



Save Wincheap Orchards and Fields Campaign Group Response to the Draft Canterbury District Local Plan (2042/43) Regulation 19 (March 2026)



Introduction

This response focuses primarily on site C10 (Land at Merton Park) and adjacent sites in the Canterbury Local Plan. It has been written by nine residents of Wincheap who form an action group on behalf of the wider community and who feel passionately about the right to access green space within their environs. We have a website, WhatsApp group of 234 members, Facebook with 557 members, and Instagram page with 128 followers, and seek to highlight the beautiful historic landscape which is on our doorstep and which is under threat from large scale development. We would like to draw attention to Appendix 1 which is a collection of photos taken by the community which say in pictures more eloquently the evidence we have presented in words.

<https://www.wincheaporchards.org/>

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Participation in the Public Examination

We would like to participate in the hearing session at the Independent Examination.

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Consultation Process

Summary

The Council's engagement with the community over the Merton Park proposals during Regulation 18 stages was limited in its techniques and failed to reach most people. It was therefore not effective and not consistent with national policy and does not provide a sound basis for moving to submission. In addition, while the Council claims to have taken all consultation responses into account there is no publicly available evidence that analyses the points raised or explains why they should, or should not, lead to a change to the Plan. This has left many people feeling that the Council has not listened, and leaving them not knowing the Council's counter-arguments to the issues they have raised. The Council has also been reluctant to release information in a timely way which leaves the community with a feeling that it has not been an open and transparent process.

National Policy and Guidance

NPPF paragraph 16.c states that plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees

Objection

While the opportunity to comment on the Council's Regulation 18 draft versions of the Plan is appreciated the **engagement has not been effective** and is therefore in conflict with national policy.

Minimal effort appears to have been made by the Council to enable public awareness of the draft versions of the Plan and its proposals with the result that the consultation process has **failed to reach many residents and businesses**. This has certainly been the case in relation to the Merton Park proposals and Wincheap residents and businesses where the majority of those residents who are aware are only aware because of the publicity undertaken by local groups. Bearing in mind that this is the largest single allocation in the Plan it is a strong indictment of the Council's failure to engage effectively. There are three particular aspects to this objection:

1) Limited consultation techniques

The Council largely relied on information on their website, press release and emailing those who were already on their database. The consultation in 2024 did include public meetings, one of which was in Canterbury. This was held in the Guildhall which has a capacity of around 90 people. As a result, many were told that they could not enter the building. In any case, it was a formalised meeting mainly consisting of a presentation from the Council. It would have been much more engaging and productive if the Council had held a series of

informal exhibitions around the district where the public could discuss the proposals and issues directly with officers.

2) Lack of analysis/feedback

When comments have been made to the various Council consultations it is unclear how (and whether) they have been considered. There is no comprehensive document which sets out an analysis of the points raised and a reason for either accepting or rejecting them. There are summaries of matters that have attracted comment which are often not comprehensive but no consideration of their merits. Apart from being disrespectful and disheartening to people who have spent a long time (hours, days and even weeks) preparing comments it is also poor practice as it is unclear what the Council's counter argument is to objections. This creates a feeling that the Council is not taking people's views seriously or indeed giving them any thought at all. This is the opposite of what is sought by national policy. This is compounded by the Council's unnecessarily complicated way of logging comments which makes a distinction between those made on the Council's standard survey form and those received by other means, called written representations. The survey forms are collated against the relevant policy in the Plan whereas the written representations are not. It would have been much more helpful if all the comments had been amalgamated and collated in the survey form format.

3) Reluctance to release information

There has been an unnecessarily secretive approach to releasing consultation comments, withholding these until the next stage in the process had been reached. This puts the public at a considerable disadvantage as it is unknown which parts of the Plan are contentious, the views of the statutory consultees and how one's own arguments align with others. This has given rise to Freedom of Information and Environmental Information requests which the Council was often reluctant to agree, or in some cases they simply did not respond. All of this is an additional drain on the public's time and certainly does not foster a feeling or reality of effective engagement. From the community's perspective the Council's engagement process is a failure, is **inconsistent with national policy** and therefore the Plan is **not sound** in this respect. This can only be rectified by taking the Plan back to the Regulation 18 stage and the Council taking a much more open and transparent approach to plan-making.

Feedback from residents

A) "the local plan has been poorly communicated to residents and is exclusionary for the local community. Information and updates have been relayed through community action groups and political campaigning rather than a coherent community engagement strategy or active consultation run by the incumbent council or the developers. The results of these shortcomings were overwhelmingly displayed in the Wincheap ward by-election in November 2025, won with a 23% swing to the Green Party on a campaign promise to

protect green spaces (i.e. the orchards). This serves as a clear, democratic rejection of these proposals by the Wincheap community.”

B) “We heard nothing about this proposed development from Canterbury City Council in advance. Complete radio silence! The consultation process was pitiful. The council should have consulted fully and widely with local people and other key stakeholders from the outset, in their own communities, to properly shape the Local Plan and take into account the needs, wishes and ideas of local people. Instead, we feel ignored and betrayed.”

Strategy

Summary

The Council’s strategy of focusing a highly disproportionate level of development at Canterbury City has not taken account of infrastructure constraints relating to foul water disposal and fresh water supply which will delay development and seriously questions whether it can all be delivered within the plan period. Neither has it taken proper account of the need to protect the rural setting of the Cathedral World Heritage Site which has led to the inclusion of an unsuitable site at Merton Park (Policy C10). It has also led to the adoption of a high risk and unproven transport strategy to deal with the City’s transport issues and to the allocation of a disproportionately high amount of new housing without any evidence that it is capable of being delivered by the local housing market. For these reasons the strategy is ineffective, not justified, contrary to national policy and, therefore, unsound and needs to be reconsidered.

National Policy

NPPF Paragraph 36 states:

Plans are ‘sound’ if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs²⁰; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;...

Objection

The development strategy for the District (Policy SS3 4.) identifies Canterbury as the principal focus for development. While this has some sense, in that Canterbury is the main settlement, it has not taken sufficient account of infrastructure constraints particularly drinking water, sewage disposal and road capacity. Neither has it taken account of the need to protect the rural setting of the Cathedral World Heritage Site. In trying to implement this strategy the Council has created a situation of allocating most development where there are most constraints. This has two consequences: the identification of an unsuitable and inappropriate large greenfield site at Merton Park (Policy C10) in order to meet housing land allocation targets and the high likelihood that infrastructure issues will delay the start of development and push a significant amount beyond the Plan period.

Canterbury is affected by water nutrient pollution issues arising in the internationally important nature reserve at Stodmarsh. This has led to restrictions on new development which would aggravate the issue, in particular, through additional foul water discharges and caused very significant delays to housebuilding. The Council has responded by including a requirement in the larger allocations (C10 Merton Park, C15 and C16) for an on-site wastewater treatment works. Responses from the Environment Agency and Southern Water in relation to the Council's 2025 Regulation 18 focused consultation, however, object to this approach.

In summary, the Environment Agency advised that all development should connect to the main drainage system and that private treatment works should be avoided. In respect of Merton Park it stated that its location within groundwater source protection zones requires that the protection of groundwater is subject to higher scrutiny and that all development should ensure adequate wastewater infrastructure with capacity in the mains network prior to occupation. Southern Water stated that their agreed investment plan will bring the relevant wastewater treatment at the Sturry Road works up to nutrient neutrality standard by 2030. No reference should therefore be made in the Plan to on-site treatment works. This indicates that foul water from new housing cannot be dealt with acceptably until at least 2030.

With regard to water supply South East Water advised that their assessment of water supply/demand balance shows that Canterbury lacks headroom to support growth beyond the assumptions in their Water Resources Management Plan 24. They would need to recalculate the forecast to take account of the new growth targets in the Local Plan but the outcome would not become known until the WRMP29. The plan's housing targets in the 2029-41 period are considerably higher than in the WRMP24 and will need delivery in planned new connectivity between Maidstone and Ashford and the planned Broad Oak reservoir. Broad Oak will not be complete before at least 2035. These plans are also based on reducing per head consumption and the Local Plan is not sufficiently ambitious on

this. Finally, as the South East is already a water stressed area it is vital that groundwater source protection zones are safeguarded from pollution.

On traffic issues, the Council and the Highway Authority (Kent County Council) acknowledge the capacity and resilience issues with the highway network and are entirely reliant on an strategy of achieving a high level of modal shift in order to create the capacity to support the level of proposed development. This will be monitored and reviewed as developments progress but what happens if developments are committed but the modal shift measures are proving ineffective? In our view it is a high risk unproven strategy where the consequences of any failure will be borne by local residents.

In relation to heritage, it is clear from the Council's evidence base that no assessment of the constraints that might be posed by the setting of the Cathedral World Heritage Site has been carried out. While our focus is the impacts on setting associated with the proposed Merton Park allocation it is a general point and one which the Council should have addressed at the outset of the plan-making process, in accordance with UNESCO Guidelines and the advice of Historic England - this is detailed in our Heritage objection. In our submission the quantity of development at Canterbury that is being pursued by the Council is only achievable through causing significant harm to heritage of the highest order.

While the water issues are ones that are capable of being resolved the timescales advised by the water companies imply delay to housebuilding projections and such major infrastructure works may well slip beyond current targets. This puts a serious question mark against the likelihood of strategic allocations in Canterbury being built out within the Plan period.

The strategy of focusing development at Canterbury has resulted in housing allocations at the City for around 12,490 homes (new local plan allocations plus those carried forward from the current adopted plan but not including windfall allowance and small sites of under 5 dwellings). To put this into perspective, this represents around 54% of the District's total allocations whereas Canterbury's population of 57,500 is about 35% of the District's total of 163,500. The issue of whether Canterbury's City's local housing market can in reality support such an increase in new housing development, or simply be saturated, has not been addressed. Bearing in mind that Canterbury District has recorded an annual average of only 587 net housing completions over the 2015/16 to 2024/25 period (Kent Analytics Housing Completions in Kent 2024/25) this has to be seriously questioned. The strategy seeks an annual average of 735 homes per annum over the plan period to be built at Canterbury which is 148, or 25%, more per year than has been achieved on average in the District as a whole. Without convincing evidence to show that the Canterbury City market can support this massive uplift in new housing sales within the next 15 years the strategy appears unimplementable and ineffective. The Council seems to have approached this as a mathematical exercise to make the books balance, with the result that there are too many eggs in one basket.

For these reasons, based on existing evidence and the above views of statutory consultees the Council's strategy is considered not to be justified and not effective. It is therefore not consistent with national policy and needs to be reconsidered.

Sustainability Appraisal

Summary

The way in which the sustainability appraisal has approached assessing issues with the Merton Park (Policy C10) proposal highlight weaknesses that indicate the advice in national practice guidance has not been sufficiently followed. These weaknesses are likely to apply throughout the SA and, certainly in the case of Merton Park, indicate that the SA is not a reliable basis for taking decisions about the Plan.

Planning Practice Guidance

Paragraph 001 of the national practice guidance States that sustainability appraisal is::

.....a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met.

Sustainability appraisals incorporate the requirements to produce a strategic environmental assessment of a local plan and paragraph 019 of the guidance states:

Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 sets out the formal requirements of an 'environmental report', which can form an integral part of the sustainability appraisal report and is a core output of any strategic environmental assessment. An environmental report for the purpose of the regulations must identify, describe and evaluate the likely significant effects on the environment of implementing the plan policies and of the reasonable alternatives, taking into account the objectives and geographical scope of the plan. The sustainability appraisal report will need to show how these requirements have been met as well as recording the wider assessment of social and economic effects.

Objection

The sustainability appraisal considers the likely effects of the Plan's proposed allocations in Table 5.8 of the main report. This appraisal identifies the likely effects without considering any mitigation (as included in the proposed allocation policy and other relevant Local Plan policies) in order that all sites are considered equally. Taking Merton Park (Policy C10) as an example and specifically historic environment, **the appraisal flags double negative effects plus uncertainties.** Appendix G provides some commentary on this and states "Significant negative effects on Biodiversity, Landscape, Water, Flooding and Historic environment (uncertainties around the possible impacts on the World Heritage Site, its setting or views to

and from it)." Appendix I page 13 then re-appraises the site's likely effect on the historic environment taking account of mitigation measures required by the Plan's relevant heritage policies and reduces the effects to minor negative.

There are several issues with this approach:

The Practice Guidance is looking for an SA to test the evidence underpinning the Plan and not just accept the authority's position

Uncertainties indicate that there is **an evidence gap** upon which the Council should be challenged

In this instance there is a UNESCO expectation (and Historic England advice) that a heritage impact assessment is undertaken at the earliest stage of plan making and is used to inform the assessment of any proposals that may affect the significance of the World Heritage Site yet this does not seem to have been taken into account.

The SA appears to have accepted the Council's stance that HIA can just be delegated to the later planning application stage without any explanation or reasoning.

An HIA needs to be undertaken by a suitably qualified and experienced specialist, and it is unclear who within the Council and within the consultancy undertaking the SA has given opinion on the matter and what weight should be attributed to it.

With regard to mitigation, merely stating that the Plan's policies will apply at the planning application stage and speculate on how effective they will be is **inadequate** especially in relation to larger sites where impacts are likely to be greater. The scope for mitigation and its likely effectiveness will vary from site to site and this requires deeper individual consideration drawing upon a reliable and proportionate evidence base.

The role of SA is akin to that of a critical friend but in this case it seems to be just friend

This criticism is applicable to other issues with Merton Park. For example, on landscape impact the Council's own Landscape Appraisal report **is not supportive of development in the Merton Park area**. The Council should have produced a landscape impact assessment of their proposed allocation to understand the likely impacts of their proposal which could then have been used to inform the SA and provide a clearer evidence trail underpinning decisions. Also, the SA simply repeats the Council's claim that access to the Merton Park site is achievable from Hollow Lane and Homersham but there is no reference to the evidence upon which this is based and, indeed, our Group has not been able to find any.

For these reasons it is considered that the SA has not sufficiently tested the Council's evidence base, been sufficiently inquiring and challenging of the Council's proposals, or approached the issue of mitigation in a sufficiently nuanced way. Overall, the SA has not sufficiently carried forward national practice guidance and is **not therefore a reliable tool for taking decisions on the Plan's proposals.**

Heritage

Summary

The proposed Merton Park allocation would cause harm to the significance of the setting of both the Cathedral World Heritage Site and the City Conservation Area. The Council has not justified this with any clear and convincing evidence and therefore the proposed allocation is not consistent with national policy (or the Council's own Local Plan policies) which renders it unsound. CCC has not carried out the mandatory **Heritage Impact Assessment (HIA)**, despite a request to do so from Historic England in October 2025. On reviewing the local plan Historic England concluded that "In the absence of a process of HIA the policy also **may not fully meet the objective in NPPF**, paragraph 2 in relation to the 1972 World Heritage Convention: 'Planning policies and decisions must also reflect relevant international obligations and statutory requirements.'" The Council should either commission a Heritage Impact Assessment compliant with UNESCO Guidelines to help determine if the proposal can be justified or delete the allocation from the Plan. To proceed any further without such an assessment would lead to unsafe and **unsound** decision making.

National Policy and Guidance

NPPF paragraph 202 states:

"Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value"

NPPF paragraph 203 states:

"Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats."

NPPF paragraph 208 states:

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal

NPPF paragraph 212 States:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

NPPF paragraph 213 states:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional

NPPF paragraph 215 states:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

NPPF (Dec 2025) - "Avoid harm to the significance of heritage assets and instead preserve and enhance this significance."

Planning Practice Guidance

The Historic Environment section states:

Paragraph 007

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the **contribution of its setting**, is very important to understanding the potential impact and acceptability of development proposals

Paragraph 032

In line with the National Planning Policy Framework, plans, at all levels should conserve the Outstanding Universal Value, integrity and authenticity (where relevant for cultural or 'mixed' sites) of each World Heritage Site and its setting, including any buffer zone or equivalent. World Heritage Sites are designated heritage assets of the highest significance. Appropriate policies for the protection and sustainable use of World Heritage Sites, including enhancement where appropriate, need to be considered in relevant plans. These policies will need to take account of international and national requirements as well as specific local circumstances.

When developing plan policies to protect and enhance World Heritage Sites and their Outstanding Universal Value, plan-making bodies should aim to satisfy the following principles:

- protecting the World Heritage Site and its setting, including any buffer zone, from inappropriate development
- striking a balance between the needs of conservation, biodiversity, access, the interests of the local community, the public benefits of a development and the sustainable economic use of the World Heritage Site in its setting, including any buffer zone
- protecting a World Heritage Site and its setting from the effect of changes which are relatively minor but which, on a cumulative basis, could have a significant effect
- enhancing the World Heritage Site and its setting where appropriate and possible through positive management
- protecting the World Heritage Site and its setting from climate change but ensuring that mitigation and adaptation is not at the expense of integrity or authenticity

Local planning authorities whose area covers either the World Heritage Site itself or all or part of its setting need to take these principles and the resultant policies into account when making decisions on applications

Paragraph 018

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194 to 196) apply.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a

key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

Adopted Local Plan

Policy HE3 Significant Views and Setting of the World Heritage Site

- The City Council will seek to protect significant views of the City, and in particular the three parts of the World Heritage Site and their setting, from both within and from outside the City. Development proposals should respond positively to the character and setting of the World Heritage Site which contributes to its Outstanding Universal Value.
- Where buildings are proposed that are substantially taller than their neighbours, affect one of the identified long distance views, close viewing places, locations and/or significantly change the skyline, they should be assessed against the following criteria:
 - The relationship to context (topography, urban grain, built form, views, prospects and vistas and effect on the skyline);
 - The effect on the historic environment including the need to preserve and enhance historic buildings and sites;
 - The effect on the World Heritage Site and its buffer zone;
 - The architectural quality of the proposed building including its materials, scale, form, massing and silhouette.
- Through the careful siting and design of buildings and appropriate landscaping, developers should demonstrate how their proposals will respect or enhance the landscape and topographical features which contribute to the Outstanding Universal Value of World Heritage Site.
- Views into, out of and across the World Heritage Site are identified in the Canterbury Conservation Area Appraisal. Development proposals will be assessed against their impact on identified views.

Paragraph 9.23 supporting the Policy states:

The prominence and visual impact of the cathedral and its Bell Harry tower, rising above the roofs of the City in order to create a sense of awe and inspiration, was an essential characteristic of historical views of the City. It still is today and a key element of the World Heritage Site Management Plan is to prevent proposals coming forward that would cause damage by blocking or imposing on the World Heritage Site, or by creating an intrusive element in a view's foreground or middle ground.

And paragraph 9.25

Canterbury is a compact city in a valley setting that provides for a close relationship between the town and its surrounding rural landscape. The Cathedral is the dominant element of the townscape, as it has been for centuries, and is the focus of many views from city streets and surrounding areas. This valley setting is assessed as part of the Canterbury Conservation Area Appraisal, which illustrates important views of the Cathedral seen against the backdrop of the valley sides. An Area of High Landscape Value has been identified to protect the historic setting of the City and World Heritage Site. Within this area, any development that causes unacceptable harm to the local landscape character or the setting of the City and/or World Heritage Site should not be permitted. Policy LB2 is also relevant when considering the Council's approach to development in the Canterbury Area of High Landscape Value.

Draft Local Plan

Policy DS30

Paragraph 3

Proposals for development within, or affecting the setting of, the UNESCO Canterbury World Heritage Site and/or its Buffer Zone must provide a Heritage Impact Assessment (HIA) within the Heritage Statement. This must be in line with UNESCO guidance and informed by the Canterbury

World Heritage Site Management Plan with a particular regard to the identified attributes, and should also have an understanding of the cumulative impact of development upon the World Heritage Site's Outstanding Universal Value.

Paragraph 8

Proposals for development affecting the setting of the Canterbury World Heritage Site or views into, out of and across the three parts of the World Heritage Site from the setting, will be required to demonstrate how they will respect or enhance the landscape, townscape and topographical features which contribute to the Outstanding Universal Value of the World Heritage Site, Winter's Farmhouse Grade II listed building, Hollow Lane etc.

Objection

1) Heritage Assets Affected by the Proposal

As a first step national policy requires a Local Authority to identify and assess the significance of any heritage asset that may be affected by a proposal. Table 5.1 in the Council's Heritage Topic Paper (produced late in the process at publication stage) contains a column titled Assessment of Impacts and against Merton Park identifies an Area of Archaeological Potential within the site, four conservation areas that lie in proximity to the site, Hollow Lane, a key historic approach to the City adjacent to the site and the World Heritage Site which is visible from within and across the site. The Paper has not identified

the City Conservation Area within which the Cathedral is situated which is a serious omission that should be rectified.

2) Assessment of Impacts on the Significance of Heritage Assets

Other than noting that the Council's Conservation Area Appraisal identifies the views of the World Heritage Site and describes them as important there is no assessment of the proposed development's impacts on the identified heritage assets. The final column in Table 5.1 simply re-states the requirements that planning applications should meet as set out in Merton Park policy C10. This is woefully inadequate and not at all consistent with national policy and guidance.

Paragraph 5.2 in the Topic Paper states, "This assessment is high-level and not exhaustive, given the exact form of development (including layout, scale, massing, orientation etc.,) is not known at this stage." It is not, however, necessary to have an exact layout in order to assess the significance of potentially affected heritage assets, the importance of the asset and hence weight to be given to its conservation and to identify the way in which it could be impacted e.g. physically or visually. As the mix and quantity of the proposed development are known an assessment can be taken further to establish overall impacts and harms and investigate whether development in parts of the site are likely to cause more or less impacts and whether some types of development would be more or less obtrusive, enabling a conclusion as to the level of any harm, which parts of national policy apply and whether or not the site is, in principle, suitable for development. To delegate this level of assessment to the planning application stage is too late as the Local Plan will have already established the principle of development and the only remaining question then is how, rather than whether, the site should be developed.

