



Thanington Neighbourhood  
Resource Centre

Charity No: 1155263

Consultations  
Canterbury City Council.  
14 Rose Lane  
Canterbury  
CT1 2UR

20<sup>th</sup> October 2025

To whomever it may concern.

Please find enclosed the full and substantive response of the Board of Trustees and Management of Thanington Neighbourhood Resource Centre to Prop N3 DLP 2040

I urge you to read in full and appreciate as much as I do the intrinsic value of the Thanington Recreation Ground and its enduring legacy of benefit to the health of the area in all its many forms.

N3 should not be in the Draft Local Plan. It is in your gift to have it removed.  
Yours sincerely

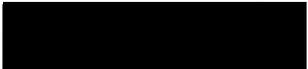
Paul O. Todd LLB CEO

Yours Faithfully



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21 October 2025

This document is the substantive response of the Board of Trustees and Management of Thanington Neighbourhood Resource Centre to the Draft Local Plan 2024 focussed consultation under s18 Town and Country Planning (Local Planning) (England) Regulations 2012.

**Thanington** is special because it is a true community. Thanington is not just somewhere to live it is a home for almost 3000 families. It is a community where we all know each other with a strong sense of community spirit and ownership. It needs nurturing and looking after, Thanington Neighbourhood Resource Centre (TNRC) does just that.

TNRC performs a vital role within the community of Thanington, acting as it does as a hub, as a point of delivery for a mixed range of community, health and social services, as a drop in centre where residents can gain support and advocacy as well as a meeting place where residents can commune and which helps reduce the impacts of poverty and deprivation in the commonly understood, financial sense as well as with poverty of opportunity and access. Thanington Neighbourhood Resource Centre is a vital resource and a coherent local plan, with considerations in the Parish of Thanington should bear in mind very seriously the impact such plans have on the Centre and work that it does bolstering the community.

TNRC fulfils an important role in community building, in developing civic awareness, cohesion and pride in the markedly different areas within the Parish it serves. This is its unique point of relevance. Thanington Without, the largest settlement in the Parish has long held the unfortunate distinction of being one of the most deprived areas of England. Prior to TNRC's arrival at the recreation ground, very little resource was provided to Thanington and as a result serious public disorder took place and a sense of alienation and resentment built up which has been hard to dispel. TNRC has helped the local residents to help themselves and whilst doing so, it has also helped the local area. TNRC is anecdotally responsible for a 50% reduction in crime and antisocial behaviour. Many of our young people have become civic champions through their involvement with youth club provision at TNRC both as members and as volunteers. This strengthens our community, and it is vital that this work continues.

TNRC's management has determined that although the DLP does not include TNRC directly in the plans for development, that as a consequence of the relocation of P&R, the work that TNRC does alongside its partners would be at risk.

This is because TNRC is supported primarily on room hire to counselling agencies and to local organisations and businesses for training and leisure purposes. These bookings provide us with the means to carry on Youth Club provision and community engagement activities, and we fear that as construction work and then noise and traffic increases, those room hires will be lost and we assert that a direct and foreseeable consequence of P&R relocation is the ultimate failure of TNRC as a going concern.

Thanington is isolated from other areas of the City by the A2 and has been underserved by decades of underinvestment in its people and amenities. There are no other green spaces left in the area, no GP practice, or clinics. This is particularly relevant because as we discuss later in this response, the demographic profile of the Parish indicates a preponderance of residents with young families and a significant number of elderly residents. There are no other leisure facilities in the immediate vicinity other than community centres with a limited offering aside from the Recreation Ground which means that the people of Thanington have to travel for support services and for entertainment.

It is noteworthy that Thanington is the only area in the City to suffer from poor bus and cycle links, particularly when one considers the emphasis placed on sustainable transport by planners. N3 proposes a Park and Ride, which as 20% of households in the Parish do not drive or have access to a car and that more than 50% of all households display at least one descriptor for deprivation and that the price as a foot passenger of Park & Ride is very expensive, £4.00 per adult passenger each way at current prices, is clearly another amenity not meant for them. The A28 road will need to be reorganised again, which will negatively impact on the ability of pedestrians and cyclists to travel between the Parish centres and the City.

