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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 12:18  
**To:** Consultations  
**Subject:** Subject: Objection to Unsound Policy N1 - A Recipe for a School Run Nightmare  
**Categories:** AI?

**--Email From External Account--**

Dear Planning Policy Team,

As a parent of school-aged children, I am writing to object in the strongest possible terms to the allocation of Policy N1 (Land at Merton Park). My objection is based on the plan's complete failure to address the severe and dangerous impact this development will have on school-related traffic and the safety of children travelling to and from school. The plan is not **positively prepared** to create a safe and healthy environment for families.

The transport network around South Canterbury is already severely congested during the morning and afternoon school runs. The roads around existing primary and secondary schools are frequently gridlocked, with cars parked on pavements and dangerous manoeuvres being commonplace. To add the traffic from up to 1,930 new families into this mix without a truly radical and deliverable transport solution is grossly irresponsible.

The policy's proposal for a new on-site primary school does not solve this problem; in many ways, it exacerbates it.

Firstly, a new primary school will not cater for all the children on the development. Many will still need to travel to other existing primary schools in the area, particularly if they have specific needs or a religious affiliation, adding to the traffic chaos on the wider network.

Secondly, and most critically, the policy provides no solution for secondary school pupils. There is no new secondary school proposed as part of the development. This means that hundreds of teenagers from the new estate will have to travel to the existing secondary schools across the city. Many of these journeys will be by car, adding a huge new volume of traffic to the morning peak. For those travelling by bus, it will add to the overcrowding on existing school services.

The plan's reliance on "upgrades to walking and cycling routes" as a solution is particularly concerning in the context of school travel. While laudable, these routes will not be used by a majority of pupils, especially younger children or those travelling longer distances to secondary school, particularly in poor weather. The plan is not **effective** because it relies on an unrealistic assumption of modal shift for school journeys. The reality is that the 'school run' is one of the most car-dependent activities, and this development will pour fuel on that fire.

A **positively prepared** plan would have a comprehensive, integrated, and funded 'Safe Routes to School' strategy at its heart. It would demonstrate, with evidence, how all the children from the new development can travel to their primary *and* secondary schools safely and sustainably. It would include commitments to new, dedicated school bus services, segregated cycle lanes on all key routes, and measures to manage traffic around existing school gates. Policy N1 contains none of this detail.

The allocation as proposed will create a daily 'school run nightmare' that is more congested, more polluted, and more dangerous for all children in South Canterbury. It is an unsound and unsafe policy, and I object to it in the strongest possible terms.

Yours faithfully,

Linda Huggett

[REDACTED]

[REDACTED]

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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 12:16  
**To:** Consultations  
**Subject:** Subject: Objection to Policy N1 – The Human Cost of Losing Local Farmland  
**Categories:** AI?

**--Email From External Account--**

Dear Planning Policy Team,

I am writing to object to the allocation of Policy N1 (Land at Merton Park) in the Draft Local Plan. While many objections will rightly focus on technical planning matters, I wish to focus on the human cost of this proposal: the destruction of local farming livelihoods and the loss of a connection to our food-producing landscape. The plan is not **positively prepared** because it fails to consider the social and economic wellbeing of the existing rural community.

The land at Merton Park is not an abstract void on a planner's map; it is an active part of our local agricultural economy. This land is currently farmed, likely under a combination of ownership and tenancy agreements. The allocation of this site for development will result in the direct and permanent loss of this farmland, potentially displacing farming families who may have worked this land for generations. This is not simply about the loss of a field; it is about the loss of a business, a home, and a way of life.

A **positively prepared** plan should support, not undermine, the rural economy. The NPPF requires planning policies to "enable... the development and diversification of agricultural and other land-based rural businesses." Policy N1 does the exact opposite: it seeks to extinguish a viable agricultural enterprise in favour of urban sprawl. The council's evidence base contains no assessment of the economic impact of this loss. How many jobs will be lost? What is the value of the produce grown on this land? What will be the impact on the tenant farmers who may lose their homes and their livelihoods? To proceed without this information is irresponsible and demonstrates a disregard for the existing rural community.