3) Impact on the World Heritage Site and City Conservation Area

The Wincheap Orchard and Fields Campaign Group's focus is on the impact and harm that would be caused to the World Heritage Site and the City Conservation Area in which it is situated.

World Heritage Site status denotes a heritage asset of the highest order and in accordance with the NPPF the greatest level of weight should be given to its conservation. Understanding an asset's significance is crucial to this process.

UNESCO's description of the site's outstanding universal value (OUV) includes the following:

"The vast Cathedral, and particularly its Bell Harry Tower, still dominates the city as it has done for five hundred years. The Tower is the highest building in the city and its location in the valley floor means that it can be seen from surrounding higher land and extensively along the valley. **Maintaining views to and from the Cathedral is crucial to sustain this visual dominance.**"

The Council's "Canterbury Conservation Area Appraisal February 2023" produced by Purcell elaborates on these views. Section 4.6 "Setting, views and approaches" is of particular relevance. Part 4.6.1 highlights the importance of the green setting of the conservation area as a particularly important part of its special interest which has been retained over centuries of evolution and the importance of long-distance views of the city from its surroundings. Route 11 Hollow Lane and Wincheap on page 65 highlights long distance views of the Cathedral from Iffin Lane and includes a photo. Merton Park lies in the line of sight on the photo between Iffin Lane and the Cathedral and would seriously diminish, if not destroy, this view. In section 4.6.3 "Important Views and Landmark Buildings" part 14 "Fields North of Stuppington Lane", which is within the Merton Park proposed allocation, includes a photo and says "The foreground shows an open agricultural landscape to the south-east of the city, which forms an important part of the setting of the conservation area and should be retained as farmland." The Merton Park concept masterplan shows development in this area, which would be highly damaging and is in disregard of this conclusion.

While the Conservation Area Appraisal has identified certain views this does not reflect the reality that outstanding panoramic views of the Cathedral in its predominantly rural valley setting are available from many parts of the Merton Park site. Appendix 1 of photographs attached to this submission illustrate this range of views.

The Council has accepted that the proposed development would have an effect on these views and proposes to mitigate this in part 2 f. of Policy C10 by requiring the development layout to "be structured and oriented to provide viewing opportunities to the World Heritage Site". The concept masterplan indicates two such corridors. This fails to acknowledge that the special characteristics of the currently available views are panoramic and enable an appreciation of the dominance of the Cathedral in a full view of its valley setting. The very relationship noted by UNESCO. It also does not appreciate that some of the views of the Cathedral are dynamic, in that as one walks up the hillside on one of the public footpaths the Cathedral first appears as just the top of the Bell Harry Tower and gradually more is revealed until a full-length view of the Cathedral emerges. These panoramic views will largely be destroyed and boiled down to two relatively narrow viewing corridors in amongst a housing estate. While the Council might argue that this retains views of the Cathedral it is a disingenuous argument as it conceals the fact that it is at the expense of losing most of the current views and that those that remain have lost their context and meaning. The addition of "viewing opportunities" and "viewing corridors" in the local plan lack enough detail to prove they are anything but thoroughly inadequate to meet UNESCO's requirements.

Furthermore, the Council's approach fails to consider the effect upon views from outside the Merton Park area. For example, from Iffin Lane as mentioned above, and the public footpath from New House Lane crossing towards Thanington, where Merton Park lies in the middle ground towards the Cathedral. Neither does it consider the view from the adjacent

lay-by on the A2. This lay-by provides the only view of the Cathedral from the A2 which would be destroyed through a combination of built development and a proposed substantial landscape buffer along the A2 boundary.

An additional failure is that of considering the effect upon reverse views from the opposite side of the valley, for example from Neal's Place and the University of Kent, where Merton Park currently provides a rural backdrop to views of the Cathedral, and historic vantage points in the valley floor such as the Westgate Tower, Dane John Mound and the Castle (see Appendix 1). The urbanisation of the Merton Park area would significantly and substantially erode the significance of the setting of the Cathedral World Heritage Site and the City Conservation Area and is in direct conflict with both national policy and guidance and the Council's own local plan policies - both Adopted Plan and Draft Plan. It should be noted that the policies of both the Adopted and Draft Local Plans relate to proposals for development generally and not just planning applications.

The Council has also failed to consider the cumulative effects of the Merton Park proposals. Merton Park needs to be considered in the context of the effect of other development on the setting of the World Heritage Site and the City Conservation Area such as development close to the ridgeline at the University of Kent, the ongoing development at Saxon Fields, and the committed but not yet commenced development at South Canterbury.

The site assessments for the Local Plan acknowledge that development in this area will affect the landscape - **"The site has potential to impact on the surrounding landscape as it is open countryside"** ("Strategic Land Availability Assessment - Appendix B - Site Assessments (February 2026) (Canterbury City Council, 2026j)

The surrounding landscape provides historic and treasured views of Canterbury Cathedral. The OUV of Canterbury Cathedral, as defined by UNESCO is intrinsically linked to:

- Its visual prominence in the landscape
- Long-distance and approach views across open countryside
- Its historic relationship with the surrounding rural setting

A survey conducted by the Save Wincheap Orchards & Fields campaign in 2026 found that from 366 respondents, 91.8% said that they enjoyed the panoramic views of the Cathedral in its rural setting.

Development at Merton Park would:

- Introduce dense housing into currently open land forming part of the Cathedral's wider setting
- Interrupt and degrade key views toward the Cathedral from the south and south-west approaches

- Urbanise an important transitional landscape between town and countryside

4) Lack of Evidence and Justification

As stated in paragraph 213 of the NPPF,

“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.” The proposal’s potential to cause harm is clear as demonstrated above.

Such justification is clearly lacking and undermines the soundness of the proposed allocation. This matter has been raised in response to Regulation 18 consultations, including by Historic England (Canterbury Draft Local Plan to 2040 Reg18 Focused Consultation (Historic England response, 21.10.25), but the Council has chosen not to carry out a properly undertaken Heritage impact Assessment (HIA).

As advised by Historic England, paragraph 2 of the NPPF requires that “Planning policies and decisions must also reflect relevant international obligations and statutory requirements.” Of particular relevance in this context is the 1972 World Heritage Convention and the undertaking of a process of Heritage Impact Assessment following the UNESCO methodology as set out in the Guidance and Toolkit for Impact Assessment in a World Heritage Context 2022.

Guiding Principles in the UNESCO Toolkit of particular relevance are:

- An HIA should be undertaken in relation to “ any proposed action that could reasonably be expected to affect the World Heritage property’s outstanding universal value (OUV), whether in the property itself, its buffer zone or the wider setting.
- HIA should start at the earliest consideration of a proposed action to allow heritage to be adequately considered in advance and for the action to be adjusted, relocated or prevented, if necessary, before commitments are made
- HIA is to be carried out by specialists with relevant expertise. A multidisciplinary and independent team is required
- HIA should promote and encourage the effective inclusive and equitable participation of local communities and stakeholders. These should be identified early and consulted to allow their views to be meaningfully considered
- HIA should include a range of reasonable alternatives and assess their potential impacts. This is to identify the most sustainable option that protects OUV and achieves the objectives of the proposed action. Options may include alternative locations, scales, layouts and must include not to proceed
- HIA should evaluate broader trends and cumulative impacts and consider past, present and reasonably foreseeable future actions which affect the World Heritage

property. Having assessed specific impacts in detail HIA should include a final analysis of all potential impacts together

- The final impact assessment report needs to be ready in time to inform the decision on whether the action should proceed, be modified or not carried out at all

The first bullet point above makes it clear that the requirement for HIA applies to “any action” that could affect a World Heritage Site - not simply planning applications, as the Council appears to be arguing. Local Plan proposed allocations are not exempt because they do not have an exact layout. If the Council wishes to proceed with the inclusion of the Merton Park allocation in the Local Plan it should commission a UNESCO compliant HIA now in order to provide a reliable evidence base for the Examination. To proceed without this would be an unsafe and unsound basis for the Examination to reach a recommendation.

The C10 proposal is not consistent with National Policy and furthermore puts CCC in direct conflict with UNESCO’s designation of Canterbury Cathedral as having Outstanding Universal Value. Given that World Heritage Sites are of the highest significance, even less than substantial harm must be clearly and convincingly justified, which has not been demonstrated. Liverpool lost its World Heritage status because of “irreversible loss of attributes conveying the outstanding universal value of the property” and residents fear that Canterbury may be at risk of doing the same if CCC proceed with the Merton Park development.

As matters stand, the proposed allocation would clearly cause harm to the significance of both the World Heritage Site and the City Conservation Area and is therefore in conflict with national policy (as well as the Council’s own policies) and is unsound. On that basis it should not remain in the Plan. Furthermore, the area should be redesignated as a protected open space/landscape buffer (like Golden Hill) to preserve the setting of Canterbury Cathedral and maintain the valued landscape character of the southern approach to the city.

Landscape Objection

Summary

The Merton Park development will endanger a landscape which has clear evidence of ecological and geological value, and which contributes positively to the UNESCO world heritage site of Canterbury Cathedral in its landscape setting. The land forming the proposed allocation site makes an important contribution to the rural valley setting of the City and the Cathedral World Heritage Site through providing outstanding panoramic views and also a rural backdrop when viewed from the opposite side of the valley. The characteristics of the site and the functions it provides for the local community justify its recognition and protection as a valued landscape. The proposed development would urbanise the landscape causing irreparable harm and be a major loss of open space for the local community. The Council’s own Review for Local Landscape Designation report does not support the proposal,

and the Council has not produced a properly undertaken landscape impact assessment. The lack of evidence to justify the proposal, combined with the obvious degree of harm it would cause, bring it into conflict with national policy rendering it unsound. It is also contrary to the Council's own planning policies. It should be deleted from the Plan.

National Policy and Guidance

NPPF paragraph 15 187a states that planning policies and decisions should contribute to and enhance the natural local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

In addition, the following NPPF guidelines will be referred to:

- c) NPPF 2024 8.96c - the provision of safe and accessible green infrastructure
- d) NPPF 2024 104, NPPF 2025 HC2 - Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on.
- e) NPPF 2024 107a, b, c - demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

Adopted Local Plan

Policy LB2 Areas of High Landscape Value

The policy applies to the Merton Park area which falls within part e) Canterbury (the valley of the River Stour around Canterbury) and the policy states:

Within these areas, development will be considered in relation to the extent to which its location, scale, design and materials would impact on or protect the local landscape character and enhance the future appearance of the designated landscape and its heritage and nature conservation interest. Development proposals that support the landscape character (including settlement character), and have no significant impact upon historic setting, archaeological or nature conservation interests, where relevant, will be permitted.

Within the Canterbury AHLV, development proposals should have particular regard to the historic setting of the city and the World Heritage Site.

Paragraph 10.12e which supports the policy states:

Canterbury AHLV (the Valley of the River Stour around Canterbury) has been identified to protect the historic and landscape setting of the city and the World Heritage Site. Policy HE3 and associated text also sets out requirements for protecting the setting of the City.

Draft Local Plan

Policy DS26 Landscape Character part 2 states:

Proposals for development will be permitted if the following criteria are satisfied:

c. The development does not have an adverse impact on important long-distance views, both from and to the site, including from vantage points, the PROW network and National Trails; and

e. The development avoids or mitigates any impacts on the character and landscape context of the historic City of Canterbury including the World Heritage Site;

Objection

1) A Valued Landscape

Although this site is currently within the Canterbury Area of High Landscape Value the Council's review of landscape designations (Canterbury District Local Landscape Designations Review and Recommendations LUC 2021) considers that it no longer meets the criteria for local landscape designation. That review does, however, highlight that the European Landscape Convention establishes that all landscape is of value and that the National Planning Policy Framework states that valued landscapes should be protected and enhanced. The NPPF does not define "valued landscape" but the report states that case law indicates that to be valued a landscape needs to have something special or out of the ordinary in terms of physical attributes rather than just popularity. In recognition of the importance of Canterbury's Stour Valley setting the Council commissioned a further report from LUC (Canterbury City AHLV Review for Local Landscape Designation 2021) to consider the value of the landscape surrounding Canterbury for its contribution to forming the rural setting of the City within the Stour Valley, including views of the Cathedral World Heritage Site. The Merton Park area falls within this review and in summary the report concludes **that it does make important contributions**. The Council appears to have accepted the report as it forms part of the evidence base.

In the report Merton Park falls within area H4 Nackington Farmlands and it identifies that this area contains "Dramatic and surprising views from more elevated areas and along valleys and the North Downs Way to Canterbury and the Cathedral in its Stour Valley setting." It is clear from the report that views which enable an appreciation of the City and Cathedral in their wider, panoramic rural landscape setting should be highly valued and protected. The report particularly mentions the area between Nackington Road and Stuppington Lane and views east of Stuppington Lane from the A2. These include views in the foreground across land to east of Stuppington Lane, but the report has not recognised

the spectacular views that are available from within the land to the east of Stuppington Lane. The report does, though, rightly highlight the importance of this area, when viewed from the opposite valley slope, in providing part of the rural setting and backdrop to the City and Cathedral. Indeed, the photo that LUC chose for the front cover of the report illustrates this point.

While the findings of the report and its acceptance by the Council must surely indicate that the landscape is valued in NPPF terms and that the objective should be its protection and enhancement, further evidence has been gathered by the Save Wincheap Orchards and Fields Group through a user survey of the Merton Park area. The survey had 366 respondents, and the results reveal the reasons why local people use and cherish the area and are attached as an Appendix 2. In summary, it is for a number of reasons including panoramic long distance views of the Cathedral and its wide landscape setting, varied and important wildlife, a mixed agricultural landscape of orchards and fields including a group of tree roundels (at least of heritage status and possibly veteran), walking on the extensive network of footpaths including PROWS, a sense of tranquillity and fostering of physical and mental wellbeing. The area also contains the Cooper's Pit Regionally Important Geological Site. Altogether, this demonstrates a range of attributes more than sufficient to justify the designation and protection of the area as a valued landscape.

The survey also revealed the degree of passion that the local community has for the area and the impact its loss would have. It is very easily accessed from the existing urban area and offers an immediate transition to a rural environment. Its relative tranquillity and connection with wildlife has often acted as a release valve for people in terms of both physical and mental wellbeing. Unfortunately, there is no easily accessible comparable alternative area for the residents of Wincheap ward as the ward is boundaried by major roads, which indicates that residents' physical and mental wellbeing will suffer and explains why 97% of respondents felt that the Local Plan does not address their needs for green space. The Merton Park development would erode the rural setting and green gap at the edge of the city, creating a large urban sprawl between the A2, Wincheap and South Canterbury.

The Merton Park site comprises grade 1 agricultural land and orchards forming part of the rural fringe of Canterbury, contributing to landscape character and local amenity. A [video](#) from the Save Wincheap Orchards & Fields campaign shows the beauty of the area filmed with a drone camera (Save Wincheap Orchards and Fields, 2026). CCC has failed to designate Wincheap Orchards and Fields as Local Green Space and has failed this community who rely on this space for recreation and healthy living.

2) Landscape Harm Caused by the Merton Park Proposal

The development proposed under Policy C10 represents the urbanisation of the current agricultural landscape and will cause irreversible harm. It would obscure many of the

currently available wide views of the City and Cathedral within their Stour Valley setting and reduce those remaining to narrow corridors. Views of the site from across the Valley and historic vantage points such as the Dane John Mound, Westgate Tower and Castle will be changed from providing a rural backdrop to the City and Cathedral to an urban one (see Appendix 1). This will be aggravated by the relatively high density of residential development proposed by the Council |(45+dph) and the mix of development including large structures such as a football stadium. Mitigation in the form of tree planting would be of limited effect and very little at all in the winter months, while the residual harm to landscape would be substantial. The impact of the proposed development needs to be considered in the context of other developments that have encroached on the rural setting of the City and Cathedral such as at the University of Kent, Saxon Fields at Thanington and the South Canterbury development which has yet to commence. The effects of these developments make it even more important to protect sites that contribute to the City's historic rural setting.

The Council does not appear to have undertaken a proper assessment of the impact of the development on the landscape and what evidence does exist (the Canterbury City AHLV Review for Local Landscape Designation 2021) is not at all supportive of the allocation. This seems to be an inconvenience that the Council has simply sidestepped. This lack of evidence to justify the allocation combined with the obvious and highly damaging harm that would be caused to this valued landscape bring it into conflict with NPPF policy and render it unsound. From a landscape perspective it is not a suitable site for development. Furthermore, the proposed allocation is clearly and substantially in conflict with the Council's own policies both in the adopted and draft Local Plans to the extent that it is highly surprising it was ever seriously considered.

Should the Council wish to pursue the proposed allocation a properly undertaken and proportionate landscape impact assessment should be carried out sufficient to determine the impacts of the principle of development, the scope of mitigatory measures and the residual impacts. This study should take account of cumulative impacts by considering the effects of the Saxon Fields development |(under construction|), the South Canterbury development (committed but not yet commenced) and development on the ridgeline at the University of Kent. Further consultation should then be carried out in order that the Examination has an adequate evidence base from which to judge the proposal taking account of the case for the site to be recognised and protected as a valued landscape. It is, however, hard to see how the conclusions would be any different.

Transport and Access

Summary

Wincheap (A28) is already a severely congested strategic route into Canterbury, experiencing regular queues and high pollution due to limited alternatives, constrained junctions and

narrow carriageways. The Local Plan proposals would almost double the number of households in the ward, generating thousands of additional daily vehicle movements and placing intolerable pressure on an already overstretched road network. The Plan has **not been positively prepared**: local communities have not been meaningfully engaged, key transport evidence was produced after decisions were taken, and infrastructure proposals lack clarity and credibility. Access arrangements via Hollow Lane and Homersham fail to meet Kent Design standards and are unsuitable for both construction and long-term use. Traffic modelling relies on unrealistic assumptions about modal shift to walking, cycling and bus travel, despite known constraints, car ownership levels and constrained public transport capacity. Cumulatively, the proposals would worsen congestion and air quality, rendering the Plan **unsound, undeliverable, and inconsistent with national policy**.

National Policy and Guidance

This is an objection to C10 under the following guidelines and to the Canterbury City Council Draft Transport Strategy (2026a)

- NPPF, 2024, 3; 2024, 109a; 2025, TR1.1a
- NPPF, 2024, 112d; 2025, TR2.3c; TR4.1c
- NPPF, 2024, 117d; 2024, 109b; 2024, 110; 2025, TR4.1a; 2025, TR4.1d
- NPPF, 2024, 110
- NPPF, 2025, Principle of Development Outside Settlements (2025, S5.1h).

Objection

Wincheap (the A28) is a key route into Canterbury bringing cars into the city centre from the south and west of Kent and beyond. Significant traffic jams regularly occur on this road as Canterbury is quite compact and there are not many alternative routes, so traffic tends to funnel through this area. Multiple traffic lights at the A2/A28 junction, the single carriageway through Wincheap and under Canterbury East Railway bridge all contribute to the daily queues and high levels of pollution, especially at morning and evening rush hours.

The Local Plan 2024 proposes additional houses at: Merton Park (1,950), Langton Lane (14), Nackington Police Station (20), Wincheap Industrial Estate (1,000), Cockering Farm (36) and Milton Manor (95). This means the number of households in the ward would increase by 3,115 making the total number of households 6,885, almost doubling the number of households. This will significantly increase the traffic using Wincheap and the adjacent roads.

1) Plan-making Policies.

The National Planning Policy Framework (NPPF, 2024 109a; 2025, TR1.1a) states that transport considerations should involve **early engagement with local communities**. Positively prepared plans utilise participant-derived models of visioning in order to be effective and deliverable (Lyons *et al.*, 2025, p.3), however, CCC has adopted a top-down

visioning model determining who takes part and how and needs to do more work with the local communities impacted by the developments. Co-creating visions with local communities involving diverse stakeholders is more impactful and successful than asking them “to react to a draft vision with a view to informing its subsequent review and revision” (Lyons *et al.* 2025, p. 10). CCC has repeatedly **refused** to share detailed infrastructure plans particularly around access to Merton Park (C10) with local residents, despite these questions being raised in the consultation process in November 2025 and at the Special Meeting of the Overview Committee (5 March 2026). It has also failed to hold public meetings in the affected areas. Not only this, but the Draft Canterbury District Transport Strategy (2026a) is still under consultation although the city council approved the local plan in March 2026 and many of the policies relating to the plan such as the Canterbury Transport Modelling Forecast Report (February 2026); Local Cycling and Walking Implementation Plan (February 2026); Air Quality Assessment (March 2026); Canterbury Bus Action Plan (February 2026); Understanding Travel Behaviour Change Insight Paper (2025); Origin Destination Study (February 2026b) were produced **too late** for residents or councillors to be well-informed of the decisions that were being taken. This plan **has not been positively prepared**.

