaker adoption

Model 2: Management Company Maintained

- Developer creates management company
- Residents pay annual service charge for maintenance
- Management company contracts maintenance
- **This model depends on:** Adequate service charge levels; competent management; residents actually paying

Risks:

- Service charges increase over time – residents resist paying
- Management company cuts maintenance to reduce costs
- Features deteriorate
- Drainage fails
- No enforcement mechanism ensuring maintenance
- **History shows management companies often provide inadequate maintenance**

Policy N1 does not specify management company obligations or funding adequacy

Model 3: Individual Residents Responsible

- Features on private land maintained by residents
- Permeable driveways, rain gardens, green roofs maintained by homeowners
- **This model depends on:** Residents understanding their obligations; residents willing and able to afford maintenance

Risks:

- Residents don't understand SuDS maintenance needs
- Residents cannot afford maintenance (e.g., replacing permeable paving)
- Residents replace permeable with impermeable (cheaper)
- Features deteriorate and fail
- **No enforcement mechanism**

Policy N1 does not require individual maintenance or provide enforcement

The Reality:

Without specific, enforceable, funded maintenance requirements, SuDS features will deteriorate and fail within 10-20 years of construction.

The consequences:

- Drainage capacity reduces as features clog/deteriorate
- Flooding increases
- Residents experience flooding that should not occur
- Retrofitting/repair costs fall on residents
- **No one takes responsibility**

Policy N1 must require:

- Specific maintenance schedule for all SuDS features
- Management company with adequate funding secured through legal agreement
- Annual reporting to Council demonstrating maintenance conducted
- Enforcement provisions requiring remediation if maintenance inadequate
- Adoption by sewerage undertaker preferred option

Policy N1 requires NONE of these provisions.

Comparison with Best Practice: Policy N1 Falls Far Short

London Plan Policy SI13 - Sustainable Drainage:

London Plan requires:

- **Aim to achieve greenfield runoff rates** (8 liters/second/hectare)
- **Incorporate SuDS elements as high up the SuDS hierarchy as possible**
- SuDS should be:
 - **Multifunctional** (provide amenity, biodiversity, cooling benefits)
 - **Designed for maintenance** with management plan
 - **Integrated with public realm** not hidden
- **Detailed drainage strategy** demonstrating compliance

Kent County Council SuDS Guidance (as Lead Local Flood Authority):

KCC requires:

- **SuDS Management Plan** covering design, construction, maintenance

- **Runoff destination** identified and agreed
- **Exceedance routes** planned for beyond-design events
- **Water quality treatment** meeting standards
- **Climate change allowances** incorporated (40% peak rainfall increase)
- **Adoption/maintenance arrangements** secured

Environment Agency Climate Change Allowances:

EA requires:

- **Peak rainfall intensity increase: 40%** for 2070-2115 (central estimate)
- Drainage designed for climate-changed rainfall, not current

CIRIA SuDS Manual (C753) - Industry Best Practice:

CIRIA (Construction Industry Research and Information Association) SuDS Manual recommends:

- **SuDS hierarchy:** Manage runoff at source first, then site level, then regional
- **Treatment train:** Multiple features in sequence providing water quality treatment
- **Multifunctionality:** SuDS features providing amenity, biodiversity, cooling benefits
- **Design for maintenance:** Features must be accessible and easy to maintain
- **Adoption strategy:** Secure adoption or management before development

Policy N1 Complies with NONE of These Best Practice Standards

Policy N1:

- **✗** Does not require greenfield runoff rates
- **✗** Does not require SuDS hierarchy
- **✗** Does not require multifunctional SuDS
- **✗** Does not require detailed drainage strategy at allocation stage
- **✗** Does not require climate change allowances
- **✗** Does not require exceedance route planning
- **✗** Does not require maintenance plan or adoption strategy
- **✗** Does not specify discharge destination or receiving watercourse capacity

Policy N1 is approximately 20 years behind best practice in sustainable drainage.

The Sewerage Network Capacity Issue

Surface water should be managed through SuDS and discharged to watercourse at controlled rate.

But what about foul sewerage?

1,930 dwellings will generate approximately:

- 4,000 people × 150 liters/person/day = 600,000 liters foul sewerage per day
- Plus additional from commercial uses, schools, healthcare, etc.

This must connect to sewerage network.

