

# CONSULTATION SUBMISSION CANTERBURY DRAFT LOCAL PLAN SEPT. 2025

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## CONSULTATION RESPONSE TO CANTERBURY DRAFT LOCAL PLAN SEPTEMBER 2025

As residents of Thanington for over 25 years we are responding to the proposed Part Draft Local Plan (DLP) for Canterbury, as put out for Reg. 18 Consultation on 8<sup>th</sup> Sept by Canterbury city Council. Particularly relating to **POLICY N3 THANINGTON RECREATION GROUND & POLICY N3 MERTON PARK**

### In Summary

#### N3 THANINGTON RECREATION GROUND

1. It will have serious negative implications for The Thanington Community , Thanington Neighbourhood Resource Centre and Thanington in general.
2. It does not comply with the National Planning Policy Framework Dec 2024. EXAMINING PLANS (Sec 36) OPEN SPACE & RECREATION (Sec 103- 105) PROMOTING SUSTAINABLE TRANSPORT (Sec 109-110) Details Below.
3. It does not comply with CANTERBURY CITY COUNCIL OPEN SPACE STRATEGY 2023 2040

## **1/General Comments and Concerns POLICY N3 THANINGTON RECREATION GROUND:**

1. This will have major negative impact on Urban Thanington, its impact on the community, its facilities and quality of life.
2. The recreation ground forms a crucial part of the Thanington Neighbourhood Resource Centre (TNRC). An organization which has been in existence for 25 years. It has contributed massively to the improvement and quality of life in the area, been key in engendering its community spirit, and greatly valued by the community.
3. If N3 Policy proposal goes ahead, it will have a massive impact on TNRC will cease to exist. The area has improved significantly

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since its existence from 2000. Even so, Urban Thanington is still considered to be one of the most deprived areas in the UK.

4. TNRC, and its hard working staff, perform a valued and respected service, and give significant support to the local community. Its loss would have a severe negative impact on the area. With the probability of the return to the problems of 25 years ago. Which have all but been eliminated since its creation.
5. The community values this recreation space immensely, and it is highly used. It is the ONLY remaining community green space in Urban Thanington. If it is lost then there is NO VIABLE ALTERNATIVE available in the area as a replacement Green space
6. The replacement as proposed on the Merton Park site, is NOT A SUITABLE REPLACEMENT, as it is over 1.5 miles plus away from the current space. It is NOT in any way an alternative for the loss of the Recreation Ground, and details show it will be a commercially operated area, not a GENERAL ACCESS GREEN SPACE as is the Recreation Ground
7. With this proposal you could have up to 1800 vehicle movements a day. The existing A28 and associated A2 Junction, and Wincheap are already congested. There is not even the basic traffic analysis in this proposal as regards its viability and impact which surely is key to its viability even at concept stage.
8. What is justification for the development of an additional significant number of P&R car parking spaces, on a valued recreational area? There are far better alternatives:  
i.e. Expand the existing P& R site and re design the 4<sup>th</sup> Slip Road. That would have obvious significant advantages over the proposal for the recreation ground  
There were P& R sites proposed on both the SAXON FIELDS site and the ORIGINAL MERTON PARK SITE. Why have they been removed?  
There was also a proposal for a P&R site at HARBLEDOWN. What has happened to these proposals and how have they been adequately considered?

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9. It does not assist with the housing numbers requirements, and what the basis for its funding? It is not mentioned at all?
10. Its basic design, has not been thought through, even at this early stage ( one of the major issues on the current failing Local Plan were exactly the same problem occurred and we now see the outcome of that) i.e. How will the access and exit integrate with the existing highly complex local junction and traffic light system?,
11. Transport issues should be considered from the earliest stages of plan making. As required by Sec 109 of the NPPF 2024. This has NOT been done for this presented proposal.
12. its impact of this on the junction capacity, its environmental impact on both the A28 and the River Stour Marsh area, to just point out some obvious ones? The River is already showing pollution concerns and this proposal does nothing to reverse that trend.
13. Infrastructure must be a priority in this DLP. Detailed and an upfront delivery requirement, The existing infrastructure systems cannot support any more demand. The detail to remedy this is singularly missing in this DLP DRAFT. It is also a failure of the failing Current Local Plan. Consideration and provision for it, is key to the success of the proposed local plan. It is missing in all aspects of the DLP.

## **2/ NPPF 2024 & LOCAL POLICY CONFORMITY**

POLICY N3 does not conform to the CANTERBURY CITY COUNCIL OPEN SPACE STRATEGY 2023-2040. In which Thanington is identified has having a lack of green space AT PRESENT. This is the last Green Space in Urban Thanington.

The argument, that there are other Green Spaces available is false, and shows a lack of understanding. They do not offer suitable alternatives for the loss of the recreation ground, are in place for current or future developments and this space is particularly and are not viable as a proposed alternative in any way.

The recreation area will not be replaced by these, and they are not equivalent to it as an alternative.

If this be adopted, it would further undermine the trust of the local community in its Local Authority. It will show, it does not listen to very valid concerns of the community it serves and is out of touch with reality and its understanding of the planning issues with this.

Finally:

To meet the soundness test for the NPPF it must be **SUSTAINABLE**

It is not **SUSTAINABLE**, given that the definition of **SUSTAINABLE** is :

***“Meeting the needs of the present without compromising the ability of future generations to meet their own needs***

This proposal clearly does not meet that test.

It therefore should be removed from the DLP and other suitable alternatives considered.