Furthermore, this allocation contributes to a wider, concerning trend of 'agricultural gentrification', where the value of land for housing completely eclipses its value for food production. This makes it increasingly difficult for new entrants to get into farming and for existing farms to remain viable. By allocating this site, the council is sending a clear message that it values developer profits over local food production and the preservation of our farming heritage.

A truly sustainable plan would recognise the multi-functional benefits of farmland on the urban fringe. This land provides local food, supports rural employment, offers opportunities for recreation, and forms the cherished landscape setting of our city. Policy N1 treats it as a single-use commodity, a blank canvas for a housing estate.

This is an unsound and deeply unsympathetic policy. It ignores the human cost of its decisions and fails in its duty to support the rural economy. I object to this allocation and urge the council to consider the people, not just the housing numbers, and protect our vital local farmland.

Yours faithfully,

Linda Huggett



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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 12:14  
**To:** Consultations  
**Subject:** Dear Planning Policy Team, I am writing to object to the allocation of Policy N1 (Land at Merton Park) in the Draft Local Plan. My objection is grounded in the firm belief that the proposal is unsound because it is not positively prepared to create a heal

**Categories:** AI?

**--Email From External Account--**

Dear Planning Policy Team,

Please accept this as my formal objection to the allocation of Policy N1 (Land at Merton Park). My objection is focused on an aspect of the development that is often overlooked in strategic plans but has a profound impact on the lives of existing residents: the sheer scale and duration of the construction phase. The plan is not **positively prepared** because it fails to adequately consider or mitigate the severe and prolonged disruption that will be inflicted upon the local community for more than a decade.

A development of nearly 2,000 homes is not a standard building site; it is a massive civil engineering project that will last for many years. To allocate this site without a clear and binding Construction Management Plan is a failure to protect the amenity of existing residents. The impacts will be multi-faceted and severe.

First, there is the issue of construction traffic. The development will generate tens of thousands of heavy goods vehicle (HGV) movements over its lifespan. These vehicles, carrying everything from aggregate and concrete to timber frames and roof tiles, will be using the same local roads as residents, such as Nackington Road and Hollow Lane. This will cause road safety issues, structural damage to road surfaces, and further, extreme congestion. The plan offers no designated haulage routes and no strategy for managing this enormous volume of HGV traffic.

Second, the environmental impacts of construction will be significant. There will be a constant problem with dust and mud, polluting the air and coating local homes and cars. The noise from piling, earthmoving, and general construction will be audible from a great distance and will last from early in the morning until the evening, six days a week, for years on end. This will destroy the peace and quiet of the neighbourhood and have a measurable impact on residents' mental and physical health.

Third, there will be significant disruption to local services and utilities as new connections for water, sewerage, gas, and electricity are made, likely requiring road closures and diversions.

A **positively prepared** plan should anticipate and plan for these impacts. It should ensure that the harm to the existing community is minimised. Policy N1 is completely silent on this matter. It contains no requirements for off-site road improvements to be completed before construction starts, no limits on construction hours, no mandated dust suppression schemes, and no requirement for a single point of contact for residents to report issues.

To expect the existing community to endure over a decade of such profound disruption without any protections or mitigation measures written into the strategic policy for the site is unacceptable. It demonstrates a lack of consideration for the people who already live here. The plan is therefore unsound because it is not positively prepared to manage the immense negative impacts of the construction phase. The human cost of building this development is too high, and I urge you to delete this allocation.

Yours faithfully,

Linda Huggett



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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 12:10  
**To:** Consultations  
**Subject:** Subject: Objection to Unsound Policy N1 - A Detrimental Impact on Public Health and Wellbeing

**Categories:** AI?

**--Email From External Account--**

Dear Planning Policy Team,

I am writing to object to the allocation of Policy N1 (Land at Merton Park) in the Draft Local Plan. My objection is grounded in the firm belief that the proposal is unsound because it is not **positively prepared** to create a healthy, inclusive community and is inconsistent with the clear direction of national policy on public health and wellbeing.

The National Planning Policy Framework (NPPF, Chapter 8) explicitly states that planning policies should "aim to achieve healthy, inclusive and safe places". This involves planning for the necessary social infrastructure and creating environments that support active lifestyles and good mental health. The allocation of Merton Park will have a series of direct and cumulative negative impacts on the health of both existing and future residents, which the plan fails to adequately mitigate.

