
Objection to Policy C10 - Merton Park

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Objection to Policy C10 Merton Park Regulation 19 Draft Canterbury District Local Plan

Introduction

I am objecting to the proposed allocation at Merton Park (Policy C10). After reviewing the Council's material, including the Sustainability Appraisal (2026), it is clear that this site does not meet the NPPF tests of soundness. The evidence shows substantial environmental harm, unresolved infrastructure issues, and an over-reliance on future mitigation that may never materialise. The policy is not realistically deliverable, nor does it steer development toward genuinely sustainable locations.

1. The policy is not positively prepared

The case for allocating Merton Park simply isn't made. The supporting documents do not demonstrate that the site can be delivered when the Council claims, or that it can be delivered sustainably at all.

- **Water supply issues push delivery years beyond the plan's timeline.** South East Water has already said the required supply infrastructure cannot be provided until 2036. The Council expects homes to be occupied around 2030/31—an obvious contradiction.
- **Sustainability Appraisal flags major environmental downsides.** Greenfield development here increases emissions and puts further pressure on biodiversity. The SA's own scoring describes the climate and biodiversity effects as partly positive but significantly negative overall.
- **Local people have not been properly involved.** Consultation has been selective and late in the process, which does not match the NPPF's requirement for early, proportionate engagement.

2. The allocation is not justified

The Sustainability Appraisal demonstrates that this site performs badly across several environmental criteria, and the policy relies heavily on mitigation that is vague, unspecified, or pushed off for later.

- **Landscape harm is built in.** The SA calls for a Landscape and Visual Impact Assessment to figure out "key mitigation," which effectively admits that the development would be harmful without extensive work—and that such work may not fully resolve the issue.
- **Significant loss of high-quality farmland.** The appraisal makes clear that best and most versatile agricultural land would be permanently lost.
- **Questionable consideration of alternatives.** The plan does not offer a transparent explanation of why other, less constrained locations—including brownfield sites—were ruled out.
- **Overall environmental balance is negative.** Even with mitigation, the SA still expects significant adverse effects. This sits uneasily with NPPF requirements for sustainable growth patterns and protection of valued landscapes.

3. The policy is not effective

For a site to be effective, it needs clear, committed infrastructure and realistic phasing. C10 does not have these.

- **Water and wastewater capacity unresolved.** The SA warns of potential negative effects unless major upgrades are delivered, yet these upgrades are not secured.
- **Transport capacity problems remain.** Local routes—Hollow Lane and Nackington Road—are already constrained. The SA anticipates significant congestion in this part of Canterbury, with C10 contributing to that pressure.
- **Mitigation is pushed too late.** Key measures like structural planting and off-site improvements are mentioned but delayed. The SA actually recommends early delivery and revised phasing, showing the current policy wording doesn't guarantee what's needed.
- **Evidence base is out of date.** The plan still relies on the 2022 Infrastructure Delivery Plan. Without updated information, the policy's deliverability is uncertain at best.

4. The policy is not consistent with national policy

The Council's own assessments show effects that are fundamentally at odds with several parts of the NPPF.

- **Environmental assets would be harmed.** Significant negative impacts on biodiversity, landscape, heritage, and land use are all recorded in the SA. These matters relate directly to NPPF sections requiring protection of these assets.
- **Greenfield-led strategy undermines climate aims.** Policy C10 forms part of a wider pattern of large greenfield allocations that will increase emissions and run ahead of infrastructure—contrary to NPPF objectives on climate resilience and sustainable development.
- **No clear pathway to Biodiversity Net Gain.** The Council removed the earlier 20% requirement and has replaced it with weaker language, despite the statutory duty for measurable gain.
- **Water-sensitive area with unresolved risk.** Parts of the site lie within Source Protection Zones, and the SA warns of potential negative effects for water quality and flood risk.

Conclusion

Merton Park (Policy C10) would create long-term environmental harm while depending on infrastructure that is uncertain, delayed, or not yet committed. The policy does not meet the NPPF's tests of soundness:

- **Not Positively Prepared:** Water infrastructure cannot be delivered on time.
- **Not Justified:** SA evidence shows major, lasting harm.
- **Not Effective:** Delivery and mitigation rely on weak or outdated evidence.
- **Not Consistent with National Policy:** Conflicts with NPPF aims on climate, environment, and heritage.

For these reasons, the allocation should be removed or replaced with options that are genuinely less constrained, better served, and more environmentally appropriate.

Kind regards,

David Phillips

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