

FORMAL REPRESENTATION TO THE REGULATION 19 CONSULTATION CANTERBURY DISTRICT LOCAL PLAN 2040

Policy/Objected Site: Policy C10 – Merton Park Strategic Allocation

To whom it may concern,

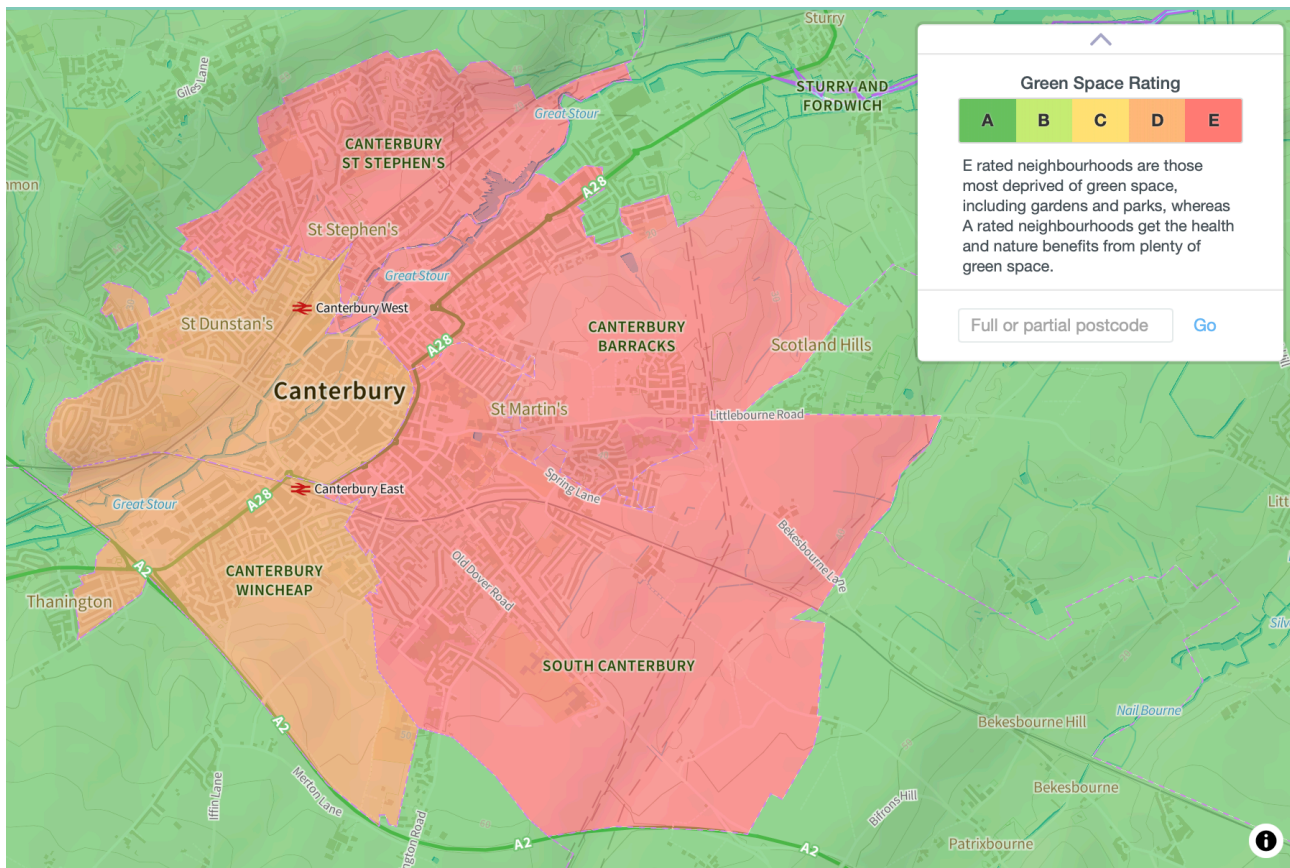
I am writing to lodge my objection to Policy C6 (Merton Park) on the grounds that the allocation is unsound and may not be legally compliant. The allocation has not been justified through proportionate and robust evidence, and it relies upon uncertain mitigation measures, understates cumulative environmental effects, and fails to demonstrate that the scale of development proposed can be delivered without unacceptable impacts upon air quality, biodiversity, transport infrastructure and the setting of Canterbury. The allocation is therefore inconsistent with the soundness requirements of the National Planning Policy Framework (NPPF), specifically that plans must be:

- positively prepared,
- justified,
- effective,
- and consistent with national policy.

The current Local Plan does not meet those sound requirements. What follows are 6 key areas of failures of the soundness of the plan are areas of legal compliance that require closer scrutiny. This is followed by a conclusion, primarily of bullet points.

1. AIR QUALITY AND IMPACT ON TRAFFIC

The evidence base does not adequately demonstrate that the proposed scale of development at Merton Park can be accommodated without materially worsening existing air-quality problems and congestion within Canterbury and along the A2 corridor. Canterbury already experiences significant congestion and contains declared Air Quality Management Areas. The city's constrained historic form and topography increase sensitivity to traffic-related pollution accumulation. The current local plan, even if fully realised, would worsen the air quality, not improve it. The Local Plan and its evidence library do not address the distinction topography of Canterbury, situated in a geographic 'bowl', which traps pollution. Many of the plans to counteract the substantial loss of green space, trees, hedges and farmland take place outside of the 'bowl', the effect of which would be extremely minimal because polluting elements like carbon flow down the sides of the bowl and sit at the lowest points in the city centre. The current plan not only removes a substantial amount of green space in the 'bowl', but the mitigations proposed will make those effects much worse. The Friends of the Earth have an interactive map of the UK ranking all areas for their 'access to green space' and the bulk of Canterbury gets the worst possible rating, apart from the Wincheap area which gets only the second-to-worst rating: precisely the green space the current local plan aims to remove and then develop into a housing estate.



