

Objection to Site C10 - the proposed Merton Park

From: Derek Sellen [REDACTED]

(quotations from the NPPF and from CCC documents are in bold)

The Merton Park proposal is in conflict with various parts of the National Planning Policy (NPPF) as detailed below.

NPPF talks about '**Conserving and enhancing the natural environment.**'

Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced

C10 however results in:

Net loss of trees - C10 removes the 1000s of trees in the Wincheap orchards, the mature holm oaks in the Nackington fields, the extensive hedgerows associated with the arable fields of the area. This will result in extreme habitat loss for wildlife and will damage beyond repair the natural beauty of this area.

NPPF N2a

20. Conserving and enhancing the historic environment ... Heritage assets are an irreplaceable resource, and 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. These assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations⁷³ . (NPPF)

C10 takes no account of the heritage view of the Cathedral from the orchards and fields. The Outstanding Universal Value (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

The intrusion of the development into the landscape will damage all these irreparably for the generations to come.

Plans for development of C10 also conflict with the **Canterbury Landscape Character Assessment and Biodiversity Appraisal October 2020** .

This recommends, among other similar recommendations:

- **Conserve remnant traditional orchards for their landscape, biodiversity, and historic value.**
- **Manage and enhance the interest of arable fields by encouraging the creation of uncultivated field margins and other wildlife-friendly farming methods.**
- **Improve the quality of the existing boundaries and restore hedgerows, tree belts and areas of deciduous woodland (including ancient woodland) to strengthen the connectivity to habitats within the BOA. Development Management**
- **Conserve the open character of the arable dip slope cut by more enclosed dry valleys.**
- **Conserve and enhance views of Canterbury City and seek to maintain views to Canterbury Cathedral against the Stour valley slopes and open skyline backdrop.**

The same document describes the 'Nackington farmlands' (H4) as having these 'Key Characteristics':

A gently rolling landscape with broad dry valleys extending northwards towards Canterbury City, forming part of the dip slope setting of the Kent Downs

Simple, smooth open arable landscape, with deep, calcareous soils intensively farmed for cereals, with some areas of more enclosed fruit belt/orchards. v

Remnant shelterbelts, parkland trees and hedgerows create diversity and interest within the open arable landscape, with small remnant areas of ancient woodland.

All of these would be lost or damaged by Merton Park development.

In addition, the Wincheap Orchards are planted on Grade 1 agricultural land which would be lost to agricultural use.

Other aspects of Merton Park which are of concern to me include:

Effect on air quality and Increase of traffic

I quote research by a local resident: "The Council no longer plans the original relief roads for a "bus-led" strategy. Their own **Draft Transport Strategy** (Table 5.1) admits this will leave the A2/A28 Wincheap interchange and M2 J7 severely congested! Crucially, they don't have a signed legal agreement (Statement of Common Ground) with National Highways accepting this traffic chaos. Without this, the plan is legally non-compliant."

Huge increase in water consumption through for example showers, washing machine and dishwasher use, in an area which suffers from water shortages

Increase in waste & sewage in an area already experiencing problems with this

Increase in urbanisation on the fringes of a World Heritage city.

Loss of a much-valued local amenity; as shown by local surveys, the Wincheap Orchards and Fields are a popular walking and dog-walking area for the nearby urban population. They have been enjoyed for generations by adults, teenagers and children, providing an important and irreplaceable accessible environment for contact with wildlife, natural beauty, fresh air etc. overall, Overall, to develop Site C10 blatantly conflicts with this policy of :

encouraging the protection and enhancement of valued landscapes in accordance with the National Planning Policy Framework (CCC Landscape Character and Biodiversity Appraisal 2020 p7)

CONCLUSION:

The Merton Park plans should be decisively rejected as they are unsound and in conflict with national and local policy.