Firstly, the loss of this large, accessible green space will have a direct negative impact on public health. The fields and orchard at Merton Park currently serve as an invaluable informal recreational resource for the local community, used for walking, running, and quiet contemplation. Access to such natural environments is clinically proven to reduce stress and improve mental and physical wellbeing. Removing this asset and replacing it with a built-up environment is a retrograde step that runs contrary to public health objectives. Vague promises of formal "open space" within a new development are no substitute for the existing natural landscape.

Secondly, the transport strategy for the site will be actively detrimental to public health. The inevitable increase in private car journeys resulting from nearly 2,000 new homes will lead to a significant worsening of air quality along the Nackington Road and Wincheap corridors. Increased levels of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>2.5</sub>) are linked to respiratory illnesses, cardiovascular disease, and developmental problems in children. To plan for a development that will knowingly increase traffic congestion and air pollution in an area where many families live is a failure of the council's duty of care.

Thirdly, the plan is not **effective** in demonstrating how it will provide the necessary healthcare infrastructure to support a new population of over 4,500 people. Local GP surgeries are already operating under immense pressure, with residents facing long waits for appointments. The policy does not provide a guaranteed, funded, and timely plan for the delivery of a new health centre capable of meeting this new demand. The result will be a decline in the standard of primary care for everyone in the community.

In summary, the Merton Park allocation represents a triple threat to public health: it removes a vital green space for mental and physical wellbeing, it will increase air pollution through traffic congestion, and it will place an unsustainable burden on primary healthcare services. This is not a healthy or sustainable model of development. The policy is unsound, and I urge you to delete it.

Yours faithfully,

Linda Huggett

[REDACTED]

[REDACTED]

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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 12:07  
**To:** Consultations  
**Subject:** Subject: Objection to Unsound Policy N1 (Merton Park) - Irreversible Loss of Productive Agricultural Land

**Categories:** AI?

**--Email From External Account--**

Dear Planning Policy Team,

I am writing to formally object to the proposed allocation of Policy N1 (Land at Merton Park). My objection is based on the grounds that the policy is not **justified** and is inconsistent with national policy regarding the protection of agricultural land and the promotion of food security.

The National Planning Policy Framework (NPPF) at paragraph 184 states that planning policies should recognise the "economic and other benefits of the best and most versatile (BMV) agricultural land". It clarifies that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. The allocation of Merton Park represents a direct and significant loss of what is likely to be productive agricultural land, including the traditional orchard which is a form of specialist food production.

The council's evidence base, particularly the Strategic Land Availability Assessment (SLAA), fails to provide a comprehensive assessment of the agricultural land quality across the site. Without a detailed Agricultural Land Classification survey, the council cannot possibly have justified this allocation in accordance with the NPPF's requirements. To propose the irreversible loss of a significant area of farmland without first establishing its quality and value is a serious omission that renders the site selection process, and therefore the policy itself, unsound.

In the current national and global context, with increasing concerns over food security, supply chain resilience, and the need for sustainable local food production, the practice of concreting over productive farmland on the edge of our city is profoundly short-sighted. This land is a finite resource. Once lost to development, it is lost forever. A truly **positively prepared** plan would seek to protect these assets, recognising their long-term value to the community and the nation.

Furthermore, the plan is not **justified** because it has not been demonstrated that there are no reasonable alternative sites on lower-grade agricultural or previously developed land that could accommodate the district's housing needs. The plan appears to have defaulted to a large, easy-to-develop greenfield site without giving due weight to the permanent loss of its productive capacity. This is not a sustainable approach to planning for the future.

The loss of this land also has a direct impact on the rural character of the area and the viability of the local rural economy. The allocation erodes the essential green buffer between the city and the countryside, contributing to urban sprawl and diminishing the very landscape that makes Canterbury special.

Therefore, I object to the allocation of Policy N1. It is based on an incomplete evidence base regarding land quality, it is inconsistent with the spirit and letter of national policy on protecting BMV land, and it is an

unjustified and unsustainable choice when food security is of growing importance. I urge the council to find the policy unsound and remove it from the plan.