Friends of the Earth 'Green Space Rating' for Canterbury (accessed 17 May 2026)

The Sustainability Appraisal appears to acknowledge transport and air-quality effects but relies heavily upon assumed mitigation measures including modal shift, sustainable transport uptake and strategic transport interventions without demonstrating with certainty that: these measures are fully funded, that they are deliverable within the plan period, or even if they are capable of offsetting cumulative impacts arising from the scale of proposed growth (relating in large part to the bowl effect of Canterbury, remarkably, overlooked in the proposal). The Sustainability Appraisal therefore appears to rely upon speculative mitigation assumptions rather than robust evidence of actual environmental capacity. The Local Plan is consequently not justified or effective.

2. CUMULATIVE ENVIRONMENTAL EFFECTS

The Sustainability Appraisal appears to assess environmental effects in isolation rather than properly considering cumulative effects arising from:

- concurrent strategic allocations,
- traffic growth,
- infrastructure pressure,
- and progressive urbanisation around Canterbury.

Nor does it take adequate account of the cumulative effects of multiple allocations upon (nor have these areas in particular been robustly assessed):

- congestion,
- nitrogen dioxide concentrations,
- landscape character,
- ecological connectivity,
- and public health

3. HEDGEROWS, BIODIVERSITY AND ECOLOGICAL CONNECTIVITY

This is a significant omission given the acknowledged environmental constraints affecting Canterbury. The Merton Park allocation would result in substantial development of currently open land containing established hedgerows and ecological corridors. The evidence base does not adequately demonstrate how important hedgerows (more than 7km of them around the Merton site alone), mature habitat networks and ecological connectivity would be retained and protected. Instead, the Sustainability Appraisal appears to rely upon generic assumptions regarding biodiversity, net gain, and landscaping mitigation without demonstrating that:

- existing ecological functions can realistically be replicated,
- habitat fragmentation can be avoided,
- or biodiversity impacts can genuinely be mitigated.

This approach conflicts with national policy requirements to conserve and enhance biodiversity and appears inconsistent with the Council's own environmental objectives and strategies concerning nature recovery, tree protection and ecological resilience. Not mentioned in the evidence is that the Local Plan would remove a minimum of 7km of hedgerows from the Merton site alone. The South Canterbury site, and others, would be much more.

4. LANDSCAPE AND SETTING OF CANTERBURY

The scale of development proposed would significantly alter the rural approach and landscape setting of Canterbury. The Sustainability Appraisal appears to understate the cumulative urbanising effect of strategic-scale expansion, visual impacts upon the wider landscape, and the erosion of the distinction between urban and rural character. The views of Canterbury from the edges of the 'bowl' have been captured since the time of Chaucer, and form iconic scenes in the 1944 film *A Canterbury Tale*.

Mitigation planting cannot fully mitigate the permanent landscape effects associated with development at this scale. The evidence base does not demonstrate that the allocation can be accommodated without significant harm to landscape character and the setting of Canterbury.

5. INFRASTRUCTURE DELIVERY AND EFFECTIVENESS

The allocation relies upon major infrastructure provision including: highway mitigation, education provision, healthcare capacity, drainage infrastructure, utilities upgrades, and sustainable transport improvements. However, the evidence submitted does not clearly demonstrate that this infrastructure is fully funded, deliverable, or even capable of being implemented in a timely manner. As a comparison, the Saxon Fields development had similar assurances when proposed by the council, but has singularly failed to fulfil them. Apropos to the infrastructure topic, Saxon Fields did not create 'walkable communities'—and the promised medical facilities and green spaces never materialised. Moreover, to this day the sewage produced by Saxon Fields cannot be managed by the

existing sewage system, and every week sewage must be removed in tanker lorries. The allocation therefore appears dependent upon uncertain future delivery assumptions and speculative mitigation measures. As such, the plan fails the NPPF test of effectiveness.



Iconic view of Canterbury Cathedral in *A Canterbury Tale* (1944)

6. SUSTAINABILITY APPRAISAL AND ALTERNATIVES

It is not clear from the Sustainability Appraisal that reasonable alternatives to the scale and location of development proposed at Merton Park were properly assessed. The appraisal process assumes that adverse effects can be mitigated without sufficiently evidencing that conclusion. There is insufficient explanation as to why lower-impact alternatives, reduced development scales, or less environmentally constrained options were rejected. Accordingly, the Sustainability Appraisal does not appear to provide a robust justification for the allocation.

CONCLUSIONS

For the reasons set out above, Policy C6 (Merton Park) is unsound because it is not justified, effective, or consistent with national policy. The evidence base does not adequately demonstrate that the scale of development proposed can occur without unacceptable cumulative impacts upon:

- air quality,
- biodiversity,
- ecological connectivity,
- transport infrastructure,
- landscape character,
- and public health.

Main Modification Requested

Policy C6 should be deleted from the Plan.

In the alternative, the scale of development should be substantially reduced pending:

- further air-quality assessment,
- cumulative traffic assessment,
- ecological and hedgerow surveys,
- landscape impact reassessment,
- and robust evidence demonstrating deliverable infrastructure mitigation.

Sincerely yours,

Robert Rawson
Canterbury 17 May 2026