

From: Amanda Bates [REDACTED]
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Dear Planning Inspector,

I am writing regarding Canterbury City Council's proposed Local Plan. This submission addresses Policy C10 – Land at Merton Park in Wincheap. I have serious concerns that this proposal, in its current form, fails to adequately protect the health, safety and wellbeing of existing residents and future occupants.

In my view, the Local Plan should not be found sound unless these issues are fully and transparently addressed. In particular, I am concerned that the proposal is not justified or consistent with national policy within the meaning of the National Planning Policy Framework, given the significant unresolved impacts relating to air quality, public health, traffic congestion and highway safety. I also question whether the evidence base supporting this allocation is sufficiently robust to demonstrate that the Plan is legally compliant in respect of the Council's duties relating to public health, environmental assessment and sustainable transport.

Therefore, I am specifically contacting you about two significant concerns:

1. Air Quality and Public Health

Wincheap is located within Canterbury's Air Quality Management Area (AQMA), with nitrogen dioxide (NO₂) levels already close to the legal annual mean objective of 40 µg/m³ (Kent Air Monitoring).

Hollow Lane, one of the planned access routes, passes Wincheap Primary School and would therefore expose young children to increased traffic-related pollutants. Children are particularly vulnerable to air pollution. NO₂ and fine particulate matter (PM_{2.5}) can penetrate deep into the lungs and bloodstream, affecting developing organs and increasing the risk of respiratory disease, including asthma (World Health Organisation 2018; BMJ 2024; Royal College of Paediatrics and Child Health, 2025).

The addition of traffic generated by more than 2,000 new homes will inevitably increase NO₂ and particulate emissions, worsening existing pollution and directly impacting schoolchildren and local residents. Local authorities are expected to reduce exposure to air pollution,

particularly in areas used by vulnerable groups such as children (NICE NG70: Air Pollution – Outdoor Air Quality and Health).

There is also substantial evidence demonstrating the public health value of retaining urban green space. Large cohort studies have found that people living in greener areas experience significantly lower respiratory and non-accidental mortality rates compared with those in less-green environments. These benefits persist even after adjusting for pollutants such as PM_{2.5}, NO₂ and ozone. Major reviews further conclude that urban green infrastructure improves health outcomes through temperature regulation, stress reduction and increased opportunities for physical activity.

Given these factors, I do not believe the Plan can currently be considered sound unless the cumulative air quality and public health impacts have been properly assessed, mitigated and evidenced. Failure to do so risks undermining both the justification for the allocation and the Plan's consistency with national policy concerning sustainable development and protection of public health.

2. Traffic Safety and Congestion

Hollow Lane, one of the proposed access routes to Merton Park, is a narrow residential road with limited pedestrian and cycling space and no realistic alternative access for emergency vehicles.

Peak-time traffic along Wincheap and Hollow Lane is already heavily congested, creating safety hazards for pedestrians and cyclists, particularly schoolchildren. The addition of thousands of daily vehicle movements from this development would significantly exacerbate congestion, increase collision risk and worsen pollution exposure.

The Highway Code makes clear that roads used by children require particular caution and appropriate safety measures due to the presence of vulnerable pedestrians. In addition, Section 122 of the Road Traffic Regulation Act 1984 places duties on local authorities to secure the safe and convenient movement of traffic, including pedestrians and cyclists.

The National Planning Policy Framework (paragraphs 115–116) further states that development proposals must provide safe and suitable access for all users and may be refused where they would create an unacceptable impact on highway safety.

In light of the existing conditions in Wincheap and Hollow Lane, I am not persuaded that the current evidence demonstrates that safe and suitable access can be achieved for a development of this scale. Unless these highway and congestion impacts are comprehensively resolved, I do not believe the Local Plan allocation can reasonably be regarded as sound.

I would therefore respectfully ask that these concerns are given careful consideration during examination of the Local Plan, particularly in relation to whether the Plan meets the statutory tests of soundness and legal compliance.

Yours sincerely,

Amanda Bates

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