The main Accident and Emergency Hospital for the City is the William Harvey Hospital in Ashford, which as the name suggests is accessed via the A28 Ashford Road. Additional traffic means slower ambulance journeys and potentially more serious outcomes including death for people who need treatment.

Neither the local plan, nor the associated plans for the Wincheap gyratory system and A2 off ramp give any indications as to how these issues may be addressed. This goes against the guidance set out in s109 of the National Planning Policy Framework 2024, (NPPF), which clearly states that traffic plans should be considered at the "earliest stages of plan making". The DLP and this consultation are demonstrably not the earliest stage of this process.

There are pinch points which already affect traffic flow in and out of the City at Wincheap roundabout and at Thanington Bridge which either cannot or have not been addressed by the DLP and given that traffic at present is often queuing from the bridge before 8 o'clock in the morning until 8 o'clock at night, often past Thanington to Milton this does not auger well for a population that due to its social deprivations has worse health outcomes than should be expected. Indeed, this influx of heavier traffic, alongside a proposed 900 cars and goodness knows how many ancillary vehicle movements in and out of the site over a day, will have a catastrophic effect on air quality and consequently on the lungs of children who are the ultimate legatees of the plan.

Those same children will not only suffer from the health implications of much heavier traffic but also the loss of their recreation ground with its play areas, sports facilities and very likely their Youth Clubs, but also their ability to access a safe green space, a place where their imagination and simple childhood birthright of free play can take place. The Pandemic helped us understand that places like Thanington Recreation Ground are crucial to the mental health and physical wellbeing of residents. We must not forget that lesson, nor should we sacrifice this oasis of fun, of fantasy and imagination to the motor car, having already surrendered the streets outside children's homes.

Many of our residents have no other green space to call theirs, living as they do in flats in the middle of the estates.

It takes very little effort to discover how important to the lives of residents the recreation ground is, when one talks to people as they walk their dogs, bring the children to play or who have come for a break, family histories come flooding out. It is a truism to say that the trees of Thanington Recreation Ground are family trees, holding a special place in the hearts and memories of residents.

The plan N3 has described the trees of Thanington Rec as being in no danger, which on the face of it is a good thing, but is it really true? Increased and consistent high levels of pollution cannot but affect the trees which are as we all know important carbon capture devices, oxygen producers and soundproofing. These trees also form an important function for the wildlife of the area, filled with songbirds, starlings, woodpeckers and the squirrels of the rec. These in their turn provide the visiting Red Kites and red foxes with a larder, on and in the river and its bank there are other animals that rely on the peace and quiet of the rec just as much as people do.

The City Council's green spaces strategy describes Canterbury as being "lucky" to be a "district filled with natural local parks" and that "these are not just scenic spots, they are the lifeline for our health, culture and environment", offering "refuge from hectic urban life" the "green lungs" in the fight against climate change".

Why should Thanington be any different? Why should the current and future generations of Thanington have their spaces, their lifelines, their green lungs taken away? It is plainly not fair to for the City Council to do this to the community that needs its support the most but receives it the least.

TNRC, Thanington Estate and Thanington recreation Ground are a partnership. A symbiotic representation of all that our community can do together when it is given the same opportunities as anywhere else, if we lose the Rec, then we will lose TNRC and the loss of both would be an utter disaster for Canterbury's most unique community. I, we urge the council and the Councillors to have this thought foremost in their minds when they come to vote on the DLP.

#### **Alternative recommendations.**

There are other options for park and ride that do not destroy Thanington Recreation Ground, and we urge the Council to consider these alternatives most carefully as they must under NPPF.

1. **Build up and not out:** A simple multistorey structure on the current site would as I understand it be the least impactful on the environment and potentially on the Council's reserves, the park and ride infrastructure already exists on site, it is well known enough and if properly utilised would provide an 'oven ready' solution to the parking issues which Canterbury businesses wish the council to solve.
2. **Merton Park:** We invite the City Council to reconsider the removal of the previously posited Park and Ride site at Merton Park, with access from the A2.

