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To: Consultations
Subject: Response to the Draft Canterbury District Local Plan (2042/43): Regulation 19 consultation

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Good afternoon,

As a local Canterbury Wincheap resident, I would like to submit my response to the Draft Canterbury District Local Plan (2042/43): Regulation 19 consultation in regards to the site C10 (Land at Merton Park).

I will focus on the topics of transport & access and biodiversity.

Transport & Access

Wincheap (A28) serves as a crucial yet heavily congested gateway into Canterbury. The route frequently suffers from slow moving traffic and elevated pollution levels, a situation exacerbated by limited route options, inadequate junction capacity, and narrow roadways. The draft Local Plan envisions nearly doubling the number of residences in the area, resulting in thousands more vehicles on the roads daily, thereby placing excessive strain on an already burdened transportation infrastructure.

The Local Plan's preparation has not adhered to best practices: there was insufficient engagement with local residents and businesses, critical transportation data was generated post-decision-making, and the infrastructure proposals lack both transparency and viability. The access plans through Hollow Lane and Homersham do not conform to the recommended Kent Design standards, rendering them inappropriate for both construction and prolonged usage. Traffic modeling is predicated on overly optimistic projections about shifts to walking, cycling, and public transport, despite recognition of existing limitations regarding car ownership and public transport resources. Collectively, these proposals are likely to exacerbate congestion and deteriorate air quality, making the Plan unsound, unfeasible, and inconsistent with national policy.

The A28, an essential route funneling traffic into Canterbury from southern and western Kent, is afflicted by recurrent traffic jams, primarily due to its compact form and lack of alternative pathways. Conflicting traffic signals at the A2/A28 junction, the single-lane stretch through Wincheap, and the restricted space under Canterbury East Railway bridge collectively contribute to the congestion and pollution levels, especially during peak hours.

The Local Plan 2024 proposes the following additional housing developments: Merton Park (1,950 homes), Langton Lane (14), Nackington Police Station (20), Wincheap Industrial Estate (1,000), Cockering Farm (36), and Milton Manor (95). Consequently, the ward's household count would surge by 3,115, nearly doubling the total to 6,885 households—a change that will severely escalate traffic along Wincheap and surrounding streets.

The proposed vehicular access for both construction and occupancy phases is neither suitable nor sufficient. According to Section 2 of the Kent Design Guide, developments of this magnitude should be connected via a local distributor road that accommodates all types of vehicles, including larger transport vehicles. Typically, the carriageway should be 6.75 meters wide (ranging from 6 to 10.5 meters), a verge width of 2 meters (with a range of 0.5 to 5 meters), and a footpath/cycleway width of 3 meters (ranging from 1.8 to 5 meters). The consultation document indicates that primary access to the site would be via Wincheap, with Hollow Lane converted to a one-way system between Wincheap and the junction with Hollowmede, along with proposed upgrades to Homersham that include creating off-street parking bays. However, Hollow Lane, originally a country lane, is inherently unsuitable for accessing a development of this size.

The stretch from Wincheap to the Hollowmede junction has carriageway widths that vary from approximately 5.5 meters to 4.3 meters, featuring on-street parking, no verges, and footways that measure around 1.2 meters on either side. Additionally, there is a local primary school entrance at the Hollowmede junction, and terraced houses line both sides of Hollow Lane right up to the back edge of the footways, leaving no front gardens. Consequently, there is little potential to upgrade this road to the standards expected of a local distributor road. Increasing traffic volume and variety on this route would significantly jeopardize the amenities and health of local residents by elevating noise levels, dust, air pollution, and endangering pedestrian safety, even if a one-way traffic flow were imposed. The consultation document fails to address the consequences for existing on-street parking; if removal of these spaces is likely, what alternative measures will be implemented? The segment of Hollow Lane from the Hollowmede junction to the site entry is proposed to be two-way; however, its carriageway width is only about 4.5 meters, with limited possibility for expansion, let alone the addition of footpaths, cycle lanes, or verges.

