



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

Planning Policy Team
Canterbury City Council
14 Rose Lane
Canterbury
CT1 2UR

18th May 2026

JW/OR/20-145
BY EMAIL

Dear Sir/Madam,

**REPRESENTATION TO THE CANTERBURY DISTRICT LOCAL PLAN REGULATION 19
CONSULTATION IN RESPECT OF LAND AT MERTON PARK, CANTERBURY (DRAFT
ALLOCATION POLICY C10)**

Iceni Projects, on behalf of Quinn Estates (QE), welcomes the opportunity to submit representations to the Canterbury District Local Plan 2042/43 (Regulation 19 Consultation). QE is one of the leading and most prominent developers in Canterbury, with strong ambitions to deliver a sustainable urban extension at Land at Merton Park, Canterbury.

QE continues to support the inclusion of Merton Park as a strategic allocation (Policy C10) within the Regulation 19 Consultation. As identified in the previous representations, the development will generate a number of significant and unique economic, social and environmental benefits to help the District realise its strategic objectives. The site will provide approximately 1,950 new dwellings, which will make a significant contribution to the Council's housing requirements, including affordable housing, older persons housing, accessible housing, and self and custom-built housing. Further benefits (not exhaustive) include the sports hub, including the enhanced Canterbury Rugby Club facilities and a new football stadium for Canterbury City FC, a new community hub with commercial and business space, and a new primary school. The site will deliver sustainable development in accordance with the spatial strategy, which prioritises development within Canterbury.

Representations have been made through every previous stage of consultation on the emerging Local Plan and the concept plan has been informed by a suite of technical information that QE has produced on matters relating to masterplanning, air quality, heritage, trees, drainage, ecology and transport.

Subsequently these representations are supported by:

- **Appendix 1** - Land Budget Plan (ref: 2937-313 AN) prepared by Milton Studios;
- **Appendix 2** - Canterbury Local Plan – Regulation 19 Response - Merton Park, Canterbury (ref: 22-022-018) prepared by C&A; and
- **Appendix 3** - Heritage commentary on masterplan approach - Merton Park (ref: EWLH/I001219/160725) prepared by Iceni Projects.

QE shares the Council's aspirations for Merton Park and considers the allocation will facilitate a high-quality new community to be delivered across the plan period to meet increasing housing needs and secure sustainable development. QE envisages working closely with CCC and other key stakeholders in the remainder of the Plan period and in the preparation of an outline planning application over the next 12 months.

a. The Prescriptiveness of Policy C10 (Land at Merton Park)

QE supports the inclusion of Land at Merton Park for mixed use development as part of Canterbury's growth ambitions up to 2042/43 and considers the site to amount to a multi-phase strategic site that is critical to the delivery of the Plan, as identified in the emerging Framework. If Merton Park cannot be delivered for any reason, it could jeopardise the delivery of the spatial strategy and create housing delivery problems.

QE considers that the Council has worked hard to create a detailed and carefully conceived policy allocation for Merton Park that identifies all of the infrastructure and component parts of the Masterplan. However, QE would caution against unintended consequences of a highly prescriptive policy, noting the emerging NPPF policy HO13, concerning the build out of residential and mixed-use development, which states: [inter alia]

"3. Where there are development proposals for large scale residential and mixed-use development which will be implemented through multiple phases across development plan periods, the consenting framework for the proposal should:

- a. **Secure the approach to design, infrastructure and other site-specific requirements for the development, including the scale of affordable housing; and***
- b. **Be flexible enough to respond positively to changing circumstances as phases are brought forward, including changes to housing need, viability and design.***

4. Development proposals affecting sites for large scale residential and mixed-use development set out in emerging development plans should not be inconsistent with the proposed scale, location and phasing of those emerging proposals."

Whilst the Plan is tested for soundness against the 2024 version of the Framework, it is considered that the emerging National Decision-Making Policies of the new Framework should be applied to the Plan to ensure policies can be given full weight upon adoption. Furthermore, QE considers that the acknowledgement in national planning policy of the importance of policy flexibility, particularly for multi-phase strategic sites to be built out over a sustained period of time, should be taken through and applied in considering the soundness of relevant allocations and policies. Regardless of the emerging NPPF, Paragraph 86 of the current NPPF is highlighted which outlines planning policies should be flexible enough to accommodate needs not anticipated in the plan.

Whilst QE has worked collaboratively with the Council in the evolution of the proposals for Merton Park and the evolution of the corresponding policy, it is through the prism of shifting market conditions and the need for flexible policy in the face of changing circumstances that QE provides the following comments.

b. Quantity of Development, Density, and Land Use

The updated allocation has slightly increased the total residential figures to *approximately* 1,950, from 1,930 in the previous focused Regulation 18 consultation. While a density of 35dph by the Council is proposed within the SLAA, Policy C10 recognises that this includes the community hub. Outside of this, a density of approximately 45dph is proposed. In order to achieve a density of 45dph, this will need areas of higher and lower density across the site, and it is noted that some flexibility is included within the policy wording to allow for areas of greater and lower density. In addition to this, in order to achieve the 1,950 dwellings proposed by the Council at an average of 45dph, some other aspects of the policies will need to be reconciled. Paragraph 36 of the NPPF is clear that plans need to be deliverable, and Quinn Estates is keen to work with the Council to develop and refine the allocation to ensure that it is fully deliverable over the plan period.

The quantum of housing and density identified for the allocation is supported in principle, but QE considers that the possibility of changing circumstances should be reflected in the policy. It is crucial to avoid a scenario whereby a scheme of slightly fewer or slightly more homes being brought forward – potentially at a slightly different density – results in policy conflict. There should be flexibility in the

allocation as to how the blended site-wide aim of 45dph is achieved, and whether this can be fully achieved is a matter for detailed consideration. Allocations of this nature will inevitably be subject to evolving design considerations, market conditions, and infrastructure requirements, meaning that the precise number of homes delivered may vary marginally from any indicative figure identified at the plan-making stage. To underline this point we would once again draw attention to the flexibility requirements set out with Policy HO13 of the emerging NPPF.

Development mix

Whilst the overall balance of the different uses is supported, the prescriptive approach within the policy to the required amounts of each use could present further challenges down the line at planning application stage should further detailed work determine that not all elements can be achieved in those precise quantum. The wide range of different uses and infrastructure required for the site also goes hand in hand with a large number of unknowns that will not be clarified until a later stage – for example the level of financial contributions for schools and the fluctuating cost of building materials. Similarly, the draft Policy requires compliance with Policies DS1 and DS2 which specify a specific housing mix for all development proposals, which might not be appropriate for the entire site. We therefore advise that greater flexibility is built into the policy, in accordance with national policy.

With regards to the affordable housing mix, this is set to be in line with draft Policy DS1, which requires this provision to be split between 60% affordable rent, 10% social rent, and 30% affordable homeownership models. The standard housing mix requirements do not reflect the unique characteristics and vision for Merton Park and again we therefore advise that greater flexibility is built into the policy, in accordance with national policy, to enable a more appropriate strategy to come forward in agreement with the Council.

c. The Concept Masterplan

A revised Land Budget Plan (**Appendix 1**) has been prepared to support this representation, which supports this allocation. While supportive, the plans demonstrate that further work is required to refine the allocation, and Quinn Estates is willing to work with the Council to undertake this work. We note that in particular the open space figures within the policy might need reconsideration, particularly in light of the overprovision of the sports area that is required.

Following ongoing engagement with KCC and CCC, the site masterplan has been adjusted to discourage through traffic through the site and to include a parking facility to intercept vehicle trips into the city centre. This is reflected in the Land Budget Plan (**Appendix 1**), and discussed in more detail within the C&A Regulation 19 Response (**Appendix 2**).

The total amount of business space may also need to be reconsidered based on the masterplan. In respect of the business space provision within Policy C10 (minimum 4,000m²), Quinn Estates continues to raise concern on this part of the allocation. Policy DS9 – Town Centres and Community Facilities is clear on its focus of steering business space towards ‘town centres’. The current sizeable provision is contrary to the aims and objectives of Policy DS9 and the NPPF (Paragraph 90), and we urge the Council to consider a lower business space provision at this location. Quinn Estates is willing to engage with the Council on this matter.

Quinn Estates wishes to reiterate points from previous representations in relation to parcels R07 and R13 that should be allocated for residential development rather than open space under Policy C10. 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. The masterplan and policy should therefore be amended to reflect this balanced approach.

Heritage

Heritage commentary has previously been provided to the Council for Merton Park in July 2025 by Iceni Projects Heritage Team and is resubmitted (**Appendix 3**) for reference. This responded to an earlier Regulation 18 draft of the Local Plan (Revised Consultation), alongside a review of comments

from Historic England. The commentary details how the heritage team have worked proactively with the design team to develop and refine the masterplan to embed effective mitigations, including refined layout changes, adjusted parcel boundaries, sensitivity zoning, robust view corridors, green opportunity areas, landscape buffering, and height sensitivity zones. Collectively, these measures would mitigate against potentially harmful heritage effects identified in relation to a change in the way the city and its heritage assets are experienced from the viewpoint (View 14) identified in the Canterbury Conservation Area Appraisal. Importantly, the masterplan creates new opportunities for public views towards the Cathedral and skyline that are aligned with the experiential qualities of these key viewpoints, while also enabling the delivery of the planned development.

d. Green Infrastructure

Whilst it is acknowledged that a 20% BNG may be achievable at Merton Park, our plan-wide representation submitted on behalf of QE addresses this matter in full and should be noted and applied to this allocation accordingly. QE has significant concerns over the soundness of the 20% BNG requirement set out in Policies SS1 & DS25.

Similarly, in respect of the requirement for 20% tree canopy cover, our plan-wide representation on behalf of QE sets out our position on this matter in detail and should equally be read and applied in the context of this allocation.

e. Transport and Access

Detailed transport work has been undertaken prior to this consultation, including providing information related to access principles, traffic assessments and sustainable strategies, confirming Merton Park's allocation as sound. The evidence which C&A have provided to date confirms that Merton Park would be a highly sustainable urban extension to Canterbury.

The site will include strong public transport provision, initially taking advantage of the 'fast bus' service from the adjacent Mountfield Park site and later providing opportunities for longer-distance services to penetrate the site. Modelling evidence to date from CCC and the site promoter provides confidence that at application stage, the development can implement a strategy such that the residual traffic impact would be non-severe. This will be informed by further modelling of the Wincheap and Nackington Road corridors in particular.

In accordance with NPPF paragraph 110, the allocation of the site would enable significant development in a sustainable location, with limited need to travel and a genuine choice of transport modes.

To support this representation, as noted C&A have prepared further transport and highways evidence in the form of a Regulation 19 Response (**Appendix 2**). Following ongoing engagement with KCC and CCC, the site masterplan has been adjusted to discourage through traffic through the site and to include a parking facility to intercept vehicle trips into the city centre, which is detailed within the response.

