

## Policy N1: Land at Merton Park

I strongly object to the proposal to build 'Merton Park'. This proposal will strip all of the agricultural land between Hollow Lane and the rugby club and replace it with nearly 2000 houses.

The local plan states 'Local Plans enable growth to be delivered in a coordinated manner, with the necessary infrastructure and services, while protecting our most important greenspaces, landscapes and habitats from inappropriate development'. This proposed plan is contradictory to this statement and the level of uncertainty, omission of detail and inaccuracies in the plan is astounding.

### 1. Transport and Roads

Transport needs to be addressed and agreed as a priority with KCC and Highways England and concrete proposals submitted so that residents can comment in an informed way.

With the cancellation of the A2 slip road traffic will be funnelled onto highly unsuitable local roads such as Hollow Lane, Nackington Rd and incredibly Lime Kiln Rd. These roads in South Canterbury are already under considerable strain.

- Lime Kiln Road is especially unsuitable as it is narrow and windy and in part forms a footpath. It cannot safely accommodate additional traffic and it is not possible for two cars to pass for much of the road. One car has to back down the road to allow the oncoming car to pass. In some places it will not be possible to widen the road as houses are on either side of it. Gordon Rd which already suffers from significant traffic from Wincheap (road) into Wincheap will be used to access Lime Kiln Road. In addition, as Lime Kiln Road is unsuitable for heavy traffic, Martyrs Field Road, Guildford Rd and Oxford Rd will see increased levels of road traffic and pollution.
- Hollow Lane is narrow and is ~ 200m from to Wincheap Primary School. Please read ['Mitigating Exposure to Traffic Pollution in and Around Schools'](#). Has any consideration been given to the higher levels of pollution that will result from increased traffic in Hollow Lane? As children are smaller, they are closer to exhaust pollution. The exposure of children to air pollution is associated with a lack of alertness and concentration, as well as bronchitis, stunted lung development, and an increased risk of long-term conditions including asthma and other respiratory diseases.
- Wincheap will then receive significant additional traffic to add to the present congestion. In the [Canterbury City Council Air Quality Plan](#) it is the only road in Canterbury where modelled annual mean NO2 concentrations are more than 40micrograms/m square.

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), the Merton Park proposal would have a severe impact on the roads in Wincheap.

### 2. Infrastructure Limitations

- Healthcare: The expansion and funding of the Kent and Canterbury hospital is currently uncertain and GP practices are at capacity. There is nothing in the plan to manage the

Commented [RW1]: (Children are short and therefore closer to car exhaust pollution.)

healthcare requirements of additional Canterbury residents. 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. If the 'fully-updated Infrastructure Delivery Plan' is not available until next year it is not possible to comment on the effect of Merton Park (and the other proposed developments). E.g. where would the sewage go? How would it be transported? N1 1) b) V "Provision of a new high quality wastewater treatment work at an appropriate location within the site, or in combination with Site 10" is very vague.
- Schools and Community Facilities: While a school, sports hub and community centre are proposed, there is no binding timetable or enforcement. Experience elsewhere in Kent suggests these facilities often lag behind housing. 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).

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

It is possible to walk from Wincheap into the 'Orchards' in 10 minutes and I have done so for the last 30 years. It is important for Canterbury to protect its green spaces which are near built up or traffic-heavy areas. The draft [Canterbury District Open Space Strategy](#) says 'Open spaces contribute to the health, well-being, cultural heritage, landscape, education, climate change mitigation, biodiversity and movement for people and wildlife. That is exactly what the 'Orchards' represents to Wincheap residents. E.g. the children from Wincheap Primary School use the 'Orchards' for field trips.

The adopted plan emphasized repeatedly (11.4, 11.19-20) that open space is important for mental, social and physical health. This updated plan does not mention it, and crams even more houses into Merton park while removing the main access. Residents in Wincheap and Thanington feel that their mental, social and physical health is being disregarded because the area is comparatively poor. This is socially divisive. People in these areas feel they don't matter.

N2 c "Higher density development will be encouraged in the central and northern parts of the site, closer to the city centre and Wincheap" but 3 c "Provide a significant proportion of the natural and semi natural open space at the southern boundary of the site" near the lower density development (and the views over the cathedral). This means that Wincheap residents will have to walk through the housing estate to access the 'natural and semi natural open spaces'. This feels like an insult, to take away the green spaces nearest to Wincheap. Also, higher density housing will be cheaper housing, so near to Wincheap, and larger more expensive houses will be furthest away from Wincheap. This has an element of social engineering.

