

From: Mike Shaw [REDACTED]
Sent: 17 May 2026 20:58
To: Consultations
Subject: Regulation 19 representation - objection to Policy C10: Land at Merton Park

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Dear Policy Team,

I'm writing to submit a Regulation 19 representation objecting to Chapter 2, Policy C10: Land at Merton Park in the Draft Canterbury District Local Plan.

I'm writing as a resident of the Wincheap area, and I do not wish to participate in hearing sessions.

I do not consider Policy C10 to be sound. In my view, it is not positively prepared, justified, effective, nor consistent with national policy. I am not making a separate legal compliance objection in this representation, but I do believe the policy fails the soundness tests.

I request that Policy C10: Land at Merton Park is removed from the Local Plan.

Summary of objection

I object strongly to Policy C10 because it would remove one of the few remaining large green spaces in Canterbury.

I'm not anti-housing. I understand that Canterbury needs homes. But I don't believe this site is suitable, justified or deliverable. Brownfield and greyfield sites, as well as existing developed areas, should be prioritised and better managed before this important green landscape is lost.

My children walk in this area every day. As a family, we have used them for leisure, exercise, informal sport and mental health support for around two decades. We use the area several times a week. It's part of our ordinary life, and part of the life of the local community.

I've heard the area referred to as "empty land". Land without buildings isn't empty; it's just full of something different. Often something more valuable.

This is a living landscape, used and valued by people and wildlife.

1. Policy C10 is not justified because it would cause unacceptable harm to a valued landscape

The land affected by Policy C10 is one of the few large green spaces left in this busy part of Canterbury. It gives local people immediate access to the countryside and to the open air; for exercise, family time, informal play, cycling, walking and mental health recovery. Its value is not theoretical. It is used every day.

The Local Plan presents Merton Park as a sustainable and accessible location, with open space, green corridors and active travel links. I don't accept that this justifies the loss of the existing landscape. Replacing a large, open, informal, beloved and biodiverse green space with a planned development containing housing, roads, facilities and a couple of managed open spaces is not an equivalent exchange.

The character of this place comes from its openness, views, informality, wildlife, and its place within the rural setting of Canterbury. Once developed, that character cannot be recovered. For that reason, I do not consider Policy C10 to be sound nor justified.

2. Policy C10 is not consistent with national policy because of harm to heritage setting and Cathedral views

The views of Canterbury Cathedral from this area are of paramount importance. This is Canterbury. The Cathedral is a UNESCO World Heritage Site and the global seat of the Anglican Church. These are not just pleasant local views. They are part of the historic and spiritual identity of the city.

Residents, walkers and pilgrims have experienced views of the Cathedral in its wider landscape setting for centuries. For religious and non-religious people alike, those views are a reminder that Canterbury is part of something bigger and older than ourselves.

Policy C10 seeks to address this through heritage assessment, view corridors, and design. That approach doesn't reassure me. It accepts the principle of a major development first, then tries to manage the harm afterwards. That's not enough for a landscape that contributes to the setting of one of the most important heritage sites in the world. We must protect the integrity of the space for walkers and worshippers alike.

Large-scale development, roads, a Park and Ride facility, sports facilities and lighting would inevitably change the setting and experience of these views. For this reason, I do not consider Policy C10 to be sound, justified or consistent with national policy on conserving and enhancing the historic environment.

3. Policy C10 is not justified because it underestimates the biodiversity and ecological value of the area

The fields and orchards are rich in wildlife. More than 50 species of birds have been recorded in the area, with some being rare, red-listed birds.

This is not unused or lifeless land. It is a functioning habitat.

The policy itself acknowledges ecological features such as hedgerows, trees, orchard areas, green corridors, habitat connectivity and pollinator connectivity. But it still allocates the land for major development.

It risks fragmenting and degrading the very ecological network the policy claims to protect and enhance. Retaining pieces of habitat and adding managed green corridors is not the same as

protecting the wider living landscape. The biodiversity value of this area depends on the connection between fields, orchards, hedgerows, paths, darker areas, insects, birds and bats.

For that reason, I don't consider Policy C10 to be sound, justified or consistent with national policy on protecting and enhancing the natural environment.

