

Draft Canterbury District Local Plan: Regulation 19 Consultation

1. Introduction

This response to the Consultation addresses Policy C10 – Land at Merton Park. This response will consider transport AND ACCESS features which are common across the whole Local Plan and other strategic site allocations, but for the purposes of brevity – and recognising that many other individual and groups will be covering those topics – this response is focussed on this one topic at this site.

Policy C10 is for a comprehensive mixed-use development which incorporates 1,950 dwellings, a sports hub, a community hub, a primary school, a new park & bus facility and a new wastewater treatment works. The current land is almost wholly agricultural.

2. Soundness

It is my view that the proposal for Policy C10 fails the ‘Soundness’ test as defined by the National Planning Policy Framework (NPPF), as it is **not** consistent with national policy which should be “...*enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant...*”

Traffic and Access

The NPPF (Para 109 (b)) states that “*Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve...ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places*”

The transport solutions relating to Policy C10 do not meet these requirements. Specifically, they appear to have been overlaid following the master plan of housing and incorporation of non-housing amenities have been laid out.

Initially, primary access to the site was intended to be via a new junction on the A2, but since this project has been curtailed the design of Policy C10 has been hastily reconfigured to enable access via a series of minor roads (including Hollow Lane, Birch Road and Homersham) that are fundamentally incapable of sustaining the projected traffic load without major reconstruction (which is probably impossible without demolition of existing properties). The Council’s own Canterbury Forecasting Report (dated 13 February 2026) recognises that “...*There is also significant [traffic] flow increase in west Canterbury, on Hollow Lane, due to the developments at Merton Park...*”, but no mitigation is proposed. The proposal appears to say that there will be an impact, and the existing residents will have to grin and bear it – this is not consistent with “...*transport solutions that deliver well-designed, sustainable and popular places*”.

Sustainable Transport

The NPPF (Para 109 (d)) states that “*realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated*”

In relation to transport, the Regulation 19 version of the Local Plan makes a significant assumption around ‘modal shift’, i.e. that there will be a conversion of more than 20% of journeys currently taken by car in the Canterbury District to journeys by public transport, on foot or on a bicycle. There appears no basis in reality for such a substantial shift, and no such changes have occurred from previous, large-scale developments.

For policy C10, the assumption is that this unevidenced high proportion of current car users will switch to either (a) public transport, using the Park & Bus scheme which sits at the northeastern-most extremity of the development, or (b) to use active travel using ill-defined corridors which will feed into heavily congested and unsympathetic (e.g. no dedicated or segregated cycling path) main routes into the City Centre.

In both cases, these are unlikely to be an attractive alternative for many people on the C10 site, and the preferred option will be continued use of private vehicles, and the 20% modal shift will not emerge within this site.

What happens when this (and other) developments are committed, but the modal shift proves unattainable? Local transport will become unmanageable and unsupportable. Further, evidence-based analysis should be undertaken in support of such a transition in order to improve the ‘soundness’ of this plan.

I would like to be afforded the opportunity to appear at the Independent Examination, should the Inspector believe this is appropriate.

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