The city council is confused as to whether the 'Orchards' are brownfield or greenfield. The government defines greenfield as '[typically refers to land which has not been developed.](#)' Canterbury City Council says '[A raft of proposals have also been added to the draft or strengthened, including: .... prioritisation of brownfield development sites such as Wincheap.](#)' Parts of Wincheap may be but the 'Orchards' are not - in the plan N1 is designated as greenfield!.

- The fields around Stuppington Lane are part of Canterbury's historic rural setting and also productive farmland. At a time when food security is a national issue, it is unwise to

permanently lose this land for food production. [The UK Food Security Report 2024](#) states that 'Long term decline in the UK's natural capital is a pressing risk to UK food production. The relatively low production to supply ratios shows that the UK is more reliant on imports of fruits and vegetables than for other components of the UK diet. Planning policies should recognise the benefits of the best and most versatile agricultural land (NPPF 145).

- These green spaces also support biodiversity, from hedgerows and pollinators to bats, slow worms, frogs, and farmland birds. 38 species of birds have been recently recorded in the 'Orchards' including sparrow hawks, meadow pipits, spotted flycatchers and Cetti's warbler. The planned narrow landscaped buffers will not compensate for the continuous, diverse landscape that is found in the 'Orchards'. For wildlife to thrive large uninterrupted spaces with diverse terrain are needed. This is what the 'Orchards' and the fields around them currently provide. Plans should identify, map and safeguard ecological networks and wildlife-rich habitats, and secure measurable net gains (NPPF 186, 187).
- The orchards and fields here offer uninterrupted views of Canterbury Cathedral, a perspective captured in many historical paintings. These views are of cultural and heritage value. It is areas like this that make Canterbury a beautiful city, once built over we have lost them for ever. Great weight must be given to conserving designated heritage assets and their settings (NPPF 207), and any harm must be weighed carefully against public benefits (NPPF 210).

#### **4. Benefits to the local community?**

The introduction to the Local Plan states '.....we now need to plan for a higher level of housing needs over the full period of the Local Plan to meet the LHN requirements.' Whose needs are being planned for?

1.18-1.20 highlights the aspiration for affordable housing but recognises the difficulty with funding to the extent that 'some flexibility may be needed in terms of any relevant policies within the new Local Plan'. Are there (any) new building schemes in the area where aspirational levels of affordable housing have been met? Developers will promise to deliver affordable housing (also schools and community facilities) but may change their priorities especially on large projects.

At Saxon Fields the houses are described as ' - A luxury collection of two, three and four bedroom homes close to Canterbury. Prices range from £379,995 to £659,995. The average price house price in Canterbury, England at £336,000 in June 2025 (Office of National Statistics). What would be the average house price for Merton Park?

#### **Conclusion**

The proposed Merton Park development would cause long-term uncertainty and major disruption for local communities. There is no assurance that essential infrastructure or community facilities will be delivered on time — or at all.

Local roads such as South Canterbury Road, Nackington Lane, Hollow Lane, and Lime Kiln Road cannot safely accommodate the extra traffic from around 2,000 new homes. Healthcare and sewage systems are already at capacity, and valuable farmland and green space — important both for food security and local heritage — would be permanently lost.

This allocation does not meet the NPPF tests of soundness: it is not justified by proportionate evidence, not effective in delivery, and not consistent with national policy.

I therefore request that Merton Park be removed from the Local Plan. The Council should instead focus on smaller, sustainable brownfield and town-centre sites that can deliver new housing without harming our local community, food security, or Canterbury's historic and natural environment.

**Policy N3: Thanington Recreation Ground**

2.66 The Thanington community centre and sports facilities were paid for by an EU regeneration project to support people and children in one of the most deprived areas of Canterbury. Canterbury City Council says the most deprived Lower Super Output Area (SLOA ) in the district falls within Wincheap ward, and is in the 20% most deprived areas in the country ([Canterbury District Customer and Community Profile](#)). It is the only green space in this area and my son has played and practised football there. I have received training there as a volunteer for a local charity. It is a warm and welcoming place. Replacing this essential community facility which has free public access with a 'sports hub' a mile away in the middle of a 2000-house development removes one of the very few public facilities that is available to the people who live in Thanington and turns it into a car park. This plan will increase the social inequalities that already – is it the case that Wincheap and Thanington residents do not matter? This has elements of social engineering.

The inevitable increased traffic in this area will also further increase pollution along Wincheap and the surrounding area.