

Dear Canterbury City Council

I would like to object to the proposed allocation of 1930 houses at Merton Park. Whilst I appreciate the pressures and the complexity involved on this, I think this proposal is poorly thought through, without thought for how it would integrate with the surrounding area. I am grateful to you for the opportunity to feed in, as I think some form of development could be of benefit to the area. So instead I would like you to consider a development that has appeals to the best interests of the local residents, the infrastructure of Canterbury and the biodiversity and history in this area. At the end of my message I have made some suggestions.

I have separated my concerns into sub-headings for your convenience.

1. Traffic

Wincheap traffic is already poor, with the development at Saxon Fields likely to add to this. The Wincheap gyratory system has already attracted lots of criticism as traffic modelling was done on out-of-date data. There is still a single choke point in that there are only two lanes available to join Canterbury ring road.

Cancelling the proposed slip road onto the A2 now means that all traffic will have to enter via Hollow Lane or Nackington Lane, or potentially Stuppington Lane and Lime Kiln Road.

Hollow Lane is already narrow, and a struggle for two vans to pass. It has lots of foot traffic in and around it, and the traffic calmed area on Homersham is also increasingly difficult to navigate and joins another choke point by Dunelm. Nackington lane queues are not uncommon, though marginally better, but canterbury is already beset by bad traffic. This proposal has not set out adequate consultation. There must be a comprehensive traffic analysis before this gets the go ahead, also factoring in other developments and the gyratory. 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).

Lime Kiln and Stuppington are unsuitable for more traffic. The former already barely navigable, and the latter risking causing traffic delays around the hospital.

2. Environmental impact

This part of Canterbury already has the highest level of air pollution. Green spaces removed 28000 tons of pollution in 2017 alone, with an estimated cost saving in health of £162 million. Removing all the green space will worsen Canterbury's pollution problem, and the proposed high speed bus link to mitigate some pollution does not exist.

The orchards are very biodiverse. Far more biodiverse than grassland around Blean. There have been 38 species of bird recorded in the past 2 years on these orchards. 11 of these are on the Red list. Aside from birds there are multiple other species including badgers, bats, shrews, stoats, foxes and rabbits. This plan puts in no provisions to maintain this biodiversity. Canterbury's Green Infrastructure Strategy 2018 specifically calls out that it will protect biodiversity, enabling gains in local biodiversity. This proposal will do the opposite.

Canterbury's Green Infrastructure Strategy 2018 specifically identifies that lack of access to green space coincides with poorest health. It also calls out that whilst Northern Canterbury meets the requirements for green space, Southern Canterbury does not.

Loss of farmland at a time when people are increasingly aware of the environmental footprint of their food is irresponsible. These orchards and fields have been educational and part of the community's history for 50 years.

Any future plan must identify, map and safeguard ecological networks and wildlife-rich habitats, and secure measurable net gains (NPPF 186, 187).

Impact on the community health

The green space and footpaths around the orchards are used by hundreds of dog-walkers and local people every day and have been for decades. My

neighbour Linda, has asked me to report that she has played in them for 50 years. The area depends on this space for recreation, exercise and for the benefits on mental health. Wincheap is one of the more deprived areas of Canterbury and you want to take away our only green space. A large 10-year study showed that people with close access to green and blue spaces have better mental health with less anxiety and depression.

The proposal talks about improving the play area at the top of Lime Kiln and seeing a green corridor from the quarry down to Elham Gardens area. This corridor already exists and is inaccessible. The Quarry is not a suitable replacement for recreation with sheer walls. This proposal needs real and meaningful green space that can serve the community – a community with disabled people, young children, people exercising and dog walkers. A small patch of green sandwiched between the top of Lime Kiln and the highest density housing of the development will be entirely inadequate. The proposed sports hub, also must be open and freely available for all to use whenever, otherwise it will further inequality and be an extremely poor replacement for the Thannington recreation ground.

3. Inequality

The wealthy people of Blean are able to push all development away from them. They have Blean Woods on their doorstep, less pollution, less traffic. This proposal does nothing to address the inequalities, with Wincheap being far more deprived community. The next plan must address this imbalance, and look to level up the poorer parts of the city, not overlook their concerns.