The C&A note also requests a number of changes to the draft allocation policy. It is requested that policy paragraphs 1e, 4a, 4c, 4d and 4e are amended to provide suitable flexibility and allow for further evidence gathering. While the note should be referred to, these changes are highlighted as follows:

Criterion of Policy C10	Commentary and suggested change
1e.	Draft policy paragraph 1e refers to '<i>Provision of a new Park and Bus Facility for a minimum of 300 spaces (approximately 0.9 ha)...</i>' The allocation will provide this facility but the current wording does not convey the full range of opportunities which the parking facility will provide. While some users

	will use the fast bus for onward travel, others will walk into the Hospital site and others will use the cycle hire scheme. Furthermore, as explained later in Chapter 4, the number of spaces should not be specified now as this will be informed by later evidence through the planning application. The policy should state: 'Provision of a public parking facility to enable onward travel by sustainable modes, located on the eastern side of the site adjacent to a fast bus connection, to serve traffic from Nackington Road and Stone Street. Consideration should be given to incorporating this facility with parking provision for the Sports Hub.'
4a.	Draft policy paragraph 4a, part v requires <i>"Improvements at Wincheap Roundabout and Riding Gate Roundabout to facilitate safe and convenient pedestrian and cycle access to the city centre"</i>. As mentioned above, these changes form part of the wider CDTs including reduction of parking demand, roadspace reallocation to bus lanes and the conversion of roundabouts to signalised junctions. This inter-relation means that the proposals should form part of the Infrastructure Delivery Plan for KCC / CCC to deliver, rather than being tied to Merton Park specifically. It would be appropriate for the Merton Park site to contribute towards these improvements so the policy should change to: 'Appropriate contribution to CCC interventions at the Wincheap Roundabout and Riding Gate Roundabout, to facilitate safe and convenient pedestrian and cycle access to the city centre'.
4c.	Draft policy paragraph 4c refers to a 'bus-only connection to the fast bus link located in Site 10 (Policy CF1). However the initial bus provision relies on Merton Park residents being able to walk into the Ridlands Farm site to access the fast bus. The wording should be replaced with: 'active travel and bus connection to the fast bus link located in Site 10 (Policy CF1).'
4d.	Draft policy paragraph 4d refers to <i>'primary vehicle access from Hollow Lane and secondary vehicle access from Nackington Road.'</i> This implies a hierarchy between the two accesses which will be of a similar design and function. On this basis this should be simplified to; Provide all-modes access from Hollow Lane and Nackington Road.
4e.	Draft policy paragraph 4e states <i>'Provide upgrades to Hollow Lane including the creation of a one-way working between the junctions with Wincheap and Hollowmede, upgrades to Homersham including the creation of off-street parking bays, plus any necessary upgrades to the A2 junction at Wincheap.'</i> This requirement is accepted in principle but any interventions will need to be informed by the CCC wider modelling and evidence in the application Transport Assessment. This should be replaced with a more general requirement to:

	'Investigate works to Hollow Lane, Homersham and surrounding streets which may be required to manage motor traffic levels'.
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f. Infrastructure and Phasing

As highlighted in this and previous representations made by Quinn Estates, it is necessary to test and evolve as required by the draft allocation policy to ensure that all of the detailed criteria, as well as the impact of whole Plan development management policies, will work in practice and thus illustrate that the Plan is deliverable (Paragraph 36 – NPPF). In particular, this will include further consideration of matters relating to open space, housing mix and biodiversity net gain. There are a number of key infrastructure requirements identified which will have space, cost and phasing implications attached to them.

Quinn Estates considers that whilst the identification of land to deliver an on-site WWTW is supported as a potential way of making the future development Nutrient Neutral, given the changing landscape regarding Nutrient Neutrality, the Policy should be amended to provide flexibility for the delivery of a suitable solution, thus ensuring that all parts of the allocation remain deliverable and optimising the best use of land in the most sustainable and strategic locations. This would be in line with the general thrust of Paragraph 86 of the NPPF which requires policies to be flexible to accommodate needs not anticipated in the plan, and Policy HO13 of the emerging NPPF. On this matter, we highlight that the Stour Environmental Credits programme (run by Ashford BC and CCC) is achieved through upgrading inefficient septic tanks, while an alternative nutrient neutrality scheme being operated by Greenshank Environmental Scheme is deploying drainage ditch management schemes for nutrient mitigation¹.

Comments are also reiterated in respect of the education provision. The Education Review previously prepared by EFM as part of the previous representation looked at the current and future capacity of schools that could serve Merton Park and concluded that the provision of a 2FE primary school at Merton Park, as favoured by the Department for Education, would be an appropriate mitigation solution and would provide a good balance of provision across the area. Quinn Estates maintains this position. Quinn Estates suggests the inclusion of 'up to' within the wording of 1(b)(iii) to enable flexibility within the delivery of the school to meet the suitable level of demand at the time of construction.

Given the strategic nature of the scheme there will be longer timeframes for delivery and therefore a flexible approach needs to be incorporated to allow for changing demands or needs over this period and ensuring appropriate triggers for delivery. This is in line with paragraph 86 of the NPPF to ensure that planning policies are flexible enough to accommodate needs not anticipated in the plan and to enable rapid responses to changes in economic circumstances –and be consistent with national policy, meeting the criteria for being sound (Paragraph 36 – NPPF).

It is therefore considered necessary that suitable caveats are included within Policy C10 to acknowledge this, and detailed comments in respect of the policy were provided during the previous representations for this site. This is particularly important in light of issues such as nutrient neutrality, whereby mitigation is necessary as part of the Habitat Regulations Assessment and a number of solutions will be required which will need to be viability tested. Specifically, section (5) of the Policy relating to phasing and delivery sets out certain time triggers for the delivery of key elements of the scheme. However, it is not clear what evidence has been used to determine many of these and if this aligns with finance and occupation triggers that make these timings viable.

g. Summary and Conclusions

Quinn Estates strongly supports the inclusion of Merton Park as an allocation for mixed use development and as part of the South West Canterbury Strategic Development Area within

¹ <https://www.greenshank-environmental.com/nutrient-neutrality>

Canterbury's emerging Local Plan. Quinn Estates is willing to enter into a Statement of Common Ground with the Council and other relevant bodies on this allocation.

The site will deliver a sustainable development at a location that accords with the spatial strategy. The development will generate a number of significant and unique economic, social and environmental benefits to help the District realise its strategic objectives. Quinn Estates is committed to working closely with CCC, other landowners and consultees to ensure the policies for Merton Park enable the delivery of sustainable development of the highest quality, and refine the policy such that it can be considered sound in accordance with Paragraph 36 of the NPPF.

Viability is an important aspect of the evidence base at this point, particularly given the commitment to identify and maximise the societal benefits the development can potentially deliver and as highlighted. While it is noted that some of the infrastructure requirements have been removed as part of this most recent iteration of the draft Local Plan, these may still change and Quinn Estates therefore remains agile to any changes. Quinn Estates is keen to engage with the Council on this matter.

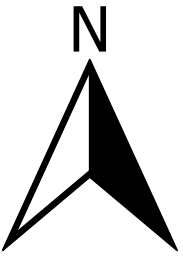
Should the Council wish to discuss any or all of the issues raised in these representations, please do not hesitate to contact me.

Yours sincerely,

Oliver Ricketts

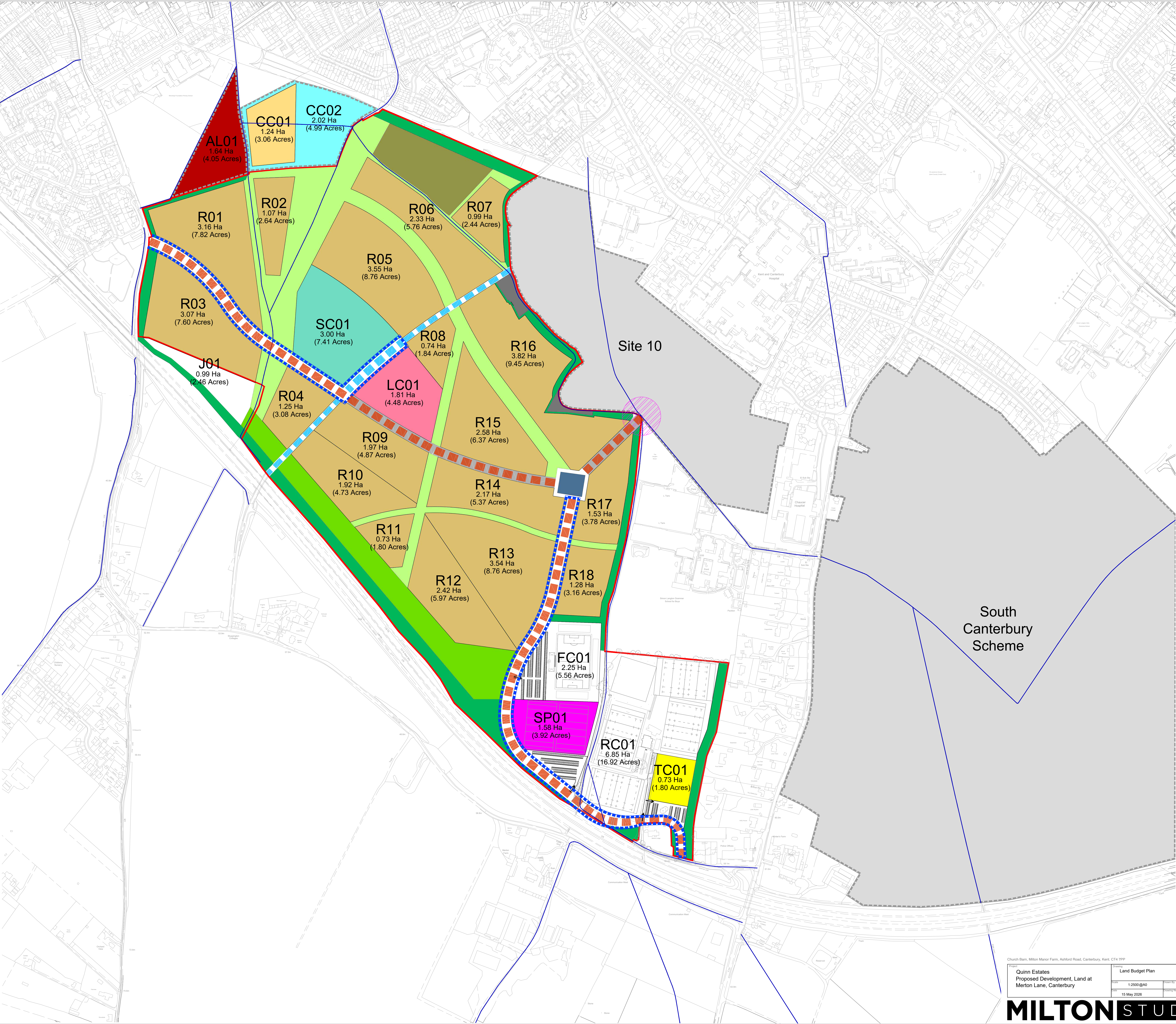
Oliver Ricketts
Senior Planner

APPENDIX 1



Key		
	Development Boundary	80.36 Ha
	Residential	38.12 Ha
	Local Centre & Mixed Use*	1.81 Ha
	School	3.00 Ha
	Sports (Rugby Club)	6.85 Ha
	Sports (Football Club)	2.25 Ha
	Sports (Informal)	1.58 Ha
	Kent MS Therapy Centre	0.73 Ha
	Existing Development	0.38 Ha
	Square	0.20 Ha
	Landscape Buffer (SN + NS)	6.18 Ha
	Amenity Green Space and Green Corridors	8.57 Ha
	Play Area	TBC
	Parkland	3.60 Ha
	Existing Quarry	1.99 Ha
	Bus Route	TBC
	Filter Stuppington Lane for active travel corridor	TBC
	All-purpose access from Hollow Lane and Nackington Road	TBC
	Adjacent Development	2.02 Ha
	Canterbury City Council Land	1.24 Ha
	Canterbury City Council (Development)	1.64 Ha
	Allotments (Existing)	
	Bus Gate	
	Public Right of Way	

