

From: Erika R [REDACTED]
Sent: 17 May 2026 01:42
To: Consultations
Subject: Comments to Regulation 19 of the Town and Country Planning, in particular the Policy C10 (Land at Merton Park)

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I wish to express my objections to Draft Canterbury District Local Plan (2042/43), Regulation 19 of the Town and Country Planning, in particular the Policy C10 (Land at Merton Park).

The Draft Canterbury District Local Plan, is unsound and legally non-compliant.

1.It is not effective. It is not based on effective joint working on cross-boundary strategic matters. There is no evidence of a statement of common ground. Many residents have expressed their concerns to Council consultations but there is no document which would show analysis of their comments with reasons for accepting or rejecting the comments that have been made. This contradicts National Planning Policy Framework (NPPF) 16c, 'effective engagement.'

The plan is legally non-compliant. The future traffic impact fails the duty to cooperate. The Draft transport strategy (table 5.1) admits the plan will leave the A2/A28 Wincheap interchange and M2 J7 severely congested.

Most importantly, there isn't a signed legal agreement (Statement of Common Ground) with National Highways accepting this traffic increase. Without this, the plan is legally non-compliant.

The Plan is non-compliant with the NPPF on air pollution levels. Wincheap already has the highest air pollution levels in the Canterbury district. NPPF199 (2024, p.57) Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. According to Canterbury City Council Draft Air Quality Action plan (2024, pp 8), '...the annual mean objective (for nitrogen dioxide) is achieved at the majority of receptors in Canterbury, with exceedances indicated at five receptors all allocated at the roadside at Wincheap.'

Those who live in Wincheap know the reality of traffic congestion around the Wincheap roundabout, Wincheap/ Thannington interchange, and the congestion of small side roads such as Hollow Lane, Homersham and Hollowmede. These particularly are very important because of our local primary school and the impact any development in Wincheap will have on all primary

school children, their health impact due to air quality and noise pollution and simple fact of walking to and from school safely.

This shows the plan is not positively prepared and does not achieve sustainable development.

The proposed Merton Park ignores brownfield sites. National policy states that brownfields sited must be exhausted before greenfield sits are used for development. Instead of using brownfield sites, the Council is sacrificing the historic green setting of Canterbury for Policy C10. This is show that proposed Merton Park is not justified.

The ecological impact of the proposed Merton Park fails legal compliance and national policy. The Council's March 2026 Habitats Regulations report (para 5.5.22) explicitly admits they are uncertain if the environmental mitigation for these proposed 1950 homes can actually be delivered. Under UK planning law, you cannot legally approve a plan if you are uncertain about its environmental damage.

The proposed plan ignores the fact that there isn't enough water for all those new proposed homes.

Mr Bell, the head of water supply for Kent at South East Water spoke for BBC about the proposals for a reservoir at Broad Oak, which, if it is built, will supply water for Canterbury, Whitstable and Herne Bay.

However, the final design is still subject to planning and is not thought that the construction will start before 2028 and will take up to a decade before reaching completion. Mr Bell said the development was necessary to ensure SEW's customers have an uninterrupted supply of water.

Taking this into consideration proves that the proposed Merton Park is undeliverable, ineffective, thus unsound.

Erika Repaska

Responding as a resident of the Canterbury District

I do not wish to participate in hearing sessions



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