

Local Plan Canterbury

N1 - Land at Merton Park

Mr Philip Embry

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Consultation Feedback:

Dear Sir / Madam,

I would be grateful if you would take into consideration the following feedback regarding the proposed development of the “N1 - Merton Park” site in the Wincheap area of Canterbury.

As a resident who has lived in the area for more than ten years, and a father of children who attend Wincheap Primary school I find the proposal to build 1,930 dwellings in the proposed location not only shocking but also lacking significant consideration including but not limited to the ecological and environmental impacts, the transport impacts, pollution and wider social implications.

The breakdown that follows outlines why I believe that this location, scale and type of development proposed is wholly inappropriate and in conflict to the best interests of our local community and Canterbury as a whole.

Individual Issues:

(i) Traffic:

1) Access to the proposed development:

The proposal for N1 – Merton Park does not adequately address site access considerations. The Concept Master Plan identifies two entrance points, which have not been realistically assessed. The first entrance, located on the southern side via Nackington Road, is constrained by its proximity to the A2, Kent Police garage facilities, and residential properties, limiting expansion possibilities. The second entrance from Hollow Lane is similarly restricted due to existing housing and road limitations.

The proposal for Hollow Lane seems to lack thorough on-site evaluation. The intended entry point to the site is at a major bottleneck on Hollow Lane, where vehicles barely have room to pass each other. As one moves past the mini roundabout which is likely to be impacted by construction traffic Wincheap School is situated adjacent to the proposed route for numerous new vehicles. This section poses significant health and safety concerns for local children, which will be addressed further in my commentary. Continuing along the road, traffic becomes single-flow due to residents parking outside their homes, limiting the number of vehicles that can traverse this route. Additionally, construction traffic will face difficulties passing through. If the proposal suggests using the route via Homersham, similar single-flow traffic issues will arise, and the access point concerns remain unresolved.

The proposal to remove Stuppington Lane would eliminate two access routes into the planned development. Although this road already exists, it seems the council prefers to create new access points instead of utilising existing roads. Please note that Canterbury City Council does not have authority over roads; this responsibility lies with Kent County Council and National Highways (Department for Transport). This aspect appears to be overlooked in your plan.

2) Traffic Environmental impact:

The increase in road traffic is expected to have a considerable negative impact on the local community's environment. According to the Canterbury and Herne Bay Air Quality Action Plan¹ (January 2025), the Wincheap area is noted for having an annual Mean NO₂ level exceeding 40 µg/m³, which is classified as RED in your study.

- Air pollution is a significant public health concern, comparable to cancer, heart disease, and obesity.
- The Department of Health and Social Care's advisory Committee on the Medical Effects of Air Pollutants (COMEAP) estimates that long-term exposure to man-made air pollution in the UK contributes to shortening lifespans, equating to 28,000 to 36,000 deaths annually.
- Those most susceptible to air pollution include children, the elderly, and individuals with pre-existing medical conditions. With the planned access routes passing Wincheap Primary school

¹ <https://www.canterbury.gov.uk/sites/default/files/2025-02/Canterbury%20and%20Herne%20Bay%20air%20quality%20action%20plan%20November%202024.pdf>

- Poor air quality disproportionately affects the poorest and most vulnerable communities. Wincheap falls within one of the wards of Canterbury that is within the top 10% of most deprived².
- The health impact of air pollution is influenced by the duration and intensity of exposure, with air quality objectives set to mitigate both short-term (acute) and long-term (chronic) health effects.

Your report highlights that air quality monitoring shows a decline in pollutant levels. The addition of numerous vehicles will worsen this situation, meaning your pollution management goals are not being met and conditions will deteriorate in one of the city's most deprived areas.

Canterbury already has a higher age-standardised prevalence of asthma compared to Kent overall³. The introduction of more vehicles will further aggravate this issue. The case of Ella Ella Adoo-Kissi-Debrah⁴, who tragically passed away in 2013 due to an asthma attack linked to air pollution, underscores the potential risks. The proposed development could pose a similar threat in Canterbury. If such an incident occurs, it may be attributed to Canterbury City Council's planning shortcomings and reluctance to heed public concerns.

(ii) Wincheap Primary School:

The proximity of the proposed development and its access roads to the community's sole primary school presents notable health and safety concerns. As previously highlighted, the deteriorating air quality will increasingly affect the youth in our community. This situation will have enduring consequences, impacting not only the residents and families of Wincheap but also the already strained health services in Canterbury.

