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To: Consultations
Subject: Objection to Canterbury District Local Plan: Regulation 19 Consultation
Attachments: Objection to Policy C10.docx

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I object to the above plan (Canterbury District – Regulation 19) for the following reasons:

The proposed allocation fails to satisfy the National Planning Policy Framework (NPPF) tests of soundness, particularly in relation to whether the plan is “justified”, “effective” and “consistent with national policy”. The scale of development proposed is not supported by adequate infrastructure provision and would result in significant and irreversible harm to the local environment, transport network and rural setting of Canterbury.

Roads, footpaths and transport infrastructure in South Canterbury are already under considerable strain, particularly along South Canterbury Road, Nunnery Fields, Nackington Lane, Hollow Lane and Lime Kiln Road. The NPPF states that development should only be prevented or refused on highways grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network would be severe. In this case, the cumulative impacts of an additional 6,000 dwellings (2 adjacent developments) would clearly place intolerable pressure on an already constrained local network.

Neither Lime Kiln Road nor Stuppington Lane, including their narrow and heavily used footpaths, can safely accommodate substantial increases in traffic. These routes are long-established and valued local amenities used daily by walkers, dog-walkers and schoolchildren travelling to and from school. Increased traffic volumes would significantly reduce pedestrian safety and undermine the character and accessibility of these rural lanes.

Furthermore, the cancellation of the proposed A2 slip road means traffic will inevitably be diverted through unsuitable residential roads, including Norman Road and Nunnery Road, where air quality is already a matter of concern. This conflicts with the NPPF’s objectives to promote sustainable transport, support healthy communities and protect public health and environmental quality.

The fields surrounding Stuppington Lane form an important part of Canterbury’s rural setting, historic landscape and agricultural heritage. They also comprise productive farmland at a time when national food security is increasingly recognised as a strategic concern. The NPPF recognises the economic and environmental value of the best and most versatile agricultural land and seeks to protect and enhance valued landscapes, biodiversity and the natural environment.

The proposed allocation would also result in the loss of wildlife-rich habitats and green spaces which currently contribute to biodiversity, ecological resilience and the setting of the city. This is inconsistent with the NPPF requirement for plans and developments to minimise impacts on biodiversity and provide measurable environmental gains.

In addition to the transport impacts, the proposed scale of development would place unsustainable pressure on healthcare services, sewage infrastructure and other essential public services, all of which are already stretched. The current proposals do not demonstrate convincingly that this infrastructure can be delivered adequately, sustainably or in advance of development. The NPPF is clear that strategic policies should make sufficient provision for infrastructure, community facilities and service capacity required to support development.

A lack of critical infrastructure alone renders this allocation unsustainable. Experience from previous developments demonstrates that promised infrastructure is often delayed, reduced or omitted once development is underway. In this case, even the draft proposals fail to provide confidence that the necessary infrastructure can realistically be delivered.

For these reasons, the proposed South Canterbury/Merton Park allocation is unsound and inconsistent with national planning policy. Merton Park should therefore be removed from the Local Plan. Instead, the Council should prioritise smaller-scale brownfield and city-centre developments where housing can be delivered more sustainably, with less damage to the natural environment, rural communities, biodiversity, food security and Canterbury's unique historic setting.