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To: Consultations
Subject: Regulation 19 Representation – Objection to Allocation C10 (Merton Park)

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Regulation 19 Representation – Objection to Allocation C10 (Merton Park)

Canterbury District Local Plan Submission Draft

To whom it may concern,

I object to the proposed allocation of Site C10 (Land at Merton Park) in the Canterbury District Local Plan Regulation 19 Submission Draft.

Having reviewed the supporting evidence, Sustainability Appraisal, and associated consultation material, I do not believe the allocation satisfies the soundness requirements set out within Paragraph 35 of the National Planning Policy Framework (NPPF). In particular, the proposal is insufficiently justified, conflicts with national policy objectives relating to environmental protection and climate resilience, and raises serious concerns regarding infrastructure delivery.

Failure to Protect the Character of the Landscape

This allocation conflicts with Paragraph 186 to 189 of the National Planning Policy Framework (NPPF), which require planning policies and decisions to contribute to and enhance the natural environment while recognising the intrinsic character and beauty of the countryside.

The land identified within C10 forms part of the open rural edge of Canterbury and contributes strongly to the separation between the city and surrounding countryside.

The area is characterised by:

- Open agricultural land and orchards
- Long uninterrupted views across the landscape
- A clear sense of tranquillity and rural identity
- Historic field patterns and green corridors

The Council's own landscape evidence identifies this landscape as sensitive to major development. Introducing large-scale housing into this setting would permanently alter the character of the area through urban expansion, loss of openness, increased built form, lighting, traffic, and associated infrastructure.

This approach appears inconsistent with national planning policy requiring local authorities to recognise the intrinsic beauty and character of the countryside and to conserve valued landscapes.

Environmental and Ecological Harm

The proposal appears inconsistent with NPPF Paragraphs 192 and 193, which require development plans to minimise impacts on biodiversity, protect ecological networks, and secure measurable environmental gains.

The proposed allocation would result in the loss and fragmentation of greenfield habitats that currently support biodiversity and ecological connectivity around the southern edge of Canterbury.

Particular concerns include:

- Removal of existing trees, hedgerows, and orchard landscapes
- Loss of habitat corridors used by wildlife
- Reduction in natural green space and ecological resilience
- Increased pressure on already vulnerable ecosystems

The Sustainability Appraisal accompanying the Local Plan acknowledges significant negative environmental effects associated with the site. Despite this, the allocation proceeds without demonstrating how these impacts can be effectively avoided or fully mitigated.

Replacement planting cannot realistically compensate for the immediate and long-term loss of mature landscape features and established habitats.

Wincheap already experiences significant traffic congestion and associated air pollution due to its role as a principal route into Canterbury and its proximity to the A28 and A2 corridor. Increased housing development at Site C10 would likely

generate additional vehicle movements through the Wincheap corridor, particularly during peak periods, potentially worsening existing air quality conditions and congestion.

The Sustainability Appraisal and transport evidence do not clearly demonstrate that the proposed mitigation measures would be sufficient to prevent deterioration in local air quality. This is particularly concerning given the cumulative impact of traffic growth, idling vehicles, and congestion on nitrogen dioxide (NO₂) and particulate emissions.

While the transport strategy relies heavily upon modal shift and enhanced bus provision, the long-term delivery and effectiveness of these measures remain uncertain.

Water Infrastructure and Flooding Concerns

The concerns regarding water supply, wastewater infrastructure, and flood resilience engage NPPF Paragraphs 8, 20, 173, and 174, which require the planning system to support sustainable development, ensure that sufficient infrastructure capacity exists, and direct development away from areas at risk of flooding.

The proposed development raises unresolved questions regarding water supply capacity, wastewater infrastructure, and flood resilience.

Canterbury lies within the Southern Water region, which has been formally designated by the Environment Agency and DEFRA as an area of serious water stress. The Council's own Sustainability Appraisal evidence also recognises that the South East is one of the driest regions in the UK and subject to significant pressure on water resources.

Despite this, the evidence provided does not demonstrate that the necessary water supply and wastewater infrastructure will be available in time to support development at the scale proposed.

While the proposed Broad Oak reservoir may improve long-term regional water resilience, it remains a future strategic infrastructure project that is not yet operational and remains subject to further approvals, funding, environmental assessment, and delivery timescales. The existence of a proposed reservoir therefore does not demonstrate that sufficient water supply, wastewater, drainage, and associated infrastructure capacity will be available in time to support development at Site C10.