* To Include Retirement Living



Scale: 0 20 60 100 240m

APPENDIX 2



Canterbury Local Plan – Regulation 19 Transport Response

Merton Park, Canterbury

22-022-018 Rev -

May 2026



Charles & Associates

Document Control Sheet

Project Name:	Merton Park, Canterbury
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Rev	Issue Purpose	Author	Checked	Reviewed	Approved	Date
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C&A Consulting Engineers

Park House, Park Farm
 East Malling Trust Estate
 Bradbourne Lane
 Aylesford, Kent
 ME20 6SN
 Tel: 01732 448120

Landmark House
 Station Road
 Hook
 Hampshire
 RG27 9HA
 Tel: 01256 630420

enquiries@c-a.uk.com



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1 Introduction

1.1 Overview

- 1.1.1 C&A have been appointed by Quinn Estates to provide transport and highways support for their site promotion activities associated with the emerging Canterbury City Council Local Plan (2040), specifically site C10 – Merton Park.
- 1.1.2 The emerging LP allocates the site for a comprehensive mixed-use development including circa 1,950 dwellings and other land uses. The site is the most sustainable location for strategic development in the district, close to Canterbury city centre and regional-level attractions including retail, education, healthcare and transport hubs such as Canterbury East railway station.
- 1.1.3 This note responds to the consultation on the Regulation 19 Local Plan, including the latest Draft Canterbury District Transport Strategy (CDTS). This reflects recent engagement with CCC and KCC, as well as National Highways' comments in respect of the Strategic Road Network (SRN).

Some elements of the policy will be supported by further evidence at application stage and to reflect this, the highlighted paragraphs suggest changes to the policy wording.

1.2 Recap of Promotion History

- 1.2.1 C&A have previously provided extensive transport and highways evidence for the site including sustainable transport measures which have since been incorporated into the draft policy for the site.

- 1.2.2 CCC's Regulation 18 Local Plan draft policy for Merton Park included the following requirements for 'Access and Transportation':

4 - The access and transport strategy for the site should:

a) Provide safe and convenient pedestrian and cycle connectivity including:

New and improved walking and cycling connections to A28 Wincheap and Great Stour Way via Hollow Lane, Birch Road and Victoria Road;

New and improved cycle connections to the city centre and South Canterbury development using the fast bus route;

New and improved cycle connections to Canterbury East station;

New and improved walking and cycling connections to school locations, both within the site and surrounding communities;

New and improved walking and cycling connections to the wider countryside to the south and south-east;

A direct cycle greenway between proposed Site C7 and the Kent and Canterbury Hospital; and

Improvements to the PRow network crossing and around the site as required.

b) Provide improvements to Canterbury East Station to include facilities for cycle parking and passenger flows;

c) Provide new access from and to the coastbound A2 carriageway to serve the site and provide vehicular connectivity to Site C7;

d) Provide new Park and Ride facilities containing a minimum of 500 car parking spaces, located on the eastern side of the site to connect to the fast bus link and the sports hub and incorporating cycle parking provision;

e) Provide a dedicated fast bus link connecting Nackington Road and South Canterbury Road;

(f) Provide a transport assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars; and

(g) Investigate the downgrading of Stuppington Lane within the site to non-motorised/ recreational use/ access only, in combination with opportunities for similar changes with other historic lanes around the site.

- 1.2.3 For the Regulation 18 Consultation in Summer 2024, C&A provided the following suite of transport evidence:

- Multimodal Access Principles (ref 22-022-RPT-011)
- Sustainable Transport Strategy (ref 22-022-RPT-013)
- Early Sustainable Delivery – Modelling Results (ref 22-022-RPT-017 Rev B)

- 1.2.4 The NPPF update in December 2024 endorsed the need for a vision-led approach to transport planning and C&A used this for the next stage of evidence gathering.
- 1.2.5 The exceptionally sustainable location of the Merton Park site gives high potential for active travel to key destinations. The STS included an audit of the main active travel routes and used this to suggest high-level improvements on routes around through Wincheap and South Canterbury.
- 1.2.6 The modelling results indicated that the A2 slip roads would not in fact be necessary and that, with the above sustainable transport interventions, it would be sufficient for the site to take access from Hollow Lane and Nackington Road.
- 1.2.7 C&A subsequently engaged with CCC and KCC to show concept drawings for the active travel interventions, as shown in **Drawings 22-022-042 to 22-022-046**.
- 1.2.8 As the site would take all-modes access from Hollow Lane, the proposals include traffic calming and reconfiguration of street parking around Hollow Lane and Homersham. KCC raised concerns that this could limit the existing parking provision. To address this, C&A commissioned parking surveys which confirmed that the existing bays are under-utilised, so some bays could be removed without knock-on effects. These were reported in the above Sustainable Transport Strategy.

- 1.2.9 CCC's Focused Regulation 18 Consultation in Autumn 2025 largely accepted the above evidence and used this to modify the draft policy as follows (where the significant changes are shown in bold).

4 - The access and transport strategy for the site should:

a) Provide safe and convenient pedestrian and cycle connectivity through the creation of new and improved routes including:

Connections to Wincheap and the Great Stour Way via Hollow Lane, and Victoria Road;

Connections to Thanington via Birch Road;

Connections to Canterbury East station including upgrades to Lime Kiln Road;

Connections to the city centre, including upgrades to Stuppington Lane, South Canterbury Road and Nunnery Fields;

Improvements at Wincheap Roundabout and Riding Gate Roundabout to facilitate safe and convenient pedestrian and cycle access to the city centre;

A direct active travel corridor through the site between Site 10 (Policy CF1) and Hollow Lane;

Connections to school locations, both within the site and surrounding communities;

Connections to the wider countryside to the south and southeast; and

Improvements to the PRow network crossing and around the site as required.

b) Provide improvements to Canterbury East Station to include facilities for cycle parking and passenger flows;

~~**DELETED:** Provide new access from and to the coastbound A2 carriageway to serve the site and provide vehicular connectivity to Site C7;~~

~~**DELETED:** Provide new Park and Ride facilities containing a minimum of 500 car parking spaces, located on the eastern side of the site to connect to the fast bus link and the sports hub and incorporating cycle parking provision;~~

~~**DELETED** Provide a dedicated fast bus link connecting Nackington Road and South Canterbury Road;~~

c) Provide good public transport facilities through the site, including a bus-only connection to the fast bus link located in Site 10 (Policy CF1), with a new bus route with bus priority measures, connecting residential areas and the community hub to adjacent local areas and the city centre;

d) Provide primary vehicle access from Hollow Lane and secondary vehicle access from Nackington Road;

e) Provide upgrades to Hollow Lane including the creation of a one-way working between the junctions with Wincheap and Hollowmede, and upgrades to Homersham including the creation of off-street parking bays;

f) Investigate the ~~downgrading~~ severing of Stuppington Lane to vehicular traffic, and repurposing for non-motorised vehicles and access; and

g) Provide a Transport Assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars.

1.2.10 For the further ‘Focused Consultation’ in Autumn 2025, C&A updated the evidence in the following documents:

- Updated Sustainable Transport Strategy (ref 22-022-RPT-013 Rev D)
- Traffic Impact Assessment (ref 22-022-RPT-014 Rev A)

1.2.11 Since then, C&A have continued to engage with KCC on the site access strategy, with the need to constrain through traffic, and the proposed Park and Ride facility within the site. These are now reflected in additional text in the Regulation 19 Local Plan:

1 v) Provision of a new Park and Bus Facility for a minimum of 300 spaces (approximately 0.9ha), located on the eastern side of the site adjacent to a fast bus connection, to serve traffic from Nackington Road and Stone Street. Consideration should be given to incorporating this facility with parking provision for the Sports Hub;

4 a) – added a further requirement for ‘Improvements to the PROW network crossing and around the site as required’;

4 d) ‘The internal road network should be designed for access only to serve the development and to discourage through trips between Nackington Road and Hollow Lane’;

4 e) ‘Provide upgrades to Hollow Lane including the creation of a one-way working between the junctions with Wincheap and Hollowmede, upgrades to Homersham including the creation of off-street parking bays, plus any necessary upgrades to the A2 junction at Wincheap.’

1.2.12 The above evidence has informed the evolving policy requirements and remains a valid part of the Local Plan evidence base. Following further engagement with CCC and Kent County Council (KCC) since the Focused Regulation 18 Consultation, the indicative masterplan for the site has been updated. This is set out in this note alongside further evidence to justify the continuing inclusion of the site in the Local Plan.

1.3 Neighbouring Sites

1.3.1 The proposals have been developed to coordinate with other nearby sites coming forward:

1.3.2 Ridlands Farm is an existing residential allocation to the north of Merton and the two sites would benefit from a combined access and sustainable transport strategy.

- 1.3.3 The committed Mountfield Park residential development to the south-east of the site is bringing forward sustainable transport measures including active travel interventions and a 'fast bus' proposal towards Canterbury city centre, which would further enhance the sustainability of Merton Park.
- 1.3.4 The Merton Park draft allocation is proposing sustainable transport interventions around the A28 Wincheap corridor which in turn would also benefit allocation C18 for mixed-use development of the Wincheap Commercial Area.

1.4 Report Structure

- 1.4.1 This note is structured as follows:

- Chapter 2 explains the latest refinement of the Merton Park development proposals;
- Chapter 3 reflects the sustainable transport measures proposed for the site allocation and the overall Local Plan ;
- Chapter 4 provides further information on traffic modelling;
- Chapter 5 summarises the note.