2) Access

There is unsuitable and inadequate means of vehicular access for construction and occupation phases. Kent Design Guide Section 2 expects a development of this scale to be accessed by a local distributor road capable of catering for all vehicle types up to pantechnicon. A typical carriageway width is 6.75m (within a range of 6m to 10.5m), with a typical verge width of 2m (range .5m to 5m) and a typical footway/cycleway of 3m (range 1.8m to 5m). The consultation document states that the primary access to the site would be from Wincheap via Hollow Lane with Hollow Lane converted to one-way working between Wincheap and its junction with Hollowmede, and upgrades to Homersham including the creation of off-street parking bays. Hollow Lane is, in origin, a country lane and is fundamentally not suitable for accessing a development of the scale proposed. The section between Wincheap and the junction with Hollowmede has a carriageway width varying between around 5.5m to around 4.3 with sections of on-street parking, no verges and footways of typically around 1.2m on both sides. There is also an entrance to the local primary school at the junction with Hollowmede. Predominantly terraced housing is set on both sides of Hollow Lane from the back edge of the footways i.e. there are no front gardens. There is, therefore, no scope for bringing it up to the design standards of a local distributor road. Furthermore, significantly increasing the volume and type of traffic on this road would cause considerable harm to the amenities and health of residents through increased noise, dust, air pollution and reduced pedestrian safety, even if traffic flow was restricted to one-way. The implications for the current on-street parking are not mentioned in the consultation document but if, as seems likely, it would have to be removed what is the alternative arrangement? The section of Hollow Lane from the junction with Hollowmede to

entry with the site would be two-way traffic but the carriageway width is only around 4.5m with restricted scope to widen it, let alone provide footways, cycle paths and verges.

3) Traffic Flow

The proposed traffic flow arrangements are obscure. It is not stated which way the one-way working on Hollow Lane would be. Depending upon whether it is one-way in or out it has different implications for local residents to access their properties, parents to access the school, the ability of traffic to avoid Wincheap and rat run through Hollowmede and residential roads through to Nunnery Fields. Neither is it clear how the one-way junction of Hollow Lane with Wincheap would interact with the Council's proposed junction arrangement at Cow Lane for the Wincheap one-way gyratory system. It is also questionable whether sufficient visibility is available at the junction to meet Kent Design standards.

The role of Homersham is equally unclear. It is not mentioned that it would be part of the primary access proposals, yet it would have to be if Hollow Lane was converted to one-way working. Homersham appears to have been built as an access road to serve up to 300 homes and is designed to discourage non-essential traffic. It follows a boulevard design concept with verges and footways, generous tree planting and traffic calming measures and is, one of the better designed suburban developments in Canterbury. Any proposals to "upgrade" it to perform as a local distributor road would undermine its design principles and cause harm to the amenities of its residents.

The use of Hollow Lane and Homersham by construction traffic would be harmful, potentially dangerous and inappropriate. Bearing in mind that the construction period for a development of this scale would be in the region of 10 to 15 years it is quite unacceptable. Lorries would struggle to navigate the mini-roundabout near Brayebrook Road (The Observatory) and the pedestrian island (51.26792913174405, 1.0689213685081056) which is designed for safe crossing and to connect communities may be compromised.

The consultation document does not provide any information on the effect of the traffic generated by the proposed development on the road network. This, of course, needs to be considered in conjunction with other proposals such as the Wincheap slip road, Park and Ride, the industrial estate proposals and the Wincheap one-way system. The Council should provide this in the form of the technical work but also a non-technical summary. As it stands, it is hard to see how the junctions at each end of Wincheap would not simply be **swamped**. Apart from anything else this would nullify the claimed benefits of the Wincheap one-way system.

The consultation document focuses on proposed cycle and pedestrian connections but in reality Merton Park would be a **car dependent** development (as noted in the Sustainability Appraisal) and once built out would be likely to generate in the order of 1,600 vehicle movements in the peak hours through junctions that are already stretched and have physical

constraints that limit expansion. For example, the right turn lane into Homersham cannot be extended.

Overall, it seems that the access proposals are ill-conceived and reliant on seriously compromising Kent Design standards to the detriment of local residents and all users of Wincheap. It is incumbent upon the Council to demonstrate how they think the arrangements would work and what the effects would be. The current lack of information is disappointing, to say the least, and this should be put right before the Council agrees the submission version of the Plan. There should also be an opportunity for the public to comment on that information before a decision on submission.

4) Local Parking Standards.

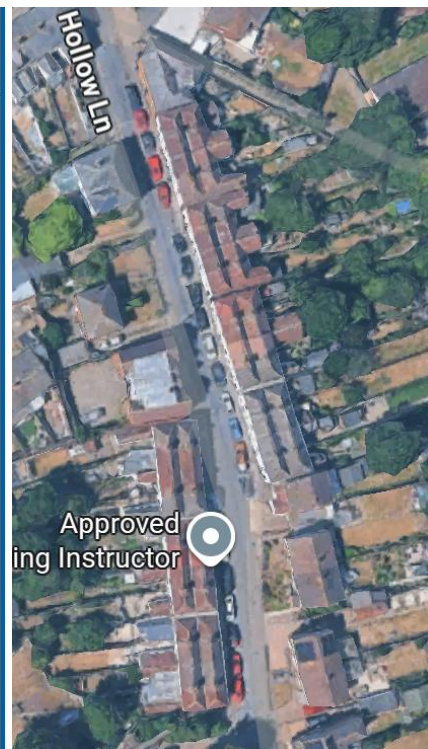
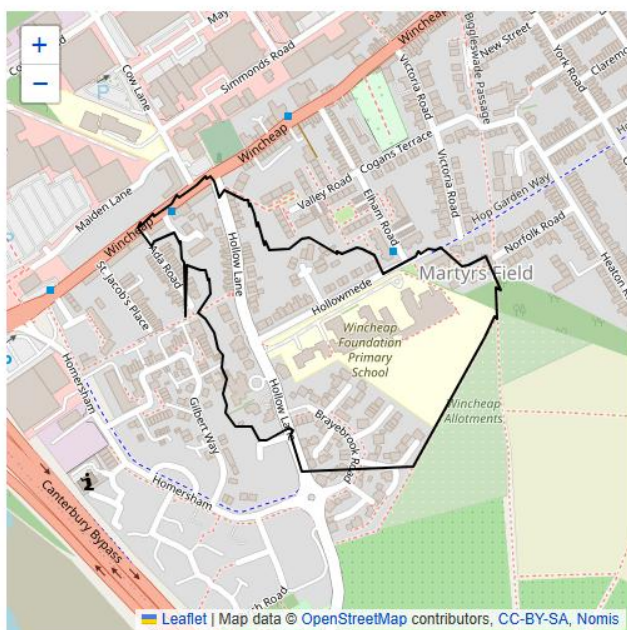
When setting local parking standards for residential and non-residential development, planning should consider **local car ownership levels (NPPF 112d; TR2.3c)**. Kent County Council has raised concerns that the proposed mitigation scheme around Homersham and Hollow Lane could affect the on-street parking which currently occurs here (Canterbury Local Plan Evidence Volume 2 -Traffic Impact Assessment, 2025, 1.12). The site proposer Quinn Estates commissioned Charles and Associates to undertake overnight parking beat surveys over two nights in April 2025 and concluded that the parking stress did not exceed 50% for on street parking bays. They suggested that “car ownership in this area is significantly lower than anticipated by the local provision, suggesting that some residents do not own cars due to the highly sustainable location”. Although households in the Output Area containing Hollow Lane (CT1 3SA) show lower travel to work car use compared with Canterbury Local Authority as a whole (E00167523 Output Area, Canterbury Local Authority and England Country, 2021), it is disingenuous to compare the wider district with a city suburb which is within walking distance of the centre. The Output area contains 162 households with 183 cars and households owning one car is higher in the output area than across the Canterbury Local Authority. Therefore, the assumptions made by Charles and Associates that some residents do not own cars due to the highly sustainable location is not credible. 52.6% of residents in this area are economically active and 34.4% of these drive a car or van to work. Added to this, the people who are retired and may be driving for leisure purposes and those who have caring responsibilities and will need access to health services, there are many car owners in this area who will be making daily journeys. Not only this, but the largest occupational group for residents in this area is Q Human health and social work activities, and these employees often require mobility and flexibility during unsocial hours. Reducing parking near their homes puts them (particularly women) at risk at night. Charles and Associates, commissioned by the site promoter to undertake traffic and parking surveys, also suggested that some on-street parking bays could be removed “without adverse effects on the local highway network”. However, the 50% stress statistic is for overall street parking in the area and for Hollow Lane specifically, there is a 100% parking stress with no observed

spaces. On the aerial view on Google Maps (2026) there are 27 spaces for cars on Hollow Lane of which 26 are occupied.

At the Extraordinary Meeting of Full Committee, 6.30 pm Wednesday 18 March 2026, Cllr Mike Sole said that the council was committed to “roads that still work for drivers too, because good transport planning is not about punishing drivers but about giving people better choices”, however this plan seeks to punish the residents of Hollow Lane. It is not always possible for disabled or elderly residents or delivery drivers or shoppers to park at a distance from homes, so removing these parking bays would create conflict between cyclists in the new proposed cycle contraflow and cars and impact on the inclusivity of the site for current residents **(TR4.1c)**.

The Canterbury Local Cycling and Walking Implementation Plan (Canterbury City Council, 2026e) recommends a modal filter or cycle contraflow lane south of the junction with Hollowmede (E7) and traffic calming to encourage cycling (E8) and to discourage traffic from using this route (Hollow Lane is used not just by residents but by cars accessing Wincheap and Langton schools). Charles and Associates (Iceni Projects on behalf of Quinn Estates, Canterbury Local Plan Evidence Vol 1 – Sustainable Transport Strategy Policy N1 - Merton Park, Canterbury, 6.4.16) predict that there will be a 26.7% increase in traffic on adjacent Hollowmede at AM peak time after the development of Merton Park so it is hard to see how this cycle contraflow lane links to safe cycling routes or offers a genuine choice for residents **(TR3.1a)**.

Map of E00167523
Output Area



5) Access

To **achieve faster travel** to Merton Park on-street parking will be removed from Homersham and off-street parking will replace the boulevard style green corridors, flying in the face of CCC's commitment to making urban areas "greener and healthier" (Canterbury Local Plan 2042/43, March 2026, p.7). **NPPF 110 states that** the planning system should actively manage patterns of growth and significant development should be focused on locations which are or can be made sustainable, through **limiting the need to travel** and offering a **genuine choice** of transport modes to reduce congestion and emissions and improve air quality and public health. However, the two access points to the proposed Merton Park will create bottlenecks at either end of the site and drive-up traffic numbers on already congested roads. The primary access road to Merton Park will be via a mini roundabout off Hollow Lane (51.26714339593374, 1.069373320891748). Hollow Lane is an ancient hollow way and Roman Road which has cut down through a rare inland chalk exposure (Smart, Bissom and Worssam, 1966) to a depth of more than 10 feet in places and floods in heavy rain. It is **too narrow and inappropriate** to serve such a large development. Not only this, but the proximity of this access point to the local primary school and a children's play area at Birch Road also make it an **unsuitable** as it will **increase traffic and pollution** to vulnerable populations.

6) Traffic Movement

The Local Plan is curiously vague regarding **traffic movement** around Merton Park (C10) relying on active transport policies and indicating only the two access points to the site with no additional road infrastructure outlined (fig1). This is clearly **unsound** as at a minimum with a development of an additional 1,950 houses with approximately 4,062 residents¹ there should be vehicular access for emergency services (**NPPF 117d**). Moreover, the Local Plan commits that Merton Park should include commercial (minimum 1,200sqm), local shopping and community uses (minimum 490sqm); business space (minimum 4,000sqm) including flexible working space. These spaces will naturally require vehicular access for deliveries (**NPPF, 117d**). CCC has **failed** to ensure patterns of movement, streets, parking and other transport considerations are integral to the design of the scheme and contribute to making high quality places (**NPPF 109b**). Indicative infrastructure on the plan provided by Icen Projects on behalf of Quinn Estates, the Council's preferred developer, reveal a large road linking the two access points to the site (fig2). This road will link Wincheap via Homersham to the B2068 which is **effectively a link road or bypass** allowing road users from the A28 to cut through the estate to access the Nackington Road and onto the Old Dover Road. The proposed slip road from the A2 will also encourage southbound traffic to exit at this point to access the B2068, particularly minibuses and coaches coming to the proposed sports stadium. Regardless of whether traffic calming measures are put in place, this **will not**

¹ Based on an average of 2.36 resident per household using data from the Housing, England and Wales: Census 2021.

discourage traffic from adopting this new route. Satnavs programmed to avoid congestion will inevitably use the estate as a rat run as has occurred at the nearby Saxon Fields development, where drivers use the estate as a cut through to avoid lengthy queues off the A2 exit. Suggestions that the “internal road network should be designed for access only to serve the development” (Canterbury Local Plan 2042/3, March 2026, p.51) are completely **unsound** when traffic scenarios indicate that traffic in the surrounding areas will increase impacting on existing residents. This is **divisive and unjust**. Why should Wincheap residents endure more traffic? This illustrates that CCC has **failed** to demonstrate an understanding or address the potential impacts of development on transport networks (**NPPF 109 c**). Furthermore, it is unclear from the plan whether the police/emergency vehicle only access road off the A2 will be continued to be used. The **NPPF (115d)** states that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety should be considered and **no clear strategy** related to this exit has been outlined. In addition, both Hollow Lane and the secondary access point at Nackington Road feed onto Stone Street **creating additional pressure on an essentially rural road**.

7) Internal Road Network

The Local Plan states that the **internal road network** for Merton Park should be designed for access only to serve the development and to **discourage through trips** between Nackington Road and Hollow Lane. However, evidence shows that traffic-calming schemes designed to promote active travel **increase traffic on adjacent roads** (Bradley *et al.*, 2026) and this is born out in the Canterbury Forecasting Report (February, 2026) where Hollowmede (the site of a local primary school) and St Mildreds (the site of a residential home for the elderly), Oxford Road, and Nunnery Road (access road for emergency vehicles heading to the Kent and Canterbury hospital) are identified as areas which will experience **a higher density of traffic**. More research is needed to evaluate “the spillover effects of active travel infrastructure schemes on the wider network and other neighbourhoods such as traffic redistribution, delays to public transport, and air and noise pollution” (Bradley *et al.*, 2026, p.16). As such, the Canterbury Local Plan fails to take a holistic approach to traffic management and as such is **unsound**. Not only this, but it **fails** to identify how it will encourage the modal shift to active travel in existing areas.

8) Promoting Sustainable Transport and Active Travel

The Department for Transport spent £6.6 billion on active travel during the period (2016-2023) but failed to meet three of its travel objectives with the outcome of the fourth uncertain. Barriers to success included poor quality infrastructure, limited and inconsistent provision of active travel in local areas, limited capacity and skills within local authorities to deliver active travel interventions and public concerns around safety and confidence to cycle (National Audit Office, 2023, p.4). CCC has demonstrated **weak policy** regarding identifying and pursuing opportunities to promote walking, cycling and public transport use (**NPPF 109**

e). The e-scooter scheme introduced in 2020 was withdrawn in 2022 and the Beryl Bike scheme launched in 2026 is already a disaster (Harper, 2026). Beryl Bike locations are ill-thought out as the casual rider (serious commuters would own their own bike and not rely on the availability of the bikes) is put at risk by **dangerous cycle locations**. There are two Beryl Bike spaces at the top of Nunnery Fields and the junction with Nunnery Road and two on the corner of Hollow Lane and Wincheap but as these roads do not have cycle lanes, this seems **ill-judged**, particularly as the bike stations do not provide cycle helmets putting the lives of casual cyclists at risk. The council's active transport strategy is **not fit for purpose** as it is not suited to the conditions or circumstances of living in a historic city.

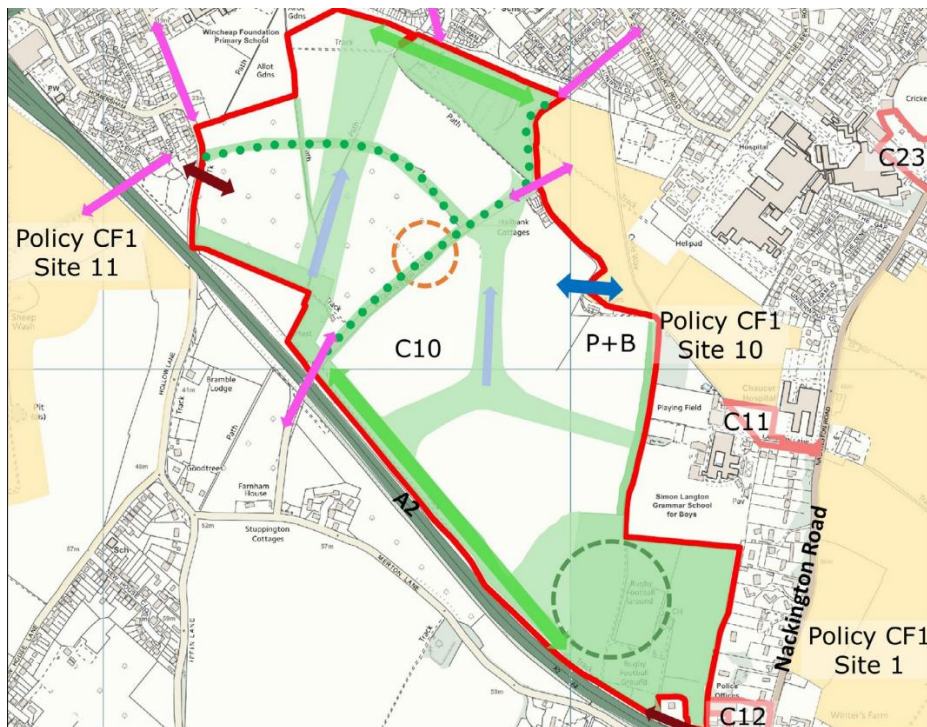


Fig.1

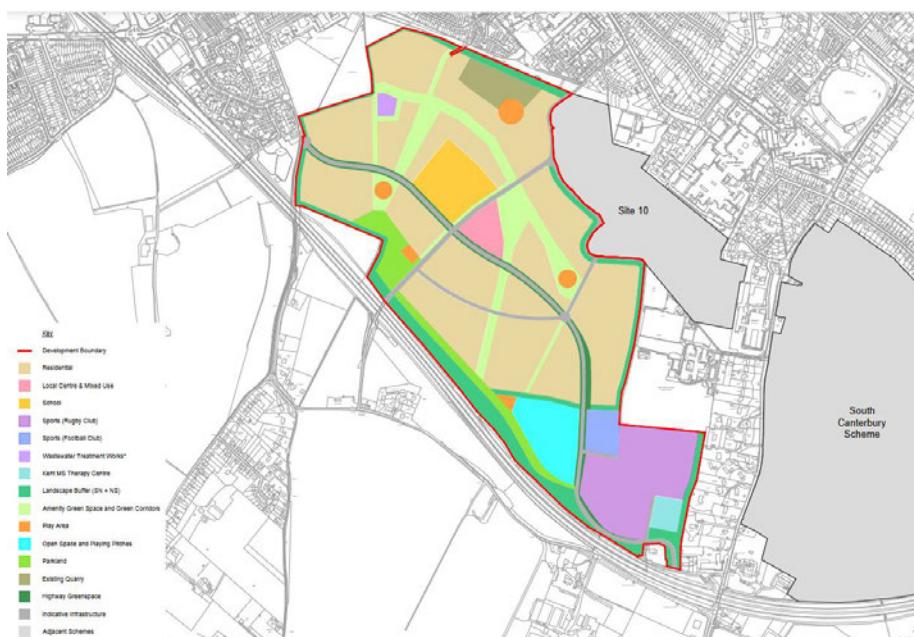


Fig.2

The Draft Local Plan states that Merton Park is set “in a highly sustainable and accessible location and will deliver a suite of improvements to encourage active travel (walking, cycling and wheeling). These include upgrades to Hollow Lane, Lime Kiln Road, Stuppington Lane, South Canterbury Road and Nunnery Fields (Draft Local Plan, 3.19). To achieve this, it commits to siting growth at the urban area of the city (Merton Park is on Grade 1 agricultural land and by definition is not an urban area) to offer the greatest opportunity to **encourage a higher mode switch to active travel**. This it suggests will be complemented by the draft Canterbury District Transport Strategy (2026a) which purports to provide a vision-led approach to managing the impacts of growth and development by **prioritising sustainable travel** (EV charging at all private properties on Merton Park – clean cars, but still capable of creating congestion) and **managing the demand to travel by private cars**. Car ownership estimates based on data from the ONS (2024) reveals that 74.7% of households in the Wincheap ward own cars with 3,770 households owning approximately 4,192 cars. Assuming similar car ownership levels a further **3,115 households from the C10-14 developments** would increase the numbers of cars in the district to **7,656**, putting an **additional 3,464** cars on the road. The Draft Transport Strategy (2026a) states that making improvements to the bus network and focusing parking at Park and Ride and Park and Bus sites, along with investment in walking, wheeling and cycling infrastructure, will help to **remove private car traffic** from the city roads to improve the historic fabric of the city and its air quality. However, the plan is not vision-led, it is **unsound**, utopian and undeliverable as will be outlined below.

9) Bus Travel.