Yours faithfully,

Linda Huggett

[REDACTED]

[REDACTED]

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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 12:06  
**To:** Consultations  
**Subject:** Subject: Formal Objection: Policy N1 (Merton Park) is Unsound and Fails to Respect Environmental Limits

**Categories:** AI?

**--Email From External Account--**

Dear Planning Policy Team,

I am writing to register a formal objection to the allocation of Policy N1 (Land at Merton Park), as I believe it to be unsound. The policy is not **positively prepared** because it proposes a quantum of development that is fundamentally unsustainable within the well-documented environmental limits of the Stour Valley catchment area, particularly in relation to water resources and nutrient neutrality.

The issue of nutrient pollution affecting the Stodmarsh Special Protection Area (SPA), Special Area of Conservation (SAC), and Ramsar site is the single most significant environmental constraint on development in the district. Natural England's advice on this matter has been clear and binding: any new development that results in a net increase in wastewater cannot be permitted unless it can be proven to be 'nutrient neutral'. To propose a new settlement of approximately 1,930 homes—generating wastewater from a population of over 4,500 people—without a clear, costed, and legally certain strategy for achieving this neutrality is speculative and reckless.

The Draft Local Plan and its supporting documents offer no such certainty. They rely on vague aspirations and potential future mitigation schemes that are not yet in place, funded, or proven to be effective at the scale required. This renders the policy entirely ineffective and undeliverable. To allocate such a massive site on the mere hope that a solution will eventually be found is not sound plan-making. The environmental risks are too high, and the plan fails to provide the necessary assurances that the integrity of internationally designated nature conservation sites will be protected, as required by the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations').

Furthermore, beyond the issue of nutrient pollution, there is the equally critical challenge of water neutrality. The South East of England is a severely water-stressed region. Any major new development places an additional burden on finite water resources for drinking, sanitation, and agriculture. The plan does not adequately demonstrate how the water demand from nearly 2,000 new homes at Merton Park will be met sustainably without causing environmental harm, such as through abstraction from the sensitive chalk aquifer of the River Stour.

A **positively prepared** plan would be strategy-led, confronting these environmental limits head-on and shaping the quantum and location of growth accordingly. It would direct development towards areas where solutions are deliverable or where the environmental impact is lowest. Instead, this plan proposes a massive development in a highly sensitive location and defers the resolution of these critical, show-stopping constraints to a later date. This is a fundamentally flawed approach.

The allocation of Merton Park is therefore unsound. It is based on wishful thinking rather than a robust assessment of environmental capacity. It is not deliverable within the known legal and environmental

constraints and is therefore inconsistent with the highest levels of national and international environmental protection policy. The allocation must be deleted.

Yours faithfully,

Linda Huggett

[REDACTED]

[REDACTED]

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**From:** tony [REDACTED] >  
**Sent:** 20 October 2025 12:04  
**To:** Consultations  
**Subject:** Subject: A Local Resident's Objection to the Unsound and Damaging Merton Park Plan (Policy N1)

**Categories:** AI?

[REDACTED] [nt](#)

**--Email From External Account--**

Dear Planning Policy Team,

As a long-term resident of South Canterbury, I am writing to express my profound dismay and to formally object to the proposed allocation of land at Merton Park (Policy N1). This plan is not just a document of policies and numbers; it is a proposal that will fundamentally and permanently degrade the quality of life for me, my family, and my neighbours. I believe the plan is unsound because it has not been **positively prepared** with the wellbeing of the existing community at its heart.

For years, we have lived with a road network that is already at breaking point. Every morning and evening, Nackington Road becomes a slow-moving car park. The idea of funnelling the traffic from nearly 2,000 new houses onto this and other local roads is frankly terrifying. This isn't a minor inconvenience; it means more pollution outside our homes and schools, more time wasted in traffic, and more stress in our daily lives. The so-called transport "solutions" in the plan feel like a cynical joke, completely disconnected from the reality we face every day. They will not work, and we, the existing residents, will bear the consequences.

Our local services are already stretched to their absolute limit. I have personally experienced the difficulty in getting a doctor's appointment and have heard countless stories from neighbours about the struggle to find school places for their children. How can the council possibly justify adding a new population the size of a large town to this area without a concrete, funded, and guaranteed plan to bolster these essential services first? The policy's vague promises of a new school and health facilities are not enough. We need guarantees, not aspirations, and this plan provides none. This is not **effective** planning; it is a recipe for social infrastructure collapse.