2 Development Proposals

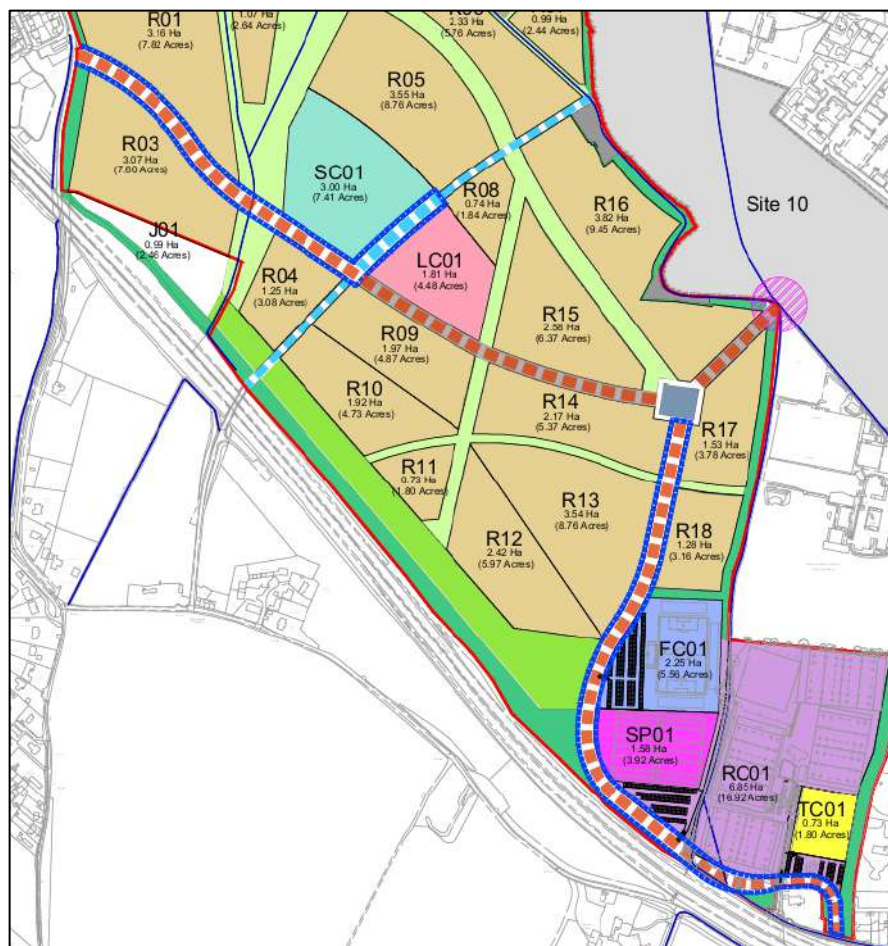
2.1 Overview

- 2.1.1 As before, the development will provide a comprehensive residential-led development with around 1,950 dwellings, a sports hub, a local centre, primary school and other ancillary uses. The indicative masterplan has recently been updated as part of this submission.

2.2 Site Access and Corridors

- 2.2.1 The latest proposals have retained all-modes access from Hollow Lane along the north west frontage and Nackington Road / Merton Lane North at the southeastern corner.

Figure 2.1: All-modes access points



- 2.2.2 Early iterations assumed through connections between these access points and the access with the A2 and the site was modelled on this basis, although this was not a requirement for placemaking.

- 2.2.3 The scale of the development will generate significant movement of all types including pedestrians, cyclists, cars, buses and some larger vehicles such as refuse collection. With reference to the Kent Design Guide, these all-modes access into the site would use the Major Access Road type which ‘discourages non-essential through traffic’ and ‘can serve as a bus route’.

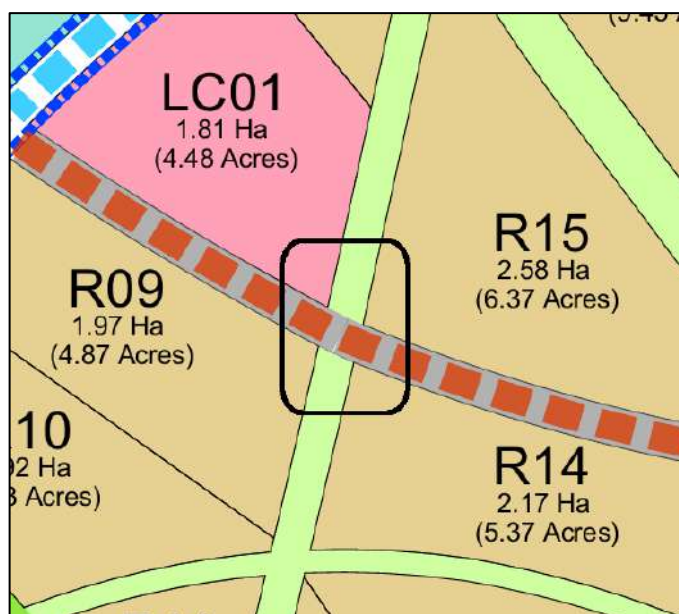
Draft policy paragraph 4d refers to ‘*primary vehicle access from Hollow Lane and secondary vehicle access from Nackington Road.*’

This implies a hierarchy between the two accesses which will be of a similar design and function. On this basis this should be simplified to;

Provide all-modes access from Hollow Lane and Nackington Road.

- 2.2.4 There was some concern in the previous consultation that provision of a high capacity link between the above access points would encourage rat-running vehicles between the Ashford corridor and the Hythe / Folkestone / Dover corridors.
- 2.2.5 To avoid this the corridor could be filtered around the centre of the site with a ‘bus gate’. This would retain permeability for active travel, buses and emergency vehicles, but would prohibit general motor traffic. Alternative but constrained routes would be provided so that a vehicle entering at Hollow Lane could reach a dwelling closer to Nackington Road, and vice versa.

Figure 2.2: Indicative location of bus gate



- 2.2.6 An example of a bus gate elsewhere in Kent is shown below, with ANPR enforcement to prevent general motor traffic from passing through the filter.

Figure 2.3: Example of bus gate in Maidstone, Kent



2.3 Parking Provision

- 2.3.1 The proposals include a sports hub which would upgrade facilities for the existing Canterbury Rugby Club on the site, and provide a new stadium for Canterbury City Football Club.
- 2.3.2 The sports hub would be served by a car park. As the sports hub will mostly generate activity in the evenings and weekends, there is an opportunity on weekdays to use the same car park to support sustainable travel into the city centre.

Draft policy paragraph 1e refers to '*Provision of a new Park and Bus Facility for a minimum of 300 spaces (approximately 0.9 ha)...*'

The allocation will provide this facility but the current wording does not convey the full range of opportunities which the parking facility will provide. While some users will use the fast bus for onward travel, others will walk into the Hospital site and others will use the cycle hire scheme.

Furthermore, as explained later in Chapter 4, the number of spaces should not be specified now as this will be informed by later evidence through the planning application.

The policy should state: '**Provision of a public parking facility to enable onward travel by sustainable modes, located on the eastern side of the site adjacent to a fast bus connection, to serve traffic from Nackington Road and Stone Street. Consideration should be given to incorporating this facility with parking provision for the Sports Hub.**'

3 Sustainable Transport Measures

3.1 Overview

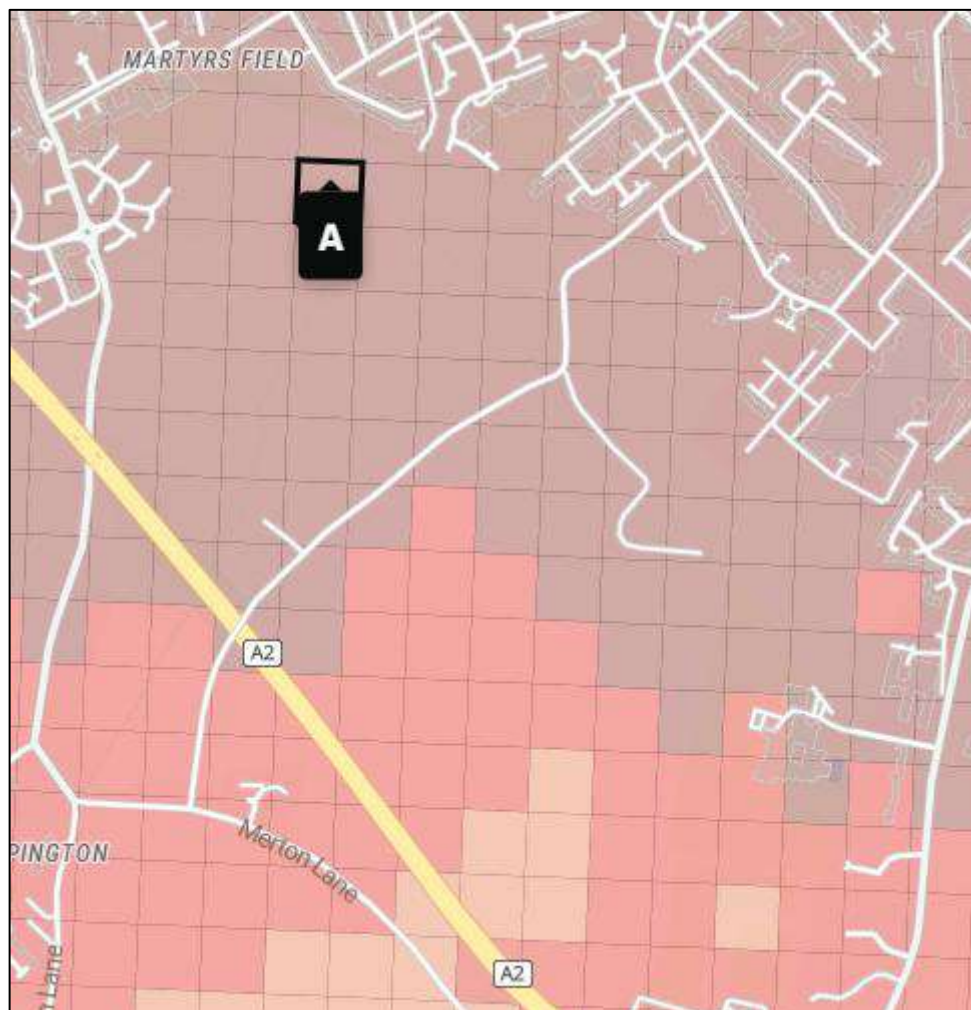
3.1.1 NPPF paragraph 109 requires that:

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.

3.1.2 Transport issues and opportunities have been central to the promotion of the Merton Park site to date and continue to be so, reflected in the draft policy requirements for the site.

3.1.3 The DfT Connectivity Tool shows that the site already has the highest connectivity of the strategic sites in the Local Plan, with the northern parts of the site scoring 70/100 or above and nearly all of the site falling in the highest two bands for the Canterbury district.

Figure 3.1: DfT Connectivity Tool for Merton Park

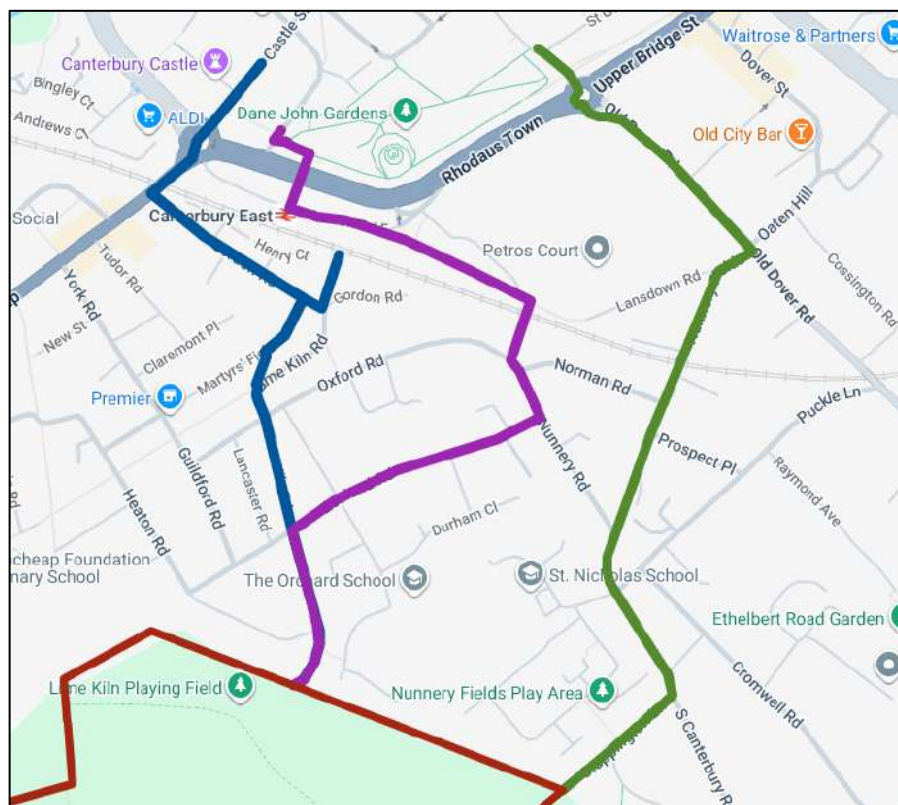


- 3.1.4 The connectivity of the site would increase further with the on-site amenities and sustainable transport interventions set out in the draft policy.

