

**Tom Hawkes**

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**From:** Kalyani Sandrapragas [REDACTED]  
**Sent:** 20 October 2025 10:33  
**To:** Consultations  
**Subject:** Formal Objection to the Proposed Development at Land at Merton Lane, Canterbury (Wincheap Orchards / Merton Park)

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

## **Formal Objection to the Proposed Development at Land at Merton Lane, Canterbury (Wincheap Orchards / Merton Park)**

To:  
Planning Department  
Canterbury City Council  
Military Road  
Canterbury, Kent CT1 1YW

Date: 20 October 2025

Subject: Objection to Planning Application – Land at Merton Lane (Wincheap Orchards / Merton Park)

Dear Sir/Madam,

I am writing to register my formal objection to the proposed development at Land at Merton Lane, Canterbury, known locally as Wincheap Orchards or Merton Park. This proposal is wholly inappropriate for the site and would result in significant, irreversible harm to Canterbury's natural environment, heritage, landscape character, and community wellbeing.

### **1. Loss of Biodiversity and Ecological Value**

This site is not "vacant land" but a rich and interconnected ecosystem of orchards, hedgerows, mature trees, scrubland, and grassland that forms a vital wildlife corridor between South Canterbury and the wider Kent Downs landscape.

Local residents have gathered extensive evidence confirming that this area supports:

- Over 20 bird species, including robins, wrens, finches, woodpeckers, blackbirds, and several red-list species, documented through a two-year local bird study with photographic evidence.
- Established badger setts within and around the orchard boundary.
- Regular bat activity near Stuppington Lane, Chineham Way, and the Oast Houses —

consistent with roosting and foraging habitats protected under the Wildlife and Countryside Act 1981.

- Frequent sightings of hedgehogs, foxes, slow worms (a protected species), and pollinators essential for the surrounding ecosystem.

These species are evidence of a mature, biodiverse habitat mosaic, not a degraded or low-value site. The loss of these habitats would violate statutory biodiversity duties under:

- Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006.
- Sections 174–179 of the National Planning Policy Framework (NPPF).
- The Environment Act 2021, which requires developments to deliver a minimum 10% Biodiversity Net Gain (BNG).

No credible ecological mitigation strategy could offset the permanent destruction of such a complex and established ecosystem.

## **2. Destruction of Green Space and Community Wellbeing**

Wincheap Orchards is one of the last remaining accessible green spaces in South Canterbury. It is used daily by residents for walking, dog exercise, recreation, and mental wellbeing. Families, elderly residents, and young people rely on this area as a safe and tranquil open space within easy reach of their homes.

The removal of this land would have a direct negative impact on community health, social cohesion, and access to nature — at odds with the Government’s 25-Year Environment Plan and the Canterbury District Local Plan. Replacing orchards and meadows with dense housing will permanently erase a non-renewable natural and social asset.

## **3. Climate and Environmental Impact**

This proposal contradicts the Council’s own Climate Emergency Declaration (2019) and carbon-reduction objectives. Building on greenfield land leads to increased carbon emissions, reduced urban cooling capacity, and increased surface water runoff and flood risk. Canterbury should be prioritising brownfield regeneration, not greenfield destruction.

## **4. Traffic, Air Quality, and Safety**

The Merton Lane / Wincheap / A28 corridor is already operating beyond capacity, with daily congestion and dangerous air quality levels. The proposed development would add hundreds of vehicle movements per day, causing severe congestion, increased air pollution, and heightened risk to pedestrians and cyclists. The site’s poor transport accessibility — coupled with the cancellation of the A2 slip road — renders the development unsustainable from a transport planning perspective.

## **5. Prolonged Disruption and Construction Impact**

Residents will face years of noise, dust, vibration, and traffic disturbance. The surrounding roads are too narrow to safely accommodate construction vehicles, and the environmental damage during the build phase alone would be substantial. Nearby developments such as Saxon Fields remain incomplete, demonstrating the pattern of unfinished, disruptive, and environmentally damaging development already afflicting the area.

## 6. Heritage and Landscape Character

The orchards form part of the historic setting of Canterbury, offering open green views toward the Cathedral and the surrounding valley. This landscape is integral to the city's identity as a UNESCO World Heritage Site and has remained largely unaltered for centuries. The development would permanently erase this rural gateway, undermining both Local Plan Policy HE1 and NPPF Section 16.

## 7. Procedural and Strategic Concerns

There is widespread public concern that:

- The ecological surveys supporting the proposal are outdated, incomplete, or seasonally limited.
- The development conflicts with Canterbury's emerging Local Plan policies emphasising sustainable growth and green infrastructure preservation.
- The cumulative impact of multiple large developments around South Canterbury has not been properly assessed or mitigated.

It would be premature and irresponsible to approve this proposal without a full, updated, and independently reviewed Environmental Impact Assessment and Biodiversity Net Gain Plan.

## Conclusion

The proposed Land at Merton Lane development is unsound in environmental, social, and policy terms. It would eliminate a high-value ecological network supporting protected species, remove a vital community green space, exacerbate traffic congestion and air pollution, cause years of disruption to residents, and irreversibly damage Canterbury's historic landscape and climate goals.

I therefore strongly urge Canterbury City Council to refuse this application in full, and to instead explore sustainable alternatives — including designating Wincheap Orchards as a Local Wildlife Site or Local Green Space under the NPPF.

Protecting Wincheap Fields is not only a matter of local interest, but a legal and moral obligation under the UK's environmental and planning frameworks.

Yours faithfully,

Kalyani Bryant

