

From: Naomi Hogben [REDACTED]
Sent: 16 May 2026 14:39
To: Consultations
Subject: Reg19 Consultant of Draft Local Plan

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Dear Planning Inspector,

I would like to introduce myself as Naomi Lines, [REDACTED]
[REDACTED]

As a resident of the local area I am writing as part of the regulation 19 consultation of the Draft Canterbury District Local Plan to highlight concerns specifically relating to the proposed Merton Park development (Policy SS3 and Policy C10). I believe that the plan is both Unsound and Legally Non-Compliant for these following reasons:

1. The local plan must fulfil "Duty to Cooperate" & "Effective" criteria. However the plan does not meet these tests in relation to transport needs. There are insufficient infrastructure and transport considerations to make this development feasible. Entry and exit of the new development via small residential roads such as Hollow Lane (past a large primary school no less) would not be at all sufficient to service the number of additional cars, motorcycles and bicycles required for a 2000 home development. The Canterbury Council Draft Transport Strategy (Table 5.1) acknowledges that the proposed 'strategy' to service the development in the draft plan, will leave the A2/A28 Wincheap interchange and M2 J7 severely congested. The idea of a bus-led strategy is unrealistic as the bus station is also already at capacity. The council also do not have a signed legal agreement (Statement of Common Ground) with National Highways accepting these traffic challenges. Without this, the plan is legally non-compliant.

2. The Merton Park development is proposed to build a substantial number of homes on Greenfield sites that have existed for hundreds of years. National policy states that councils must exhaust brownfield land before developing greenfield sites. Unfortunately Canterbury City Council has not fully exhausted these brownfield sites (for example Wincheap Industrial Estate, under-used car parks across the city and existing vacant student housing). I believe this is significant evidence to suggest the 'justified' test has been failed.

3. The plan does not meet criteria for "Legal Compliance" & "National Policy" tests. It is acknowledged that Stodmarsh Nature Reserve is failing due to water pollution. The Council's own Habitats Regulations report (Para 5.5.22) published March 2026 explicitly states that they are "uncertain" if the environmental mitigation for the 2000 home Merton

Park development can be realistically delivered. The Waddenzee principle dictates that plans cannot legally be approved where uncertainty about environmental damage remains.

As a additional point I was flabbergasted to hear at a recent council meeting that Southeast Water have stated that they would be unlikely to be able to supply proper water service to further homes in Canterbury as they are already struggling with their current supply needs!

The evidence above highlights how the Draft Canterbury District Local Plan is Unsound and Legally Non-Compliant based on Transport, Brownfield, and Habitats Regulations failures. I would ask that you kindly consider these points as the plan is reviewed.

Kind regards,
Naomi Lines