

Representation to the Regulation 19 Examination of the Draft Canterbury District Local Plan (2042/43)

Barney Parsons – The Wincheap Society

The Wincheap Society represents the interests of residents and small businesses in Wincheap and the immediately surrounding areas. Its overriding objective is to preserve and enhance the distinctive character and environmental quality of the area.

The Wincheap Society recognizes the contribution that other local groups have made to the Regulation 19 consultation on Policy C10 and this representation is solely focussed on access issues.

Introduction

This submission addresses Policy C10 – Land at Merton Park. This is for a comprehensive mixed-use development to include 1,950 dwellings and considerable non-residential development, including a sports hub with a Category 3 Stadium.

Other proposed developments on this site include a new primary school and community hub.

Despite Canterbury City Council's Policy DS18 discouraging the use of private cars, there will nevertheless still be considerable vehicular traffic generated by this development. The Jacobs report (2026)* forecasts increased traffic flow resulting from policy C10.

“There is also significant flow increase in west Canterbury, on Hollow Lane, due to the developments at Merton Park. These include primary vehicle access from Hollow Lane, secondary vehicle access from Nackington Road, one-way traffic on Hollow Lane between the junctions with Wincheap and Hollomede and severing of Stuppington Lane.” Page 43

A map showing the primary access routes from Wincheap can be found at the end of this submission. The brown arrow points to vehicular access and the pink arrows show opportunities to improve cycling and walking.

This submission asserts that the proposals for the primary access to the site are unsound, unjustifiable and impractical. They would place intolerable traffic stress on the surrounding residential area of Wincheap. The current proposals make this site unsuitable for inclusion in the Local Plan as it is currently set out. Local communities have not been considered at an early stage about these access proposals as required by Policy 109 in The National Planning Policy Framework December 2024:- Promoting sustainable transport.

*“Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. **This should involve making transport considerations an important part of early engagement with local communities.**”*

**Jacobs Canterbury Forecasting Report: Canterbury Local Plan 13 February 2026 Page 43*

Are the plans for access to the C10 site sound and justifiable?

The map at the end of this submission shows the primary access route to the site and is taken from the Regulation 19 draft. The base map is many years out of date in that it fails to show a housing development with 48 dwellings known as “The Observatory” which lies to the south of Wincheap Foundation Primary School. There is also a roundabout, constructed to provide access to Homersham from Hollow Lane and The Observatory which also is not shown.

An implication of this error is that it implies that there might be land available to widen parts of Hollow Lane which instead lies within the curtilage of The Observatory development. It is unsound planning which uses maps which are incorrect and outdated and clarification is needed.

Are the primary access road proposals sound?

The local plan identifies 3 residential roads for primary vehicular access to this site.

- **Birch Road** is a residential cul-de-sac and does not at present connect to Hollow Lane. It would require demolition of a large dwelling to connect it to Hollow Lane. Residents of this area have not been consulted. The brown arrow in the plan clearly indicates that it is to be part of the primary access route.
- **Hollow Lane** is narrow with no footway in many places. The local plan states that there should be one-way traffic between Wincheap and Hollowmede but does not specify in which direction traffic could travel in the one-way section. It is unclear how on-street parking in Hollow Lane, and the proposed cycle lanes are to be accommodated in the narrow throughway. With the proposed gyratory system for Wincheap, residential access to Hollow Lane could become problematic. The local community has not been engaged with regard to these changes.
- **Homersham** is a residential road with traffic calming measures which connects Hollow Lane to the major junction with the A28 and the A2. With a one-way Hollow Lane, it is likely to be the most used two-way access route to the development. Like most residential roads in Wincheap, using it as a “through” route is difficult, and it has been designed to discourage through traffic. Again there has been no engagement with the local community.

These roads are all inadequate for access to such a major residential and non-residential development. Data is lacking as to whether the proposals will lead to ‘rat runs’ and congestion in neighbouring roads and in Wincheap as a whole, especially in the road outside Wincheap School.

Mitigation measures to accommodate traffic will need to include removal of a substantial amount of footway which is not justifiable or safe, given the presence of a nearby primary school.

Alternative access routes to this site could be found which would avoid Wincheap altogether. A new junction off the A2 south-east of Wincheap could provide vehicular access to and from this development should it go ahead. This is not currently under consideration in the local plan.