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 children play, and where we find a moment of peace away from the city. I have personally seen a huge variety of birdlife there, and it is a cherished local asset. To see it bulldozed for a featureless housing estate would be a heartbreaking 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.

This is not a case of "NIMBYism." This is a desperate plea for sustainable, responsible, and compassionate planning that considers people first. The Merton Park allocation fails on all counts. It will create traffic misery, overwhelm our services, and destroy a precious green space. It is an unsound, unjust, and deeply damaging proposal. I urge you to listen to the community you serve and remove it from the Local Plan.

Yours faithfully,

Linda Huggett



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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 12:02  
**To:** Consultations  
**Subject:** Subject: Objection to Policy N1 (Merton Park): An Ineffective and High-Risk Allocation Lacking a Deliverable Strategy

**Categories:** AI?

**--Email From External Account--**

Dear Planning Policy Team,

Please accept this as a formal objection to the proposed allocation of Policy N1 (Land at Merton Park) within the Draft Local Plan. My objection is based on a critical assessment of the policy's deliverability, and I contend that the allocation is unsound because it is not **effective** as required by the National Planning Policy Framework (NPPF). The entire strategy for the site is riddled with such a high degree of risk and uncertainty that there can be no reasonable confidence in its successful implementation.

A key test of soundness is that a plan must be deliverable. This means that its policies should be based on realistic assumptions about the availability of resources and the likelihood of infrastructure being provided when needed. Policy N1 fails this test spectacularly. The strategy is built upon a complex and fragile web of dependencies between multiple landowners and developers across the wider South West Canterbury strategic area (including N1, N2, and Site 10).

The delivery of the most critical piece of mitigating infrastructure—the "fast bus-only connection"—is a prime example of this risk. Its route crosses multiple land ownerships. The policy provides no robust mechanism, such as a legally-binding joint delivery agreement or a comprehensive, council-led funding strategy, to guarantee that this connection will be delivered in a timely and coordinated manner. What happens if one developer builds their houses but a neighbouring landowner delays or fails to deliver their section of the bus route? The result is an isolated, car-dependent housing estate and unmitigated traffic chaos on the local road network. A sound plan provides certainty; this policy provides a lottery.

This uncertainty extends to all aspects of the required infrastructure. The phasing requirements set out in the policy are welcome in principle, but in practice, they are vulnerable to variation and negotiation at the planning application stage. Without an upfront, comprehensive masterplan and a single, overarching delivery body, there is a significant danger of a piecemeal and disjointed development where the housing is delivered long before the necessary schools, health facilities, and transport links are in place. This would be a profound planning failure, creating a poor-quality environment for new residents and placing an intolerable burden on the existing community.

The initial collapse of the A2 slip road scheme should have served as a stark warning about the risks of relying on complex, aspirational infrastructure projects. Instead of learning this lesson and selecting more deliverable sites, the council has substituted one high-risk strategy for another. The plan is not **effective** because there is no credible guarantee that its core requirements can be implemented. It is based on the hope that multiple commercial actors, each with their own priorities, will seamlessly cooperate to deliver a public good. This is not a sound basis for strategic planning.

I therefore object to this unsound allocation. The level of risk associated with its delivery is unacceptable. The council must prioritise certainty and deliverability in its Local Plan by removing high-risk, speculative allocations like Merton Park.

Yours faithfully,

Linda Huggett

[REDACTED]

[REDACTED]

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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 12:00  
**To:** Consultations  
**Subject:** Subject: Formal Objection: Policy N1 (Merton Park) is Unsound and Contradicts the "Brownfield First" Principle

**Categories:** AI?

**--Email From External Account--**

Dear Planning Policy Team,

I am writing to submit my formal objection to the allocation of Policy N1 (Land at Merton Park) in the Draft Local Plan. This allocation is fundamentally unsound because it is not **justified** and fails to represent a sustainable pattern of development, directly contradicting the long-established "brownfield first" principle that is a cornerstone of effective land use planning in England.