Policy N1(5)(a) requires: *"The wastewater treatment works must be delivered and fully operational prior to the occupation of any dwellings."*

But what about the connection between development and wastewater treatment works?

- Pipes from development to WWTW
- Capacity adequate?
- Upgrades required to existing network?

In many developments, surface water and foul sewerage systems can become mixed due to:

- Misconnections (foul to surface water drain)
- Combined systems in older areas
- Surcharging during intense rainfall

If sewerage network is at or near capacity:

- Intense rainfall causes sewerage to surcharge
- Sewerage backs up into properties
- Combined sewer overflows discharge untreated sewage to watercourses
- **Pollution incidents**

Where is the sewerage capacity assessment?

Policy N1 should require:

- Sewerage capacity assessment demonstrating adequate capacity for 1,930 dwellings
- Upgrades identified and funded
- Separation of surface water and foul sewerage (no combined systems)
- Protection against misconnections

Policy N1 does not require any of these assessments.

Water Quality and Pollution

Surface water from development will carry pollutants:

- Oils and heavy metals from roads and parking areas
- Nutrients (nitrogen and phosphorus) from gardens, landscaping
- Sediment during construction
- Urban pollutants (litter, chemicals, etc.)

These pollutants will reach local watercourses unless SuDS features provide adequate treatment.

Policy N1 makes NO REFERENCE to water quality treatment requirements.

The consequences:

- Polluted runoff discharged to watercourses
- Ecological harm to aquatic life
- Cumulative pollution affecting downstream water quality
- Potential impacts on designated sites if watercourses connect to European sites

National Policy Requirements Breached

NPPF Paragraph 159:

"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)."

"Whether existing or future" – flood risk will worsen with climate change. Policy N1 must assess **future flood risk**, not just current.

Has future flood risk been assessed? No evidence provided.

NPPF Paragraph 163:

"When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere."

Policy N1 must ensure flood risk not increased to existing properties (including mine on [REDACTED]).

Has this been demonstrated through hydraulic modeling? No evidence provided.

NPPF Paragraph 165:

"Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate."

"Sustainable drainage systems" (plural) – comprehensive SuDS features throughout development.

Policy N1 makes no specific SuDS requirements.

NPPF Paragraph 169:

"Major development should only be allowed in areas at risk of flooding where... it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate."

Policy N1 does not adequately require comprehensive SuDS.

What the Council Must Do

To make this Plan sound, the Council must:

1. Strengthen Policy N1 Drainage Requirements:

Add comprehensive, specific, enforceable drainage standards:

"Development must incorporate comprehensive sustainable drainage systems (SuDS) in accordance with the following requirements:

(a) DISCHARGE DESTINATION:

- Surface water discharge destination must be identified and agreed with relevant authorities
- Receiving watercourse/drainage system capacity must be demonstrated as adequate
- Discharge rate must not exceed greenfield runoff rate (8 liters/second/hectare maximum)

(b) MANAGE RUNOFF AT SOURCE:

- All driveways and parking areas must use permeable paving

- Green roofs required on all buildings over 100m²
- Rain gardens/bioretention areas integrated throughout development
- Disconnection of roof drainage from sewerage system

(c) SITE-LEVEL ATTENUATION:

- Swales along all streets managing road runoff
- Detention basins distributed across site providing storage for 1-in-100 year +40% climate change event
- Attenuation features designed for multifunctional use (amenity, biodiversity, cooling)

(d) WATER QUALITY TREATMENT:

- Treatment train approach with minimum 3 stages of treatment before discharge
- Pollutant removal achieving water quality standards for receiving watercourse
- Protection of downstream water quality

(e) CLIMATE CHANGE RESILIENCE:

- All drainage designed for 40% peak rainfall intensity increase (EA climate change allowance)
- Future-proofing for 2100 climate scenarios
- Additional capacity beyond minimum design standards

(f) EXCEEDANCE PLANNING:

- Exceedance routes directing overflow away from properties
- Safe management of beyond-design events
- No flooding of buildings for events up to 1-in-100 year +40%

(g) MAINTENANCE AND MANAGEMENT:

- SuDS Management Plan required covering design, construction, maintenance for building lifetime
- Maintenance schedule and responsibilities identified
- Adoption by sewerage undertaker preferred; if management company, annual service charge and maintenance obligations secured through legal agreement enforceable by Council
- Annual reporting to Council/KCC demonstrating maintenance conducted