From a safety standpoint, the increase in vehicles near the primary school presents a notable risk. During construction, the presence of heavy and potentially hazardous vehicles on narrow roads, along with the subsequent traffic from servicing 1,930 houses, further exacerbates this concern

While considering the broader educational impacts, there is currently no evidence to suggest that an increase in city population has been taken into consideration with wider effects on secondary school places and facilities. The proposed primary school within this development will not sufficiently address the overall educational capacity challenges faced by the city.

(iii) Wider environmental impacts:

The draft plan currently lacks sufficient detail regarding its ecological and environmental impact. It is essential to conduct a comprehensive independent environmental assessment for the proposed development. The site hosts a diverse range of wildlife, including Badgers (Protected under the Protection of Badgers Act 1992⁵), Foxes, smaller mammals, and Bats (protected under the Wildlife and Countryside Act 1981⁶ and the Conservation of Habitats and

² [The Index of Multiple deprivation \(IMD2019\): Headline findings for Kent](#) Pg.11 Table 4a

³ KCC Kent population demographics and health of the population [Pharmaceutical Needs Assessment 2025](#)

⁴ [google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKewjitt7MlbGQAxWCTUEAHfDgFyUQFnoECB0QAQ&url=https%3A%2F%2Fellaroberta.org%2Fabout-ella&usg=AOvVaw1gKsc-Dh8cezmrkhzydTTx&opi=89978449](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKewjitt7MlbGQAxWCTUEAHfDgFyUQFnoECB0QAQ&url=https%3A%2F%2Fellaroberta.org%2Fabout-ella&usg=AOvVaw1gKsc-Dh8cezmrkhzydTTx&opi=89978449)

⁵ [Protection of Badgers Act 1992](#)

⁶ [Wildlife and Countryside Act 1981](#)

Species Regulations 2010⁷). Additionally, numerous wild birds on the site are classified as vulnerable, endangered, or critically endangered on the Red List⁸.

These being (Amber and Green included for wider context of species diversity):

Red

Eurasian Skylark
Starlings
Yellowhammer
Spotted flycatchers
Fieldfares
Common Linnet
Cetti's warbler
Herring gull
House Martin
House sparrows
Greenfinch

Amber

Meadow Pipit
Redwing
Song Thrush
Common Whitethroat
Dunnock
Kestrel
Eurasian Wren
Black-headed gull
Sparrowhawk
Rook
Lesser black-beaked gull

Green:

Great spotted woodpecker
Green woodpecker
Robin
Chaffinch
Chiffchaff
Blue tit
Great tit
Eurasian Blackcap
Black bird
Buzzard
Red Kite
Goldfinch
Long tailed tit
Pied wagtail
Wood pigeon
Collared dove
Magpie
Carrion crow
Jackdaw
Pheasant

When the proposed development occurs, it will lead to the destruction of valuable and rare biodiversity. Any post-construction efforts to reintroduce species will not compensate for the significant damage to this important green and biodiverse area. According to Canterbury City Council's Green Infrastructure Strategy⁹, the council is committed to protecting and enhancing green spaces for the health and wellbeing of residents alongside sustaining biodiversity. This development contradicts these objectives and failing to adhere to the Green Infrastructure Strategy could result in serious environmental, social, and economic repercussions for the district, including increased flood risk, heightened climate change vulnerability, biodiversity loss, and a diminished quality of life for residents.

In considering climate change, it's important to note that the Council declared a climate emergency in July 2019, leading to the adoption of climate change action plan¹⁰ in May 2021. This plan aims for net zero emissions from council operations and assets by 2030, supports district-wide net zero emissions by 2050, and enhances climate resilience. However, the proposal to introduce numerous new households to the Wincheap ward could hinder these goals. The loss of a substantial green space would eliminate a major carbon sink, negatively impacting the City's environmental footprint.