A new Park and Bus facility (300 spaces) will be provided on the eastern side of Merton Park with connection to the fast bus link to the city centre and it is predicted that this will provide the opportunity to intercept car journeys from the south on Nackington Road and Stone Street (B2068), alleviating pressure on Old Dover Road (The Canterbury Local Plan 42/43, March 2026, p.47) However, most of the pressure on the Old Dover Road comes from traffic exiting the A2, travelling to the three secondary schools in this area, avoiding the New Dover Road and crossing the city. Commuters travelling from the villages south of Canterbury may have destinations beyond the city centre. Moreover, despite their high weekday daytime frequency, P&R services **do not operate into the evening, and have a significantly reduced Sunday service**, which means that bus use is unsuitable for evening leisure activities and weekend workers. The plan also states that consideration should be given to incorporating this facility with parking provision for the Sports Hub, which would mean that at times of matches this carpark could be at full capacity impacting on its use by other users. Every football or rugby match has home and away players and away players and their supporters tend to drive rather than cycle to a match. Even home players are unlikely to exhaust themselves with an uphill walk or cycle before the match. With a proposed stadium capacity of 2000, this could lead to at least an additional 1000 cars arriving for matches, swamping the 300 spaces.

Park and Ride and Park and Bus schemes are **designed for visitors** and commuters to the city and **do not address local needs** or provide solutions for reducing private car traffic use by local residents. Active travel aspirations as outlined in Canterbury Urban Area Strategy (Draft Local Plan, p43) are **unsound**.

Not only this, but the projections for bus usage ignore the **capacity issues** outlined by the Bus Action Plan (2026) which notes that the key radial routes **such as A28 Wincheap** into Canterbury city centre and Canterbury's ring road are **key congestion hot spots** and many of these routes are **narrow, single carriageway routes**, meaning conflicts for road space between different road users (**TR4.1c**). The Bus Action Plan (2026) also notes that the bus station is itself a key pinch point in the bus network. **Space within the bus station is highly constrained** and is at or near capacity. Introducing new services which would require additional layover spaces would be very challenging as opportunities for expansion of the bus station or re-modelling to allow through movements, are constrained by the surrounding historic environment.

In addition, the Bus Action Plan (2026) has stressed that the overall population of Canterbury district is projected to grow by 11% by 2042 with this **growth driven by those 65 and over** which presents **a challenge** in terms of providing concessionary services which meet the needs of this ageing population who may have limiting physical conditions.

Not only does the Bus Strategy highlight these major concerns, during a debate held at the Canterbury Guildhall regarding the extension of the Wincheap Park and Ride by an additional 900 spaces (Overview Committee 12 Feb 2026) councillors expressed their concern that there might be overbuilding of the site, that lack of signage to the Dover Road site had led to underuse, and that they were being forced to choose the best of a bad set of options and any attempts to highlight the deficiencies of the current Park and Ride system were brushed aside by council officials. This highlights the **lack of robust and firm evidence** gathered to realise opportunities from existing or proposed transport infrastructure (**NPPF 109 d**) and **the fragile democratic process**, which has recently been exposed by **the collapse of the council coalition over** planning processes, which **prevents positive planning**.

10) Cycling

The active corridors highlighted on the Merton Park Development are **cycling routes** from Lime Kiln Road and Stuppington Lane, however these cycle routes will feed into narrow congested roads such as Gordon Road and Nunnery Fields, which are not wide enough for dedicated cycle lanes. Proposals to add signs to clarify cycle right turn and remove on street parking to extend the cycle lane at the junction of Nunnery Fields and Lansdown Road although (Canterbury District Draft Local Cycling and Walking Implementation Plan 2025-2040) welcome in many respects (although not for bulky drop off at the launderette which will be adversely affected by these plans), will not address the **narrowness of the road**

further up by Caledon Terrace (51.272909957330896, 1.0828693497715096) which is **single traffic only**.



Moreover, the **gradients of these cycle routes** have not been fully considered. The ten-minute return journey from Canterbury East to Merton Park climbs 144 feet (Google Maps).

The Canterbury Local Cycling and Walking Implementation Plan (Canterbury City Council, 2026e) does not commit to extend the cycle path the full length of Lime Kiln Road so would **fail** to serve both existing residents and new residents on Merton Park (C10). Detailed plans drawn up by Charles and Associates (Canterbury Local Plan Evidence Vol 1 – Sustainable Transport Strategy Policy N1 - Merton Park, Canterbury, 6.4.16) show the cycle path deviating onto Lancaster Road, to avoid the stretch of Lime Kiln where garages, waste bins and safety concerns make the space unsuitable for cycling, however Lancaster Road **is not a cycle path** and cyclists will be in conflict with car users (**TR4.1c**). Additionally, no indication has been given as to how table improvements at each end of Lancaster Road designed to slow traffic will impact parking for local residents nor how they will be nudged to reduce car ownership. Not only this, but the proposed active travel connection from Oxford Road to Gordon Road along the southern end of Lime Kiln Road has **not been effectively designed** for mixed transport use as this narrow stretch of road which in part has reduced visibility (51.272990132007074, 1.0765844482873146) is used extensively by car drivers, allowing access to schools, hospital and shops. If Lime Kiln Road was closed to motorized traffic residents trying to access Oxford Road from Wincheap would be forced to drive either further along Wincheap or along Martyr's Field Road **adding to already over-burdened roads** such as Victoria Road.

At the other end of the site, CCC has proposed **repurposing Stuppington Lane** for non-motorised vehicles and access only. However, Iceni Projects on behalf of the site promoter Quinn Estates have indicated a road cutting across the lane, and an additional road joining the lane which suggests cyclists would be put into conflict with road users (**TR4.1c**).

Furthermore, severing Stuppington Lane would only shift existing traffic elsewhere. Stuppington Lane, is a single track-lane which suffers from the impact of Sat Navs directing cars from Stone Street to avoid traffic build up at Nackington Road. Charles and Associates have predicted the impact of the severing of Stuppington Lane (Figure 5.2: Impact of Stuppington Lane Filtering - AM Peak Hour) revealing not unsurprisingly flows through Nackington Road distribute into Old Dover Road (60 and 70 vehicles net increase in the AM and PM peak hours respectively) with a direction towards the city centre impacting existing road networks (**NPPF, 2025, TR6.3, p.71**) A traffic survey conducted by Save Wincheap Orchards and Fields during the week beginning the 26th January revealed that cars were using the lane as a short-cut into Canterbury rather than by people going out of the city, with an average of 200 cars a day during the morning rush hour (7-9 am). Although residents would welcome a reduction of traffic in this area, the impact of this would be felt by other routes in and out of the city. All development proposals should be capable of proceeding without having a severe adverse impact on the traffic network (**NPPF, 2025, TR6.3, p.71**) however, CCC's transport modelling has failed to rigorously evidence this. The knock-on impact on the Old Dover Road has not been measured, and the plan **has not been effectively or positively prepared.**

11) Realistic Journeys

Unrealistically high assumptions have been made about the proportion of walking, cycling and bus trips that will be made by Merton Park residents. 60% of people in the Southeast walk at least once a week for leisure (recreation, health, competition, or training). This drops to 35% for travel purposes (commuting, visiting a friend, or going to the supermarket) (Walking and cycling statistics, England: Local area walking and cycling rates (Active Lives Survey, 2024). Moreover, the Canterbury Local Plan assumes car ownership within the city is linked to movement into the city but most people who live within walking distance of the city centre walk as the ring road is too congested and journey times slow. People own cars to work outside the city, to do the weekly shop, to visit friends and family, to attend GP and hospital appointments, take children to school or for leisure purposes. They use the ring-road as a conduit to get to places and rarely need to enter the city wall zones. Additional buses unless linking retail parks, schools, hospitals and GPs to local communities will not reduce these local journeys. CCC has failed to demonstrate an understanding or addressed the potential impacts of development on transport networks (**NPPF 109 c**).

Moreover, transport modelling (Canterbury City Council, Feb 2026) has **not focused on realistic journeys**. According to the Origin-Destination Analysis Canterbury City Council - Policy and Strategy (Feb 2026b) of the 635 vehicles that travelled eastbound along the Wincheap Road in the AM peak (DS1 model), the greatest proportion (25%) were travelling to the City Centre. A further 132 (21%) of destinations were travelling to New Dover Road and Old Dover Road, to schools, universities, Canterbury College, and hospitals. There was also a substantial volume of vehicle journeys with destinations in Canterbury's outlying

areas, such as Blean (including the University of Kent), Military Road and Sturry Road area (including retail parks and light industry). The Council state that under the scenarios DS1, 2 and 3 (Do Something 1, 2 and 3), these traffic volumes will be 635, 543 and 506 respectively with 49% of journeys originating from the Wincheap area, including the Merton Park development and 34% of from the urban periphery at Thanington and villages. 2021 Census data indicates that 75.8 percentage of the 10,143 residents of Wincheap ward are over 16 years of age. 57.4 of these are economically active (4,413) of which 37% travel to work by car (1,632). This suggests that 527 of the anticipated 635 vehicles originate from Wincheap or Thanington, so the other 1,105 residents will be using other routes such as Nunnery Fields to Old Dover Road or westward on the A28. This origin-destination analysis (2026b) says little about the congestion that will arise as a result of development in south and southwest canterbury, nor the cumulative effect of the Mountfield Park (South Canterbury) development on roads in this area. **The impact on the Old Dover Road which is a key arterial route has not been modelled** which is a huge oversight. These unrealistic assumptions about car use create a vision-led strategy that is fantastical. Wiek and Iwaniec (2014, cited by Lyons *et al.*, 2025, p. 5) point out that “visions need to remain in the domain of plausibility in order to be more than fantasies and daydreams” and CCC’s Local Plan **fails to be realistic or sound**. The National Highways (Brown, 2025) requested in their regulation 18 response that further details should be provided in relations to the **adverse impacts** that Merton Park with have on the Strategic Road Network (SRN) and the Origin-destination analysis (2026b) has failed abysmally to provide this.

12) Modal Shifts

The Canterbury Local Plan commits to significantly reduce traffic congestion through a **decisive switch** towards public transport and active travel which will **improve health, quality of life and the environment** (p.25). However, this commitment is **unsound** as it assumes a modal shift in transport behaviours. The reliance of the plan on active travel whilst laudable appears inconsistent with the **target demographic** of the Merton Park development of older persons and families. The probability of achieving modal shift is only possible by outlining a “detailed understanding of the activity patterns of residents in key areas of the district” through bespoke travel surveys and partnerships with existing residents (Kenyon, 2025). A survey conducted by Cycling UK (2025) suggests that, in most years, about 11%-12% of people aged 16 and over cycle at least once a week. This drops to 5% of adults who cycle at least once per week for travel, rather than leisure (Active Lives Survey, 2024). 57.4% of the over-16s in Wincheap ward are economically active. This equates to 4,413 persons of which 37.6% drive to work, 19.6% walk and 2.7% cycle (ONS data). Transport decisions are influenced by activity and lifestyle which can be highly subject to change (Kenyon, 2025). With climate change, increasingly wet winters, and dark nights, cycling is not always the most popular mode of transport to reach smart work or leisure opportunities, such as the swimming baths, theatre and cinema. The lower dip slopes create a natural flooding risk. Stuppington Lane for example has a dip that floods in bad weather, which will preclude cycling on wet days. Furthermore,

around two-thirds of the population aged 16+ agree/strongly agree that it is too dangerous to cycle on the roads (National Travel Attitudes Survey, 0101a). In the 2017 adopted local plan it was stated that Canterbury's urban areas are particularly suited to walking being mainly flat and compact and as such the potential to shift journeys currently made by car to walking is extremely high (5.26, (Canterbury Local Plan Evidence Vol 1 – Sustainable Transport Strategy, 15). However, Merton Park will be in an elevated position, up Nunnery Fields and Stuppington Hill. Lyons *et al.* (2025, p. 4) state that “A vision shaped by a plurality of experiences, perspectives, needs and expectations” is desirable to achieve the vision and reduce resistance.

13) Timely Delivery of Infrastructure

Changing transport behaviour towards sustainable modes requires integrating improved public transport, safe active travel infrastructure and personalized nudge such as leveraging ‘moments of change’ to encourage new residents to make sustainable choices. Lyons *et al.* (2025, p.10) ask **how far the bounds of future possibility can be stretched** to achieve these goals. Unless the cycling and walking infrastructure is in place ahead of the development it is **unlikely** new residents will make the modal shift. The NPPF recommends making transport considerations an important part of early engagement with local communities (**NPPF, 2024, 109a**) and that site developers should work collaboratively to ensure the site is delivered in a coordinated manner, to secure **the timely delivery of infrastructure alongside new housing** and other development. The Local Plan states that “new and improved walking and cycling connections to school locations, both within the site and surrounding communities; are required to be provided prior to the opening of the school on site” (Canterbury Local Plan 2042/43, March 2026, p.52); however, the Infrastructure Delivery Plan (March 2026, 9.7, p.26) indicates that “schools are expected to be delivered in the **medium to long term** aligned with the delivery of housing” suggesting that early residents will have to travel to neighbouring schools, thus **creating car dependency habits**. At nearby Saxon Fields, a promise by KCC to deliver a new primary school has been delayed beyond the construction phase (Pallant, 2025) and this school is planned to open by 2028/29 expanding to 2FE post 2033 as housing delivery at the site progresses. The Local Development Scheme (Canterbury City Council, March 2026i, p.9) anticipates that should the plan be successful, it will be adopted in December 2027. Charles and Associates acknowledge that “in the future year when the development comes forward traffic levels might be worse” (3.4.5, p.13) however to assume that “40-45% of all peak hour trips to/from the development, previously assumed to be car based on in the strategic model, would now be made by sustainable modes”(Charles and Associates) is a prediction that is not credible. Parents are not obliged to send their children to the local school and there will be additional traffic to Wincheap school. The age-old tradition that everything starts at 9 AM means that parents trying to drop off children to school and get to work on time often have to rely on fast modes of transport. A traffic survey conducted by Save Wincheap Orchards and Fields noted over two days (30.4.26-1.5.26) that an average of 440 cars arrived at the Homersham/Hollow Lane (eastbound) mini-roundabout between 7.30-9.00 AM with 249 cars exiting from Hollow Lane

to Homersham (westbound). Traffic from Merton Park will create a bottleneck at both ends of Homersham. In addition, bus gates at key locations, including Old Dover Road, Hollowmede, Merton Park, South Canterbury and Ridlands Farm are to be delivered in years 11-15 (Long term) (Infrastructure Delivery Plan, March 2026, p. 65) which would correspond with 2038/9-2042/3 whereas Quinn Estates anticipate 200 houses a year from 2030/1 (Iceni Projects, 2025, p.4). The Infrastructure Delivery plan, draft transport plan and site promoters vision appear to be in conflict **preventing the personalized nudges** required for active travel and this renders the local plan **unsound**.

14) Trains

The National Planning Policy Framework (NPPF) recommends a default “Yes” to suitable planning applications for housing near well-connected train stations, increasing density around transport hubs. It states that “development for housing and mixed-use development which would be within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services” should be approved (**NPPF, 2025, S5.1h**). However, although Canterbury East has a line to London Victoria, commuters prefer the high-speed links from Canterbury West to St Pancras which are twice as quick (begging the question why the SDA is in the south of the city and not the north) (Evidence shows that Canterbury East has more than half the number of passengers of Canterbury West (Railwaydata.co.uk)) and anyone moving to Merton Park with the intention of commuting is more likely to travel across the city to the West station, adding to the **already over-burdened ring road**. The walk from Merton Park to Canterbury East takes 30 minutes, the car from Merton Park to Canterbury West takes 12 minutes and there are better parking options at Canterbury West with 20 EV chargers. Furthermore, policy C3 commits to train station improvements at Canterbury West to extend the platform to accommodate 12 coaches in line with the Draft Transport Strategy (2026a) to improve its **operational capacity** and accessibility. In contrast, at Canterbury East policy C6 commits to provide long and short stay cycle parking for railway users but does not include a commitment to EV charging, illustrating that Canterbury East is not considered a key commuter station to London. Moreover, the Local Plan commits to deliver approximately 37 new dwellings at Site C6 Land at Station Road East including affordable housing whilst ensuring **adequate** car parking arrangements for the railway station remain in place following the development. Adequate car parking at site C6 is **inconsistent** with the Local Plan’s commitment to concentrate housing in the South of the city as it only meets **basic expectations, is not sustainable** and does not allow for future expansion. Not only this, but the residents of the 37 dwellings may also need parking spaces. There are currently 127 spaces shown on the aerial map of the site. This car park is popular with commuters, but also employees of Canterbury Christ Church University working in Augustine House Library which has no onsite parking. With the recent decision by CCC to change Augustine House from educational to business use, the number of staff working in the building with the arrival of accountancy firm Burgess and Hodgson will increase. They will also need space for their visiting clients to park locally. This

important micro-detail has been lost in the Local Plan because CCC has **failed** to consult residents or commuters and to undertake effective transport planning. In addition, only 2.3% of residents in the Wincheap ward travel to work by train (2021 Census Data) so to consider Merton Park an immediate 'yes' due to its transport links would be erroneous.

15) Recreational Walking.

A vision-led planning process rather than a 'predict and provide' model has to consider walking not only as a means of travel but also as a recreational activity and to decrease car ownership there needs to be recreational space available within the local community. By taking away the green space at Lime Kiln play area (a contested space belonging to the council but a site of housing on the site proposer's plan) and Wincheap Orchards and Fields, residents of Wincheap will be forced to get in their cars to access the countryside which flies in the face of CCC's vision. Merton Park residents are promised "connections to the wider countryside to the south and south-east" (Draft Local Plan 2042/43, 4aviii, p. 51) whilst residents of Wincheap will have theirs taken away – unjust! The whole plan concentrates development to the south of the city whilst the north retains its green spaces. There is no fair distribution of housing development across the city and as one of the poorest, most polluted suburbs, Wincheap will suffer. Moreover, although the Draft Local Plan commits to enhancements to Public Rights of Way (p.47). These are maintained by Kent County Council and local residents who have asked for enhancements have been left in lengthy queues with their work unassigned so it is unclear how CCC proposes to leverage this work.

Vision "is the ability to think about or plan the future with imagination or wisdom" (Oxford English Dictionary). Canterbury City Council has displayed neither. There exists a "tension between deliverability and ambition" (Lyons *et al*, p. 9) which makes the plan implausible. Visioning implies 'creat[ing] desirable futures" (Lyons *et al*, 2025, p.2). The Canterbury Local Plan will create a nightmare.

Air Pollution

Summary

This objection contends that the Local Plan fails to adequately address air quality and public health impacts, contrary to NPPF requirements. Air pollution is the UK's largest environmental health risk, and Canterbury already performs poorly, with pollution levels significantly above the national average. The Wincheap area—bordered by the A28 and A2 and identified by the Council as the city's worst pollution hotspot—would be particularly affected by the proposed Merton Park development. Almost 2,000 new homes, increased traffic volumes, and the removal of more than 16,000 trees would substantially worsen nitrogen dioxide and particulate pollution, especially in the low-lying Stour Valley where pollution accumulates. Traffic modelling shows continued congestion and increases exceeding 1,000 AADT on key routes despite active travel assumptions. Monitoring data is insufficient and inconsistent, undermining the evidence base for the plan. NPPF requires

transport and development impacts on air quality to be avoided or mitigated and opportunities for pollution reduction secured. The Council's strategy does neither, placing existing and future residents' health at risk.

National Policy and Guidance

This objection has been informed by the current and the draft legislation. The Canterbury Local Plan fails to meet the following guidance and is therefore unsound:

- NPPF, 2024, 109f
- NPPF, 2025, TR3.1c
- NPPF, 2025, HC1.1e
- NPPF, 2025, 17. P1.1c
- NPPF, 2025, 17. P3.1a, 1b, 1c, 2a

Objection

In the UK, air pollution is the largest environmental risk to public health (Office for Health Improvement and Disparities, 2022). Traffic-Related Air Pollution (TRAP) is associated with respiratory and immunological dysfunction (Kiratipaisarl *et al.* 2025). By building on the edges of a small city that cannot sustain this development, the council is putting the health of its current and future residents at risk. Canterbury ranked in the bottom 30 percent of local authority areas in England for health in 2021 (ONS, 2026) and the Health Values for the city revealed that **air pollution is above the national average** by 23.8 points.

In the Chief Medical Officer's annual report on air pollution published in 2022, it was identified that the effects of air pollution have negative effects on health **throughout the life course** (Chief Medical Officer, 2022) and that this is evident from pre-birth to old age. The Council's Air Quality Report (2025) highlighted that: 'The Department of Health and Social Care's advisory Committee on the Medical Effects of Air Pollutants (COMEAP) has estimated that long-term exposure to man-made air pollution in the UK has an annual impact on **shortening lifespans**, equivalent to 28,000 to 36,000 deaths (COMEAP, 2018).

The Local Plan has highlighted current problems with **traffic congestion and poor air quality** (2.1 p. 27). Pollution builds up in the low-lying area of the Stour Valley and along the A28. The NPPF (2025, TR3.1c) advises that the environmental impacts of traffic and transport infrastructure should be identified, assessed and considered, including taking opportunities **to avoid or mitigate** any adverse environmental effects and to secure net environmental gains such as **reductions in air pollution** (NPPF, 2024, 109f).

The impact of construction and additional houses and cars in the Wincheap area with the proposed project at Merton Park will impact the quality of life of the residents of Southwest Canterbury even further. The Wincheap suburb is bordered by the A28 and A2 which are both high traffic density roads. CCC's Air Quality Action Plan identified that the highest site of air pollution within Canterbury is at the Wincheap/Hollow Lane junction. Developing

nearly 2000 houses will significantly increase the air pollution especially with the removal of 16,000 trees, which **absorb pollutants** such as nitrogen dioxide, sulphur dioxide, and particulate matter through their leaves, releasing **clean oxygen** and mitigating climate change (Woodland Trust, 2026).