- Enforcement provisions requiring remediation if maintenance inadequate

(h) PROTECTION OF EXISTING PROPERTIES:

- Hydraulic modeling demonstrating no increased flood risk to existing properties on Hollow Lane and surrounding area
- Baseline monitoring of existing properties before construction
- Ongoing monitoring during construction and post-development
- Compensation mechanism if flooding of existing properties occurs due to development

(i) CONSTRUCTION PHASE:

- Construction Phase Drainage Management Plan approved before works commence
- Temporary attenuation features operational before vegetation clearance
- Silt traps and filtration preventing contamination of receiving watercourses
- Monitoring and emergency response plan^{***}

2. Require Comprehensive Evidence Before Allocation:

Before Policy N1 can be considered sound, the Council must provide:

(a) Hydraulic Modeling Report demonstrating:

- Current surface water flow paths, volumes, and discharge points
- Future surface water flow paths and volumes with development
- Identification of receiving watercourse/drainage system and capacity assessment
- Impact on existing properties (particularly Hollow Lane)
- Adequacy of proposed attenuation measures
- Climate change scenarios (2080 rainfall)
- Exceedance route analysis

(b) Drainage Strategy showing:

- SuDS features locations, sizes, specifications
- Attenuation capacity calculations demonstrating compliance with 1-in-100 year +40% standard

- Water quality treatment provisions
- Discharge destination and receiving watercourse capacity
- Maintenance arrangements and funding
- Adoption strategy

(c) Statement of Common Ground with Kent County Council (as Lead Local Flood Authority) confirming:

- Drainage strategy is acceptable
- Discharge destination agreed
- Climate change allowances incorporated
- No increased flood risk to existing properties
- No objection to allocation on flood risk/drainage grounds

(d) Statement of Common Ground with Environment Agency confirming:

- Discharge to watercourse acceptable
- Water quality standards met
- No objection on flood risk grounds

(e) Statement of Common Ground with Thames/Southern Water (whichever serves area) confirming:

- Sewerage capacity adequate for 1,930 dwellings
- Adoption of SuDS features (if applicable)
- No combined sewer overflow issues
- No objection on drainage grounds

3. Apply Sequential Test:

Demonstrate through Sequential Test that:

- Alternative sites with lower flood risk have been assessed
- Development of Policy N1 site is necessary despite flood risk
- No other reasonable sites available in lower flood risk zones or with better drainage capacity

If lower flood risk sites exist (e.g., brownfield sites in urban Canterbury with established drainage), Policy N1 fails Sequential Test and should be deleted.

4. Assess Construction Phase Flood Risk:

Provide assessment of:

- Flood risk to existing properties during 10-year construction period
- Temporary drainage measures required with specifications
- Monitoring and emergency response arrangements
- Financial security for remediation if construction phase flooding occurs

5. Consider Site Unsuitability:

If flood risk cannot be adequately managed, or if no adequate discharge destination exists:

- Delete Policy N1
- Allocate alternative sites with lower flood risk and established drainage infrastructure
- Prioritize brownfield urban sites

Conclusion

Policy N1's surface water drainage strategy is **fundamentally inadequate** for a development of 83.9 hectares with 1,930 dwellings:

- **Policy makes virtually no specific drainage requirements** beyond generic FRA
- **No climate change allowances required** – design to 2025 climate not 2080 climate
- **No protection for existing residents demonstrated** – hydraulic modeling absent
- **No maintenance and management provisions** – features will fail within 10-20 years
- **No construction phase drainage strategy** – existing residents at risk for 10 years
- **Falls far short of best practice** – London Plan, KCC guidance, CIRIA standards
- **No discharge destination identified** – unknown where 23+ million liters per event will go

The consequences:

- **Existing residents (including me on [REDACTED]) will experience increased flooding** as 23+ million liters additional runoff per intense event flows toward our properties with no demonstrated protection
- **Future residents will experience flooding** as inadequate drainage is overwhelmed by climate-changed rainfall
- **Construction phase will create flood risk** for 10 years before permanent drainage operational
- **SuDS features will deteriorate and fail** due to lack of maintenance provisions
- **Unknown downstream impacts** due to no discharge destination identified

I live immediately adjacent to this site, downslope. Any increase in surface water runoff will affect my property. The Council is proposing to allocate a site that will generate 23+ million liters additional runoff per intense event, flowing downslope toward my home, **without:**

- Demonstrating where this water will discharge
- Hydraulic modeling showing I will be protected
- Specific attenuation requirements
- Climate change allowances
- Construction phase protection

This is unacceptable.