There are also concerns that:

- Increased hard surfacing will intensify surface water runoff
- Existing drainage systems are already under strain
- Extreme weather events linked to climate change may worsen flood risk over time
- Water and sewerage upgrades remain uncertain or delayed

The NPPF requires plans to address climate adaptation, infrastructure resilience, flood management, and water supply in a proactive and deliverable way. At present, the evidence for C10 does not provide sufficient confidence that these obligations can be met.

Harm to the Historic Setting of Canterbury

The allocation also raises concerns under Section 16 of the NPPF, particularly Paragraphs 202, 203, 212, and 213, which require local planning authorities to conserve heritage assets in a manner appropriate to their significance, including consideration of their setting and the need for clear and convincing justification for harm.

The NPPF makes clear that World Heritage Sites are heritage assets of the highest significance because they are internationally recognised as being of Outstanding Universal Value. National policy also requires plans to include a positive strategy for conserving and enhancing the historic environment and to avoid harm to the significance and setting of heritage assets wherever possible.

Given the exceptional significance of Canterbury's World Heritage Site, even less than substantial harm must be clearly and convincingly justified. In my view, the evidence supporting allocation C10 does not demonstrate that this test has been met.

The countryside around Canterbury forms part of the wider historic setting of the city and contributes to important public views toward Canterbury Cathedral.

Canterbury's World Heritage Site designation is recognised internationally for its Outstanding Universal Value (OUV), including the historic and visual relationship between Canterbury Cathedral, St Augustine's Abbey, St Martin's Church, and their surrounding landscape setting. UNESCO identifies the visual prominence of Canterbury Cathedral within the landscape and the historic relationship between the city and surrounding countryside as key components of this significance. The rural approaches to Canterbury form part of this significance and contribute to the city's distinctive historic character.

Development at Merton Park would introduce substantial urban form into land that currently acts as a transitional landscape between the city and open countryside. The site assessments prepared for the Local Plan itself acknowledge that the allocation has the potential to impact the surrounding landscape because the site currently forms open countryside.

The proposed development would:

- Introduce dense housing into land forming part of the Cathedral's wider landscape setting
- Interrupt and diminish important views toward Canterbury Cathedral from southern and south-western approaches
- Urbanise a sensitive transition between the built edge of Canterbury and the surrounding countryside
- Reduce the sense of openness that contributes to appreciation of the World Heritage Site

This would erode elements of the wider setting that contribute to the appreciation of Canterbury's UNESCO World Heritage Site and its Outstanding Universal Value. This risks degrading the visual setting of Canterbury and diminishing the character of approaches into the city.

Given the significance of Canterbury's heritage assets and World Heritage status, any harm to their setting should be clearly justified and convincingly outweighed by public benefit. I do not believe this threshold has been met.

Concerns Regarding Sustainability and Deliverability

The Sustainability Appraisal accompanying the Local Plan identifies a range of significant adverse effects associated with the allocation. These concerns engage Paragraph 35 of the NPPF, which states that Local Plans must be positively prepared, justified, effective, and consistent with national policy.

The allocation also gives rise to wider concerns about whether the development can genuinely be considered sustainable.

Potential impacts include:

- Increased traffic congestion on already pressured routes
- Additional strain on public services and utilities
- Loss of productive agricultural land
- Greater air pollution and noise
- Pressure on healthcare, schools, and local infrastructure

The Local Plan evidence identifies numerous significant adverse effects associated with this allocation, yet there remains insufficient clarity regarding how the required mitigation and infrastructure improvements will be delivered within the proposed timeframe.

The transport strategy associated with allocation C10 appears to depend heavily upon enhanced bus services and assumptions that a significant proportion of journeys will shift away from private vehicle use. However, the provision, frequency, reliability, and long-term commercial viability of bus services are dependent upon third-party operators and funding arrangements that are not fully within the Council's direct control.

In the absence of firm guarantees regarding delivery and long-term operation, there is uncertainty as to whether the proposed transport mitigation measures can realistically be regarded as effective and deliverable in accordance with Paragraph 35 of the NPPF.

Conclusion

In addition to the concerns above, I note that the Council's own Sustainability Appraisal identifies negative effects in relation to landscape, biodiversity, water resources, flood risk, and infrastructure pressure. In my view, the evidence base does not adequately demonstrate that these impacts can be mitigated to an acceptable level.

For the reasons outlined above, I consider the allocation of Site C10 to be unsound because it is not adequately justified, fails to properly address environmental and infrastructure constraints, and conflicts with national planning policy relating to landscape protection, climate resilience, biodiversity, and heritage.

I respectfully request that Site C10 (Land at Merton Park) is removed from the Canterbury District Local Plan.

Yours faithfully,

Bill Newland



17 May 2026