The Canterbury City Council 2025 Air Quality Annual Status Report acknowledges that Canterbury suffers from “**significant congestion** due to the **large net inflow** of commuters as well as secondary school children, shoppers, university students and tourists. The city centre roads are subject to frequent congestion in peak hours due to the **high traffic volumes** along a historic road layout, with **residential properties in close proximity to the roadside.**” (ii) The Wincheap slip road and gyratory expected to be delivered by 2026/7 will not solve the bottleneck that will occur at the Wincheap roundabout, although they will reduce pollution from diesel buses for residents living directly on the A28. However, as 1000 new homes are to be built on the industrial estate, these residents will receive the air pollution from the diverted traffic.

Air pollution sensors on Wincheap show that hourly mean levels of NO₂ regularly exceed 70mg/m³ with a level of 90.4 mg/m³ reached on April 8th 2026. This is below UK legal air quality limits but considerably higher than WHO guidelines (WHO, 2021).

The NPPF (2025, HC1.1e) encourages planners to “identify wider opportunities to promote good health and prevent ill-health” however CCC has **failed** to develop a viable and effective plan to improve health or address inequalities. The Canterbury Transport Modelling Forecast Report (February 2026) identified that the A28 Thanington Road corridor between Grays Way and Hollow Lane, and the Wincheap Roundabout **would continue to be traffic hotspots despite active transport modelling**. Developments at C10-14 will increase this traffic as the A28 is the main artery to supermarkets, A&E and access to the A2.

Not only this, but air quality monitoring has been patchy and lacking rigour. According to the CCC Air Quality Annual Status Report (2025) air pollution monitoring is supposed to take place in three places on the A28: Non-Conformist Burial Ground, Wincheap (DT14), 284, Wincheap (DT15) and 10-16 Wincheap (DT23) although missing tubes has resulted in a lack of data for DT15. However, the monthly reports produced by CCC over the period 2025 do not report on any of these monitors creating **a vacuum of data** on which to base the local plan. The Consumer Data Research Centre: Access to Health Assets and Hazards (AHAH) has identified that the PM10 particulate matter levels in the Wincheap ward are the highest value in Canterbury (see fig 3).

This is the area closest to the orchards and fields of Wincheap, and these residents (human and animal) deserve better. According to KentAir.org there are sensors at 123 Wincheap and 48, Wincheap. Over a 7-day period (27.4.26-4.5.26) the sensor at 48 Wincheap exceeded 60 µg/m³ of nitrogen dioxide 4 times and 123 Wincheap exceeded it 5 times. In 2026, PM10

particulate matter has had 1 exceedance of air quality strategy standards at 123 Wincheap and 3 at 48 Wincheap.

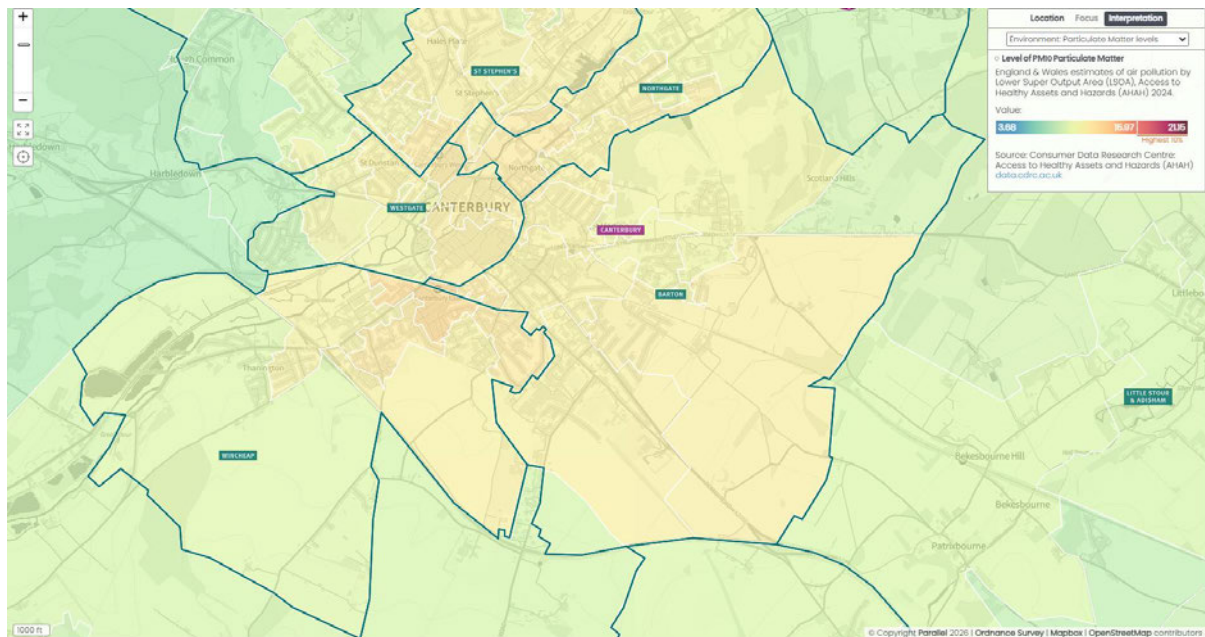


Fig 3. PM10 particulate matter levels (red is high)

The Air Quality Assessment report (March 2026) has identified several locations which will have traffic increases **exceeding 1,000 AADT** (Annual Average Daily Traffic), including Cotton Road, Elham Road, and Homersham in the DS1 (Do Something with Local Plan 1) scenario which seeks to **absorb demand through mode shift**, instead of allowing new road space to be “backfilled” by extra car trips. It also highlights that Wincheap as a longer-term mixed-use regeneration area **does not currently include sensitive receptors**, and that the introduction of future residential uses would change this context. As such, any future master planning and design for the Wincheap regeneration area will need to incorporate appropriate consideration of air quality to ensure suitable protection for potential new receptors. Exceedances on Homersham, Cogans Terrace and Elham Road are surrounded by residential properties, which are classed as high sensitivity receptors by IAQM guidance, meaning they are **more susceptible to air quality issues**. In the DS2 (Do Something 2) scenario, Oxford Road and Norman Road are predicted to see increases of up to 2,700 AADT.

CCC has **failed** to undertake robust monitoring of air pollution in this area. Their vision-led transport strategy (Canterbury City Council, 2026a) has **not been positively prepared** and does not set out effective policies for mitigating against air pollution. Nor is the plan justified, as the council has a duty of care to its current residents as well as future ones.

Biodiversity

Summary

This objection contends that allocation of Site C10 is **unsound** and fails to comply with NPPF (2024) paragraphs 192 and 193 on biodiversity and geodiversity. The Local Planning

Authority did not identify, map, or properly assess the site's high biodiversity value prior to allocation. Site C10 forms part of an important ecological network, supporting protected and priority species and functioning as a wildlife corridor linking orchards, allotments, woodland, and the disused Elham Valley Railway embankment. The site contains habitats of Principal Importance, veteran apple trees, ancient hedgerows, and a Regionally Important Geological Site (Cooper's Pit). Over 50 bird species have been recorded, including red- and amber-listed species and legally protected birds. Protected mammals, reptiles, and bats are present, yet no assessment of the site was undertaken by CCC. The proposed developer has now started an ecological survey which is far too late in the planning process. Proposed development would fragment habitats, introduce light, noise, and road mortality impacts, and result in irreversible loss of irreplaceable habitats. The removal of the 20% Biodiversity Net Gain requirement for this site, reliance on undefined off-site mitigation, and failure to apply the mitigation hierarchy further undermine compliance. Significant harm cannot be avoided or adequately compensated, and Site C10 should therefore be removed from the Local Plan.

National Policy and Guidance

The NPPF (2024) 192a states that to protect and enhance biodiversity and geodiversity, plans should: **Identify, map and safeguard components of local wildlife-rich habitats** and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; **wildlife corridors** and stepping stones that connect them; and areas identified by national and local partnerships **for habitat** management, enhancement, restoration or **creation**.

NPPF (2024, para 192b) advises that 'To protect and enhance biodiversity and geodiversity, plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. Merton Park will destroy a unique landscape leaving it much diminished and therefore the plan is **unsound**.

Objection

1) The Local Planning Authority LPA has failed to identify and map accurately (prior to allocation) that this site has a high biodiversity value.

Habitats and Biodiversity

Site C10 supports protected species, a rich biodiversity and a complex ecology, contributing to an important wildlife corridor. It is adjacent to the disused Elham Valley Railway embankment, a woodland habitat which is recognised in the Canterbury Local Plan (March 2026, p.47) as important for habitat connectivity, and to the north by extensive allotments which support species such as foxes and slow worms. This site also contains habitats of Principal Importance in England, hedgerows, and in Coopers pit RIGS scrub is found. It is also near to an area of deciduous woodland which is on the Natural England's Priority Habitat

Inventory (Canterbury City Council, Canterbury Strategic Land Availability Assessment – Site Assessment, 2022).

Orchards

The ecology of this site reflects the historical abundance of orchards and fields being present in and around Canterbury. On the site west of Stuppington Lane is an apple and pear orchard containing more than 16 000 fruit trees of which some are veteran apple trees which have been registered (Woodland Trust). The older trees provide shelter and nesting cavities for birds, roosting bats and habitat for the invertebrates that these species depend on. Other species such as voles use the base of these trees to burrow into. Fallen and standing deadwood is present throughout the site. This provides a mosaic of habitats from which different species with varied niches can benefit from. This is very similar to the type of habitat found in orchards which are designated traditional orchards (Peoples Trust for Endangered Species, 2026).

Birds

54 species of birds have been recorded on this site including the Spotted Flycatcher, Goldfinch and Greater Spotted Woodpecker which are biodiversity **key indicator species** which attests to the **ecological quality of the site**. The site supports 13 out of the 70 species of birds on **the red list of conservation concern** (those at highest risk of extinction) including one of the fastest declining birds, the Spotted Flycatcher. It also provides a habitat for 12 species of threatened birds on the amber list of conservation concern. These birds are also on Natural England's List for birds of conservation concern and woodland birds of conservation concern (Natural England, 2026). These endangered and threatened species are recorded on the national database BirdTrack (2026) (see Appendix 3). There are also three Schedule or Category 1 bird species, the red kite, fire crest, and redwing and four overwintering bird species, the common red poll, fieldfare, redwing and blackbird all of which have **enhanced legal protection** under the Wildlife and Countryside Act 1981 (as amended), which protects all wild birds, their nests, and eggs from being killed, injured, or damaged.

2) There is no evidence that the LPA has met their biodiversity duty and have been aware of biodiversity conservation in their allocation of site C10 in the Local Plan, 2026.

This objection relates to NPFF (para 192b) 'To protect and enhance biodiversity and geodiversity, plans should (b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

There is no indication that the guidance provided in 'Protected species and development: advice for local planning authorities' (Natural England, 2025) to assess whether this planning allocation would harm or disturb a protected species has been consulted. Even though this site contains likely habitats for protected species such as veteran trees, those with significant

decay, Coopers Pit scrub and ancient hedgerows, no report from a qualified ecologist has been carried out. The presence of protected species and species of principal importance (Joint Nature Conservation Committee, 1994) should have been a material consideration in the planning process. Species of Principle Importance (these species are Priority Species under the UK Post-2010 Biodiversity Framework (Joint Nature Conservation Committee, 2012) found here include hedgehogs; long brown-eared, common pipistrelle, soprano pipistrelle and Nathusius bats; and slow worms.

Bats

Bats are protected as a European protected species (EPS) (Natural England, 2014). EPS get full protection under Schedule 2 and 5 of the Conservation of Habitats and Species Regulations 2017. It would be difficult to obtain an EPS licence as the LPA have not demonstrated that “there is a satisfactory alternative to the proposals that would cause less harm to the species”. Especially as the recent 750 house development in Thanington (immediately to the west of this site) and the imminent 4000 house South Canterbury development (immediately southeast of this site) has destroyed the surrounding habitat for all species. The dark skies which currently exist will be destroyed by artificial lights sources (both from residential and public venues). Leakage of artificial light at night will have a major negative impact on the insects and the bats which forage and feed here (NPPF 198 c).

In addition, there are ancient, extensive badger setts and badgers are protected under the Protection of Badgers Act, 1992.

Geodiversity

There is evidence that the geodiversity will be damaged. The Land Use Plan from Iceni Projects on behalf of Quinn Estates ([2937-315 Land Use Plan](#)) shows that residential housing would surround the quarry and Coopers Pit RIGS, and that a play park would be located on or very near to part of the RIGS site. The Local Plan (March 2026, 3d, p.50) mandates that Cooper’s pit RIGS (Regionally Important Geological Site) should be incorporated into the wider green infrastructure/and or Open Space Strategy (2023) and enhanced. However, Quinn Estates have stated that “While it is noted that these areas are shown as open space due to the Regionally Significant Geological Site (RIGS, Coopers Pit), the Ecologia survey confirms that parts of the site can accommodate development without harming geological features and retaining the remaining area as open space would safeguard the cliff exposures.” This is in conflict with NPPF 15 187a and is unsound.

This current plan is unsound as it will not protect priority species or this regionally important geological feature.

3) The LPA have agreed that the developer for site C10 does not have to adhere to Policy DS21 (20% BNG (Biodiversity Net Gain)).

‘Policy DS21 (The Local Plan (March 2026) states that all major developments, other than those exempt through national legislation, should deliver 20% Biodiversity Net Gain’ as does the Canterbury District Biodiversity Strategy, (Draft 2026d). However, Quinn Estates (the site promoter for C10) have made private representations to the LPA which has resulted in the removal of specific reference to 20% BNG for site C10.

Evidence for this in an email from Icení (on behalf of Quinn Estates (21st October. BNG 2025) (Innes, 2025). : “Following previous representations on the matter, it is recognised and appreciated that the updated Policy N1 has removed the specific reference to achieving 20% BNG in accordance with Policy DS21, and amended to ‘Incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Area H4: Nackington Farmlands set out in Canterbury Landscape Character and Biodiversity Appraisal” (3b).

“While this change is noted, we suggest it would be advisable to explicitly identify variation and exemption from Policy DS21 where justified on a site specific basis, either within Policy N1, or within Policy DS2.”

Therefore, Quinn Estates have made representations to the LPA to remove requirement to achieve the 20% BNG. The phrase ‘Incorporating opportunities’ is meaningless. There is nothing in the *Canterbury Landscape Character and Biodiversity Appraisal* about ‘biodiversity enhancements’ for Local Character Area H4.

The general biodiversity net gain condition cannot be varied or removed by an application under section 73 of the Town and Country Planning Act. It also cannot be discharged as part of the grant of planning permission.

4) The LPA proposal for C10 fails to adhere to the statutory mitigation hierarchy which is clearly stated in the Canterbury District Biodiversity Strategy, Draft 2026 (Canterbury City Council, 2026d).

The Local Plan (March 2026) states ‘To achieve high density sustainable development on the Merton Park site, the council will accept a proportion of open space to be delivered **through off-site enhancements**.

This is giving the developer permission to build as many houses as possible on the site and then to mitigate BNG with a ‘proportion’ off site. This is very unclear. Does this mean that for example most BNG could be provided off site?

How does the LPA know which ‘off-site’ areas are suitable (and whether they are available) when no survey has been carried out to establish what degree of significant harm to biodiversity will occur if the C10 development goes ahead?

6.124 The Kent and Medway Local Nature Recovery Strategy identifies numerous areas of land within the district which could provide opportunities to improve biodiversity. At this

stage, the information available is not **targeted enough** to require safeguarding in the Local Plan as there are a range of approaches to meeting the priorities identified.

This is clearly unsound to 'offer' off site enhancements at this stage of the planning process:

- a) And not to mandate the statutory mitigation hierarchy for 10% BNG
- b) When off site land is not '*targeted enough*'

5. This objection relates to NPFF (para 193a) When determining planning applications, local planning authorities should apply the following principles:

(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused

It will not be possible to prevent significant harm to wildlife and the complex ecosystem found on this site cannot be adequately mitigated or compensated for. The indicative concept masterplan (The Local Plan (March 2026, p 48) and the Land Use Plan from Iceni Projects on behalf of Quinn Estates (2937-315 Land Use Plan) fragments habitats so that any wildlife left will struggle to survive in isolation. The landscape buffer proposed in the Local Plan, March 2026 and the Land Use Plan will concentrate any residual wildlife adjacent to the A2. This will therefore **increase the likelihood of roadkill** e.g. It will increase the risk of bats being caught in the slipstream as cars go by. In addition, noise pollution from major roads will have a detrimental effect on birds as they must alter their songs to be heard over the low-frequency traffic noise (Hill, 2008).

Connectivity

This site provides connectivity to several nationally recognised sites. This is evidenced by the presence of water species such as the Cetti's Warbler (Endangered) and Common Reed Bunting (Amber) being recorded here coming from Hambrook Marshes and Stodmarsh SSSI. There is a requirement for competent authorities to consider the importance of functionally linked habitats in Habitats Regulation Assessments (HRAs) when assessing new plans. This has not been done. Additionally woodland species have been recorded here such as the Tawny Owl. Field species found here include Yellowhammers and Linnets. This site additionally receives summer migrants from Africa including Spotted Flycatcher and Common Whitethroat. (BirdTrack, 2026).

The orchards have a high ecological value due to their significance for overwintering migrating birds such as Fieldfares (Endangered) and Redwings (Threatened) which travel from places such as Russia, Iceland and countries in Scandinavia to this site annually. Migration depends on a surplus of food being available once resident species have enough. Windfall apples are a vital resource for these orchard specialist species every winter as well as the ancient hedgerows of hawberries, sloes, mulberries and rosehips and when food sources are scarce seeds found in the catkins of the 3m tall alder hedgerows. With the loss of

this crucial food supply starvation is likely as they are loyal to sites and struggle to adapt quickly to change and/or it would negatively affect their breeding success in their home ranges.

Hedgerows

This proposal would see the loss of ancient hedgerows which would particularly affect species such as hedgehogs, the Lesser Whitethroat and soprano pipistrelle bats and contradicts the Green Infrastructure Strategy (2018-2031) (2024a) to *ensure protection of important hedgerows* as well as CCC's Tree, Woodland and Hedgerow Strategy (2024b) which promises to "protect and enhance the trees, woodlands and hedgerows across the district. Trees, woodlands and hedgerows provide huge benefits for people, nature, climate and the economy."

The ecology of this site reflects the historical abundance of orchards and fields being present in and around Canterbury. This orchard is one of the last remaining in Canterbury. In Canterbury Policy Sustainable Design Strategy for the District (SS27c) and The Kent and Medway Local Nature Recovery Strategy it states that food growing opportunities should be delivered including community orchards and C10 3.e (Local Plan, March 2026) says that site C10 should **'Incorporate and enhance areas of existing orchard as part of the Open Space provision where possible'**.

The Land Use Plan submitted by the site promoter (Iceni Projects, 2025) does not indicate that any area of the existing orchard would be 'incorporated or enhanced'. This contradicts the Green Infrastructure Strategy (2018-2031) (Canterbury City Council, 2024) for the needs across Canterbury district which says **'Ensure trees are retained on new development sites'**. This is the only area covered in the whole of the Canterbury District Local Plan in which a community orchard could be established easily and readily. The Local Plan has responded to community concern by adding "Incorporate and enhance areas of existing orchard as part of the OpenSpace provision where possible" (C10 3e, p.50), however the community fear that the site promoter will not commit to this.

In the site promoter's written representation they state that: "Aspect Ecology have reviewed the likely initial BNG calculation for the site based on the existing baseline and the proposed development. This confirms that delivering such a significant net gain in biodiversity on-site appears to be challenging and has the potential to require extensive off-site enhancement that at present is under third party ownership. This therefore creates challenges for deliverability and whilst the draft policy allows for off-site BNG provision, the cost of doing so needs to be considered for the site viability. Quinn are therefore keen to engage with officers to discuss this and how it can effectively be delivered. This should consider whether a qualitative approach to biodiversity gains to maximise opportunities for a range of species should dovetail with the quantitative measure of the biodiversity metric for the site and whether setting site specific parameters for both within the policy criteria could achieves the

best outcome for nature and wildlife. In addition, although it is acknowledged that tree cover does enhance the appearance and quality of development, Quinn would seek further discussion on the 20% tree cover figure, as also noted in draft policy SS1, in how this can be achieved and how the benefits the Council are seeking can be realised. In particular, there may be other ecological enhancements which could achieve similar or improved benefits without the same land take *and therefore may be worthwhile considering*".

Offsetting BNG elsewhere is not an option. In the past community orchards have been planted without an existing community in place and therefore have failed to gain CCC support (*personal communication with Environment Team Leader at CCC, 21st April, 2026*). However, this site has both an existing community and orchards and the council and developer has failed to recognise this value in this local plan.

Trees

A group of five roundels in a field off Stuppington Lane provide an attractive foreground to panoramic views of Canterbury Cathedral as seen by visitors arriving from the continent via the A2 and are important cultural icons. Formed of an estimated 70 trees of which at least a quarter are holm oak dating from the 1930s, the roundels appear as mature features on an 1890 map of Canterbury indicating that they have been a landscape feature for over 150 years. The UK Biodiversity Action plan has recognised the importance of mature and interesting trees and their role in the countryside in general. Aesthetically the roundels south of Canterbury complement the rolling fields and iconic oast houses. Additionally, Hollow Lane has mature trees which add to the character of this rural lane.