A development of this scale requires:

- Comprehensive hydraulic modeling demonstrating no harm to existing properties
- Detailed SuDS strategy with specifications, capacities, maintenance provisions
- Climate change allowances designing for 2080 rainfall
- Discharge destination identified with receiving watercourse capacity confirmed
- Statements of Common Ground with KCC (LLFA), EA, water company
- Construction phase drainage management
- Long-term maintenance secured through adoption or funded management company

Policy N1 provides NONE of these assurances.

Without comprehensive drainage requirements and evidence, Policy N1 is unsound and must be deleted.

I request that this objection is forwarded to the Planning Inspector and that the Council provides a detailed written response explaining:

1. **Where is the hydraulic modeling** demonstrating no increased flood risk to existing Hollow Lane properties?
2. **Where will 23+ million liters additional runoff per intense event discharge to?** What watercourse/system? What is its capacity?
3. **Where is the detailed drainage strategy** showing SuDS features, capacities, climate change allowances?
4. **Where are Statements of Common Ground** with KCC (LLFA), EA, and water company confirming drainage is acceptable?
5. **What specific measures protect existing residents** from increased flooding?
6. **How will SuDS features be maintained** in perpetuity and who pays?
7. **Why does policy make no specific SuDS requirements** beyond generic FRA?

If the Council cannot provide satisfactory answers with comprehensive evidence, Policy N1 must be deleted as creating unacceptable flood risk.

Yours faithfully,

Alan Davidson

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--Email From External Account--

Note: I have previously submitted detailed representations regarding Policy N1 (Merton Park). This objection focuses specifically on the loss of Thanington Recreation Ground as a local community facility.

SUMMARY OF OBJECTION

I **strongly object** to the proposed allocation of Thanington Recreation Ground for a Park and Ride facility. This objection is separate from my concerns about Merton Park and focuses specifically on the loss of our local Rec as a vital, free, accessible neighbourhood facility for families and children in Hollow Lane and surrounding streets.

DETAILED GROUNDS FOR OBJECTION

1. CONFLICT WITH POLICY OS9 - THE COUNCIL IS BREAKING ITS OWN RULES

The Council's own Strategic Land Availability Assessment (SLAA 2025) states clearly:

"Site is unsuitable for the use proposed as it is within a protected area of existing Open Space and would conflict with the adopted 2017 Local Plan (Policy OS9)."

The fundamental problem: The Council has assessed Thanington Rec as unsuitable, yet is allocating it anyway. This contradicts the entire purpose of having protected open space designations.

Why this matters for our neighbourhood:

- Policy OS9 exists precisely to protect local community open spaces like our Rec
- The Council's methodology explicitly recognises that development on protected open space "has the potential to compromise the function of these locally important areas"
- If the Council overrides OS9 protection here, no community open space in Canterbury is safe

Request: The Council must either respect Policy OS9 or provide exceptional justification for overriding it. None has been provided.

2. "NO ALTERNATIVE SITE" CLAIM IS UNSUBSTANTIATED

Paragraph 6.29 of the Topic Paper states: "it is considered that there is no alternative site available to accommodate a park and ride facility."

Critical questions:

- What alternative locations were actually assessed?
- Why is the existing Wincheap site being reduced rather than redesigned to accommodate both the slip road and Park & Ride capacity?
- Have brownfield sites been genuinely considered?
- What about edge-of-city locations with direct A2 access that wouldn't require the loss of protected open space?

The real issue: The need for additional Park & Ride capacity is a consequence of the Council's own planning decisions:

1. Approving the 4th slip road at Wincheap (CA/25/00634)

2. Removing the planned slip roads from Merton Park
3. Failing to plan Park & Ride capacity into earlier strategic developments

Our neighbourhood should not pay the price for these planning failures by losing our only local open space.

Request: Full publication of an alternatives assessment before any decision to sacrifice protected community open space.