The National Planning Policy Framework (NPPF) places a clear emphasis on making effective use of land, encouraging the reuse of previously developed land (brownfield sites) in sustainable locations before resorting to the irreversible loss of valuable greenfield sites. The allocation of Merton Park, a vast and sensitive greenfield area, for a strategic-scale development represents a significant departure from this core principle. It signals a planning strategy that defaults to the path of least resistance—urban sprawl—rather than undertaking the more complex but ultimately more sustainable work of urban regeneration and renewal.

A **justified** plan must be the "most appropriate strategy, when considered against the reasonable alternatives". The council's evidence base does not adequately demonstrate that all reasonable alternatives to this massive greenfield release have been exhausted. It is not sufficient to simply state that there is a housing need; the plan must show that it has robustly explored all opportunities for meeting that need through the densification of existing urban areas, the redevelopment of underused industrial or commercial land, and the conversion of existing buildings. Without a comprehensive, district-wide audit demonstrating that brownfield capacity has been maximised, the allocation of Merton Park cannot be considered the most appropriate or justified strategy.

Furthermore, a **positively prepared** plan should be based on a strategy that seeks to meet development needs in a way that is sustainable. Relying on peripheral, car-dependent greenfield sites is an inherently unsustainable model. It increases journey times, places greater strain on infrastructure, locks in high levels of private car use, and erodes the distinction between the city and the countryside. A truly positive strategy would focus on creating compact, walkable neighbourhoods by recycling land within the existing urban footprint, thereby supporting local services, reducing the need to travel, and enhancing the vitality of the city centre.

The allocation of Merton Park is a short-term solution with permanent negative consequences. It will lead to the loss of productive agricultural land, the destruction of a valuable natural habitat, and the erosion of the city's historic landscape setting. These are precious, finite resources. To sacrifice them before demonstrating that all brownfield alternatives have been exhausted is a failure of responsible planning.

For these reasons, the allocation of Policy N1 is unsound. It is not justified against reasonable alternatives and it is not consistent with the national policy imperative to prioritise brownfield development. I urge the council to adopt a truly sustainable spatial strategy, delete this allocation, and refocus its efforts on urban regeneration.

Yours faithfully,

Linda Huggett

[REDACTED]

[REDACTED]

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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 11:58  
**To:** Consultations  
**Subject:** Subject: Objection to Policy N1 - A Fundamentally Unsustainable Allocation due to Cumulative Impact

**Categories:** AI?

**--Email From External Account--**

Dear Planning Policy Team,

I am writing to object to the allocation of Policy N1 (Land at Merton Park). My objection is based on the plan's critical failure to adequately assess the **cumulative impact** of this vast strategic site when added to the existing and committed developments in South Canterbury. This failure means the plan is not **positively prepared** or **effective**, as it cannot demonstrate that the required social and physical infrastructure can support the proposed level of growth. Policy N1 is not an isolated proposal; it is the tipping point that threatens to overwhelm our community's services.

The area of South West Canterbury is already under significant development pressure. The Local Plan 2017 allocated major sites, such as the former Chaucer Technology School (Site 10), which are still being built out. Local infrastructure, designed for a much smaller population, is already showing signs of severe strain. Local GP practices have long waiting lists for appointments, our primary schools are at or near capacity, and, as is widely acknowledged, the road network is frequently gridlocked.

The proposal to add approximately 1,930 new dwellings at Merton Park, which could equate to a new population of over 4,500 people, is not sustainable. The Draft Local Plan and its supporting documents fail to provide a convincing, integrated strategy for how this cumulative pressure will be managed. While Policy N1 makes generic references to the need for new facilities, such as a primary school and local centre, it treats the site as a self-contained island. It does not properly address the compound effect on shared, city-wide infrastructure.

For example, where is the provision for secondary school places for the hundreds of new teenagers this development will bring? Where is the plan for expanding the capacity of our already struggling hospital? How will the increased wastewater from thousands of new homes be managed, particularly in the context of the sensitive Stour catchment and the Stodmarsh issue? The plan offers vague policy aspirations but no concrete, costed, and deliverable infrastructure delivery plan to address these cumulative impacts.

The transport situation is the most acute example. The traffic from Merton Park will not remain within the site's boundaries. It will pour onto the same congested arteries—Nackington Road, Wincheap, the A28—that are already used by residents from existing housing and committed developments. The plan's failure to assess and mitigate this cumulative transport impact makes the entire spatial strategy for South Canterbury unsound.