Community Value

Despite recognition for **natural green space as having value** for the whole community (Local Plan, 2026 by the LPA SS2 7C and the vision for District to 2042/43 emphasising 'both new and existing valued open spaces enjoyed by the district's residents will be protected for future generations, ensuring continued access beyond the period of the plan' this proposal will **remove the existing green space for the community**. Kent's once predominantly agricultural setting has been increasingly developed over time with **insufficient mitigations** and therefore many species on this site are **endangered farmland birds**. 90% of the UK's traditional orchards have gone since the 1950s and the location of this site on a **prominent ridgeline** is a key part of the rural setting of Canterbury and its heritage as an area that once had many orchards. With the evidence presented here it will not be possible to achieve a 10% or 20% BNG either on or offsite with the proposed development, therefore it will not be possible to adequately compensate or mitigate to prevent significant harm to wildlife. The site **C10 should therefore be removed from the Local Plan**.

Additionally, Hollow Lane has mature trees which add to the character of this rural lane. When determining planning applications, local planning authorities should apply the following principles:

6) 193 c development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or **veteran trees**) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;

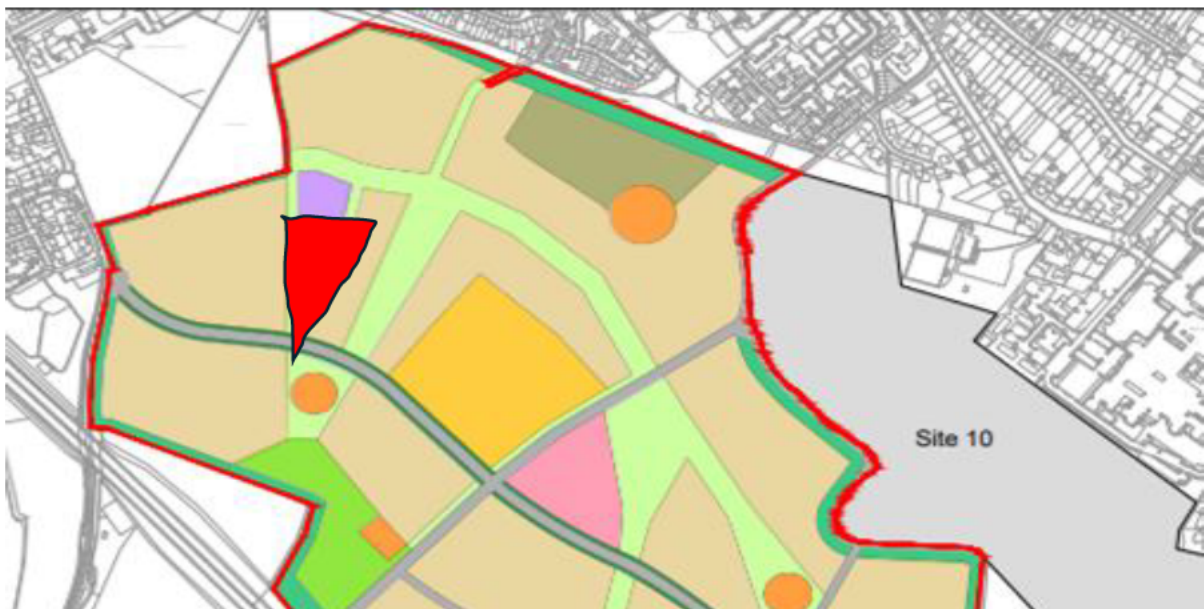
An area containing veteran apple trees (as identified by the Woodland Trust) which provide habitat for wildlife (as described above) is located west of Stuppington Lane. The map below (Figure 4- red triangle) shows the area in which these trees are found.



Figure 4 showing location of veteran apple trees (red triangle)

Both the Indicative Masterplan (Local Plan, 2026) and the developers' Land Use Plan (Iceni Projects, 2025) (Figure 2, solid red triangle) show that these trees would be lost.

Based on this, the development should be refused.



193d - development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or **enhance public access to nature where this is appropriate.**

This proposal for C10 shows no willingness to improve biodiversity and will destroy the access to nature that the public currently enjoys.

For all these reasons the plan does not adhere to the NPPF, 2026 and **C10 should be removed from the Plan.**

Light Pollution

Summary

The Merton Park proposal will inevitably require a considerable amount of outdoor lighting, including floodlighting, which will create a high degree of intrusive light pollution visible from long distances including historic viewpoints. It would also have a negative impact on the nighttime setting of the Cathedral World Heritage Site and upon wildlife. Owing to the site's elevated position it is considered that the scope to mitigate this pollution will be limited. The Council does not appear to have recognised or assessed the issue and this lack of evidence, combined with the obvious degree of harm that would be caused, indicate that this is not an appropriate location for the types of development proposed. The proposal is therefore not consistent with national policy and guidance and is unsound. It is also contrary to the Council's own policies in both the Adopted and Draft Local Plans.

National Policy and Guidance

The NPPF paragraph 198 states:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation"

National guidance provides a section on light pollution which sets out the relevant considerations and includes assessing whether the a proposal would materially affect light levels in the environment and whether in or near a protected area of dark sky or an intrinsically dark landscape where new lighting would be conspicuously out of keeping with local nocturnal light levels, making it desirable to minimise or avoid new lighting.

Adopted Canterbury Local Plan

Policy DBE9 Outdoor Lighting states that development which includes outdoor lighting will only be permitted when it can be demonstrated (amongst other criteria) that:

1. It does not adversely affect sites of nature conservation interest and/or protected and other vulnerable species and heritage assets
2. It does not adversely impact on protected landscapes or those areas where dark skies are an important part of the nocturnal landscape
3. It does not have an adverse impact on long distance views or from vantage points.

Draft Local Plan Reg 19

Policy DM15 Light Pollution and Dark Skies states that proposals for outdoor lighting schemes will be permitted subject to criteria that includes:

- d) The lighting scheme would not be visually detrimental to its immediate or wider setting or landscape, particularly intrinsically dark landscapes and would be of appropriate colour temperature for its location
- f) it does not have long distance adverse impacts, including from vantage points, the PROW network and National Trails

Objection

The Merton Park proposal combines a mix of development that would inevitably require a great deal of external lighting with an elevated and exposed site that is open to view. The worst combination of factors from a light pollution perspective. While mitigatory measures can be incorporated the residual light pollution is highly likely to be very significant and harmful to the point where it conflicts with both national policy and the Council's own policies. The evidence base does not appear to include an assessment of the likely degree of outdoor lighting, the types of mitigation that could be used, the residual pollution and the sensitivity of the environment that would be impacted. This is needed in order to judge whether the site is suitable for the types of development proposed. Without such evidence the site cannot be said to be suitable for development. This issue is a fundamental one that should not be relegated to the planning application stage. The lack of evidence, high degree of harm and the conflict with national and local policy render policy C10 unsound.

To expand upon the above objection:

- 1) While all the types of proposed development would require street lighting there are types that would additionally require substantial amounts of outdoor lighting for either functional reasons or security, or both. These are the commercial hub, the community hub, the park and bus site and the sports hub - including a football stadium.
- 2) The site comprises rising land that forms part of the southern slope of the Stour valley leading to a plateau. Although it does contain hedgerows it is predominantly a series of

open agricultural fields and orchards that are easily viewed from the opposite side of the valley and also from lower points down to the valley floor. These include historically important viewpoints such as the Westgate Tower, the Dane John Mound and the Castle (due to re-open to the public). It would also be visible from public rights of way such as at New House Lane.

3) There are extensive views of the Cathedral World Heritage Site from within the Merton Park site and at night the Cathedral is illuminated against a predominantly dark valley setting. When viewed from the opposite side of the valley, such as from the University of Kent, the Merton Park site provides a relatively dark background to the illuminated Cathedral. These night views would be substantially eroded by the proposed development. Merton Park also provides the only view of the Cathedral from the A2 at the southbound lay-by adjacent to the site. This view would be destroyed by the external lighting associated with Merton Park appearing in the foreground. The inevitable external lighting associated with the proposed development would therefore have harmful effects on night-time views and setting of the Cathedral. This is a particularly significant issue as the World Heritage Site inscription recognises the importance of the Cathedral's rural valley setting, yet it is one that has not been recognised by the Council let alone assessed. This is a further example of the lack of evidence and hence soundness of the proposal.

4) Figure 3.10, Levels of Dark Skies and Light Pollution, in the Council's Canterbury Landscape Assessment and Biodiversity Assessment report shows that the Merton Park site is currently assessed as a mix of grades of night light ranging from 4-8 NanoWatts/cm²/sr in the northern part through the 2-4 range with elements of 1-2 in the south eastern parts - which is where the majority of external floodlighting would be located. The Council does not appear to have reviewed this map to illustrate the likely effects of the proposed development, but it would obviously intensify light pollution and push the site into the 8-16 range and possibly some of the floodlight parts into the 16-32 range. This, in turn, would increase the amount of artificial light spilling over to land on the south of the A2 towards the boundary with the Kent Downs Area of Outstanding Natural Beauty where the darkest skies occur.

5) While light pollution can be reduced by measures such as directional control to limit upward light spill, ensuring lighting is not stronger than needed and of an appropriate colour temperature, these would be of limited effect as the development would be viewed from either points at the same level from across the valley or lower. The hillside and plateau would appear as highly illuminated. The existing floodlighting at the rugby club and of a car park at Kent and Canterbury Hospital together with the street-lighting at the adjacent Saxon Fields development give an indication of the harmful impacts that would be caused by outdoor lighting inevitably associated with the proposed development.

Water Supply and Sewage

Summary

The Draft Canterbury District Local Plan is **unsound** because it fails to meet key National Planning Policy Framework (NPPF) requirements on infrastructure, climate change, water supply, and environmental protection. South East Water (SEW) has repeatedly stated that it cannot accommodate additional growth beyond existing assumptions until at least 2036–2044, yet major development at Merton Park is proposed to begin occupation in 2030/31, meaning homes would be delivered without a secure water supply. The Council has disregarded SEW’s advice, relying instead on speculative future infrastructure. The Plan is also insufficiently ambitious on water efficiency, failing to mandate best-practice consumption targets or robust developer requirements. Existing water shortages across Kent, coupled with heatwave-related outages, further demonstrate **unsoundness**. In addition, risks from surface water runoff, sinkholes, and pollution of chalk aquifers have not been robustly assessed. Locating wastewater treatment within Source Protection Zones and ongoing sewage discharges into the River Stour conflict with stated environmental protections. Overall, the strategy for Merton Park is fundamentally flawed.

National Policy and Guidance

The following NPPF (Ministry of Housing, Communities and Local Government (2024) paragraphs are not being satisfied:

- a) 20b: Strategic policies should ... make sufficient provision for ... infrastructure for ... water supply, wastewater
- b) 161. Meeting the challenge of climate change, flooding and coastal change
The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including ... water scarcity,
- c) 162. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply,
- d) 182. Applications ... should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity.
- e) 187. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.

Objection

Water supply

1) South East Water (SEW) responded to the previous draft plan (Draft Canterbury District Local Plan Focused Consultation R18, September 2025) on 23rd October 2025 (Appendix 2 written consultation), saying that they would be “unable to accommodate any growth exceeding our ... forecast assumptions throughout the entire planning period.” “This

increase is likely to cause stress to our supply system that we would be unable to resolve until our new major infrastructure and resource scheme... and our new strategic solution to deliver a reservoir in Broad Oak is completed - the current estimated delivery date is approximately 2036.”

However, the proposed date for Merton Park first occupations is 2030/1 (WR0918 Icen Projects on behalf of Quinn Estates (Sophie Innes) _Redacted.pdf) (Canterbury City Council (2025a) *Appendix 5.3.1 written representations* line 917). This means the first 5 years of occupations would have no water supply. It is unsound and infringes NPPF 20.

2) In point 1 above, Canterbury City Council (CCC) appear not to have taken SEW’s response into consideration. They also ignored many of SEW’s comments in their own Scrutiny Committee meeting on 4th March, 2026 (Canterbury City Council, 2026f) SEW said:

- “Broad Oak reservoir would give the supplier a little extra headroom in the medium term”.
- “In the longer term, desalination would be the main route to increase supply”.
- “More than 20,000 new houses were being planned for the district under the new Local Plan. Smart meters and reducing demand would not provide sufficient water for these new houses”.
- “New technology would have to be used to provide more water”.
- “In the longer term, SEW would commission a new water treatment works at Aylesford, which could supply East Kent”.

In their presentation (available in the minutes) SEW write: “As outlined in our Local Plan response on 23 October 2025, **we cannot currently accommodate additional growth for Canterbury** above what has been assumed in our Water Resources Management Plan 2024. There is currently **no surplus until 2044** when we hope to bring in Reculver desalination. The plan was developed with housing growth forecasts for Canterbury provided prior to our WRMP publication. Below is our assessment of the latest Canterbury IDP datasets against our WRMP24 forecast.”

Source	Local Planning Authority	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
WRMP24	Canterbury	1,647	1,653	1,320	1,088	968	898	732	732	733	733
LPA IDP	Canterbury	950	1,035	1,267	1,396	1,425	1,336	1,682	1,876	2,078	2,347
Percentage difference	Canterbury	-42.32%	-37.39%	-4.02%	28.31%	47.21%	48.78%	129.78%	156.16%	183.61%	220.18%

Source	Local Planning Authority	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	Total
WRMP24	Canterbury	733	734	734	734	735	735	735	736	736	736	20,651
LPA IDP	Canterbury	1,876	1,367	1,300	1,310	1,300	1,159	1,054	630	298	77	25,763
Percentage difference	Canterbury	155.81%	86.31%	77.10%	78.38%	76.93%	57.67%	43.32%	-14.37%	-59.52%	-89.54%	24.75%

Nevertheless, at the Extraordinary Meeting of Full Committee, 6.30 pm Wednesday 18 March 2026 (Canterbury City Council (2026g)), a Labour councillor said: “The new ...reservoir at Broad Oak... is a substantial long-term investment to provide additional water capacity and resilience for our district. Water companies are... aware of their need to find solutions to

the increasing housing targets. The step delivery of the plan gives these water companies time to find solutions in the short term and propose long-term solutions to the water scarcity which is the Broad Oak reservoir amongst other solutions.” It is typical of many comments made by councillors. This is ignoring SEW’s statement that there is no surplus until 2044 and they cannot currently accommodate additional growth for Canterbury. It also ignores SEW’s letter in point 1 above. CCC is ignoring what SEW says and allowing development that will have no water supply. It is **unsound** and infringes NPPF 20.

3) *Household consumption.* CCC is not serious about reducing household consumption. SEW also said (in the letter cited in point 1 above), “Our aim of reducing household consumption to reach our per capita consumption ambition of 110 litres per person per day by 2050 requires the use of new approaches and technology...The savings ... will be challenging to deliver... stricter mandated building codes, design and regulations as well as national water efficiency messaging, policies and targets....**We do not feel that the current draft local plan is suitably ambitious to adequately address water scarcity in the South East**, and would like reference to an industry report published last year, which aims to inform the Government’s roadmap for water-efficient new homes. This report sets out a roadmap to target lower per capita consumption (PCC) for new housing in **water-stressed areas like ours**, aiming for 100 litres per person per day by 2025, 90 litres by 2030, and 80 litres by 2035. We fully support this ambition and encourage local authorities to adopt these targets within your strategies where possible. However, this is a regional problem for the South East. Canterbury had hose pipe ban from July 2025 to February 2026? 1.4 million customers were affected by the announcement on July 11, 2025, including residents living in Maidstone, Tunbridge Wells, Canterbury, Ashford, Whitstable and Tenterden (Hodgson, 2026). Sustainable design standards for all residential and non-residential developments, including water use standards, should be a focus for developers as well as a monitoring responsibility for councils.”

4) *Water efficiency.* The Draft Canterbury District Local Plan Regulation 19 (2026c) promotes water efficiency in several places (1.30, SS2 1, 6.56, DS12 5) but does **not** mention it in the obvious place, Appendix 4, Sustainable Design Guidance. Nor does it say anywhere how it will make developers incorporate water efficiency measures into dwellings, or indeed make people use less water. Moreover, in DS12 5, it aims for 110 litres per person per day. SEW and the Government are aiming for 80 litres per person per day by 2035. The council should aim for 80 litres per person per day, mandate water saving measures for developers, and say how it will encourage a reduction in water usage. By not doing any of these **its plan is unsound**, infringing NPPF 161 and 162.

5) *Lack of water.* Tonbridge and Faversham housing construction are also affected by **lack of water**. Patrick Barlow (2026) reported: “Tonbridge and Malling Borough Council is currently consulting on its local plan, in which it aims to build more than 19,000 homes between 2024 and 2042. But SEW now says that, due to a lack of headroom in current supply plans, it

cannot accommodate the level of growth being proposed” and in March 2026, Helen Whately, MP for Faversham argued that: “the shortage of water in Kent is no laughing matter. A few weeks ago, thousands of homes and businesses in my constituency were without supplies because tankers didn’t make it from the southwest to the southeast. **Our water supply is not up to the job.** That’s true now, so what about in a few years’ time when there will be hundreds more people living in the area affected by the outage?” (Whately, 2026). In July 2025, the heatwave affected water supply for thousands of residents in Kent (Maisner, 2025) and it was reported that: “Up to 3,000 customers in Kent are experiencing water supply issues due to the recent heatwave, according to a water company. SEW apologised on Wednesday to households and businesses in Whitstable, Seasalter and surrounding areas who were experiencing no water or low pressure.” It is **unsound** building thousands more houses in Canterbury (and all over Kent) when there are **widespread existing problems** and SEW has warned of more problems ahead. Again, it infringes NPPF 161 and 162.

6) *Source Protection Zone*. The wastewater treatment plant planned for Merton Park is in a Source Protection Zone 2. SEW also said (in the letter cited in point 1 above): “We urge future planning to take into account the Environment Agency’s groundwater source protection zones (SPZs) to safeguard drinking water. Development within these areas must mitigate pollution risks.” SPZs prevent groundwater contamination by controlling activities around water abstraction points. They are divided into four zones (SPZ1 being closest to abstraction), with increasing restrictions closer to the source. The wastewater treatment planned for Merton Park is in an SPZ2, on the edge of an SPZ1 (see images below Fig. 5 and 6). Its positioning contradicts SEW’s advice and, given that protecting the Stour (Draft Canterbury District 2042/43, March 2026c, p7 Vision for the district, Policy C1 10, Policy C4 3b, Policy C32 3) is repeatedly cited in the plan, is unsound, again infringing NPPF 187. Furthermore, the draft NPPF (2025) recommends that development proposals should “assess and mitigate impacts where the development could have an unacceptable adverse effect on water quality, especially where this concerns sensitive water bodies such as **chalk streams**” (NPPF, 2025, P2.2e). Around 200 chalk streams exist worldwide, and they are “**among the rarest, most fragile habitats in the UK**” (Kent Wildlife Trust, 2026, qtd by Bevan, 2026).

The impact of surface water runoff from the new developments on groundwater quality should be considered. There are some water wells <1 km from the site (fig 4: see triangles in map below). The former limekiln quarry at Cooper’s Pit exhibits Karst/dissolution features which can provide conduits for **polluted surface water to reach the chalk aquifer**.

Additionally, runoff directed towards permeable Thanet Sand and chalk can lead to its collapse, leading to sinkholes. There have been two sinkholes near the area (The Cross Keys pub and Prospect Place). To not consider sinkholes in a new development, or the pollution of chalk aquifers, is **unsound**, infringing NPPF 187.



Fig. 4 Water wells



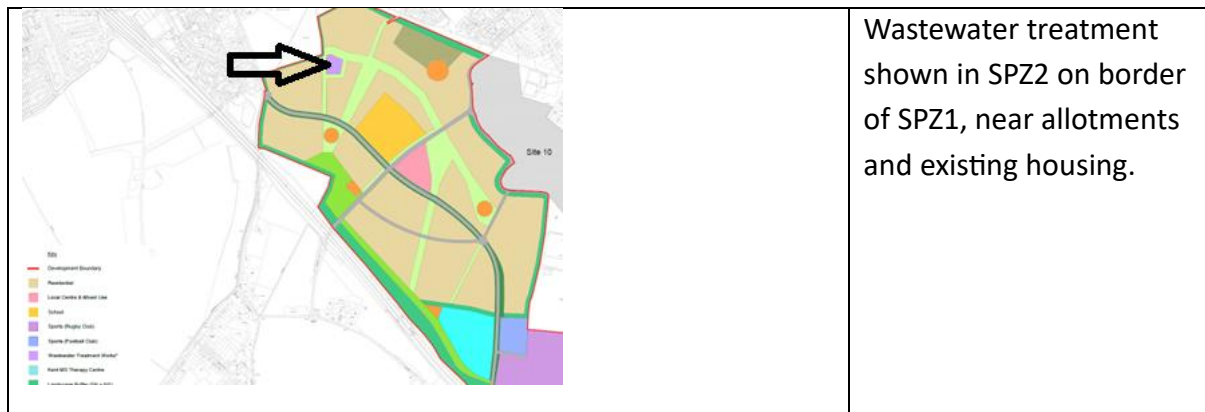


Fig. 5 and 6.