4. Infrastructure Limitations

Healthcare: This plan includes no GP practice and The Canterbury hospital redevelopment remains unfunded and uncertain. There is no plan to manage additional demand. Strategic policies must make sufficient provision for health, education, transport and community facilities (NPPF 20).

Sewage and Drainage: Southern Water's network is already under strain, with frequent discharges into rivers and coastal waters. Without guaranteed upgrades, almost 2,000 new homes would further increase pollution and flood risk.

There is a line in the plan about water treatment plant in the area. What is the impact of this? If it is similar to the one in Sturry, it can create very unpleasant smells in the area.

Schools and Community Facilities: While a school, sports hub and community centre are proposed, there is no binding timetable or enforcement. These are approved by KCC, and experience elsewhere in Kent suggests these facilities often lag behind housing. 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).

Proposed transport links are speculative and it is unrealistic to expect them to alleviate the traffic. People will still need cars, delivery drivers will still be bringing food/goods. A hypothetical fast bus link will not solve this, and with the expected traffic issues, there is no way it will be fast.

Cycle routes into canterbury sound great, except they are not continuous and still cross over roads throughout Wincheap which are already struggling with traffic. More thought needs to be put into place to ensure these are a real and useable alternative

5. Deliverability Concerns

Mountfield Park was approved in 2016, yet no homes have been built. Chilmington Green near Ashford, planned for up to 5,750 homes, has progressed very slowly with schools and community facilities still missing more than a decade later.

These examples 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).

6. Heritage and History

We live in a world heritage site. The provision of thin corridors of viewing remove spectacular views from across the landscape. This should be considered carefully.

The route of a Roman Road joining up with Stone Street cuts right through the development area. It is still the route of a footpath to this day. This should be excavated carefully and the design of the plan should look to acknowledge this.

Conclusion:

The allocation of Merton Park would create prolonged uncertainty and disruption for local communities, with no assurance that critical infrastructure will be delivered in step with housing. Local roads, including South Canterbury Road, Nackington Lane, Hollow Lane and Lime Kiln Road, are already unsuitable. Healthcare and sewage services are stretched, and farmland and green space of both practical and heritage value would be lost.

This allocation does not meet the NPPF tests of soundness. It is not justified by proportionate evidence, not effective in terms of delivery, and not consistent with Canterbury Council's own policies. The council must commit to a full and honest traffic analysis, and an assessment on the impact of local biodiversity and health before proceeding.

Alternate suggestion

I suggest a smaller proposal, reinstating the slip road onto the A2 and focussing the development towards Nackington Road/the Rugby club. This way there is at least more scope for traffic solutions and less pollution issues.

To provide green space and uninterrupted views of canterbury for the new houses and Wincheap I would suggest leaving a wide strip of land between

the end of the quarry next to Stuppington Lane straight across to opposite the play area next to Birch Road. This would encompass the mature tree at the top of the hill near Merton Farm.

This parcel of land would serve as an excellent park for the new development and Wincheap area. The existing playground would be expanded alongside the currently proposed green corridor, and a safe accessible walk would be created to allow some access to the quarry area, but with an emphasis on preserving wildlife.

This will take less than a fifth of the land from the plan but will meet your commitments in the canterbury green strategy, mitigating the disastrous effects on biodiversity, pollution and mental health the current plan affords. Leaving this space ensures some of the orchards (both pear and apple) and hedgerow and many mature trees are protected. It would be a community focal point and an enduring legacy for this part of Canterbury,, contributing to tackling some of the inequalities we see. It will also allow the land to be brought from the private owners, protecting it from being exploited with less thought and consultation than the is currently happening.

I would also strongly suggest healthcare provision, perhaps a dedicated GP surgery with assurances that it will be in place, and the same regarding schools and other transport links.

Thank you for your time and consideration. I am happy to discuss anything further if it can be in anyway helpful.

Yours sincerely

Dr Samuel Godfrey

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