A sound Local Plan must be **effective**, meaning its proposals for infrastructure must be deliverable in a timely manner. This plan provides no such guarantee. It allocates a huge quantum of development without a credible, holistic plan for the infrastructure required to support it. It is an unsustainable, piecemeal

approach to planning that will have severe negative consequences for the existing community. I therefore object to this unsound allocation and urge its deletion.

Yours faithfully,

Linda Huggett



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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 11:56  
**To:** Consultations  
**Subject:** Dear Planning Policy Team, Please accept this as a formal objection to the proposed allocation of Policy N1 (Land at Merton Park / SLAA151) in the Draft Local Plan. I contend that this allocation is unsound because it is demonstrably not consistent with n

**--Email From External Account--**

Dear Planning Policy Team,

I am writing to submit a formal representation on the Draft Local Plan, finding the allocation of Policy N1 (Land at Merton Park) to be unsound on procedural grounds. The decision to include this highly sensitive and contentious strategic site in the draft plan is premature and not founded upon a complete, robust, or adequate evidence base, meaning the policy cannot be considered **justified** as required by the National Planning Policy Framework.

A sound plan-making process requires that fundamental questions of a site's suitability and deliverability are answered *before* that site is selected for allocation. The allocation in the Local Plan establishes the principle of development. To establish this principle in the absence of critical supporting evidence is a failure of due process and amounts to pre-determination. The council is effectively making a decision to approve the site for development without having the necessary facts to properly justify that decision.

In the case of Merton Park, there are at least two fundamental, unresolved issues that render its allocation at this stage procedurally improper:

1. **The Absence of a Viable Transport Strategy:** The council's own documents confirm that the original, essential A2 slip road scheme is undeliverable. The replacement strategy, based on sustainable transport modes, is not supported by any robust evidence or transport modelling to demonstrate that it can possibly mitigate the impact of circa 1,930 new homes. By allocating the site now, the council is committing to a quantum of development without having a credible solution for the traffic it will generate. This is a clear case of putting the policy "cart" before the evidentiary "horse." A sound process would require a fully-costed, modelled, and deliverable transport solution to be in place *before* the site is deemed suitable for allocation.
2. **The Lack of a Comprehensive Ecological Assessment:** There is significant and credible local evidence of the site's high ecological value, including the presence of a Priority Habitat (traditional orchard) and protected Red List bird species. A sound plan would be informed by a full, independent Ecological Impact Assessment, undertaken at the correct time of year, to establish a comprehensive baseline of the site's biodiversity. The current policy improperly defers this crucial evidence-gathering to a later stage. The principle of development should not be accepted before the full extent of the potential environmental harm is understood and quantified. To do so makes a mockery of the mitigation hierarchy's primary principle of "avoidance."

By allocating this site with these major questions unanswered, the council is failing in its duty to prepare a **justified** and **effective** plan. The policy is based on hope rather than evidence. This approach exposes the

plan to a high risk of being found unsound at examination, as it cannot be demonstrated that the strategy is deliverable or that it is the most appropriate when considered against reasonable alternatives.

Therefore, on the grounds of procedural impropriety and the reliance on an incomplete and inadequate evidence base, I object to the allocation of Policy N1. It must be withdrawn from the plan until and unless these fundamental evidential gaps are filled.

Yours faithfully,

Linda Huggett



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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 11:53  
**To:** Consultations  
**Subject:** Subject: Formal Objection to Draft Local Plan: Policy N1 (Merton Park) - Unsound and Inconsistent with National Biodiversity Policy

**--Email From External Account--**

Dear Planning Policy Team,

Please accept this as a formal objection to the proposed allocation of Policy N1 (Land at Merton Park / SLAA151) in the Draft Local Plan. I contend that this allocation is unsound because it is demonstrably not **consistent with national policy**, specifically the legal and policy duties to protect and enhance biodiversity as enshrined in the National Planning Policy Framework (NPPF) and the Natural Environment and Rural Communities (NERC) Act 2006.