Sewage pollution

1) *Sewages Discharges*. In addition to the wastewater treatment plant for C10 being in SPZ2 on the edge of SPZ1 (as stated above), there are regular sewage discharges into the Stour. There have been over 100 sewage spills a year across the 3 nearest existing feeds into the Stour from 2021 to 2024, discharging for over an hour every day on average. (Floodmapper.co.uk). Canterbury, Chartham and Chartham Hatch.) On the 8 May 2026, there was 12 hours of discharge from Southern Water (SWS00690) into the Stour (Sewagemap.co.uk, 2026). With more wastewater treatment plants it is probable that there will be increased discharges. This is **unsound**, given that protecting the Stour (Draft Canterbury District 2042/43, March 2026c, C1.10, p.29) is repeatedly cited in the plan. It infringes NPPF 182 and 187.

2) *Sewage Disposal*. In the plan, sewage disposal for other sites is mandated (for example DS6.i and C16.1b.iii). For Merton Park it is not. This is **unsound**. On C10 5 (Merton Park), a get-out clause is stated upfront: “Unless otherwise agreed by the council and relevant providers... Waste water treatment works should be delivered at the earliest possible stage in the development.”

Also, the language in the Draft Infrastructure Plan is of hope (“The council **would like to see**”) and talk (“**working closely**”) not certainty and action. See examples below. There is no detailed planning to ensure the Stour does not become more polluted. The council should be ensuring that infrastructure pollutes the river as little as possible. It is not. This is unsound, and shameful. It infringes NPPF 187.

In the Infrastructure Delivery Plan 2022, 14.2 it states that “In July 2020 Natural England issued water quality advice which affects planning applications for new homes which would discharge wastewater to the Stour Valley river catchment area and cause any further deterioration of the water quality at Stodmarsh. Since the announcement the council **has been working closely with Southern Water**, neighbouring local authorities, Natural England, Kent County Council, the Environment Agency and government departments to find a solution and will continue to do so.”

“Infrastructure Delivery Plan 2022, 14.5 The council **would like to see early delivery of improvements to waste water and sewerage infrastructure across the district** and will continue to work closely with Southern Water and others to address the issue.”

3) “The draft Canterbury District Nutrient Mitigation Strategy sets out a clear sequential approach to embedding mitigation within sites where possible - such as through the delivery of new high-quality wastewater treatment facilities - while developing wetlands, which can remove harmful nutrients from the watercourses which feed into Stodmarsh, and other potential measures, to mitigate the impacts of developments which are unable to accommodate such mitigation within their sites.” (Draft Local Plan, p272 6.101, 2026c) However, **while wetlands will remove many harmful nutrients from the watercourses which feed into Stodmarsh, the river Stour will flow through Canterbury, Sturry etc. full of harmful nutrients and only then onwards to Stodmarsh.** This could be used as an excuse not to develop robust leak-proof sewage facilities and is **unsound**. It infringes NPPF 187.

4) *Infrastructure Delivery*. The Environment Agency response to the 2024 Draft plan (Canterbury City Council (2025b) *Appendix 5.3.1 written representations*, line 367, 2025a, p6) stated that: “All developments should ensure adequate wastewater infrastructure is provided **prior** to any occupation and that capacity is available within the mains network.” The Infrastructure Delivery Plan (2026h) is very **vague** on whether wastewater treatment and capacity should be supplied before occupation, contenting itself with “Scheme needed to support delivery of development in the district”. This does not meet the Environment Agency’s precise requirement that all developments should ensure adequate wastewater infrastructure is provided **prior** to any occupation. It is **unsound** and infringes NPPF 20b, 161 and 162.

Fundamentally, this demonstrates that the council’s proposal to locate such as large number of houses at Merton Park is **flawed** and the strategy should be revisited.

Healthy and Safe Communities

Summary

Residents of Wincheap and South Canterbury will be disproportionately affected by the proposed Merton Park development, facing loss of accessible green space, limited allotment expansion despite high demand, and increased traffic congestion that could delay emergency services. These impacts conflict with NPPF principles, rendering the plan **unsound**. In addition, healthcare infrastructure has not been adequately addressed. Canterbury lacks its own A&E unit, relying on already pressured hospitals in Margate and Ashford, where delays and capacity issues are reported. Existing GP practices are also operating at or near capacity and planned new facilities at C7 have been removed from the plan. Without sufficient investment in healthcare provision, increased demand will worsen access, increase travel distances, and add to congestion, undermining the plan’s sustainability, particularly with the predicted growth in over 65s.

National Policy and Guidance

NPPF 8.96c - enable and **support healthy lives**, through both promoting good health and **preventing ill-health**, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities for example through the provision of **safe and accessible green infrastructure**, sports facilities, local shops, access to healthier food, **allotments** and layouts that encourage walking and cycling.

NPPF 8.101 - To ensure faster delivery of other **public service infrastructure such as health, bluelight**, library, adult education, university and criminal justice facilities, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies **to plan for required facilities** and resolve key planning issues **before applications are submitted**. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.

Objection

As has been highlighted in the objections above, the residents of Wincheap will be unfairly impacted by the Merton Park development, losing access to safe and accessible green infrastructure, unable to expand their allotment provision, despite a large waiting list, and enduring traffic which will clog up roads and delay emergency services. This is contrary to the NPPF guidelines outlined above rendering the plan **unsound**.

In addition, the healthcare infrastructure needs of Canterbury have not been considered. Canterbury does not have an Accident and Emergency unit and ill patients are transported via the rural and in places narrow A28 to Margate or Ashford. In addition, a relatively new stroke facility has been moved out of Canterbury putting Canterbury residents lives at risk. Canterbury City Council's final draft Local Plan establishes a target of building 1,215 homes per year, totalling more than 23,000 dwelling by 2042/43. The average household size in the UK is 2.36 people per household (Statista, 2023). This would increase the population by 54,280 people. The Canterbury district has a population of 162,100 (Office for National Statistics, 2026) so this would be **a 33% increase**. How will the emergency services and the hospitals cope with this increase? The NHS East Kent Hospitals University NHS Foundation Trust (2025) reported that "emergency and urgent care services and 'flow' of patients through our hospitals remained an area of **significant pressure** throughout the year. We achieved improvements in the number of people being seen, discharged or admitted to hospital within the four-hour standard, but with **hospitals full to capacity**, high numbers of **patients waited** more than 12 hours for a bed". Without planning for future growth in healthcare provision, **the plan is unsustainable and unsound**.

To manage the immense strain this growth will place on infrastructure, CCC's Infrastructure Delivery Plan (IDP) requires developers to fund or build **healthcare upgrades** alongside new

developments. The Integrated Care Board (ICB) has advised that within Canterbury all existing practices are **operating at or near to capacity**. Canterbury Medical Practice's premises in Canterbury which opened in February 2021 enabled Cossington House and London Road Surgery sites to be relocated and provides capacity for 2017 Local Plan growth only. Although a primary care facility was planned for Hollow Lane C7 to absorb new local plan growth, this was **removed from the plan**. The Ridlands Farm site which is next to the Kent and Canterbury is earmarked for a park and bus facility which seems **shortsighted**, when this space could be utilised for future medical facilities. Communities will be forced to travel longer distances to access healthcare, adding additional traffic to the already congested roads. Group practices e.g. Old Dover Road/Sturry and Northgate/Blean offer appointments at both sites so that patients sometimes have to travel out of their area to access appointments. The plan has not considered these factors and is therefore **unsound**.

Conclusion

This document concludes that the Canterbury Local Plan is unsound, has not been positively prepared, will be ineffective and flies in the face of national policy. The uneven distribution of housing across the city will impact on the health, wellbeing and safety of one of the poorer, more vulnerable communities. We recommend that site C10 (Merton Park) is removed from the plan.

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Appendix 1

Photographs highlighting the important community, heritage, valued landscape and biodiversity value of Wincheap Orchards and Fields (proposed Merton Park C10 development)



Views of Canterbury Cathedral

Historic and valued landscape views of Canterbury, its Cathedral and World Heritage Site

The site includes the finest and most extensive surviving views of the historic city of Canterbury, its World Heritage Site and the wider Stour Valley from a rural setting, including panoramic views from Stuppington Hill across traditional apple and pear orchards and fields. A *Panoramic Cathedral Viewpoint* on Trip Advisor is increasingly popular with both local people and tourists. The area, with its network of historic footpaths, includes views of the city enjoyed by travellers and pilgrims across countless generations.



View of Canterbury Cathedral from Wincheap Orchards



View of the Cathedral with Oast house on Stuppington Lane

Panoramic Cathedral Viewpoint

The *Panoramic Cathedral Viewpoint* on Trip Advisor, at the top of the orchards on Stuppington Hill, is just a short walk from the city centre, encouraging walking for health and wellbeing and the exploration of a fascinating and lesser-known part of the city. It is increasingly popular with local people and tourists, achieving 5 star ratings from over 90% of those who've posted reviews.



Stour Valley view

Wincheap Orchards and Fields includes extensive views across and along the Stour valley, putting the city in context with its wider rural and river valley setting.



The view of Canterbury and the Cathedral from the A2

The only clear view of Canterbury from the A2, is a spectacular one, looking directly across Wincheap Orchards and Fields. Visible from both the north and southbound carriageways and laybys, it's appreciated by millions of people each year.



View of Canterbury and its cathedral from the A2 northbound lay by.



Photographed from the southbound layby, the view of Canterbury from the A2 is spectacular, including a sweep of green fields, the Stuppington Lane oast and the cathedral's Bell Harry Tower.

Views of Wincheap Orchards and Fields from around the city

Housing development at Wincheap Orchards and Fields (the proposed Merton Park C10 development) would have an adverse impact on views of Canterbury

from around the city, including sites on the northern side of Canterbury such as Duke's Meadow and the University of Kent, as well as from elevated sites in the city, including the top of the Westgate Towers, the Cathedral's Bell Harry Tower, the Marlowe Theatre and the Dane John Mound. This impact is heightened because the site lies on a prominent hill and skyline to the south of the city.



Wincheap Orchards and Fields, on the horizon to the right of the Cathedral (proposed C10 Merton Park) provides a soft rural backdrop to the city as seen from Duke's Meadow. The proposal to build 1950 houses on this site will adversely affect this view, day and night when light pollution will be massively increased.



The view of Wincheap Orchards and Fields (proposed C10 Merton Park Development) provides a soft rural backdrop to the city as seen from the top of Canterbury's Dane John Mound



View of Wincheap Orchards and Fields forms a rural backdrop to an iconic view of Canterbury Cathedral seen from the University of Kent. To build on these slopes would engulf the cathedral with light pollution and destroy the landscape character of the UNESCO world heritage site.



View of Wincheap Orchards and Fields (proposed C10 Merton Park Development) forms a rural backdrop to a view of the city seen from the West Gate Towers.

Cones of Vision

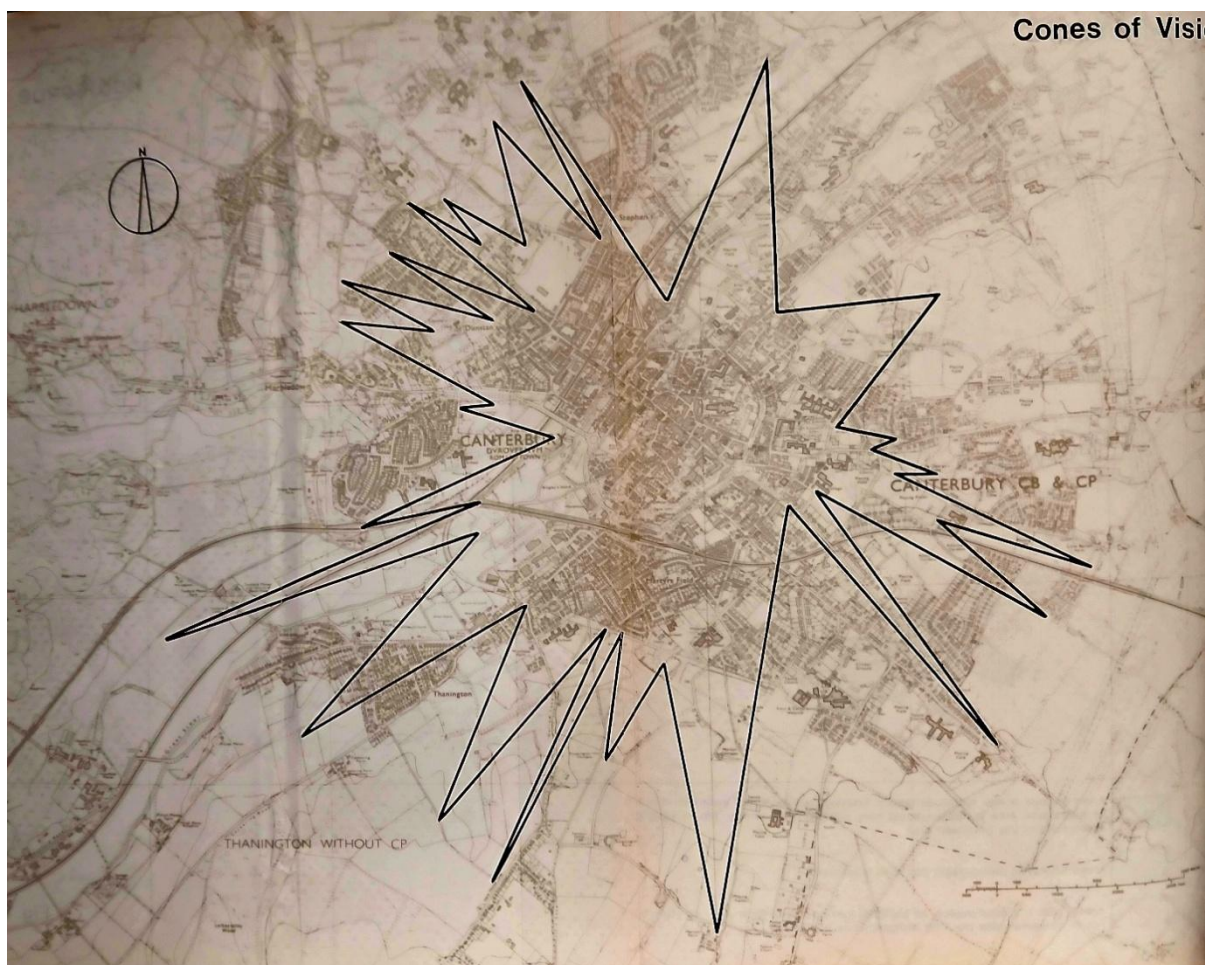
In 1979, The Canterbury Conservation Study Consultation Draft identified 22 cones of vision where panoramic views of Canterbury Cathedral could be seen. Today, most of these have disappeared entirely or been adversely affected by development (see [Search media - Wikimedia Commons](#))



Cones of Vision No. 4 – Footpath between New House Lane to Cockering Farm



Cone of Vision No. 5 – Footpath from Milton Manor Farm to Thanington



Map from the 1979 Cones of Vision study. Many of these iconic views of Canterbury Cathedral and the World Heritage Site from outside the city, have now disappeared or been severely compromised by development. The view from Wincheap Orchards and Fields, recognised in the document as one of the most important, is one of the few that survives of the UNESCO world heritage site in its landscape setting..



A housing development on the Canterbury Barracks site has reduced the quality of this view.



The viewing platform at the barracks with bench facing away from the cathedral view.

Seasonal views - spring, summer, autumn and winter

With its orchards, hedgerows, trees and fields, the views of this area change dramatically with the seasons. From winter snow and spring apple and pear blossom, to the full-flowering of summer and autumn boughs heavy with ripe apples and pears.



Canterbury Cathedral seen from the orchards in Autumn



Canterbury Cathedral seen from the orchards at apple blossom time.



The budding pear trees



The orchards in the show



Pear orchard



The Long Field





Hollow Lane

A narrow, sunken hollow lane, in use since at least Roman times, forms an impressive boundary along the southern edge of the site. Outcrops of chalk in its steep banks reveal that the Cretaceous geology of the nearby Kent Downs

AONB lies just beneath the surface. Trees and scrub along its edges provide an important habitat for badgers, bats, squirrels, mice and other small mammals. The proposed main access to the Merton Park site off this narrow and already dangerous lane, close to Wincheap Primary School is unsound.



Chalk outcrops on the narrow ancient Hollow Lane show the underlying geology. This area with its trees and scrub is a haven for wildlife.



The proposed main access road to Merton Park is planned for a dangerous narrow section of Hollow Lane, close to Wincheap Primary School. This is unsound.

Night-time views

At night, the floodlit cathedral provides an impressive focal point, with other illuminated Canterbury landmarks such as the Marlowe Theatre adding interest to the skyline. The dark skies of this largely rural area allow the stars, planets and moon to be clearly seen, within a short walking distance of the city and complementing the impressive night-time view of Canterbury.

Shooting stars (including the annual Perseids meteor shower), comets (including Comet Neowise in 2020) and even the Northern Lights have been spotted from this location. Wildlife abounds after dark with foxes, badgers, owls and bats among the many nocturnal animals. The observatory at the nearby Simon Langton Grammar School for Boys, relies on dark skies at the edge of the city, which will be adversely affected if the Merton Park development goes ahead.



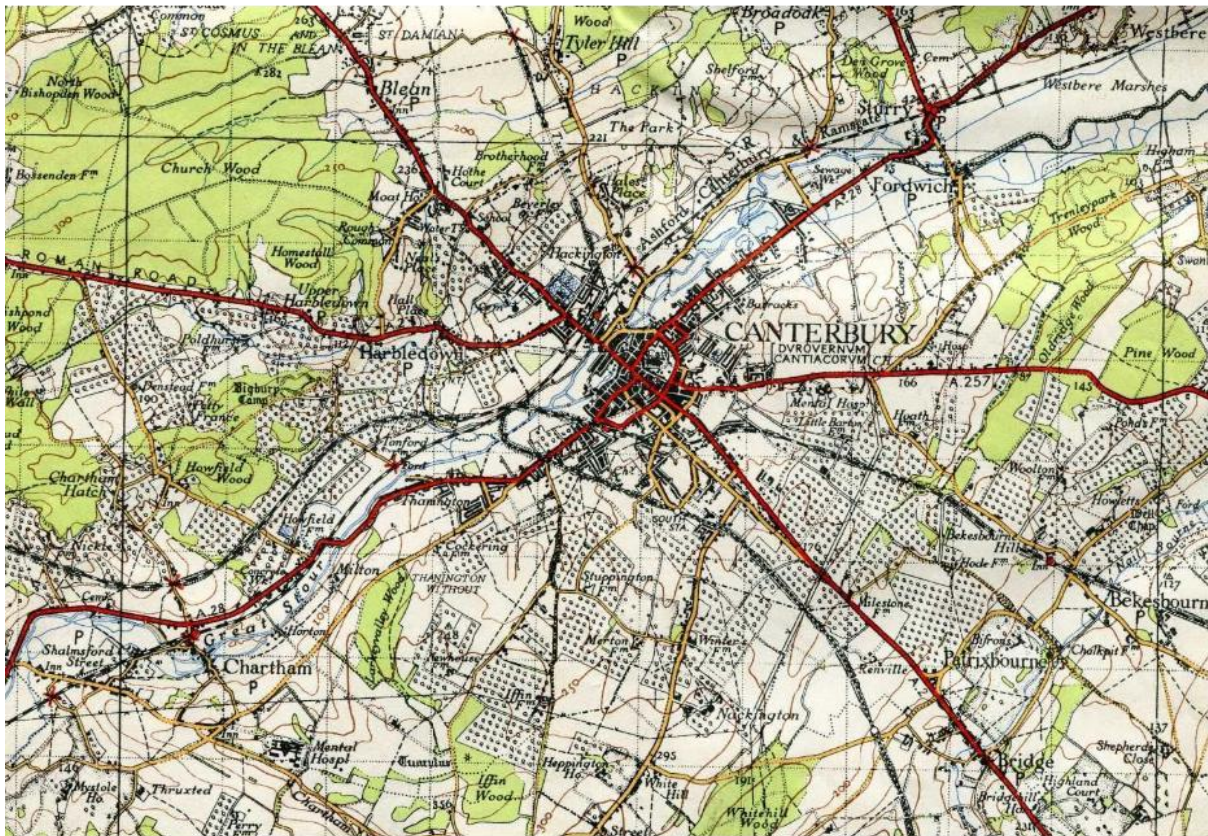
The cathedral viewed from Wincheap Orchards



University of Kent Conservation students bat detecting and planet-spotting just after sunset. Venus is visible as a bright white dot top left.

Last vestige of The Garden of England

Wincheap Orchards and Fields includes extensive apple and pear orchards, a living representation of Kent as the Garden of England. Orchards in the UK and Kent have been in serious decline with over 90% of traditional grubbed up since the 1950s. Canterbury was once surrounded by orchards and hops.



Map of Canterbury Orchards, 1945. Few of these orchards still exist and therefore it is paramount that the Council work with farmers to maintain these precious landscapes.





Orchard boughs heavy with apples frame the view of Canterbury Cathedral

Apple and pear blossom

The spectacular apple and pear blossom in April and May is a real highlight of the year, providing a visual and sensory spectacle.



The Oast House

Although no hop gardens remain, there are historic photographs and memories of hop gardens and hop-picking in the area. A 19th century oast house on Stuppington Lane provides a focal point in the landscape.



Oast houses on Stuppington Lane



Community value: The Green Lungs of Wincheap and South Canterbury

Wincheap Orchards and Fields is an important green space and recreational area for the people of Wincheap and South Canterbury. Wincheap is the most crowded and polluted area of the city and this area is much-loved and widely used by walkers, runners, dog-walkers, families, allotment holders, picnickers, playing field users, nature-lovers, astronomers, photographers, cyclists and a host of community groups from scouting groups to schools.



