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I wish to formally object to Policy C10 (Merton Park) in the Canterbury District Local Plan on the basis that the policy is unsound when assessed against the tests of soundness set out in paragraph 35 of the National Planning Policy Framework (NPPF).

The policy is not:

- Positively prepared;
- Justified;
- Effective; or
- Consistent with national policy.

1. The Policy is Not Positively Prepared

The Local Plan fails to demonstrate that the proposed development at Merton Park can be supported by the necessary infrastructure required to meet the needs arising from the allocation.

Existing local infrastructure is already under significant pressure, including:

- Local road networks and junction capacity;
- GP and healthcare provision;
- School places;
- Drainage and sewerage systems; and
- Public transport services.

The plan does not provide sufficient evidence that these constraints can be adequately mitigated or that the required infrastructure will be delivered in a timely and coordinated manner alongside development.

Without firm infrastructure commitments, funding mechanisms, and delivery timescales, the allocation risks creating an unsustainable pattern of development that would negatively affect existing and future residents.

2. The Policy is Not Justified

The allocation of Merton Park is not justified by proportionate evidence and does not represent the most appropriate strategy when considered against reasonable alternatives.

The site includes productive agricultural land, orchards, and established hedgerows that contribute significantly to:

- Local biodiversity;
- Landscape character;
- Ecological connectivity;
- Carbon storage; and
- The rural setting of the area.

The loss of these environmental assets would cause irreversible harm to the countryside character and natural environment.

The Council has not sufficiently demonstrated why the loss of this greenfield agricultural land is necessary, nor why alternative sites with lower environmental impacts could not meet development needs instead.

Insufficient weight appears to have been given to the cumulative loss of agricultural land across the district and the long-term implications for food production, biodiversity, and climate resilience.

3. The Policy is Not Effective

There is insufficient certainty that the infrastructure necessary to support the development can be delivered effectively over the plan period.

The policy lacks clear and enforceable mechanisms regarding:

- Infrastructure delivery;
- Phasing;
- Traffic mitigation;

- Healthcare and education provision; and
- Environmental protection measures.

Without robust delivery mechanisms, there is a significant risk that development would proceed ahead of the infrastructure needed to support it, resulting in unacceptable impacts on local communities and services.

Additionally, the removal of orchards and hedgerows would undermine opportunities for environmental enhancement and biodiversity recovery.

4. The Policy is Not Consistent with National Policy

The allocation conflicts with several key principles of the NPPF, including those relating to sustainable development, environmental protection, and recognition of the intrinsic character and beauty of the countryside.

In particular, the proposal appears inconsistent with national policy objectives to:

- Protect and enhance the natural environment;
- Minimise impacts on biodiversity;
- Recognise the importance of green infrastructure;
- Promote sustainable transport patterns; and
- Ensure development is supported by adequate infrastructure.

The loss of agricultural land, orchards, and mature hedgerows is contrary to the environmental objectives of sustainable development and would result in significant and irreversible environmental harm.

Conclusion

For the reasons outlined above, Policy C10 (Merton Park) is unsound under the tests set out in paragraph 35 of the NPPF.

I therefore request that Canterbury City Council remove Policy C10 from the Local Plan or substantially revise the policy to address the significant concerns regarding infrastructure capacity, environmental harm, and the loss of agricultural land and landscape character.