⁷ [The Conservation of Habitats and Species Regulations 2010](#)

⁸ [Conservation Designations for UK Taxa | JNCC Resource Hub](#)

⁹ [Green infrastructure strategy.pdf](#)

¹⁰ [Climate change action plan](#)

The proposed development threatens to eliminate a significant area of orchards, including those in Wincheap, which are endangered nationwide. These orchards are crucial for maintaining the green, biodiverse environment that supports local wildlife. Their destruction would not only be a local disaster but also contribute to the broader decline of traditional orchards¹¹

(iv) Public access:

It seems that the current plan has not considered the legal rights of access protected by the Highways Act 1980.¹² and the Countryside and Rights of Way (CROW) Act 2000¹³. Removing these established rights of way would violate the law. Even if these rights are to be maintained after development, access cannot be denied during the development phase. Any diversions must be temporary, and any attempt to permanently remove rights of way could lead to legal repercussions for those involved.

(v) Medical Provision.

In previous local plans, there was consideration for upgrading and replacing the Kent and Canterbury Hospital. However, this is no longer part of the planning process for this and other developments in the new Local Plan. The demand for medical facilities has not diminished since the last plan; in fact, it has increased. With the influx of thousands of new residents to the City, both in Wincheap and the wider community, there will be an ever more significant need for adequate medical facilities. Current provisions also fall short in GP and dentistry access. It is essential to reconsider the plan to ensure the healthcare needs of these new residents are met.

(vi) UNESCO World Heritage Site

As Canterbury is a UNESCO World Heritage Site, the Council holds both legal and moral obligations to promote planning strategies that mitigate climate change and protect green spaces. This proposed development directly contradicts these principles, as detailed earlier in this letter

(vii) Wider considerations:

1) Options for employment:

The planned developments in Wincheap and Canterbury are expected to bring an influx of new residents. However, there is uncertainty about the availability of jobs to support this growing population. The two universities in the area are experiencing financial difficulties, leading to staff reductions, and there are limited major employers in the city. Additionally, commuting to work in other areas, such as London, is becoming increasingly expensive, making it feasible only for the most affluent individuals.

If the Council intends to allocate housing, as previously done at the old How barracks, to individuals needing social housing from London boroughs, it may further burden our already stretched NHS, social care, and policing services. This approach addresses housing needs of other regions at the expense of our local community's requirements.

2) Saxon Fields

The construction activities at Saxon Field have highlighted significant concerns regarding the development approach, serving as a case study. Notably, the planned primary school has yet to

¹¹ [Traditional orchard decline - People's Trust for Endangered Species](#)

¹² [Highways Act 1980](#)

¹³ CROW: <https://www.legislation.gov.uk/ukpga/2000/37/contents>

commence construction. Additionally, inadequate consideration of weather impacts following topsoil removal has resulted in land slipping into nearby residential areas. These issues suggest potential challenges in future developments.

3) The Social Contract between Local Government and the community.

The concept of a "social contract" in the UK local government context being the implicit and explicit mutual obligations between residents and local authorities, such as councils. This relationship is grounded in legislation like the Local Government Act 1972¹⁴ and 2000¹⁵, the Localism Act 2011¹⁶, emphasizing accountability, participation in exchange for civic contributions and taxation. It promotes responsive governance where councils deliver wellbeing (economic, social, environmental) under the "general power of competence," while residents engage to shape decisions.

This being the case I hope that due consideration is taken into account when reviewing my 'n and all other responses to this consultation. Please remember that Canterbury City Council is the steward of our city, the populations public funds and services. You have a duty to promote residents' wellbeing and consult on decisions. As part of that consultation, change direction, alter and or halt plans that are rejected by the community that you serve.

The "social contract" in UK local government refers to the mutual obligations between residents and local authorities, such as councils. This relationship is based on legislation like the Local Government Act 1972¹⁷ and 2000¹⁸, and Localism Act 2011¹⁹. These laws highlight accountability and participation in return for civic contributions and taxation. They encourage councils to provide economic, social, and environmental wellbeing under the "general power of competence," while residents actively participate in shaping decisions.

Given this framework, I trust that my feedback and others' responses to this consultation will be duly considered. Canterbury City Council, as the steward of our city, manages public funds and services. It is your responsibility to enhance residents' wellbeing and engage in consultations. As part of this process, you should be prepared to adjust, modify, or discontinue plans that the community does not support.

¹⁴ [Local Government Act 1972](#)

¹⁵ [Local Government Act 2000](#)

¹⁶ [Localism Act 2011](#)

¹⁷ [Local Government Act 1972](#)

¹⁸ [Local Government Act 2000](#)

¹⁹ [Localism Act 2011](#)