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20<sup>th</sup> October 2025

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

Dear Sir/Madam,

**Subject:** Policy N1: Land at Merton Park. Formal Objection to Proposed Development of Land at Merton Lane, Canterbury (Wincheap Fields)

I wish to object to the proposed allocation of 1,930 dwellings at Merton Park.

Although I appreciate the urgency for further housing in the Canterbury area, these proposals appear under prepared and ill-judged with flagrant disregard for viable transport infrastructure and contradicts key elements of the National Planning Policy Framework (NPPF).

Beyond the practicalities, this plan will destroy what makes this part of Canterbury a special place to live. The fields and orchard at Merton Park are not just empty land waiting to be developed. They are our local “lung,” a place where we walk, where our 2 children play, and where we find a moment of peace away from the city to recharge and support our mental health and wellbeing.

I have personally seen a huge variety of birdlife in this area and this variety (including endangered species) have been well documented and photographed by local residents. This makes it a cherished local asset. To see it bulldozed for a featureless housing estate would be a heart-breaking loss for the entire community. This plan feels like it has been drawn up without any real understanding or appreciation of the local area and the people who live here.

#### 1. Deliverability concerns

There remains historical concerns about delivering large scale housing projects in the Canterbury area with key assets such as schools, community facilities and medical centres being painfully delayed in comparison to house building. These facilities are essential to prevent further overcrowding and stretching of the current infrastructure.

Examples of these concerns relate to Mountfield Park, which was approved in 2016 but with no homes built as yet.

This example highlight the risks of large, strategic sites. They are vulnerable to market cycles, developer priorities, and infrastructure delays. Plans must demonstrate a supply of deliverable sites for the first five years (NPPF 77) and developable sites for years 6–10 and beyond (NPPF 78).

Strategic policies must make sufficient provision for health, education, transport and community facilities (NPPF 20). I see no compelling plan within this development that takes into consideration these concerns. Healthcare provision in Canterbury is at breaking point with many GP surgeries considerably overstretched and healthcare related resources limited.

In relation to community facilities, while a school, sports hub and community centre are proposed, there is no binding timetable or enforcement. Experience elsewhere in Kent suggests these facilities often lag behind housing, leaving local residents pre-planning arguments undervalued and undermined, paying no more than lip-service to their concerns. Strategic policies for large-scale development must be set within a clear vision, supported by infrastructure, and look ahead for at least 30 years (NPPF 22).

## 2. Roads, Footpaths and Transport

The area covered by the proposed allocation is crisscrossed by a network of established footpaths and bridleways. These are not merely lines on a map; they are historic routes that are highly valued and frequently used by the local community for walking, dog walking, horse riding, and general recreation. They provide safe, off-road access to the countryside and are essential assets for public health and wellbeing, as recognised by the National Planning Policy Framework (NPPF).

The history of this allocation is critical. The council's own evidence, as outlined in the Focused Regulation 18 Topic Paper (August 2025), reveals that the original transport mitigation for a development of this strategic scale was predicated on the delivery of new A2 slip roads. The subsequent abandonment of this crucial infrastructure, following what the Topic Paper terms "significant concerns with the technical feasibility and deliverability" from National Highways and Kent County Council, removes the entire strategic premise upon which this development was originally considered acceptable. The justification for the allocation has not merely been altered; it has collapsed entirely and as such the whole transportation issue requires considerable scrutiny.

The aspirational plan to funnel traffic through unsuitable roads in order to make this plan viable is concerning.

This will place an intolerable and unmitigated burden on an already fragile and congested local road network. Roads such as Nackington Road, Hollow Lane, and Wincheap already experience significant peak-hour congestion, which will be severely exacerbated. This will lead to longer journey times for existing residents, a demonstrable negative impact on air quality in the surrounding area, and a significant decline in the quality of life for the local community.

Development should only be permitted where safe and suitable access can be achieved (NPPF 110), and should be refused if there is an unacceptable impact on safety or the cumulative impacts on the road network would be severe (NPPF 111).

### 3. . Loss of Farmland, Green Space and Wildlife

The council's own documentation, specifically the Focused Regulation 18 Topic Paper, acknowledges that Historic England has previously raised "Significant concerns" regarding development in this location. The inclusion of a policy requirement within N1 to "Preserve long distance views to the City and World Heritage Site" is a clear admission of the severe risk of harm. However, it is simply not credible to assert that a development of approximately 1,930 new dwellings, along with the associated infrastructure, lighting, and activity, can be constructed in this sensitive location without causing substantial harm to these critical views. The scale of the proposed development is so vast that it will inevitably urbanise the southern approach to the city, fundamentally and permanently damaging the historic visual relationship between the Cathedral and the surrounding countryside. This landscape is not merely "countryside"; it is the historic foreground to one of the world's most important ecclesiastical monuments.

As detailed earlier in this response, this area is a place of significant ecological value. Housing traditional orchards a habitat explicitly recognised as a Priority Habitat under Section 41 of the NERC Act 2006. This designation is reserved for habitats of the highest significance for conservation.

This orchard and the associated mosaic of hedgerows and grassland support a rich diversity of fauna, most notably several species of birds that are on the Red List of Birds of Conservation Concern. These species are of the highest conservation priority, and their presence is an unambiguous indicator of the site's high ecological value.

The NPPF is unequivocal in its direction on this matter. Paragraph 186 states that planning policies should "identify and pursue opportunities for securing measurable net gains for biodiversity". Unfortunately the plan for Merton Park does not offer a compelling argument which satisfies this area of the NPPF.

I have just highlighted three personal but major concerns for this development which appears to contradict the cornerstone of planning development in the NPPF.

I urge Canterbury City council to review this development and provide a considered and well judged response to these arguments .

For Canterbury City Council to have chosen this site for potential development with such a catalogue of severe, and in some cases insurmountable, constraints, it must have either systematically downplayed the severity of these impacts or given disproportionate weight to a single factor, such as a landowner's stated "availability". This is not the balanced and evidence-led approach required for sound plan-making.

I wholeheartedly object to the allocation of Policy N1 on the personal grounds stated above but which I am sure will be in harmony with other objections received for this proposal.

Can I thank you for your time in reading this response.

Yours sincerely,

James Sampson