### **3/ COMMENTS ON POLICY N1 MERTON PARK:**

#### **In Summary :**

#### **N1 MERTON PARK**

1. The scale of the development is an overdevelopment for the area. The negative impact of this size of development will be massive for Wincheap residents. Removing the only green recreational space left to them in the area. It should be down sized, to a less intrusive and destruction proportion.
2. There needs to be a visual assessment of its impact on the Canterbury vista. Again this is a fault in the existing failing Local Plan, as can clearly be seen looking at the SAXON FIELDS development. Which is far

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- removed from the impression given in the original submission and has certainly impacted on the views of Canterbury from its location.
3. The impact of all this is on the wellbeing, and health of residents, which will be adversely affected. Not only by the loss of greenspace but by the 20 years plus of disruption of the construction works. Removing the last green space for Wincheap residents is NOT supported. The benefits of retaining at least some of the Orchards and natural space on this site cannot be overstated. It is certainly not done to an adequate level in this proposal. It is a well proven fact that access to open space has a valued contribution to health in general to local communities, and this will be lost if this goes ahead in its proposed form.
  4. It will have a massive effect on the Biodiversity of the area concerned. No amount of carefully worded reports, can deflect from that, no matter how phrased or presented.
  5. Transport issues should be considered from the earliest stages of plan making (Sec 109 NPPF2024). The transport proposals present here are totally inadequate.
  6. The new Junction on the A2 off MERTON LANE has now being removed , the original proposed PARK and RIDE now removed, the proposed access and exit points from the Development being described in section4/ ACCESS & TRANSPORT a) b) c) and d are totally unworkable. All being residential streets or narrow country Lanes. Vague in their detail as to what is being proposed. How will the development manage the potential 3000 VEHICLES that could be associated with it, and the respective daily movements, from what is a surrounded location?
  7. The existing road network, A28, HOMERSHAM, WINCHEAP, THE DOWNS ROAD , IFFIN LANE, MERTON LANE NEW HOUSE LANE, STUPPINGTON ROAD are all seeing greater levels of traffic. The proposed use of HOMERSHAM, VICTORIA Road are leading onto the A28 WINCHEAP, which is already congested and proposed to be one way? If a development of this size is to be planned then there must be upfront understanding and provision of the traffic infrastructure provision required, and there is not.

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8. The junction of HOLLOW LANE & the A28 is one of the most air polluted in the area. Increased traffic from this proposal will only make this worse. Which will happen, as the proposal does not allow for adequate access and exit for traffic, in any detail.
9. There should be a survey of the whole situation for reliable data, to make an accurate assessment of the Traffic Impact of this proposal. Then it can be independently assessed for its impact. There is no faith in Developers sponsored assessments, were no consideration of the bigger picture and other considerations, other nearby development impacts are taken into account. They have proved unreliable in the past in Thanington.
10. The statement of a Transport Assessment after concept, is not as required under the NPPF 2024 (Sec 9). Those for the current Thanington sites, Saxon Fields and Cockering Farm, have been shown to be lacking. They were based on suspect data, and consequently have been shown to be wrong in their predictions, and even compliance. If not the same mistakes from the failing current plan will be repeated.
11. The experience with the Thanington sites is the issue of deliverability of the promised facilities, and protection of the natural environment. There are many things promised on these sites. Experience shows that they have not been delivered as promised. i.e A Hospice, a Medical centre, a primary School, a 4<sup>th</sup> Slip Road a Gryatory System in Wincheap, a delivery schedule that is at least 3 years behind schedule. To name some non-delivery promises.
12. This N1 POLICY is proposed by the same developer, who promised those items on submission of the Thanington site proposal. The Local Authority has no real control on developer delivery in these matters, as history has shown to be the case. That is determined by commercial and other factors. There is also a lack of ability and power on the part of the Local Authority, to ensure agreed aspects of the supply are delivered from what is seen to date.
13. Promises like a new primary school, or a new hospital, are not in the Developers control. Can promises be realistically funded and confirmed prior to approval, they should, and need to be. If not done that will

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affect the overall sustainability of the proposal? They need to be diligently checked for accuracy and can be delivered

14. The handling of the waste water treatment, is stated to be on an site plant. How will this be managed and by whom? The same was said of the Cockerling Farm site. This never came to fruition, and we now have a simple pumping station proposed, that will have to pump the waste water nearly 7 miles to Sturry Treatment Plant. Where there is said to be capacity? Putting extra load on the existing infrastructure system. Will the same happen here? Will it actually work? Will it adversely affect the existing system, its capacity and impact adversely on the users? The evidence is that could be so as it is put under more unsustainable pressure. You cannot just keep stretching the existing systems, they need additional provision when required. There is great concern that is not being addressed robustly and as a priority, and ultimately not addressed.

15. What are the proposals for the treated water on N1? Discharge it into the Stour, which already has high pollution levels and is under threat? How will the solid waste be handled? Is it the right location for a treatment plant in the middle of a massive development, bearing in mind all the issues this will bring? Another example of the need **to ensure the adequate consideration is given to infrastructure at concept a very early consideration stage.**

16. There is concern over how the site will actually be managed and delivered. Too many parties involved in its delivery, will inevitably lead to delivery issues, lack of coordination, conflicting priorities, and problems with achieving the end result. This happened on the current Thanington site where it was split into 2 after approval, and has lead to problems with delivery and conflict of interest. Another mistake in the current local plan, and should not be repeated.

**There are far too many aspects here that are not defined to the level they should be at this stage. Potentially meaning they could totally undermine the long term sustainability of the proposal.**

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The views and knowledge of local residents should be listened to,taken into account and then used to ensure that the outcome is sutainable and deliverable for the long term.

Mr.D A SMITH & Mrs T .D.SMITH

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