

Objection to Policy C10 – Merton Park

Canterbury District Local Plan (Regulation 19 Consultation)

Introduction

I object to Policy C10 (Merton Park) in the Regulation 19 Draft Canterbury District Local Plan, on the grounds that it fails the National Planning Policy Framework (NPPF) tests of soundness (paragraph 35). It is not positively prepared, not justified, not effective, and not consistent with national policy. The Council's own Sustainability Appraisal (2026) confirms significant negative impacts on landscape, biodiversity, land use, water, flood risk, and heritage for this site.

1. Not Positively Prepared

The plan's evidence does not show that Merton Park is deliverable within sustainable limits.

- **Infrastructure undeliverable:** South East Water has stated that supply infrastructure will not be available until 2036, five years after the Council's target occupation date (2030/31). The Sustainability Appraisal acknowledges that cumulative effects around Canterbury will increase pressure on water resources and wastewater systems.
- **Contradiction with climate and sustainability goals:** The Sustainability Appraisal identifies "minor positive and significant negative effects" for climate change (SA Objective 2) and biodiversity (SA Objective 3), acknowledging greenhouse gas emissions and greenfield loss linked to Canterbury allocations such as C10.

Policy should also recognise the impending health crisis facing the UK, and the associated need for local, sustainable food supplies. Food Growing should form part of Planning Policy. We need to educate people in where their food comes from, reconnecting eating habits with fresh, healthy produce. 56% of calories consumed by children aged 11-18 and adults are now coming from ultra-processed foods. Only 10% are eating the recommended amount of fruit and vegetables. This is costing the economy £126 billion per year is associated health, mental health and lost productivity from obesity and sick days.

Green space is vital for fresh food, community orchards, community gardens and education projects. Removing the sight of orchards and arable land, and easy access to them for walking from urban environments, will only bring people further down the road to sedentary living, ordering take-away processed food, having no connection to where food comes from and being socially isolated.

To ignore these issues in a quest to pack in more housing close to town centres is short-sighted and will cost us all in the long term. To improve access to vibrant communities and nature, and to promote the use of local services and infrastructure, villages should be expanded to ensure full usage of surgeries, shops, schools and public transport networks. This would relieve pressure on urban traffic flow and improve the balance of housing and nature, whilst strengthening rural communities.

- **Clash with Heritage:** The views from the A2 and Merton Park across to the Unesco Heritage Site, and in reverse from existing housing out onto nature, would be almost eradicated. This is of particular relevance for the huge numbers of people who access the site daily on foot, either for exercise, mental health, or to access the hospital, school or work.

- **Community not engaged:** Local consultation has not been inclusive or transparent, contrary to NPPF 16(c), which calls for proportionate and early engagement. The huge amount of local feedback about the Local Plan shows the lack of inclusion at the outset.
- **Overdevelopment:** Putting aside Policy, the sheer volume of housing is unrealistic for this site. With Merton Park and Ridlands Farm there is around 100 acres in total, with 2260 houses broadcast as planned. A Primary School, “Sports Hub” to provide a pavilion for football (and pitches), retention of the existing Rugby Club, plus water treatment works and 1.5 hectares of “employment land” would cut into this available land hugely. Infrastructure and green spaces would (and must) also reduce buildable space. With a normal “reasonable” density of 12-14 houses per developable acre, it is immediately clear that the numbers do not add up for suitable housing on a greenfield site in a rural setting.
- **Lack of cohesive, relevant housing strategy:** The style of housing to match local demand also needs to be addressed. There is no obvious link to existing and planned sites (South Canterbury, Thanington) to ensure the necessary housing and services are positioned where the demographic fits. The sites should be planned in unison to ensure residents can move freely, reaching the services required for each demographic without the need for increased traffic. Residents should be able to reach local employment easily, and be able to see and gain access to nature.

The greatest need is currently for 3-bedroom family homes which should, therefore, be being built at the existing South Canterbury and Thanington sites, to address the urgency first, with walkable schools and sports facilities in those locations to provide for those families, as successfully demonstrated at the previous St Augustine’s hospital site in Chartham.

The next level of urgency is for suitable housing for older residents, affordable social and key worker housing, and suitable housing for individuals to meet the rapidly changing demographic of single households. These do not necessarily require a Sports Hub or a Primary school which would then become irrelevant at Merton Park, causing unnecessary traffic and parking issues. There is already a Primary and a Secondary school at either end of the site. If a school is to be built, surely a model like St Alphege and Whitstable Junior school would make more sense, with the new school being closer to Wincheap Primary to share facilities and management staff, offering a nursery and junior school option to expand capacity.

There should be a more forward-looking Plan which takes into account local needs for the coming decades, addressing them in a more joined-up, cohesive way. Affordability, infrastructure, biodiversity, access to nature and quality of life should take priority in planning the city’s future.