3. THANINGTON REC IS ESSENTIAL FOR LOCAL CHILDREN - IT'S FREE AND WALKABLE

This is the heart of my objection. As a resident of [REDACTED], I know firsthand what Thanington Rec means to our neighbourhood.

Why the Rec matters:

A. It's free to access

- No entrance fees, no membership costs, no booking required
- In a cost-of-living crisis, free outdoor space for children is essential
- Families who cannot afford leisure centres, swimming pools, or organised activities rely on the Rec
- Children can play football, run around, fly kites, learn to ride bikes - all for free

B. It's walkable for children

- Children from Hollow Lane and surrounding streets can walk or cycle to the Rec safely
- Parents can let older children go independently - building confidence and independence
- It's part of our everyday neighbourhood life, not a "destination" requiring a car journey

C. It serves immediate local need

- This is **neighbourhood open space** - different from city-wide sports facilities
- It's where local children meet friends after school
- It's where parents take toddlers for fresh air
- It's where families have picnics, walk dogs, and connect with neighbours

The Merton Park Sports Hub cannot and will not replace this function - and I have addressed those concerns separately in my Merton Park representations. This objection is about the simple fact that our local neighbourhood will lose its only accessible, free open space.

4. THE COUNCIL'S OWN POLICIES CONTRADICT THIS ALLOCATION

Policy DS24 requires new developments to provide open space to meet community needs. Yet here, the Council proposes to:

- **Destroy existing protected open space** (Thanington Rec)
- While simultaneously **requiring developers to create new open space** elsewhere

This is fundamentally contradictory. You cannot pursue a policy of open space provision while actively removing protected open space from established communities.

The wider Local Plan emphasises:

- Health and wellbeing
- Sustainable communities
- Active lifestyles
- Reducing car dependence

Yet this allocation:

- Removes a free facility that promotes physical activity
 - Creates a 900-space car park instead
 - Forces families to drive to alternative locations
 - Undermines the health of our local community
-

5. TIMING AND UNCERTAINTY OF REPLACEMENT

Even if the Council proceeds with the Merton Park Sports Hub (which I have objected to separately), the timing creates unacceptable uncertainty:

The reality:

- Merton Park is a 1,930-home strategic development that will take 10-15 years to complete

- The Sports Hub depends on viability, infrastructure delivery, and coordination between developers
- There is **no guarantee** of when (or even if) replacement sports facilities will actually be delivered

Meanwhile:

- Thanington Rec could be lost immediately
- Our children will grow up without access to local play space
- The "interim" measure of retaining one football pitch during Park & Ride construction is wholly inadequate for neighbourhood recreational needs

This is not acceptable for our community.

6. DIRECT IMPACT ON HOLLOW LANE RESIDENTS

As a [REDACTED] resident, this proposal directly affects my family and neighbours:

Immediate impacts:

- Loss of the only open space within safe walking distance for our children
- Increased traffic from 900-vehicle Park & Ride facility on local roads
- Permanent loss of green space that contributes to neighbourhood character
- Need to drive to alternative locations (contrary to sustainability objectives)

Broader community impacts:

- Removes a focal point for neighbourhood social interaction
 - Eliminates free outdoor activity space for families on limited budgets
 - Reduces quality of life for existing residents
 - Creates inequality - families with cars can access alternatives; those without cannot
-

WHAT THE COUNCIL SHOULD DO INSTEAD

1. **Retain Thanington Recreation Ground** under Policy OS9 protection
2. **Conduct and publish a genuine alternatives assessment** for Park & Ride location

3. **Consider whether additional Park & Ride capacity is actually necessary** given the changed transport strategy
 4. **Prioritise brownfield sites** or locations that don't require loss of protected community open space
 5. **Engage meaningfully with Hollow Lane and Thanington residents** before making decisions that fundamentally affect our neighbourhood
-

CONCLUSION

This is not about opposing development generally. This is about protecting the one piece of free, accessible, walkable open space that serves our immediate local community in Hollow Lane and surrounding streets.

The Council assessed this site as unsuitable due to Policy OS9 protection. That assessment was correct. The allocation should be removed.

Our children deserve to grow up with access to free outdoor play space. The Council should not sacrifice essential neighbourhood facilities to solve transport planning problems of its own making.

I respectfully but firmly request that **Policy N3 be removed** from the Local Plan and that **Thanington Recreation Ground be retained as protected open space under Policy OS9.**

Signed: Alan Davidson