Dog walking community



Community bird walk in the orchards



Bird photography in the orchards



Kite flying at the recreation ground



Teenagers enjoying natural open green space

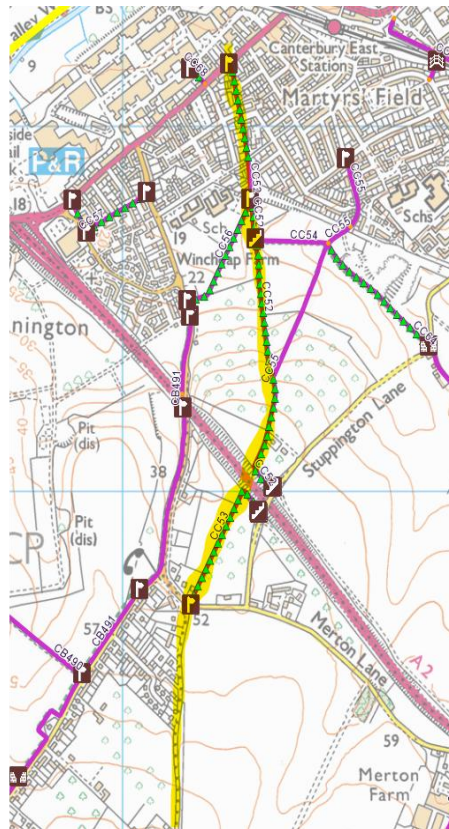
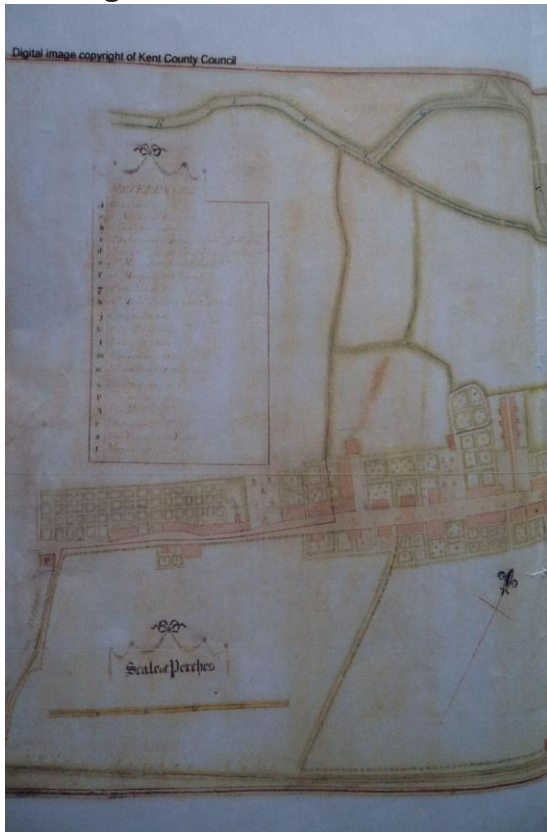


Photography walk and allotments



Walking (pilgrim routes, public footpaths and the Middle Ring)

Criss-crossed by a network of formal and informal footpaths, the area has been used by walkers and travellers for countless generations. From Roman soldiers and medieval pilgrim travelling to Canterbury from the south, to modern day pilgrims and walkers completing Canterbury's recently opened the Middle Ring Walk (of which this section is a highlight). It is also used daily by children walking to school.



Worthgate Ward Map 1790 showing Hollow Lane and Biggleswade Passage/Footpath CC52.



Footpath CC52



Footpath CC52 from Norfolk Road to Wincheap Orchards CC52





Footpath CC52 from Norfolk Road to Wincheap Orchards CC52





The Canterbury Middle Ring footpath

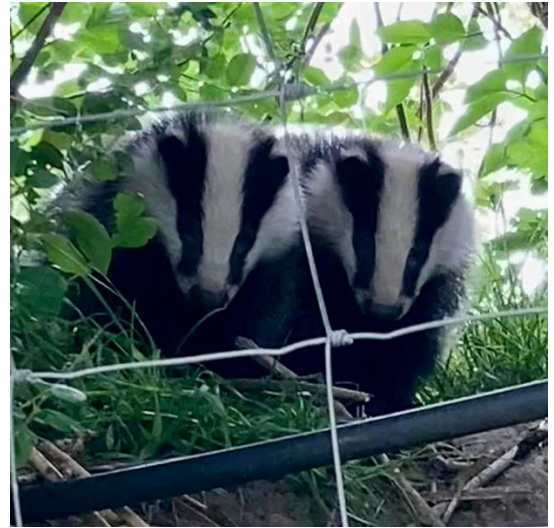
Wildlife and biodiversity

The area is rich in wildlife and biodiversity. Over 50 species of birds including many on the red and amber lists of rare and endangered species have been recently recorded, including yellowhammer and fieldfare. There are green and great spotted woodpeckers, owls, buzzards and kestrels.

A wide range of mammals live here including foxes, badgers, bats and harvest mice. Reptiles and amphibians include healthy populations of slowworm, common lizard, toads and frogs. Many feed on the large population of insects, including bees, ants, beetles, butterflies and moths.

Recent recording by a range of wildlife conservation specialists has shown this to be an area much richer in wildlife and biodiversity than previously thought, with an impressive mix of habitats including meadows, fields, hedgerows, woodland, scrub and orchard.





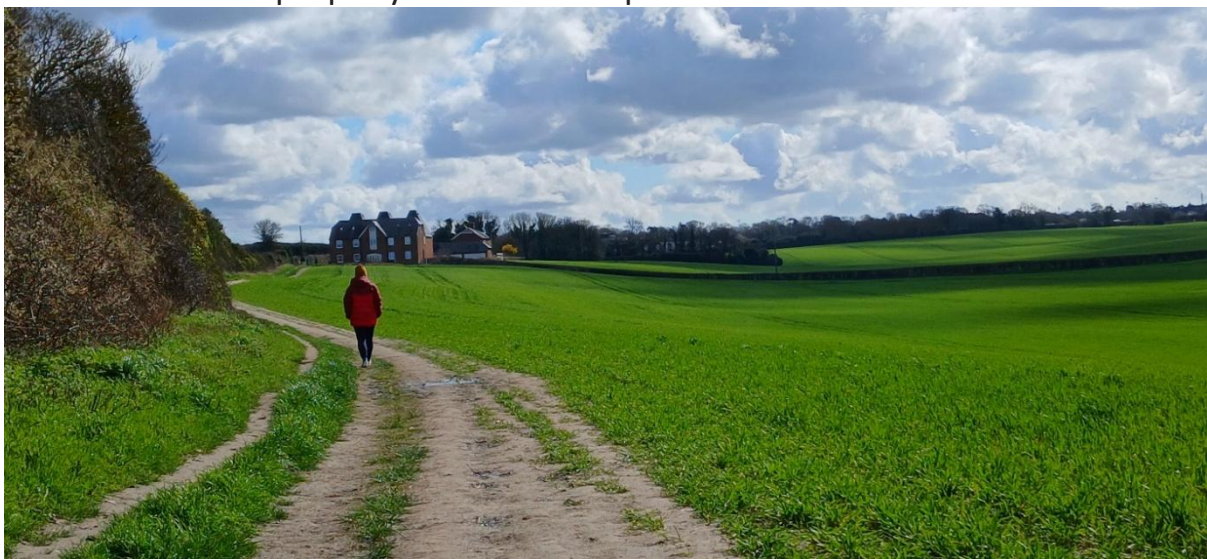
Birds, squirrels and badgers





Trees, hedgerows and fields

In addition to its orchards, the trees, hedgerows and fields provide important habitats for wildlife, landscape variety and add to the outstanding views of the city and surrounding countryside. The trees include many veteran specimens, which need to be properly recorded and protected.





Flowers and plants

The area is rich in flowers and plants that provide habitats and food for animals and spectacular displays of colour and connection with nature for people using the site.



The Roundels

A rare landscape feature and dating back to at least the mid-19th century, tree roundels once provided shade and shelter for animals and farm workers. These mature examples support wildlife and provide stunning visual content to views of the city and its World Heritage Site.



Tree Roundels





Tree roundels with view of the cathedral





Cooper's Pit

A special and spectacular part of the site, with its dramatic chalk cliff, Cooper's Pit is a former lime quarry, that has naturally rewilded over the last 50 years and is now rich in wildlife, including slow worms, rare birds, bats and badgers. Recognised as a Regionally Important Geological Site (RIGS) for its important Cretaceous geology and fossils, it deserves full protection from any kind of development and would make an incredible nature reserve, within easy walking and cycle access from the city centre.





Orchard walks

Thousands of local people and visitors use the Wincheap orchards and fields for walking and recreation for health and wellbeing. Well-used formal and

informal footpaths, used for generations, criss-cross the site, which is also an important part of the Canterbury Middle Ring walk.



A community walk in Autumn 2025 attracted over 200 people in support of the Save Wincheap Orchards and Fields campaign.

Widespread community opposition

The extent of local opposition to the proposed Merton Park development has been witnessed through extensive ongoing support for the *Save Wincheap Orchards and Fields* campaign, with hundreds of local people actively engaged in a series of protest meetings, walks, city-centre marches and community events, including the submission of evidence to council meetings to highlight that this element of the Canterbury Local Plan is unsound. Thousands more have expressed their support for the campaign.









Appendix 2 – Resident Survey - Public use of Wincheap Orchards & Fields

Survey results – 1 March 2026

Summary

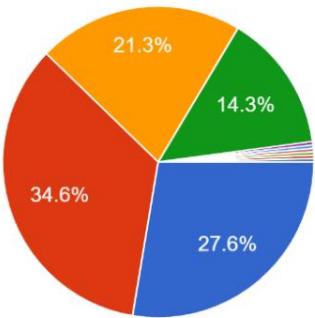
We received 286 individual responses between 5 February and 28 February 2026 inclusive.

- 83.5% of people visit the area at least once per week, with 27.6% visiting every day.
- 24.7% have been visiting the area for over 20 years, that being the second highest answer.
- 97.6% say the plan does not address their needs for green space in this area
- 91.6% of people enjoy the panoramic views of Canterbury Cathedral and 92.7% enjoy walking in the area.

- 58.7% of people would not visit the area at all if the Merton Park development went ahead.

How often do you visit the area?

286 responses

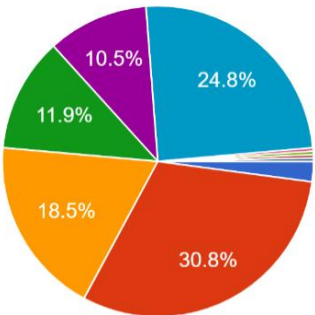


- Every day
- Several times a week
- Once or twice per week
- Once or twice per month
- Once a week in the summer/spring/autumn
- Occasional walks as well as visits to the area
- In the summer regularly but not at other times
- I have used it daily but as I sadly have...

▲ 1/2 ▼

For how many years have you been using the area?

286 responses

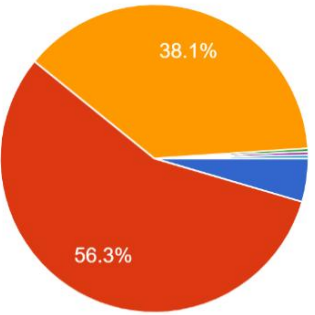


- Less than one year
- 1-5 years
- 6-10 years
- 11-15 years
- 16-20 years
- More than 20 years
- 35 years
- 38 years

▲ 1/2 ▼

When you visit, how long do you typically stay?

286 responses



- Up to 30 Minutes
- Between 30 Minutes and 1 hour
- 1 hour or longer
- It depends, from 30 mins to longer than 1 hour
- Sometimes 30 min sometimes hours
- I often go for two lots of 1.5hr dog walks each day

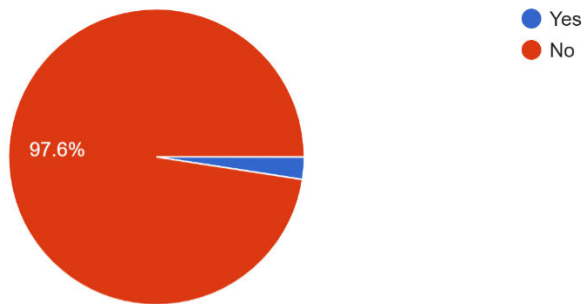
If the housing development goes ahead as proposed in the Draft Local Plan, how often do you think you would still visit for those activities?

286 responses



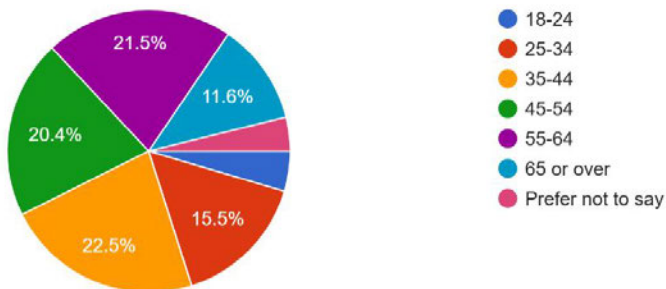
Do you think the plan addresses your needs for green space in this area?

286 responses



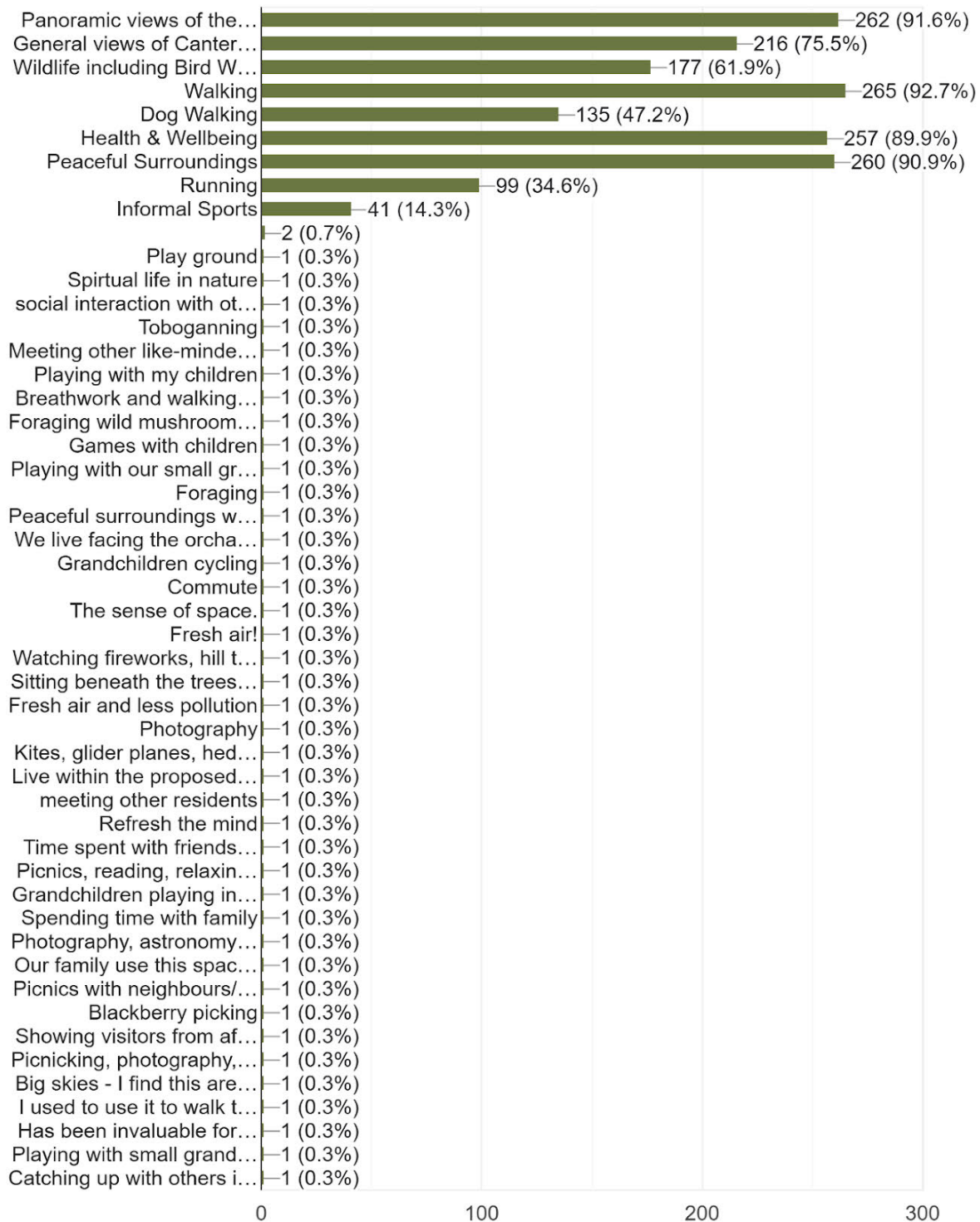
Please select your age:

284 responses



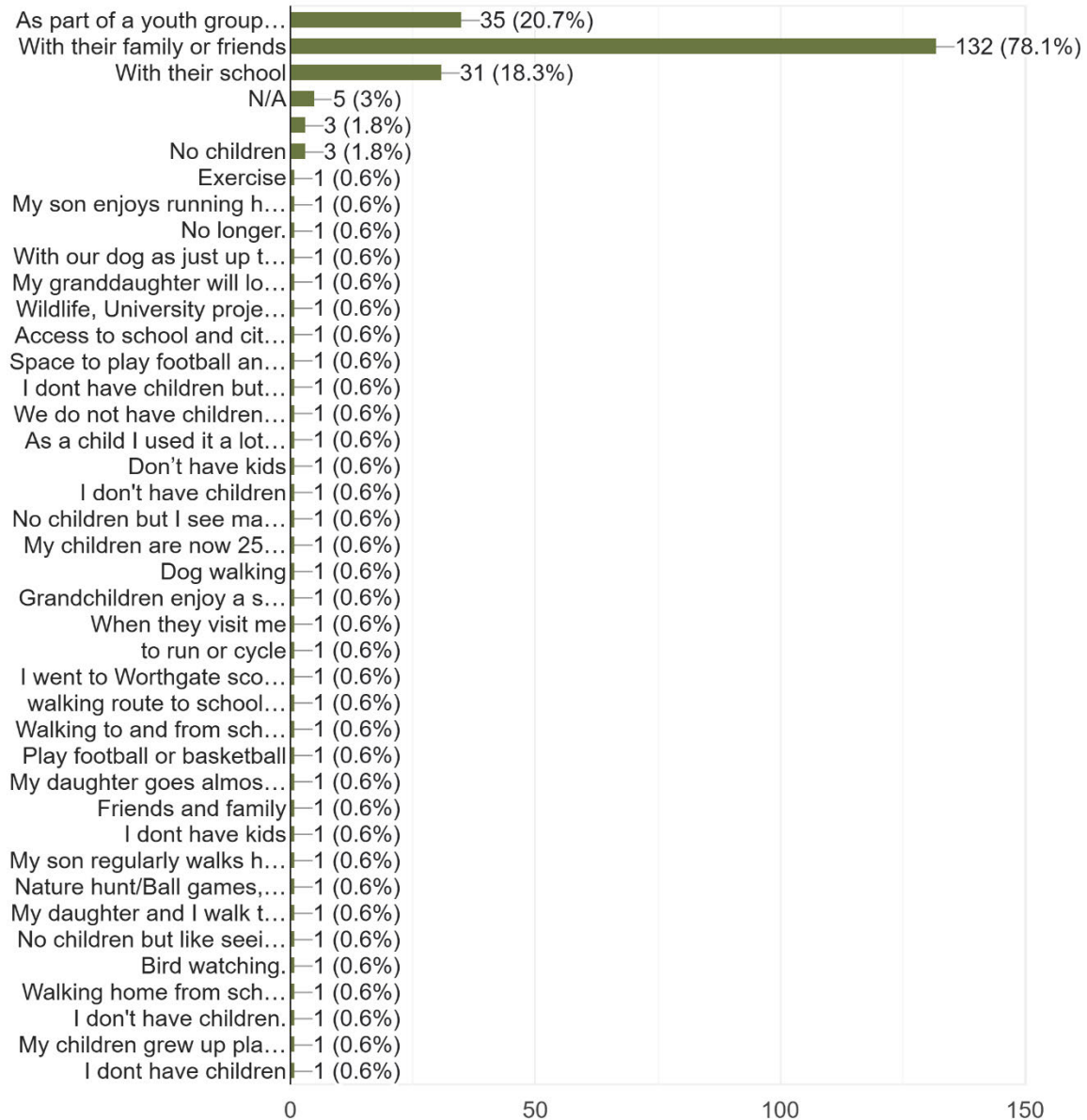
When you visit the area, which of the following do you enjoy ? (Tick all that apply)

286 responses



Do your children use the area? If so, in what way? (tick all that apply)

169 responses



Appendix 3 – Red and Amber List of Birds

Red List of birds of conservation concern	Amber List of birds of conservation concern
Cuckoo	Black-headed gull
Cetti's warbler	Common whitethroat
Common Linnet	Dunnock
Common redpoll	Eurasian Wren
Eurasian skylark	Grey wagtail
Eurasian starlings	Kestrel
Fieldfare	Meadow pipit
Greenfinch	Redwing
Herring gull	Rook
House martin	Song thrush
House sparrows	Sparrowhawk
Spotted flycatcher	Tawny owl
Yellowhammer	