The site at Merton Park is not the low-grade, ecologically sterile land that might be suitable for such intensive development. On the contrary, it contains a traditional orchard, 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. As local residents and amateur naturalists have extensively documented, 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". The very first step in the established mitigation hierarchy—a cornerstone of environmental planning—is **avoidance** of harm. The allocation of this site represents a complete failure to adhere to this principle. Instead of avoiding harm to a known Priority Habitat, the plan proposes its wholesale destruction. This runs directly counter to the national objective of reversing biodiversity decline.

The council's evidence base appears to be critically flawed. The Strategic Land Availability Assessment (SLAA) and the Habitats Regulations Assessment (HRA) seem to have underestimated, or entirely overlooked, the intrinsic value of the site itself. The HRA's focus is on impacts to designated European sites, but this does not absolve the council of its duty to protect biodiversity within its own district boundaries, as required by the NPPF. The policy's weak requirement for a future assessment of "functionally linked land" is procedurally improper. A full, independent Ecological Impact Assessment, including detailed species surveys conducted at the appropriate time of year, must inform the plan-making process itself, not be deferred as a condition of a future planning application. To allocate the site first is to accept the principle of its loss before the true ecological cost is understood.

The concept of biodiversity net gain cannot be used to justify the destruction of irreplaceable habitats like a traditional orchard. The complex, long-established ecosystem of a mature orchard cannot be meaningfully replicated elsewhere. Any "offsetting" proposal would be a poor substitute for the existing, high-value habitat.

Therefore, the allocation of Policy N1 is unsound. It is in direct conflict with national policy, it is based on an inadequate evidence base, and it proposes an act of profound and irreversible environmental harm. I urge you to uphold your statutory duties, find the policy unsound, and delete this allocation to protect our natural heritage.

Yours faithfully,

Linda Huggett

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** tony [REDACTED]  
**Sent:** 20 October 2025 11:48  
**To:** Consultations  
**Subject:** Subject: Formal Objection to Draft Local Plan: Policy N1 (Merton Park) is Fundamentally Unsound on Transport Grounds  
Subject: Formal Objection to Draft Local Plan: Policy N1 (Merton Park) is Fundamentally Unsound on Transport Grounds  
Subject: Formal Objecti

**--Email From External Account--**

Dear Planning Policy Team,

I am writing to submit a formal and detailed objection to the allocation of land at Merton Park (Policy N1 / SLAA151) within the Draft Canterbury District Local Plan. My objection is founded on the clear evidence that the allocation is unsound, specifically because its proposed transport strategy is not **justified**, **effective**, or based on a credible assessment of the development's impact on the local and strategic highway network.

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 quantum of development was originally considered acceptable. The justification for the allocation has not merely been altered; it has collapsed entirely.

The replacement strategy, which hinges on "extensive upgrades to walking and cycling routes" and a "bus-only connection," is a wholly inadequate and unrealistic substitute for strategic road infrastructure. To suggest that such measures can effectively mitigate the vehicle trip generation from approximately 1,930 new dwellings, a major regional sports hub, and associated local facilities is not a serious or evidence-based proposition. A development of this magnitude, located on the city's periphery, will inevitably generate a significant number of private car journeys for commuting, education, retail, and leisure purposes. These journeys cannot and will not be absorbed by the proposed sustainable transport measures alone.

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. The plan is therefore not **positively prepared**, as it fails to propose a sustainable pattern of development, instead creating a car-dependent community with severe, negative externalities.

Furthermore, the plan's delivery strategy for even these inadequate measures is not **effective**. The policy's success relies on the complex and uncertain coordination of multiple developers across different land parcels (N1, N2, and Site 10) to deliver key infrastructure like the bus link. There is no single, robust delivery mechanism to guarantee these works are completed comprehensively and, crucially, *before* the

occupation of new homes. The risk of housing being built and sold while the promised infrastructure remains undelivered is unacceptably high.

In conclusion, the transport strategy for Policy N1 is based on the failed logic of a withdrawn road scheme and has been replaced by an aspirational but ultimately undeliverable and inadequate set of measures. The policy fails the tests of soundness on multiple fronts. I strongly urge the council to recognise these fundamental flaws, find the policy unsound, and delete the allocation from the Local Plan.

Yours faithfully,

Linda Huggett

[REDACTED]

[REDACTED]

[REDACTED]