4. Policy C10 is not effective because the area already struggles with traffic and parking

The Wincheap area is already under serious traffic and parking pressure. Parking is, in practical terms, catastrophic in parts of the area. Many family homes have become multi-occupancy homes, increasing the number of vehicles on streets that were not designed for this level of pressure.

Traffic is already at a standstill on many days. Moving a short distance, even around a mile, can take more than 45 minutes. This is not an occasional inconvenience and is part of daily life in the area. Adding thousands more homes is counterintuitive.

I note that maps associated with the plan use information that is already years out of date. It's apparent that this scheme hasn't been given the due care, attention and scrutiny it deserves.

Policy C10 proposes primary vehicle access from Hollow Lane and secondary vehicle access from Nackington Road, with changes to Hollow Lane, Homersham and other parts of the local network. These proposals don't reassure me. They suggest that an already pressured road network, running alongside a primary school and a nursery school, would be expected to absorb the impact of a very large development. Along with the obvious pollution and air-quality challenges, the additional risk of physical harm to children and young people from vehicles is unacceptable.

The policy also relies heavily on active travel, bus priority and reduced private car use. I support walking, cycling and public transport. My family uses the area for walking and cycling now. But it is not realistic to assume that a development of this scale, including nearly 2,000 homes and major non-residential facilities, will not create substantial additional car use, parking demand and congestion.

For this reason, I don't consider Policy C10 to be sound or effective. It hasn't been demonstrated that transport impacts can be dealt with in a way that protects existing residents and avoids further congestion, pollution and pressure on local roads.

5. Policy C10 is not effective because sewage, flooding and environmental infrastructure are unresolved concerns

I'm also concerned about sewage, wastewater, flooding and environmental infrastructure. The area already struggles with flooding. I am aware that other developments in the recent past have faced problems providing sufficient sewage, waste handling or treatment facilities.

For an allocation of this scale, essential infrastructure should not be left to flexible wording, later agreement, or uncertain phasing. The policy should demonstrate clearly, and without any

ambiguity, that wastewater, sewage, drainage, flood risk and environmental impacts can be managed before development is accepted in principle.

If that can't be demonstrated now, then the allocation is not deliverable in a sound way. For this reason, I don't consider Policy C10 to be effective.

6. Policy C10 is not positively prepared because it places too much burden on an existing community

Policy C10 appears to prioritise the delivery of a large new development over the quality of life of the existing Wincheap community. The loss of green space cannot be separated from the wider consequences: pollution, overdevelopment, overcrowding, pressure on roads, parking, services, drainage and the environment.

The plan presents Merton Park as part of a sustainable strategy for Canterbury. But from the perspective of those who live here, it looks like a major burden is being placed on an area that is already under pressure. Wincheap is already busy, congested and heavily developed in places. It should not be treated as a convenient access point for a development that would remove one of the very spaces that makes the area liveable.

For that reason, I don't consider Policy C10 to be positively prepared in relation to this site. It doesn't strike a proper balance between housing delivery and the protection of existing communities, heritage, landscape, biodiversity and infrastructure.

Requested change

I request that Policy C10: Land at Merton Park is removed from the Draft Canterbury District Local Plan.

If the council maintains that housing growth is needed, it should prioritise brownfield and greyfield sites, regeneration opportunities, and better management of existing developed areas before allocating this important green landscape for major development.

At a minimum, Policy C10 should not proceed unless and until the council can demonstrate, through robust, proportionate and up-to-date evidence, that:

- The site can be developed without unacceptable harm to the setting of Canterbury Cathedral and the World Heritage Site;
- The long-established public views across this landscape can be genuinely preserved;
- Biodiversity, orchard habitat, hedgerows, bats, birds, pollinators and other wildlife will not be harmed or fragmented;
- Traffic, parking and access impacts on Wincheap, Hollow Lane, Homersham, Nackington Road and surrounding streets can be safely and effectively managed;
- Sewage, wastewater, drainage and flooding issues can be resolved before development takes place;
- Necessary infrastructure will be delivered before, not after, harm is caused to existing residents; and

- Reasonable alternatives, including brownfield and greyfield sites, have been properly prioritised.

In my view, these tests have not been met. Policy C10 is therefore not sound and should be removed from the Local Plan.

Yours faithfully,

Michael Shaw

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