

Canterbury District Local Plan: Regulation 19 Consultation

Objection to Policy C10 – Merton Park

I object to the proposed South Canterbury/Merton Park allocation within the Canterbury District Local Plan (Regulation 19) on the grounds that it fails to satisfy the National Planning Policy Framework (NPPF) tests of soundness. In particular, the proposal is not “justified”, “effective” or “consistent with national policy”.

The scale of development proposed is unsupported by adequate infrastructure provision and would result in significant and irreversible harm to the local environment, transport network, rural setting and community infrastructure of South Canterbury.

Transport and Highway Impacts

Roads, footpaths and transport infrastructure in South Canterbury are already under considerable strain, particularly along South Canterbury Road, Nunnery Fields, Nackington Lane, Hollow Lane and Lime Kiln Road. The cumulative impact of approximately 6,000 additional dwellings across the two adjacent developments would place intolerable pressure on an already constrained local network.

The NPPF states that development should only be refused on highways grounds where there would be an unacceptable impact on highway safety or where the residual cumulative impacts on the road network would be severe. In this case, the cumulative impacts would clearly be severe.

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

The cancellation of the proposed A2 slip road further exacerbates these concerns. Traffic would inevitably be diverted through unsuitable residential roads, including Norman Road and Nunnery Road, where air quality is already a concern. This directly conflicts with the NPPF’s objectives to promote sustainable transport, support healthy communities and protect public health and environmental quality.

Environmental and Landscape Harm

The fields surrounding Stuppington Lane form an important part of Canterbury’s rural setting, historic landscape and agricultural heritage. They also comprise productive farmland at a time when national food security is increasingly recognised as a strategic concern.

The NPPF recognises the economic and environmental value of the best and most versatile agricultural land and seeks to protect valued landscapes, biodiversity and the natural environment. The proposed allocation would result in the irreversible loss of open countryside that contributes significantly to Canterbury’s historic setting and rural identity.

In addition, the development would lead to the loss of wildlife-rich habitats and green spaces that currently support biodiversity and ecological resilience. This is inconsistent with the NPPF requirement for plans and developments to minimise impacts on biodiversity and secure measurable environmental gains.

Infrastructure and Service Capacity

The proposed scale of development would also place unsustainable pressure on healthcare services, sewage infrastructure and other essential public services, all of which are already stretched.

The current proposals do not demonstrate convincingly that the necessary infrastructure can be delivered adequately, sustainably or in advance of development. The NPPF is clear that strategic policies should make sufficient provision for the infrastructure, community facilities and service capacity required to support development.

A lack of critical infrastructure alone renders this allocation unsustainable. Experience from previous developments demonstrates that promised infrastructure is frequently delayed, reduced or omitted once development is underway. Even the draft proposals fail to provide confidence that the required infrastructure can realistically be delivered in a timely and effective manner.

Conclusion

For these reasons, the proposed South Canterbury/Merton Park allocation is unsound and inconsistent with national planning policy. Merton Park should therefore be removed from the Local Plan.

Instead, the Council should prioritise smaller-scale brownfield and city-centre developments where housing can be delivered more sustainably and with significantly less harm to the natural environment, biodiversity, rural communities, food security and Canterbury's unique historic setting.