2. Not Justified

The Sustainability Appraisal demonstrates that this allocation performs poorly against environmental objectives and relies heavily on mitigation that is undefined or deferred.

- **Landscape and visual harm acknowledged:** The SA specifically calls for a Landscape and Visual Impact Assessment (LVIA) for C10 “to secure key landscape mitigation,” confirming that harm is inherent and only partly remediable.

- **Greenfield loss:** The appraisal records significant negative effects for landscape (SA Objective 5) and land use (SA Objective 11), confirming permanent loss of best and most versatile agricultural land.
- **No reasonable alternative evaluation:** Other brownfield or less constrained sites were discounted or removed without clear reasoning.
- **Inherent conflict:** Even with mitigation, the SA expects “mixed positive and significant negative effects,” contradicting NPPF 11 and 174 requirements to promote sustainable patterns of development and protect valued landscapes.

Not Effective

The allocation cannot be implemented as written.

- **Water and wastewater:** Policy relies on uncommitted infrastructure; the SA notes “potential negative effects unless adequately mitigated” relating to water stress and wastewater capacity.
- **Traffic constraints unresolved:** Hollow Lane and Nackington Road lack sufficient capacity; the SA acknowledges significant cumulative congestion effects across “South West Canterbury,” which includes C10. And this is without taking into consideration the vast existing South Canterbury Development which has begun this year, the impact of which will be unknown until its completion, plus the Milton Manor and Cockering Fram sites, and then Wincheap industrial estate; all on this side of the city.
- **Mitigation deferred:** Required off-site works and landscape planting are pushed to later phases—the SA explicitly recommends “early delivery of structural planting” and phasing changes, proving current policy wording is inadequate.
- **Out-of-date delivery planning:** The Infrastructure Delivery Plan (2022) is the last version cited. The appraisal itself notes that reliance on dated infrastructure evidence creates uncertainty on effectiveness.
- **Lack of relevance:** The lack of a cohesive plan for the whole city is fundamental. If the Thanington Resource Centre is to be preserved, there is already a suitable home for a football/ sports hub there, for example, with better links to infrastructure. Adding to the existing Rugby club with increased traffic and the matched seasonal demand for parking and pitch usage seems obtuse. The need for a Primary school on Merton Park needs to also be reconsidered, as the most urgent need for family housing should be being addressed on existing development sites, with schools and sports servicing those residents locally. Any further sites should be addressing future demand, which is clearly for single-occupancy households, affordable housing and providing for the needs of an ageing population in a sensitive, natural environment which increases quality of life.
- **Not Consistent with National Policy**

The site is inconsistent with multiple NPPF objectives, as evidenced by the Council’s own Sustainability Appraisal.

- **Environmental conflict:** The SA records significant negative effects on biodiversity (SA Objective 3), landscape (SA Objective 5), heritage (SA Objective 9), and land use (SA Objective 11). These findings contradict NPPF 174–177 (protecting natural assets) and 202–203 (protecting heritage significance). The huge variety of species currently inhabiting the area, many of which are endangered or protected, should be preserved and not simply “mitigated”.
- **Climate change inconsistency:** The Plan’s reliance on large-scale greenfield allocations, including C10, undermines NPPF 8 and 11 objectives to reduce greenhouse-gas emissions and align growth with infrastructure.
- **Biodiversity Net Gain uncertainty:** The SA highlights removal of the earlier 20 percent BNG requirement and substitutes weaker phrasing, contrary to the Environment Act’s legal duty for measurable gain.
- **Flood and water risk:** C10 sits within areas affected by Source Protection Zones 1 and 2, yet the SA cautions that potential significant negative effects on flood and water quality remain.

Conclusion: According to the Council’s own Sustainability Appraisal, Policy C10 (Merton Park) produces significant negative environmental effects that cannot be fully mitigated. It performs poorly against the tests of soundness:

Positively Prepared: Required utilities undeliverable within plan period. No obvious overall strategy to ensure the relevant housing is being built in the right places, with relevant infrastructure and services for the type of housing (and demographic of residents) being planned.

Justified: Sustainability Appraisal confirms major harm to the landscape, biodiversity and UNESCO site. Loss of habitat for endangered species. Loss of premium land being used for food production as well as extensive usage for local residents for health and mental health.

Effective: Infrastructure, phasing, and mitigation uncertain

Consistent with National Policy: Conflicts with NPPF 8, 11, 174, 187, 192, 202–203

The allocation should therefore be revised to focus future growth on less constrained, more environmentally compatible locations. For example in expanding local villages and hamlets which would benefit from stronger community building whilst still enabling continued easy access to the countryside for residents. The type (and density) of housing and relevant infrastructure and services appears to be fundamentally flawed in the current plan for Merton Park and Ridlands Farm.