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To: Consultations
Subject: Response to Draft Canterbury District Local Plan (Regulation 19)

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Dear Canterbury City Council,

I would like to provide my response to the Draft Canterbury District Local Plan (Regulation 19) in this email. If you require for this response to be sent to you as a separate attachment, please let me know.

Objection Statement

I wish to object to the Draft Canterbury District Local Plan in relation to **Policy C10 (Merton Park)**.

In accordance with the **National Planning Policy Framework (NPPF) paragraph 35**, Local Plans must be **positively prepared, justified, effective, and consistent with national policy**.

I consider the allocation of Policy C10 to be **unsound**, as it fails these tests as set out in NPPF paragraph 35:

- **Not positively prepared:** Policy C10 does not represent a strategy that sustainably meets development needs. The allocation of a large-scale development at Merton Park places disproportionate pressure on an already constrained area, without demonstrating that infrastructure, access, and environmental capacity can support this level of growth. This conflicts with the requirement in **NPPF paragraph 16** that plans should be deliverable and contribute to sustainable development.
- **Not justified:** Policy C10 has not been demonstrated to be the most appropriate strategy when compared with reasonable alternatives, particularly given the significant environmental and infrastructure impacts
- **Not effective:** There is insufficient evidence that Policy C10 can be delivered without unacceptable impacts on transport, access, and community infrastructure
- **Not consistent with national policy**, particularly in relation to:

- promoting healthy communities (NPPF Section 8)
- protecting open space (NPPF paragraph 99)
- ensuring safe and suitable transport access (NPPF paragraph 109 - 111).

My response focuses on two areas:

(1) Community wellbeing and landscape

(2) Transport, access, and highway safety

1. Community Wellbeing and Landscape

The NPPF is clear that planning should support the creation of **healthy, inclusive communities**. Under **paragraph 96**, planning policies should achieve “healthy, inclusive and safe places” and support access to green infrastructure and healthy lifestyles. It also requires that planning policies should “**guard against the unnecessary loss of valued facilities and services**” (paragraph 98(c)).

In addition, **paragraph 99** states that existing open space should not be built on unless:

- it is clearly surplus to requirements, or
- it is replaced by equivalent or better provision in a suitable location.

Conflict with Policy C10

The proposed Merton Park development would result in the loss of **over 100 acres of orchards and fields**, which currently function as a well-used and accessible green space for the local community.

This area is:

- used daily for walking, recreation, and informal exercise, as well as providing young people and children with a space to play and socialise
- a key accessible natural space within an urban setting
- an important part of community life and social interaction.

The landscape provides:

- a sense of openness and tranquillity close to urban areas, and the city
- valuable views of the countryside and significantly, the heritage site of Canterbury Cathedral
- opportunities for connection with nature and seasonal change.

In my own experience, I cannot put into words how much regular use of this space has positively impacted on my mental wellbeing.

Failure to meet NPPF requirements

Policy C10 conflicts directly with national policy because:

- There is **no evidence that this space is surplus**, as required by paragraph 99
- There is **no clear provision of equivalent replacement green space locally**
- The proposal results in the **loss of a valued community resource**, contrary to paragraph 98(c)
- It reduces access to green infrastructure, contrary to paragraph 96.

Internal inconsistency and inequality

This creates a clear contradiction:

- The Plan aims to promote **health and wellbeing through access to green space**
- Policy C10 removes the **most significant accessible green space in Wincheap**.

The loss of this space disproportionately affects those without private gardens and without access to transport to travel further afield. This raises concerns about **equitable access to green infrastructure**, undermining the NPPF's objective of creating inclusive communities.

2. Transport, Access, and Highway Safety

The NPPF requires that development should only proceed where safe and suitable access can be achieved and impacts on the transport network are acceptable.

Under **paragraph 110**, it must be ensured that:

- safe and suitable access can be achieved for all users
- impacts on the transport network and highway safety can be mitigated.

Under **paragraph 111**, development should only proceed where:

- the impact on highway safety is acceptable
- the residual cumulative impacts on the road network are not **severe**.

Existing conditions in Wincheap

Wincheap already experiences significant traffic congestion as a result of constrained road layout and extensive on-street parking.

In my experience, vehicles are often parked on both sides of residential roads leaving roads to function as single-lanes. This significantly reduces visibility and restricts a driver's ability to move safely. These conditions are already unsafe. Recently, an incident on my road led to a parked car being struck, with the restricted road space likely contributing to the collision.

Impact of the Merton Park development

The proposed development would significantly increase vehicle ownership, therefore increasing traffic movements through already constrained roads. I also have concerns that access to the site is limited and reliant on existing residential routes (C10 4 d) and that these routes are not designed to accommodate large volumes of traffic, including construction traffic.

Failure to meet NPPF transport requirements

Policy C10 conflicts with national policy because:

- There is **insufficient evidence that safe and suitable access can be achieved**, as required by paragraph 110
- The proposal risks creating **unsafe conditions due to narrow roads and limited visibility**
- Increased traffic and overspill parking would worsen existing constraints
- There is no clear evidence that cumulative impacts would remain below the threshold of “severe” under paragraph 111. As noted in C10 4 d, provision of primary access to the site from Hollow Lane and secondary access via Nackington Road is unsound, because Hollow Lane is too narrow to serve the scale of the proposed development in Policy C10, let alone the volume of construction traffic required
- In contradiction to NPPF 109, 'making transport considerations an important part of early engagement', Policy C10 is vague around the subject of roads approaching or within the development, indicating that additional traffic produced from Policy C10 will fall back onto existing infrastructure which is already under significant pressure.

Failure to meet NPPF 109-111 will have significant cumulative impacts on the local community, restricting access for emergency vehicles, increasing incidents between cars, cyclists, and pedestrians, overall, reducing the safety and accessibility of the area for local residents. These impacts will disproportionately fall on those without off-street parking, and vulnerable road and street users, again undermining the NPPF's objective of creating inclusive communities.

Internal contradiction

The Local Plan aims to:

- improve transport conditions
- ensure development is supported by infrastructure

However:

- Policy C10 introduces significant additional demand into an already constrained system, indicating that the allocation is not effective or deliverable in line with the NPPF.

For the reasons outlined above, Policy C10 (Merton Park):

- Conflicts with **NPPF paragraph 96 and 98** regarding health and community wellbeing
- Conflicts with **NPPF paragraph 99** regarding protection of open space
- Fails to meet **NPPF paragraph 110–111** requirements on transport and highway safety
- Does not meet the **tests of soundness in paragraph 35**.

Accordingly, I conclude that **Policy C10 is unsound and should be removed or substantially reconsidered**.

Best wishes,
Domonique Davies