3.2 Active Travel

- 3.2.1 Following engagement with CCC and KCC, concept designs were developed for active travel improvements on key routes around the site and these are now reflected in the draft policy requirements.
- 3.2.2 It is acknowledged that the railway line through Canterbury East station and the existing Ring Road create severance for pedestrians. To overcome this there are two main routes for residents of Merton Park to access Canterbury city centre as follows.

Figure 3.2: Active travel routes from Merton Park to city centre



- 3.2.3 The west of these two routes (blue above) connects via the improvements above to reach Canterbury East station. The route continues to the city centre via Wincheap, crossing under the railway line and then across the Wincheap Roundabout, which would be upgraded for active travel via the CDTs.
- 3.2.4 A further route (green above) crosses the railway line via Nunnery Fields, Old Dover Road and across the Riding Gate Roundabout which would similarly be upgraded via the CDTs.

- 3.2.5 There is a third route towards the city centre (purple above) via the Oxford Road path, Station Road East and the City Wall. However this route includes two stepped footbridges over the railway line and the Ring Road so it is not accessible by all users. The route will remain available but the development will not provide improvements on this route, given the availability of the alternative routes above.
- 3.2.6 It should also be noted that while the package of active travel improvements is primarily aimed at Merton Park residents, the improvements around Wincheap in particular will provide residual benefits for the C18 Wincheap mixed use allocation shown below.

3.3 Wider Transport Improvements

Draft policy paragraph 4a, part v requires *“Improvements at Wincheap Roundabout and Riding Gate Roundabout to facilitate safe and convenient pedestrian and cycle access to the city centre”*.

As mentioned above, these changes form part of the wider CDTs including reduction of parking demand, roadspace reallocation to bus lanes and the conversion of roundabouts to signalised junctions. This inter-relation means that the proposals should form part of the Infrastructure Delivery Plan for KCC / CCC to deliver, rather than being tied to Merton Park specifically.

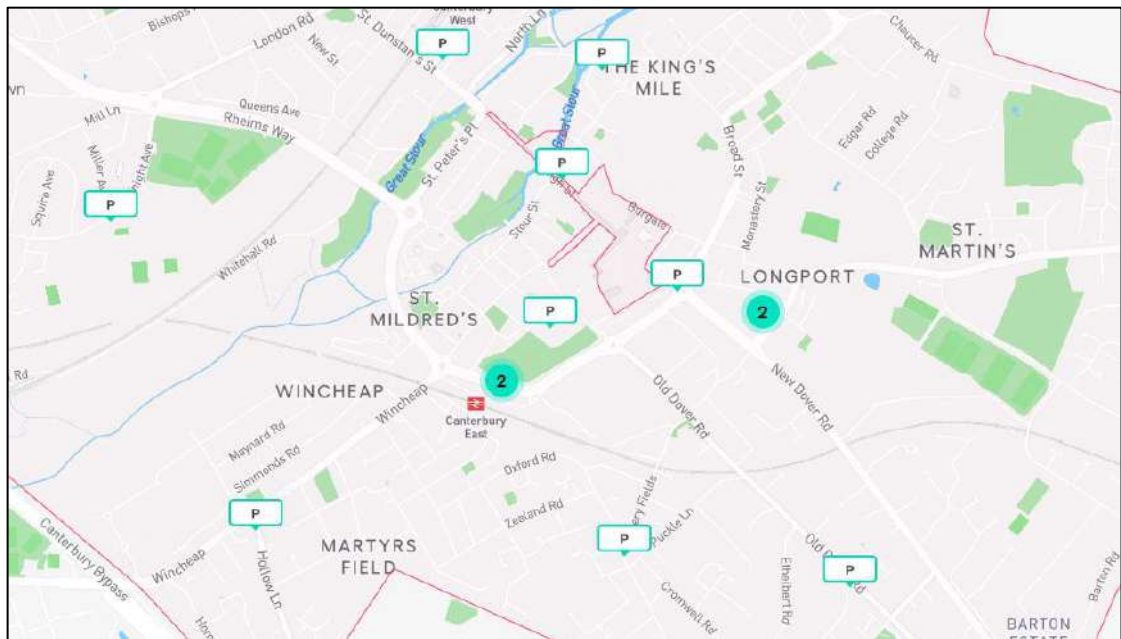
It would be appropriate for the Merton Park site to contribute towards these improvements so the policy should change to:

‘Appropriate contribution to CCC interventions at the Wincheap Roundabout and Riding Gate Roundabout, to facilitate safe and convenient pedestrian and cycle access to the city centre’.

- 3.3.1 Since the previous representations, CCC have launched the ‘Beryl’ electric cycle hire scheme with stations across the city including Wincheap and Nunnery Road.¹ Merton Park will include a mobility hub which would be a suitable location for a further hire station, allowing residents to use Beryl cycles for local trips.

¹ CCC <https://news.canterbury.gov.uk/news/canterburys-new-e-bike-hire-scheme-hits-the-streets/>

Figure 3.3: Beryl cycles - initial locations



3.4 Public Transport

- 3.4.1 **Appendix A** shows the indicative public transport strategy for the site. The bus strategy would come forward in three stages, broadly aligning with the expected phasing which would deliver the parcels closest to Wincheap and Old Dover Road in the early years, with further parcels to the south in later years.

Initial Fast Bus

- 3.4.2 The **red route** on the bus plan shows the committed 'fast bus' scheme for the Mountfield Park application east of Merton Park.
- 3.4.3 This would start at Mountfield Park, cross Nackington Road via the Chaucer Hospital site, then continue via Ridlands Farm and South Canterbury Road to reach the city centre.
- 3.4.4 This would serve some phases of Merton Park, and the bus priority measures at Nackington Road and South Canterbury Road would ensure a journey time advantage over driving.

Draft policy paragraph 4c refers to a 'bus-only connection to the fast bus link located in Site 10 (Policy CF1).

However Merton Park residents need to be able to walk into the Ridlands Farm site to access the fast bus service, so the wording should be replaced with:

'active travel and bus connection to the fast bus link located in Site 10 (Policy CF1).'

Further Connections to Ashford

- 3.4.5 This is the proposed **orange route** on the bus plan which would incorporate the above fast bus route.
- 3.4.6 Once the Hollow Lane all-modes site access has opened, routes on the A28 / Ashford corridor could enter Merton Park and then join the red route to reach Canterbury city centre. Although there is a rail service from Canterbury West to Ashford, we would not expect all residents to walk to West station so a bus to Ashford would be more direct and competitive.
- 3.4.7 The A28 corridor is currently served by route 1X which runs between Ashford, Chartham and Canterbury city centre. Previous evidence showed an indicative timetable to divert this route via Cockering Farm, Thanington and Merton Park. In the absence of the Thanington site the route could still be diverted via Homersham to serve Merton Park.
- 3.4.8 Route 1X currently runs at an hourly frequency. The Cockering Farm site has an obligation for 3 services per hour, so indicatively the services from the A28 corridor could be combined as follows:
- Ashford – Chartham – Cockering – Merton – Canterbury every 30 minutes
 - Chartham – Cockering – Merton – Canterbury every 30 minutes

This would provide a useful service for the overall corridor, with a combined 15 minutes frequency for the Cockering Farm and Merton Park sites into Canterbury city centre.

Additional Service Via Nackington Road

- 3.4.9 This is the **green route** on the bus plan, reflecting the possibility to divert existing services through the Merton Park site.
- 3.4.10 The Nackington Road all-modes site access would allow existing routes from the south of Canterbury to divert through the site and use the bus gate to rejoin New Dover Road further towards the city centre, avoiding the constraints of New Dover Road and providing a more direct route for passengers heading for the Hospital. This proposal would align with expected growth in Folkestone & Hythe which would generate demand on this corridor into Canterbury.

Future Transport

- 3.4.11 As explained in previous representations, the above proposals reflect the current public transport context in Canterbury but the proposals retain flexibility to embrace transport technology as this becomes available.

- 3.4.12 As shown in the CDTs, the introduction of a Mobility as a Service (MaaS) platform will enable multi-ticketing and one-stop bookings and payments. Smaller and more autonomous vehicles are also likely to play a role in mobility, particularly for the more rural parts of the district where traditional mass transit is less effective.

4 Traffic Matters

4.1 Overview of Modelling Evidence

- 4.1.1 As set out in the CDTs², the CCC transport modelling for the overall Local Plan includes an initial forecast scenario reflecting traffic growth associated with the development allocations. Two further scenarios then reduce the overall level of car trips by 10% and 20% to reflect the impact of sustainable transport interventions. This is a reasonable and proportionate approach at the strategic level.
- 4.1.2 In C&A's previous evidence for the allocation, more granular modelling was undertaken to reflect the proposed transport interventions, for example to promote walking between the site and Wincheap / the city centre / Abbey area. This focuses on the development's trip generation and reflects the vision-led approach required by the NPPF, including providing the basis for testing a broader range of scenarios that consider uncertainty in the forecasting. This will be brought forward as part of the forthcoming planning application on the site. The evidence prepared by C&A thus far provides the foundations for this.
- 4.1.3 In this regard, the C&A evidence complements, rather than contradicts, the work prepared by CCC. The CDTs acknowledges this approach:

The modelling is strategic testing of forecast local plan growth; it is not intended to determine site-specific access or junction acceptability, and it does not replace future, more localised Transport Assessments or detailed mitigation design.