Given that this is a considerable infrastructure project, these would seem to be the least impactful on the environment, on the citizenry of Canterbury and add to the amenities already planned for the area, creating as it would, ingress points lacking from the revised proposition N1.

3. **Milton Manor:** The former Bretts site would fit the bill as a brownfield site with much of the required infrastructure already in place. Due to its position on the outskirts of the City, would have a meaningful effect on traffic reduction. Make it possible for a better bus link to the City from the site, Thanington and Wincheap and to be linked in with National Cycle Route 18 via the riverside for both cyclists

and walking commuters.

4. **Saxon Fields:** Now that the additional housing plans have been deleted from DLP, the Park and ride could be placed on the rear end of the site and because ingress and egress via a slight extension of the current two-way slip road would be relatively low in impact on traffic and on residential amenities, should be thoroughly investigated. Indeed, this was originally part of the planned Thanington Park Development.
5. **Hall Place, Harbledown:** This is a Brownfield Site and would have the immediate effect of alleviating the inbound pressure on the Harbledown By-Pass and the Rheims Way, which is, I understand the primary driving factor behind the proposed extension of Park and Ride facilities in the City and is distant enough from the City to be meaningful in terms of traffic and pollutant reduction.
6. **Close the Park and Ride in Wincheap altogether:** The site is underused, A Freedom of Information Act disclosure from the City Council dated 15/10/2025 states that the average usage of the site to be 60% and therefore the site could serve other purposes.
7. **Amend the A2 slip road:** If the proposed 4<sup>th</sup> Slip road had an inbuilt consideration in its design, for access through the river end of the existing P&R, the P&R could then be accessed by the Dover bound A2 traffic.

Extending the 'lead in', back past the bridge over the Great Stour via the existing outside lane would not only be more cost effective, less disruptive to businesses on the Business Park, but also make the Junction onto Ten perch Road /A2 easier to navigate for traffic and cause current P& R capacity to be considerably less reduced, thus eliminating the need for a relocation of the site. By retaining existing P&R facilities at Ten Perch Road along with improved P&R options elsewhere in the City, and utilising existing infrastructure there would be a considerable saving to the City Council's resources.

### **Specific planning issues related to the DLP proposition N3.**

There are several specific issues that I raise in concern for N3.

1. Incompatibility with CCC Open Spaces assessment and strategy.
2. Incompatibility with NPPF in the following key areas:  
(quoted content from NPPF 2024 in italics),

*103. Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.*

104. Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

105. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

106. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period.

107. The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.

108. Policies and decisions for managing development within a Local Green Space should be consistent with national policy for Green Belts set out in chapter 13 of this Framework.

153 The City Council's Open Space Strategy, (OPS), identifies Open spaces of all categories as being of high importance and in collaboration with the DLP speaks of the necessity to preserve local open spaces for the use of the community.

Thanington Rec is such a space.

#### NPPF consideration

s104 requires that there be a robust and fulsome assessment of the open space and that consideration of *all* aspects of the open space earmarked for development including its practicality, impact on the environment and usage, asking that alternative sites be of similar quality and access. In reading the Council's policies it is not clear where the Council has met this obligation, save for a statement made in public that Thanington Parish does not have sufficient open space. It is clear that the N1 proposal does not meet this given the reasons stated above and that the N1 site is some 1.8 miles from the river and so habitat loss for example, is particular and lasting. One cannot simply equate that Chalk Downland (N1), and riverbanks (N3), offer the same biodiversity or amenity as each other.

s105 specifies that consideration be given to access and the provision of links between open spaces, which in the revised DLP are removed and significant obstacles in the form of the A2 and insufficient access routes further hinder the transmission of residents from Thanington to the proposed open spaces of Merton Park.

s106 allows communities to designate areas as being Local Open Spaces and the community of Thanington asserts this having given full regard to the rest of the wording of s106 and s107, and calls upon the City council to amend the DLP with that assertion in mind at this stage of the planning process.

