

The policies proposed in the Regulation 18 consultation document September 2025 must be regarded as unsustainable and unsupported by essential transport planning.

Sturry Parish Council is a member of CPRE Kent and wishes, wholeheartedly, to support CPRE's response to the September consultation document.

The parish council has the additional comments in objection to policies N1 Merton Park and N3 Thanington Recreation Ground.

The Canterbury Open Space report of August 2022 identifies Thanington as an area suffering a deficit of public open space. The Thanington Recreation Ground provides formal playing pitches, space for informal football matches, training sessions, informal open space, a playground a BMX/skate park, all of these are provided together with a community centre and contribute to a package of complementary activities which help to sustain the viability of all especially the community centre.

The recreation ground is easily accessible by regular public transport, on foot by bicycle and by car having good parking space. These also contribute to the viability of the whole by maximising the client catchment area and accessibility to low-income and otherwise deprived households by reducing car and special transport dependence.

We note also that the Sports Strategy report of April 2022 states that extra match capacity could be provided at the recreation ground. At the time of the report there was only a 3.5 surplus match capacity in the whole of the Canterbury area. There was also a predicted increase in demand (not counting any increase in residential population due subsequent planning policies). The Open Space strategy report did not consider the need for informal sport or training time.

Considering all of this it would seem obvious that Thanington Recreation Ground is a prime location for further development of all kinds of open space provision.

Policy N1 Merton Park includes a 3ha provision to replace Thanington Recreation Ground. There are no guaranteed bus services no nearby train station and without, the formerly proposed, link to the A2 getting to the new site by car, via the only access road (from Thanington) will be hell on earth – as it will for residents of Merton Park and people merely travelling through Thanington.

How can moving the sports provision from Thanington to Merton Park be considered sustainable development?

CRPE make the point that the proposed new use for the recreation ground – a replacement park and ride should not be entirely welcomed as park and ride provision tends to increase car journeys. It is worse than this. The new proposed link to the A2 through the existing park and ride will also tend to increase car journeys and Thanington is far too close to the city centre to reduce congestion along the A28 at this point. Along the south-western approach to the city via the A28 congestion often begins at Merton Bridge and anywhere in Thanington is too close to the city to provide a park and ride facility that will reduce car journeys and congestion at problem areas along this route.

These proposals do not directly Affect Sturry Parish. However, the very poor planning policies if they are approved create unacceptable precedents that put all areas of the district at risk of:

- losing essential public open space – even in areas of deficit
- reduction in viability of essential community facilities
- compounding problems of road congestion and development without essential infrastructure through lack of properly strategic forward planning.
- further increases in car journeys.