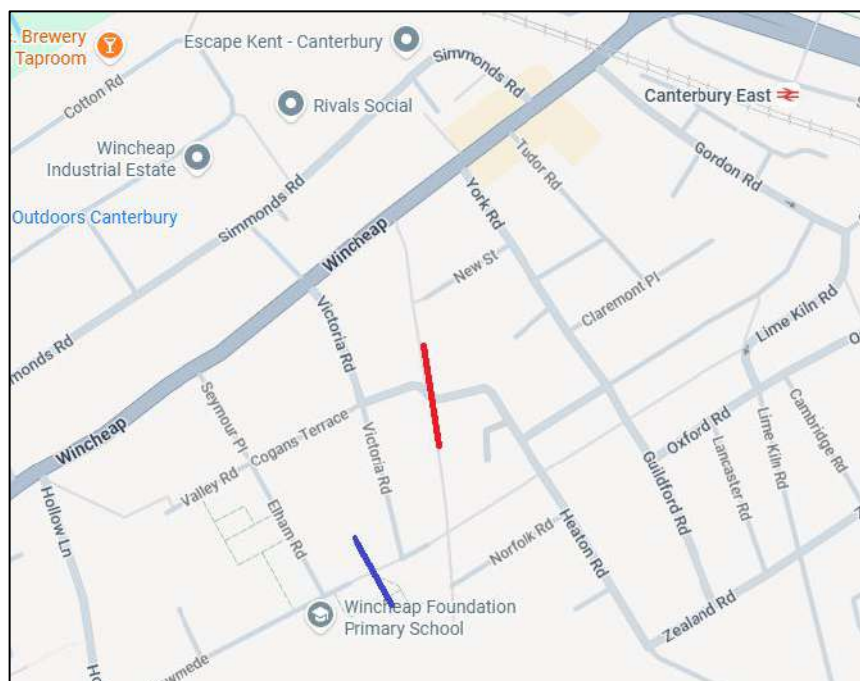
4.2 Thanington / Wincheap area

- 4.2.1 The A28 corridor between Thanington, Wincheap and central Canterbury is a complex network with several junctions in close proximity. The network is expected to change with the introduction of the A2 southbound off-slip and the Wincheap Gyratory at Simmonds Road which are linked to developments currently under construction.
- 4.2.2 The CDTs forecasts that the A2/ A28 Wincheap junction and the adjacent A28 / Homersham junction are likely to be congested in the horizon year, as these junctions are on the key route from Ashford to Canterbury city centre. While these junctions are close to the Merton Park site, it does not necessarily mean that the residual car trips associated with Merton Park result in a severe impact at these junctions, which is the relevant test in NPPF paragraph 116. This will be interrogated further in a Transport Assessment for the Merton Park application.

² CDTs Page 22 – Local Plan Modelling

- 4.2.3 The residual cumulative impact on the A28 corridor should be identified at the strategic level, taking into account the wider transport improvements in the CDTs. Following this, if car-focused improvements are justified to be taken forward, these should be included in the Infrastructure Delivery Plan and assigned to relevant developments. This also applies to the A2 corridor including the Wincheap and Bridge junctions, the former of which will need to be informed by the preferred Park & Ride strategy.
- 4.2.4 It is understood that CCC and KCC have commissioned a microsimulation model to assess the cumulative impact of developments on the Wincheap corridor and the above network changes, so on this basis C&A have not provided further analysis at this stage.
- 4.2.5 Earlier C&A evidence identified the potential to manage traffic to the north west of the site through possible changes to Hollow Lane and Homersham, that could manage traffic assignment on the minor roads to the south of the A28, which are typically Victorian era streets where on-street parking limits the carriageway space for motor vehicle movements.
- 4.2.6 The internal site layout also aims to discourage through motor traffic as shown in Chapter 2 of this report.
- 4.2.7 There remains a potential route through the Victorian streets but this could be addressed with a modal filter as endorsed by the CDTs. This could be located at St Mildred's Place and incorporated into the active travel designs for Merton Park.

Figure 4.1: Existing filter at Hop Garden Way (blue) and potential filter at St Mildred's Place (red)



Draft policy paragraph 4e states *'Provide upgrades to Hollow Lane including the creation of a one-way working between the junctions with Wincheap and Hollowmede, upgrades to Homersham including the creation of off-street parking bays, plus any necessary upgrades to the A2 junction at Wincheap.'*

This requirement is accepted in principle but any interventions will need to be informed by the CCC wider modelling and evidence in the application Transport Assessment. This should be replaced with a more general requirement to:

'Investigate works to Hollow Lane, Homersham and surrounding streets which may be required to manage motor traffic levels'.

4.3 Nackington area

4.3.1 Following discussion with CCC, below is further analysis of the site's interface with Nackington Road and the junction between Nackington Road and Old Dover Road.

4.3.2 The CCC modelling shows that in the forecast AM Peak Hour, there would be around 450–500 vehicle trips routing northbound on Nackington Road past the site access and turning left into Old Dover Road. This includes trips to these destinations:

1. Kent and Canterbury Hospital
2. Car parks in the city centre
3. Areas beyond the city centre

4.3.3 Of these three groups, the first two can be intercepted by the proposed Park & Bus facility within the Merton Park site. The site will be within walking distance of the Hospital site and will provide a more direct journey for staff and patients.

4.3.4 For drivers heading into Canterbury city centre, the CDTS shows that city centre parking provision will be replaced with Park & Ride sites at the city edge:

The aim is that the majority of public parking spaces are located at Park & Ride sites at the edge of the city so that the most environmentally damaging part of the journey is made by bus.

In order to rebalance the supply in Canterbury, it is proposed to increase provision at Park & Ride sites as follows:

New Dover Road +274 spaces (capacity expanded to 1000)

Wincheap +310 (capacity expanded to 900)

At the same time, it is proposed to reduce the number of city centre spaces by a minimum of 10%

- 4.3.5 It is estimated that around one-third of the above demand could be intercepted by a combination of providing a more convenient route for Hospital traffic, and the reduction in parking supply in the city centre. This would reduce the left turning movement from Nackington Road to Old Dover Road by around 100-150 vehicles in the AM Peak Hour.
- 4.3.6 As shown in previous evidence³, the residential component of Merton Park would generate around 120 vehicle trips through Nackington Road/Old Dover Road junction in total in the AM Peak Hour. Accordingly, the introduction of the Park & Bus service at Merton Park can be reasonably assumed to mitigate the residual development impact.

However, as shown in Section 2.3, the optimum number of parking spaces should be informed by further traffic assessment and site masterplanning at application stage.

- 4.3.7 The interception of vehicle trips on Nackington Road would increase turning movements into Merton Park in the morning peak and correspondingly out of Merton Park in the evening peak. To reflect this, the capacity assessment of the Nackington Road / Merton Road North junction has been updated in **Appendix B**. As shown below, the junction would operate well within capacity.

Table 4.1: Nackington Road / Merton Road North Capacity Assessment

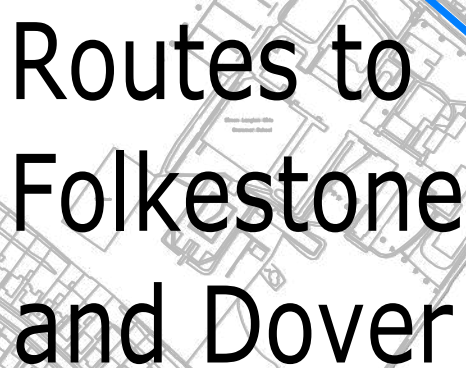
Arm	AM Peak Hour		PM Peak Hour	
	RFC	Queue	RFC	Queue
Merton Road North (includes site access)	0.14	0	0.52	1
Nackington Road right turn	0.21	0	0.18	0

³ Report 22-022-017 Rev B, Section 5.2

5 Summary and Conclusions

- 5.1.1 The draft allocation and the evidence which C&A have provided to date confirm that Merton Park would be a highly sustainable urban extension of the great city of Canterbury.
- 5.1.2 Following ongoing engagement with KCC and CCC, the site masterplan has been adjusted to discourage through traffic through the site and to include a parking facility to intercept vehicle trips into the city centre.
- 5.1.3 Measures to promote active travel have been set out in the site policy. Some of these would be delivered by the allocation and others would form part of the wider Canterbury District Transport Strategy.
- 5.1.4 The site will include strong public transport provision, initially taking advantage of the 'fast bus' service from the adjacent Mountfield Park site and later providing opportunities for longer-distance services to penetrate the site.
- 5.1.5 Modelling evidence to date from CCC and the site promoter provides confidence that at application stage, the development can implement a strategy such that the residual traffic impact would be non-severe. This will be informed by further modelling of the Wincheap and Nackington Road corridors in particular.
- 5.1.6 This note requests changes to **draft policy paragraphs 1e, 4a, 4c, 4d and 4e** to provide suitable flexibility and allow for further evidence gathering.
- 5.1.7 In accordance with NPPF paragraph 110, the allocation of the site would enable Significant development in a sustainable location, with limited need to travel and a genuine choice of genuine choice of transport modes.

Appendix A Public Transport Connections



Routes to Hythe

**MODES OF TRANSPORT AT
ACCESS POINTS TO SITE**

Bus Motor Vehicles
Pedestrian Cycle



NOTES

KEY:

- Proposed Active Travel Connections
- Committed Fast Bus
- Merton Park Route via Hollow Lane
- Merton Park Route via Nackington Road
- Ridlands Allocation
- Existing Cycle Routes
- Existing Railway Line
- Existing Bus Routes
- Existing Bus Stops
- 400m Catchment
- Indicative Bus Stops

A	Masterplan Indicated	MM	DH	JW	May 26
Rev	Amendments	Drn	Chk	App	Date

The logo for Charles & Associates features a stylized 'C' and 'A' inside a circle. To the right of the logo, the company name 'Charles & Associates' is written in a large, serif font. Below the name, the text 'Landmark House' is followed by a list of addresses: 'Park Farm', 'East Hauling Trust Estate', 'Broadmore Lane', 'Aylesford', 'Kent', 'ME20 6SN', and '01753 448370'. At the bottom, the text 'enquiries@c-a.uk.com' is followed by the website 'www.c-a.uk.com'.

Job Title

Merton Park,
Canterbury

Drawing Title

Public Transport Strategy

Client

Quinn Estates

Scale	Date	Designed
1:5000 @ A1	Jan 2026	DH
Drawn	Checked	Approved
MM	CG	JW
Job No	Drawing No	Rev
22-022	22-022/049	A

MILTON STUDY

Appendix B PICADY Assessment

Junctions 11							
PICADY 11 - Priority Intersection Module							
Version: 11.0.0.2177							
© Copyright TRL Software Limited, 2024							
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+44 (0)1344 379777 software@trl.co.uk trlsoftware.com							
The users of this computer program for the solution of an engineering problem are in no way relieved of their responsibility for the correctness of the solution							

Filename: 22-022-PIC-002 Rev B Nackington Rd Priority Junction - CE Turning Flows 2.j11

Path: P:\22-022 Merton Park Canterbury\Trans\Picady

Report generation date: 13/05/2026 12:29:49

» | DS Actual | AM

» | DS Actual | PM

Summary of junction performance

	AM					PM				
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Set ID	Queue (PCU)	Delay (s)	RFC	LOS
- DS Actual										
Stream B-C	D1	0.0	6.98	0.03	A	D2	0.1	8.55	0.06	A
Stream B-A		0.2	14.94	0.14	B		1.1	23.33	0.52	C
Stream C-B		0.3	7.73	0.21	A		0.2	6.62	0.18	A

There are warnings associated with one or more model runs - see the 'Data Errors and Warnings' tables for each Analysis or Demand Set.

