

Policy Reference: C6 – Land at Merton Park

Site: South West Canterbury

I am writing as a local architect and long-standing resident of Canterbury, to lodge a formal objection to the proposed development site at Merton Park for up to 2000 houses included in the Draft Local Plan. Whilst I recognise the urgent need for well-considered housing growth within our district, the current proposal represents a scale, form and environmental impact that are fundamentally inconsistent with the principles of sustainable and context-sensitive development.

1. Environmental Impact and Biodiversity Net Gain (BNG)

The site at Merton Park is currently composed in large part of traditional orchards, an increasingly rare and highly valued habitat within Kent. These orchard landscapes are recognised by Natural England as Priority Habitats due to their biodiversity, structural complexity, and cultural significance. They support a rich mosaic of species—pollinators, invertebrates, and small mammals—that cannot easily be replicated through post-development planting.

Replacing this well-established orchard landscape with dense housing would represent an irreplaceable loss of ecological value. While Policy C6 references the requirement for Biodiversity Net Gain (BNG), achieving a measurable net gain from a baseline of mature orchard ecosystem is, in practice, extremely difficult. BNG calculations often favour the replacement of low-value improved grassland; in contrast, the destruction of traditional orchard habitat would set a very high baseline that subsequent landscaping schemes cannot genuinely exceed within the same footprint or time frame.

The claim that the site could deliver a 10% Biodiversity Net Gain is not credible when measured against the baseline value of a mature orchard habitat. True net gain requires enhancement of existing habitats, not their replacement.

The policy therefore risks breaching the NPPF's principle of achieving measurable environmental net gain and is inconsistent with DEFRA's statutory BNG guidance.

A more responsible approach would be to retain and enhance the orchard landscape as a core feature of any masterplan, or to redirect housing growth to sites of lower ecological value and better transport accessibility.

2. Sustainability and Design Considerations

Canterbury's unique urban grain – defined by its historic core, moderate suburban fringes, and the rural transition beyond – is not suited to the imposition of a large, uniform housing estate. From a design perspective, the Merton Park site forms a crucial part of the rural setting of South Canterbury.

Its open landscape, framed by hedgerows and mature trees, contributes significantly to the green edge of the city and the transition between the built form and countryside.

A large-scale housing estate would fundamentally alter this relationship, extending the urban envelope in a way that visually and physically erodes Canterbury's distinct edge. It would introduce large-scale massing and lighting visible across the valley and approach routes—contrary to established local character and the aims of the Canterbury Landscape Character Assessment.

3. Transport Sustainability

The allocation depends upon major, uncommitted infrastructure—most notably the proposed South West Canterbury Link Road—without clear evidence of funding, delivery mechanisms or timing. This introduces a substantial risk that the development would come forward in isolation, contrary to the NPPF's requirement that plans be “deliverable over the plan period.”

The Wincheap corridor is already among the most congested routes in Canterbury, particularly around the A2 junction and the retail park area. Adding thousands of vehicle journeys daily would significantly exacerbate congestion, air pollution and noise levels. Current transport proposals appear insufficient to address this, and the absence to a credible sustainable transport framework (including public transport upgrades, safe cycle links and pedestrian connectivity) render the scheme unsupportable at this stage.

Furthermore, the Plan's reliance on a future link road and unspecified “mobility hubs” fails to guarantee genuine modal shift or walkable connectivity to central Canterbury. This risks producing an isolated, traffic-congested dormitory suburb rather than an integrated sustainable community.

4. Legal and Procedural Soundness

Under the tests of soundness in the NPPF, the allocation at Merton Park fails to demonstrate that it is justified, deliverable, and consistent with sustainable development principles.

Canterbury's housing targets could instead be met through:

- Focused brownfield regeneration within the city and existing settlements;
- Smaller, better integrated extensions that align with existing infrastructure; and
- Prioritisation of sites with lower ecological baselines, where BNG can genuinely achieve measurable improvements.

For these reasons, Policy C6 fails to meet the procedural and evidence-based standards required for soundness.

5. Summary and Requested Action

In summary, I object to Policy C6 on the grounds that it would cause irreversible harm to Canterbury's landscape and ecology, particularly through the loss of traditional orchard habitat; it fails to achieve realistic biodiversity net gain; it undermines the city's design integrity; and it relies on undeliverable transport and infrastructure assumptions.

This allocation should therefore be removed or significantly reduced, and any development on this site should only proceed if it demonstrably enhances biodiversity, protects existing high-value habitats, and conforms to best-practice principles of contextual and sustainable design.

Thank you for considering my representation. I would appreciate confirmation that my objection will be formally recorded as part of the Local Plan consultation process.