

From: Paula Wooding [REDACTED]
Sent: 17 May 2026 16:03
To: Consultations
Subject: Objection to Draft Local Plan – Policy SS3 and Policy C10 (Merton Park)

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Dear Sir/Madam,

I am writing to object to Policy SS3 and Policy C10 (Merton Park) within the Draft Canterbury District Local Plan.

In my view, the plan is Unsound and Legally Non-Compliant for the following reasons:

1. **Transport and Infrastructure Failures** The Council's proposed "bus-led" transport strategy appears inadequate to address the significant congestion expected at the A2/A28 Wincheap interchange and M2 Junction 7. The Council's own transport evidence acknowledges severe congestion issues, yet there does not appear to be a confirmed Statement of Common Ground with National Highways accepting these impacts. This raises serious concerns regarding the plan's effectiveness and compliance with the Duty to Cooperate.
2. **Failure to Prioritise Brownfield Development** National planning policy requires brownfield land opportunities to be fully explored before large-scale development on greenfield land is pursued. It is concerning that the plan proposes substantial development at Merton Park while opportunities for regeneration within existing developed areas — including Wincheap Retail Estate, city-centre car parks, and vacant student accommodation — appear not to have been adequately prioritised.
3. **Habitats Regulations and Environmental Concerns** The Council's March 2026 Habitats Regulations Assessment acknowledges uncertainty regarding whether mitigation measures for the proposed development can be successfully delivered, particularly in relation to the Stodmarsh protected area. Under established planning law principles, plans should not proceed where there is uncertainty over potential environmental harm.

For these reasons, I believe the plan is Unsound and Legally Non-Compliant.

I also wish to participate in the oral examination hearings.

Kind regards,

Paula Wooding
[REDACTED]
[REDACTED]



Sent from my iPhone