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

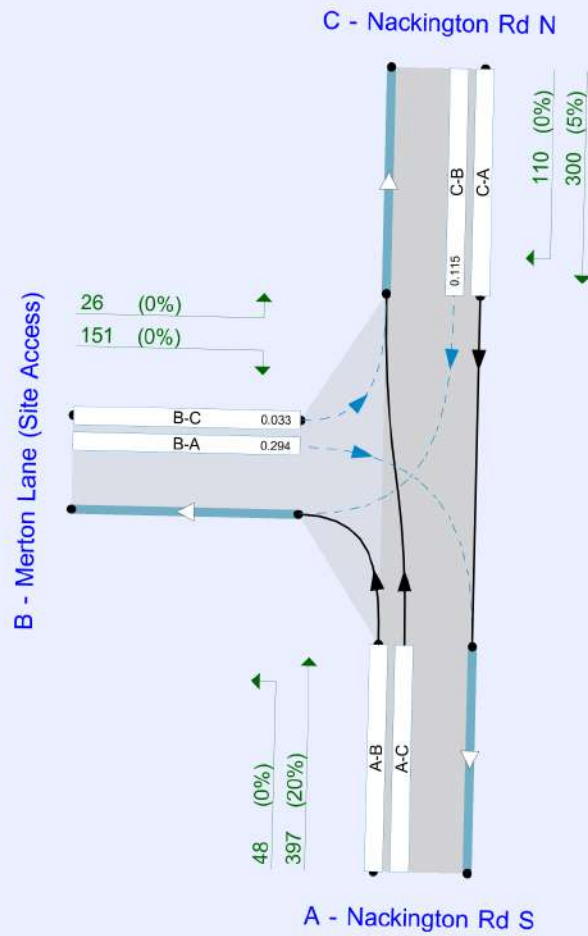
File summary

File Description

Title	22-022-PIC-002 Nackington Rd Priority Junction - CE Turning Flows
Location	
Site number	
Date	11/09/2024
Version	
Status	(new file)
Identifier	
Client	
Jobnumber	22-022
Enumerator	CA-LTP01\DA
Description	Includes Park and Bus

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	PCU	PCU	perHour	s	-Min	perMin



Flows show original traffic demand (PCU/hr) with (HV %)
Streams (downstream end) show RFC (%)

The junction diagram reflects the last run of Junctions.

Analysis Options

Calculate Queue Percentiles	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
		0.85	36.00	20.00

Demand Set Summary

ID	Scenario	Time period	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D1	DS Actual	AM	ONE HOUR	00:00	01:30	15
D2	DS Actual	PM	ONE HOUR	00:00	01:30	15

Analysis Set Details

ID	Network flow scaling factor (%)
A1	100.000

| DS Actual | AM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm visibility to right	B - Merton Lane (Site Access) - Minor arm geometry	Visibility to right expected to have two components if the arm has two lanes, or two lanes in a flared section.
Warning	Major arm width	C - Nackington Rd N - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

Junction Network

Junctions

Junction	Name	Junction type	Arm A Direction	Arm B Direction	Arm C Direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	untitled	T-Junction	Two-way	Two-way	Two-way		1.35	A

Junction Network

Driving side	Lighting	Network delay (s)	Network LOS
Left	Normal/unknown	1.35	A

Arms

Arms

Arm	Name	Description	Arm type
A	Nackington Rd S		Major
B	Merton Lane (Site Access)		Minor
C	Nackington Rd N		Major

Major Arm Geometry

Arm	Width of carriageway (m)	Has kerbed central reserve	Has right-turn storage	Width for right-turn storage (m)	Visibility for right turn (m)	Blocks?	Blocking queue (PCU)
C - Nackington Rd N	5.50		✓	5.00	100.0		-

Geometries for Arm C are measured opposite Arm B. Geometries for Arm A (if relevant) are measured opposite Arm D.

Minor Arm Geometry

Arm	Minor arm type	Width at give-way (m)	Width at 5m (m)	Width at 10m (m)	Width at 15m (m)	Width at 20m (m)	Estimate flare length	Flare length (PCU)	Visibility to left (m)	Visibility to right (m)
B - Merton Lane (Site Access)	One lane plus flare	9.55	3.97	2.99	2.99	2.99		1.00	42	19

Slope / Intercept / Capacity

Priority Intersection Slopes and Intercepts

Stream	Intercept (PCU/hr)	Slope for A-B	Slope for A-C	Slope for C-A	Slope for C-B
B-A	530	0.099	0.249	0.157	0.356
B-C	734	0.115	0.291	-	-
C-B	824	0.326	0.326	-	-

The slopes and intercepts shown above include custom intercept adjustments only.

Streams may be combined, in which case capacity will be adjusted.

Values are shown for the first time segment only; they may differ for subsequent time segments.

Traffic Demand

Demand Set Details

ID	Scenario	Time period	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D1	DS Actual	AM	ONE HOUR	00:00	01:30	15

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
A - Nackington Rd S		✓	658	100.000
B - Merton Lane (Site Access)		✓	50	100.000
C - Nackington Rd N		✓	395	100.000

Origin-Destination Data

Demand (PCU/hr)

	To			
		A - Nackington Rd S	B - Merton Lane (Site Access)	C - Nackington Rd N
From	A - Nackington Rd S	0	146	512
	B - Merton Lane (Site Access)	36	0	14
	C - Nackington Rd N	284	111	0

Vehicle Mix

Heavy Vehicle %

	To			
		A - Nackington Rd S	B - Merton Lane (Site Access)	C - Nackington Rd N
From	A - Nackington Rd S	0	0	1
	B - Merton Lane (Site Access)	0	0	0
	C - Nackington Rd N	2	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
B-C	0.03	6.98	0.0	A
B-A	0.14	14.94	0.2	B
C-A				
C-B	0.21	7.73	0.3	A
A-B				
A-C				

Main Results for each time segment

00:00 - 00:15

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	10	0.00	598	0.017	10	0.0	6.123	A
B-A	27	0.00	360	0.075	27	0.1	10.804	B
C-A	213	0.00			213			
C-B	84	0.00	663	0.126	83	0.1	6.202	A
A-B	110	0.00			110			
A-C	385	0.00			385			

00:15 - 00:30

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	12	0.00	570	0.021	12	0.0	6.449	A
B-A	32	0.00	326	0.099	32	0.1	12.235	B
C-A	255	0.00			255			
C-B	100	0.00	631	0.158	100	0.2	6.767	A
A-B	131	0.00			131			
A-C	460	0.00			460			

00:30 - 00:45

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	15	0.00	531	0.028	15	0.0	6.975	A
B-A	40	0.00	281	0.141	39	0.2	14.903	B
C-A	312	0.00			312			
C-B	122	0.00	588	0.208	122	0.3	7.718	A
A-B	161	0.00			161			
A-C	564	0.00			564			

00:45 - 01:00

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	15	0.00	531	0.028	15	0.0	6.977	A
B-A	40	0.00	281	0.141	40	0.2	14.935	B
C-A	312	0.00			312			
C-B	122	0.00	588	0.208	122	0.3	7.727	A
A-B	161	0.00			161			
A-C	564	0.00			564			

01:00 - 01:15

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	12	0.00	570	0.021	12	0.0	6.451	A
B-A	32	0.00	326	0.099	33	0.1	12.265	B
C-A	255	0.00			255			
C-B	100	0.00	631	0.158	100	0.2	6.777	A
A-B	131	0.00			131			
A-C	460	0.00			460			

01:15 - 01:30

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	10	0.00	598	0.017	10	0.0	6.128	A
B-A	27	0.00	359	0.075	27	0.1	10.839	B
C-A	213	0.00			213			
C-B	84	0.00	663	0.126	84	0.1	6.218	A
A-B	110	0.00			110			
A-C	385	0.00			385			

| DS Actual | PM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm visibility to right	B - Merton Lane (Site Access) - Minor arm geometry	Visibility to right expected to have two components if the arm has two lanes, or two lanes in a flared section.
Warning	Major arm width	C - Nackington Rd N - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

Junction Network

Junctions

Junction	Name	Junction type	Arm A Direction	Arm B Direction	Arm C Direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	untitled	T-Junction	Two-way	Two-way	Two-way		4.33	A

Junction Network

Driving side	Lighting	Network delay (s)	Network LOS
Left	Normal/unknown	4.33	A

Traffic Demand

Demand Set Details

ID	Scenario	Time period	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D2	DS Actual	PM	ONE HOUR	00:00	01:30	15

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
A - Nackington Rd S		✓	445	100.000
B - Merton Lane (Site Access)		✓	177	100.000
C - Nackington Rd N		✓	410	100.000

Origin-Destination Data

Demand (PCU/hr)

	To			
		A - Nackington Rd S	B - Merton Lane (Site Access)	C - Nackington Rd N
From	A - Nackington Rd S	0	48	397
	B - Merton Lane (Site Access)	151	0	26
	C - Nackington Rd N	300	110	0

Vehicle Mix

Heavy Vehicle %

	To			
		A - Nackington Rd S	B - Merton Lane (Site Access)	C - Nackington Rd N
From	A - Nackington Rd S	0	0	20
	B - Merton Lane (Site Access)	0	0	0
	C - Nackington Rd N	5	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
B-C	0.06	8.55	0.1	A
B-A	0.52	23.33	1.1	C
C-A				
C-B	0.18	6.62	0.2	A
A-B				
A-C				

Main Results for each time segment

00:00 - 00:15

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	19	0.00	582	0.033	19	0.0	6.392	A
B-A	114	0.00	387	0.294	112	0.4	13.023	B
C-A	226	0.00			226			
C-B	83	0.00	715	0.115	82	0.1	5.681	A
A-B	36	0.00			36			
A-C	299	0.00			299			

00:15 - 00:30

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	23	0.00	537	0.043	23	0.0	7.009	A
B-A	136	0.00	359	0.378	135	0.6	16.024	C
C-A	270	0.00			270			
C-B	99	0.00	694	0.142	98	0.2	6.043	A
A-B	43	0.00			43			
A-C	357	0.00			357			

00:30 - 00:45

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	28	0.00	452	0.063	28	0.1	8.490	A
B-A	166	0.00	320	0.519	165	1.0	22.852	C
C-A	330	0.00			330			
C-B	121	0.00	665	0.182	121	0.2	6.613	A
A-B	53	0.00			53			
A-C	437	0.00			437			

00:45 - 01:00

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	28	0.00	449	0.063	28	0.1	8.554	A
B-A	166	0.00	320	0.519	166	1.1	23.331	C
C-A	330	0.00			330			
C-B	121	0.00	665	0.182	121	0.2	6.618	A
A-B	53	0.00			53			
A-C	437	0.00			437			

01:00 - 01:15

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	23	0.00	534	0.043	23	0.0	7.050	A
B-A	136	0.00	359	0.378	137	0.6	16.391	C
C-A	270	0.00			270			
C-B	99	0.00	694	0.142	99	0.2	6.050	A
A-B	43	0.00			43			
A-C	357	0.00			357			

01:15 - 01:30

Stream	Total Demand (PCU/hr)	Pedestrian demand (Ped/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	19	0.00	580	0.033	19	0.0	6.419	A
B-A	114	0.00	387	0.294	114	0.4	13.268	B
C-A	226	0.00			226			
C-B	83	0.00	715	0.115	83	0.1	5.692	A
A-B	36	0.00			36			
A-C	299	0.00			299			

APPENDIX 3



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

Planning Policy Team
Canterbury City Council
14 Rose Lane
Canterbury
CT1 2UR

23rd July 2025

EWLH/I001219/160725
BY EMAIL

HERITAGE COMMENTARY ON MASTERPLAN APPROACH – SITE C6 LAND AT MERTON PARK

Dear Sir/Madam,

This letter accompanies the submission of updated masterplan drawings for Sites C6 – Land at Merton Park, which forms part of the Draft Canterbury Local Plan Site Allocations presented at Regulation 18 stage. Iceni Projects have been working with the project team since March 2025 to assess the draft Site Allocation, and accompanying Concept Masterplan, as it appears in the Regulation 18 submission version of the Canterbury Local Plan, alongside a review of comments from Historic England. We have visited the site, and reviewed background information relating to existing policy and the significance, setting and historic development of Canterbury's historic core and key listed buildings. The intention of this process was to evolve the Concept Masterplan in such a way that Historic England comments could be addressed, and Iceni Projects could be confident that, in our professional view, an allocation within the Local Plan for 2,250 new dwellings and provision for non residential uses (sports hub, Hospital extension, community hub) could be accommodated without unacceptable harm to the historic environment.