S108 imposes a duty on the City Council as planning authority to consider the impact of its decisions on Ch13 of the NPPF and I go on to speak on that here.

## **Environmental considerations**

Ch13 and its sections refer to 'The Green Belt' and whilst Thanington Rec is not designated as green belt land, it performs a similar function insofar as it is a buffer against urban sprawl.

S153 speaks to the reasons for preserving green belt areas in relation to a local plan and I believe that I have described above sufficient good reasons for preserving Thanington Rec. I note that one exclusion for these sections is the provision of essential local transport infrastructure, and I acknowledge that this is indeed what is proposed, however I think that I have identified that there is sufficient alternative to the destruction of Thanington Rec and the consequences of that to the community.

The City Council's OSP speaks of the need to enhance the 'Riverside Network' and of the need to tackle to climate emergency which was declared by The City Council in 2019.

The Council's policy clearly states that development should not take place in areas such as Thanington Rec, whilst the DLP insists that there will be sufficient appropriate and equivalent open space provision on Prop N1.

This is not the case, the open space provision at N1 clearly does not marry up to the Thanington Rec. Firstly the chief open space at N1 is the provision of formal sports pitches, laid out with the playing of organised Association and Rugby football in mind. Thanington Rec, has such provision and is used for sports in a formal way, but this does not constitute either the main use of the Rec as an informal, often impromptu play area for residents, but as a place for exercising people and dogs, for picnicking and community events. I am given to understand that the sports provision at N1 will be restricted to organised games and have access requirements such as pre-booking.

N1 cannot meet the needs of Thanington residents, it is too far away to be accessible for residents without a car and is inconvenient for exercising animals.

The Council has pointed to small pockets of land, across the Parish, and particularly on Saxon Fields which the Council say constitutes a broadening of the green spaces, but again this is not the same or equivalent, being in some cases 'soak away' ponds or verges. Moreover, the Saxon Fields Play Area was not provided with the needs of the entire parish in mind and is due to its size and arrangements for its upkeep are for the primary use of Estate residents there.

The Open Spaces strategy goes on to talk about limiting the impact of severe weather, DLP gives no explanation what happens in heavy rain, for example, where the soaking up ability of the 5.5 acres of open space in the Rec and its trees is to be compensated and therefore suggests a heavier flood risk downstream. The runoff from the car park

will be untreated and appears from the DLP to be ejected directly into the water course of the Great Stour, which will in turn have a negative impact on plant and animal life reliant on the River.

The Great Stour is unique, being at once a chalk stream, one of the rarest habitats in the world *and* spring fed which gives it its unusual character and responsiveness to environmental conditions. The river health is intrinsically linked to the health of the Hambrook Nature Reserve and to the Wincheap Water Meadows as well as being part of the greater drainage basin and aquifer which supplies the majority of water to the district by extraction. In short, the additional pollution from the car park will affect all participants in the life of the river and its aquifer.

## **Conclusion**

Thanington Neighbourhood resource Centre is convinced of the need to retain the open and specifically informal recreational nature of Thanington Recreation Ground.

In terms of local amenity, The Rec is a perfect example of an asset of community value, not only improving health and mental well-being outcomes but with the added value of the TNRC, the Youth Shelters and the playgrounds and Skate Park, significant in eliminating antisocial behaviour and neighbourhood crime.

The Rec and TNRC provide the area with demonstrably improved community cohesion and is universally appreciated as a public good. TNRC asserts firmly that the benefit it brings would be lost to the community should Proposition N3 be included in the final Local Plan.

There is no reasonable justification for transposing the Park & Ride site. The proposal is too large in terms of established need and the cost to the public life of the Parish and City as a whole too great.

The Parish and its Residents are determinedly opposed to the plan on sound social, economic and planning grounds that we have adequately outlined above. Simply put, We the Community of Thanington do not want it.

For these reasons We cannot but object to the Proposition N3 and urge its removal from the DLP.

On Behalf of the Board of Trustees of Thanington Neighbourhood Resource Centre.

David Smith: Chair of Trustees. Joanne Ryan: CFO. Paul Todd: CEO.