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To whom it may concern

Representation Objecting to Allocation C10 (Merton Park) Canterbury District Local Plan Regulation 19 Submission

Introduction

Having reviewed the Sustainability Appraisal, transport evidence and supporting assessments, I am not persuaded that this allocation meets the soundness tests in paragraph 35 of the National Planning Policy Framework (NPPF). In my view, it is poorly justified, environmentally damaging and reliant on uncertain infrastructure assumptions. More broadly, it raises serious concerns about extending development into sensitive countryside on the southern edge of Canterbury.

Deliverability and Soundness

Paragraph 35 of the NPPF requires Local Plans to be positively prepared, justified, effective and consistent with national policy. Here, there is still significant uncertainty over infrastructure delivery, transport mitigation, environmental effects and long-term sustainability. The Sustainability Appraisal identifies several adverse effects, yet the evidence does not show clearly how these impacts will be addressed. There is insufficient evidence that transport upgrades, drainage, water infrastructure and public services can be delivered in a timely and coordinated way, as some of these are outside of the remit of the Council. For those reasons, I do not consider allocation C10 to be deliverable.

Traffic, Air Quality and Transport Uncertainty

Traffic around Wincheap is already heavily constrained, with persistent congestion on routes linking the A28, A2 and the wider city network, especially at peak times. Development at C10 would add further vehicle movements through this corridor, increasing pressure on congestion and air quality. Although the Council's transport strategy relies on modal shift and improved public transport, the effectiveness of those measures remains uncertain. Bus enhancements depend on future funding, operator support and long-term viability. Without firm assurances on delivery, reliability and use, the proposed mitigation does not provide a sufficiently robust basis for allocating development on this scale.

Water Resources, Flooding and Infrastructure Capacity

The allocation also raises concerns about infrastructure resilience and climate adaptation, engaging NPPF paragraphs 8, 20, 173 and 174. Canterbury is in an area of serious water stress, and further growth will intensify pressure on water resources. Yet the evidence does not clearly show that adequate water supply,

sewerage and wastewater capacity will be available to support development at this scale. References to future strategic projects such as the Broad Oak reservoir do not provide certainty, as these remain subject to approvals, funding and delivery. There are also unresolved questions about surface water drainage, increased hard surfacing and the cumulative effects of climate change on flood resilience.

The Strategic Land Availability Assessment (August 2025), Appendix B, notes a small area of contaminated land from lime extraction to the north of the site, two smaller contaminated areas near the centre, and that the western part of the site lies within the buffer of a lime kiln quarry landfill. However, this description is too vague to identify the precise extent or location of the contamination. There is no evidence that a preliminary risk assessment has been undertaken or that the relevant guidance, including Land Contamination Risk Management (LCRM), has been followed.

Nor is there evidence of any proposed mitigation or supporting site investigation, despite NPPF paragraph 196 requiring that sites be suitable for their proposed use, taking account of ground conditions, instability and contamination risks, including those arising from former activities such as mining, and that adequate investigation information prepared by a competent person be available to inform that assessment.

This is also relevant to Policy DS24 of the Local Plan 2026, which requires drainage proposals to show, as a minimum, that contamination risks have been considered, including any available land contamination studies.

Landscape and Countryside Impact

National policy is clear that planning decisions should recognise and enhance the character and beauty of the countryside. The land proposed under allocation C10 forms part of Canterbury's open rural setting and provides an important transition between the urban edge and surrounding countryside. Its character is shaped by agricultural land, orchards, mature vegetation, long views and a strong sense of openness. Large-scale housing here would urbanise that landscape through roads, lighting, parking and associated infrastructure, causing a permanent loss of openness. The Council's own evidence acknowledges the sensitivity of this area, yet in my view the allocation gives too little weight to the long-term harm caused by extending Canterbury's built edge into this undeveloped landscape.

Biodiversity and Environmental Concerns

The allocation also appears inconsistent with the environmental aims of the NPPF, including paragraphs 187 and 193, which require impacts on biodiversity to be minimised and ecological enhancement to be supported. The site contributes to ecological connectivity on the southern side of Canterbury, with hedgerows, orchards and green corridors providing habitat and movement routes for wildlife. It supports a notably rich assemblage of endangered and protected species, including at least 54 bird species, 13 on the Red List and 12 on the Amber List of conservation concern recorded by Natural England, as well as active badger setts, four bat species including the rare Nathusius' pipistrelle, slow worms, and an amber zone for Great Crested Newt identified in the Strategic Land Availability Assessment Site Assessment 2022. Development at the proposed scale risks fragmenting these habitats, removing mature landscape features and disrupting a complex ecosystem that cannot realistically be compensated for. This is especially important for migratory and overwintering birds such as fieldfares and redwings, which return to the same site each year and rely on fallen apples, berries and seeds provided by the existing orchards and hedgerows. If those food sources are lost, these species may struggle to adapt, with starvation a likely consequence. While replacement planting is often proposed, new landscaping cannot replicate the ecological value or functional role of long-established habitats for many decades. The Sustainability Appraisal identifies notable adverse environmental effects, and there remains insufficient evidence that these can be mitigated acceptably over the long term.

Heritage and the Setting of Canterbury

The allocation also raises important heritage concerns under Section 16 of the NPPF, particularly paragraphs 202-3 and 212-3. Canterbury's World Heritage Site derives significance not only from its buildings but from the historic relationship between Canterbury Cathedral, St Augustine's Abbey, St Martin's Church and the surrounding landscape. The countryside on the southern edge of the city contributes to views of the Cathedral and to the wider appreciation of Canterbury's historic character. Development at Merton Park would introduce substantial urban form into land that currently provides an open transitional landscape, reducing the separation between city and countryside and harming the wider setting of heritage assets. The NPPF is clear that even less than substantial harm must be clearly and convincingly justified, and in my view that case has not been made for allocation C10.

Conclusion

For these reasons, I object to the proposed allocation of Site C10 (Land at Merton Park) in the Canterbury District Local Plan. In my view, the proposal would cause lasting harm to Canterbury's landscape setting, add pressure to already stretched infrastructure, create environmental and ecological damage, and risk harm to the setting of internationally important heritage assets. It therefore fails the soundness tests in the National Planning Policy Framework and should be removed from the Local Plan.

Yours faithfully

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