The assessment has been informed by a detailed site visit, photographic analysis, and historic research to understand the site's evolution and its contribution to the significance of the Canterbury World Heritage Site (WHS) and Canterbury City Conservation Area (CCCA). It includes a review of relevant policy and guidance, a heritage baseline analysis of the site's development and its relationship to the WHS and CCCA, a review of the Conservation Area Appraisal commentary on Viewpoints, visual analysis covering views, topography, and screening, and an assessment of the Concept Masterplan. Recommendations were provided to refine the masterplan to mitigate any potentially harmful effects and to support a heritage-led approach to development. This has included application of the UNESCO Toolkit and Historic England's GPA3 guidance to evaluate setting, visual sensitivities, and the role of rural approaches in shaping the Cathedral's Outstanding Universal Value (OUV).

Historic Context

Site C6 comprises a large expanse of open agricultural land located on the southern edge of Canterbury, between the current urban boundary and the A2 bypass. Historically associated with Stuppington Hill Farm, the land has remained largely undeveloped since at least the mid-19th century, with historic Ordnance Survey maps showing consistent field boundaries until the construction of the Canterbury Bypass (A2) in 1979, which now forms the site's southern boundary.

A railway branch line (the Elham Valley Line, operated by the South Eastern and Chatham Railway) formerly ran along the northern edge of the site, and 1907 maps identify features such as a lime kiln, lime works, and railway loading area within the vicinity. The area is also linked to the route of the

Roman road from Lympne to Canterbury, known later as Stone Street, which became a turnpike in 1712 and formerly ran through the city before being bypassed by the A2. Since the 19th Century there has been relatively little development within the Site boundary Stumppington Hill Cottages formerly stood nearby but were demolished c.1979 to make way for the bypass. The rugby club was formerly playing fields with a small pavilion until the late 20th Century where piecemeal development in association with the Rugby club has gradually developed the area. In historical mapping, the site falls within the area previously known as the 'Dane John Ward' and contains land used for orchards surrounding Stuppington Farm. This pastoral and productive character remains evident today with the area currently in agricultural use.

How the Site contributes to heritage setting and significance

Site C6 lies to the south of the Canterbury City Conservation Area and sits just beyond the formal historic core, separated by established suburban development and the A2. While not directly adjacent to the Conservation Area boundary, its location places it within the wider visual and experiential setting of the city, particularly in relation to Viewpoint 14, which captures one of the remaining longer views toward Canterbury Cathedral.

Currently, the site contributes to the setting in a more indirect and filtered way. The foreground of the site is influenced by:

- The A2 corridor, which forms a strong infrastructural boundary and visual separator from the more sensitive core of the city.
- Suburban edge conditions, including existing residential development to the north-west.
- Despite these influences, C6 retains areas of open character and rising topography, which in places allow for glimpsed views toward the city, particularly toward Bell Harry Tower. These views are neither continuous nor dominant, but they contribute to a broader sense of orientation and townscape legibility, reinforcing Canterbury's identity as a city historically perceived from a distance.

Viewpoint 14

Viewpoint 14, is identified in the Canterbury Conservation Area Appraisal. This view, located in the north-western portion of the site, currently offers one of the clearest and most legible views of the Cathedral from within C6. The Cathedral is seen rising above the treeline, framed by surrounding farmland and vegetation. It is described in the CCCA as;

14 Fields North of Stuppington Lane

The viewing point is representative of a series of views at the west end of Stuppington Lane and from the fields to the north-west. 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 Tower of Bell Harry and the west towers of the cathedral are prominent in the middle ground, illuminated by early evening sun. The only other prominent building is the Marlowe Theatre to the left, although its roof line clearly lies below the cathedral towers. New development should not compete with the prominence of the cathedral. The background reflects a green, undeveloped setting on the valley slopes to the north-east of the conservation area, which similarly to the foreground, is an important element of the special interest of the conservation area and should remain a green buffer. The skyline is characterised by pylons, removal of these to below ground would improve this view.

While View 14 is the most defined within the C6, other intermittent views exist along the top of the ridge due to the site's open field pattern and local variations in elevation. These views are currently less well articulated through PRoW, but they present an opportunity for positive enhancement.

Views of Canterbury Cathedral across the site are dynamic and vary due to the rolling topography. While Viewpoint 14 offers a strong axial view of the Cathedral in its wider landscape context, visibility from other areas—particularly in the south-east—is more limited and intermittent views which include:

- Comprehensive Views: Locations where the broader form of the Cathedral is appreciated in relation to the historic townscape.
- Skyline Views: Partial, yet important, glimpses of the Bell Harry Tower as a prominent skyline feature.
- Kinetic Views: Unfolding and changing views experienced while moving along public rights of way (PRoWs) that cross the site.

Historic England Commentary

The Regulation 18 advice from Historic England identified the following concerns:

- The site forms part of Canterbury's rural southern hinterland, contributing to the setting of the Cathedral, St Augustine's Abbey, and St Martin's Church WHS.
- Viewpoint 14, recognised in the Conservation Area Appraisal, shows the Cathedral and Bell Harry Tower with prominence above farmland which is a component of its setting.
- It was suggested that the proposed development quantum could urbanise the site, diminishing its rural character and harming the WHS and Conservation Area.
- Indicative viewing corridors within the current Concept Masterplan lacked thorough views analysis; robust evidence-based corridor definition was requested
- The absence of a heritage-led scheme and site-wide assessment prior to fixing development quantum or taller building locations.
- The site's steep topography requires careful placement of massing and height-sensitive buildings.
- Recommendation for a Heritage Impact Assessment aligned with UNESCO guidelines to inform policy and design decisions.

C6 Masterplan Response

As a starting point, it should be noted that the scheme as submitted is in outline, and therefore there exists considerable opportunity at both Outline Application and Reserved Matters stage to further assess and refine the performance of viewing corridors in relation to Historic England's concerns. At this stage, the principal question is whether or not, with the amends proposed, the allocation as proposed, would set out a framework for avoiding and managing harm, or whether such an allocation would, in principle, set in train harmful impacts.

We have worked closely with the design team, following our site visit and detailed analysis, to amend the masterplan, making suggestions in relation to the alignment and width of viewing corridors, and the location and positioning of open spaces and community hubs, to better respond to the setting and significance of the Canterbury Conservation Area and World Heritage Site.

The updated masterplan:

- Incorporates a generous, clearly defined viewing corridor focused on Viewpoint 14, structured around public open space to emphasise the Cathedral's prominence.
- Provides multiple nuanced skyline view opportunities across the site, enhancing the experiential quality of development while reinforcing the Cathedral's visual dominance.
- Reorients road layouts and parcel boundaries to create structured and spontaneous views of the Cathedral, maintaining its landmark role.

- Embeds height sensitivity zoning and landscape buffering, ensuring taller buildings are located sensitively in relation to topography.
- Integrates these changes while retaining the full development quantum, with no requirement for a reduction in housing numbers.

Outcomes

The analysis has been informed by a staged approach in line with Historic England's GPA3: The Setting of Heritage Assets and the UNESCO Toolkit for Impact Assessment in a World Heritage Context. The assessment first established the significance of Canterbury Cathedral as the key component of the World Heritage Site (WHS), alongside the role of its rural setting and historic views in supporting its Outstanding Universal Value (OUV). It then considered how Site C6 contributes to that significance, focusing on areas with strong intervisibility where the Cathedral is appreciated as a dominant skyline feature with minimal competing elements.

Key views from public rights of way and open farmland were analysed to identify those with the clearest legibility and strongest visual connection to the Cathedral, particularly where a rural foreground is maintained, allowing for an unfolding experience of the historic townscape. These sightlines were mapped as important viewing corridors, while areas of heightened visual sensitivity – where the Cathedral's form is most appreciable – were identified and integrated into the recommended mitigations for the concept masterplan. The updated masterplan has been directly informed by these findings and by Historic England's consultation comments, ensuring that key views and setting considerations are fully embedded into the design. The following outcomes demonstrate this response:

- View 12 has been strengthened, with wider greenspace splay northwards, a formalised viewing cone, and reconfigured arrival and feature spaces ensuring the Cathedral remains legible and appreciated as a landmark from within the development. This approach preserves and enhances experiential qualities at this key node.
- The Site incorporates additional and strengthened viewing corridors, including a generous parkland corridor along the centre of the Site this aligns with available views towards the Cathedral, supporting neighbourhood integration while maintaining the Cathedral's prominence as a landmark feature within daily movements through the site. The parkland area creates a central, formalised open space that maximises experiential and visual benefits by framing multiple skyline views when moving through the Site. It enhances opportunities for the Cathedral to remain a defining feature within the development.
- Routes throughout the Site has been realigned and reoriented to create improved opportunities for public long views towards the Cathedral from streets and when travelling through the area, reinforcing visual connectivity through the site and enhancing place legibility.
- Parcel boundaries, and development orientation have been adjusted to align with the site's rolling landform and available views of the cathedral. This allows development to sit lower in sensitive areas while maximising incidental skyline views elsewhere, preserving visual dominance of the Cathedral.
- The plan provides robust landscape buffering and green corridors, softening the interface between development and open countryside. This approach retains the rural character, mitigates potential visual impacts, and enhances local distinctiveness.

The revised masterplan approach ensures a proportionate and effective protection of Viewpoint 14, embedding it within a generous, clearly defined viewing corridor structured around public open space. This maintains the Cathedral's landmark status within its rural context while also creating multiple formal and incidental view opportunities throughout the site. Overall, the masterplan ensures key views and setting relationships, would maintain the rural character identified in the Conservation Area Appraisal. Our assessment concludes that Historic England's comments have been fully acknowledged and integrated, and that the proposed development can be accommodated without

resulting in any unmanageable adverse effects on the Outstanding Universal Value of the World Heritage Site or the significance of the Canterbury City Conservation Area.

Conclusion

We have worked proactively with the design team to develop and refine these masterplan amendments. The updates embed effective mitigations, including refined layout changes, adjusted parcel boundaries, sensitivity zoning, robust view corridors, green opportunity areas, landscape buffering, and height sensitivity zones. Collectively, these measures would mitigate against any potentially harmful heritage effects identified in relation to a change in the way the city and its heritage assets are experienced from View 14. Importantly, they create new opportunities for public views towards the Cathedral and skyline that are aligned with the experiential qualities of these key viewpoints, while also enabling the delivery of the planned development quantum. Overall, we consider the updated masterplans for C6 Land at Merton Park to be robust, heritage-sensitive, and fully responsive to Historic England's comments. The changes are proportionate and effective, and we are confident that the site can now be allocated in its current form.

Please let us know if any further clarification is required ahead of the next Local Plan stage.

Yours sincerely,

A handwritten signature in dark ink that reads "Icen Projects Ltd." in a cursive, slightly stylized font.

Icen Projects