
Objection to Policy C10 – Merton Park

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To whom it may concern,

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 necessary or 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 SA 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.
- **Community not engaged:** Local consultation has not been inclusive or transparent, contrary to NPPF 16(c), which calls for proportionate and early engagement.

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.

3. 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.
- **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 unupdated infrastructure evidence creates uncertainty on effectiveness.

4. 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).
- **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

Justified: SA confirms major landscape and biodiversity harm

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 deleted or fundamentally revised to focus future growth on less constrained, serviced, and environmentally compatible locations.

Regards,

Amy Jones, Canterbury resident

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