Biodiversity

The allocation of Site C10 is deficient and inconsistent with NPPF (2024) paragraphs 192 and 193 regarding biodiversity and geodiversity. The Local Planning Authority (LPA) failed to adequately identify, map, or assess the site's significant biodiversity value before its allocation. Site C10 is integral to a vital ecological network, supporting both protected and priority species, and serves as a wildlife corridor connecting various habitats including orchards, allotments, woodlands, and the disused Elham Valley Railway embankment.

This location hosts habitats of Principal Importance, veteran apple trees, ancient hedgerows, and a Regionally Important Geological Site (Cooper's Pit). Over 50 bird species, including those on red and amber lists, and legally protected birds inhabit the area. Moreover, protected mammals, reptiles, and bats are known to be present, yet no evaluation was conducted by CCC prior to this development. The proposed developer is currently conducting an ecological survey, but this is far too late in the planning timeline. The development is likely to fragment habitats, introduce light and noise pollution, and increase road mortality, resulting in an irreversible loss of irreplaceable habitats. The elimination of the 20% Biodiversity Net Gain requirement for this site, combined with a reliance on vague off-site mitigation strategies and a failure to adhere to the mitigation hierarchy, further undermines compliance. Consequently, significant harm cannot be avoided or adequately offset, necessitating the exclusion of Site C10 from the Local Plan.

The NPPF (2024, para 192a) states that plans should prioritize the identification, mapping, and protection of local wildlife-rich habitats and broader ecological networks, which include international and national sites of significance for biodiversity, wildlife corridors, and areas designated for habitat management. NPPF (2024, para 192b) emphasizes the need for plans to advocate for the conservation, restoration, and enhancement of priority habitats and species, while also seeking measurable net gains for biodiversity. The development at Merton Park threatens to degrade this unique landscape, rendering the plan unsound.

Habitats and Biodiversity - Site C10 supports a variety of protected species and boasts rich biodiversity, contributing to a crucial wildlife corridor. It is adjacent to the disused Elham Valley Railway embankment, recognized in the Canterbury Local Plan (March 2026, p.47) as significant for habitat connectivity, and bordered to the north by extensive allotments home to species such as foxes and slow worms. The site contains habitats of Principal Importance within England, including hedgerows and scrub at Cooper's Pit, and is near a deciduous woodland listed in Natural England's Priority Habitat Inventory (Canterbury City Council, Canterbury Strategic Land Availability Assessment – Site Assessment, 2022).

Orchards - The site reflects the historical prevalence of orchards and fields in the Canterbury area. Located west of Stuppington Lane, an apple and pear orchard comprises over 16,000 fruit-bearing trees, some of which are registered veteran apple trees (Woodland Trust). These older trees provide vital shelter and nesting cavities for birds, habitat for bats, and refuge for invertebrates. Additionally, species such as voles utilize the base of these trees for burrowing activities. There is an abundance of fallen and standing deadwood on-site, creating a mosaic of habitats that support various species with differing ecological niches, similar to traditional orchard environments (People's Trust for Endangered Species, 2026).

Birds - A total of 54 bird species have been observed in this area, including biodiversity key indicator species such as the Spotted Flycatcher, Goldfinch, and Greater Spotted

Woodpecker, highlighting the ecological value of the site. Among these, 13 species are classified on the red list of conservation concern (indicating the highest risk of extinction), including the rapidly declining Spotted Flycatcher. The site also provides habitat for 12 species listed on the amber list of conservation concern, corroborated by Natural England's classifications for conservation priorities (Natural England, 2026). These endangered and threatened species are documented in the national BirdTrack database (2026; see Appendix 3). Furthermore, three Schedule 1 bird species (red kite, firecrest, and redwing) and four overwintering species (common redpoll, fieldfare, redwing, and blackbird) benefit from additional protections under the Wildlife and Countryside Act 1981 (as amended), which safeguards all wild birds, their nests, and their eggs from harm.

There is insufficient evidence that the Local Planning Authority has fulfilled its biodiversity obligations and considered conservation in the allocation of Site C10 in the Local Plan 2026.

In the light of the recent "National Security Assessment on Global Ecosystems", February 2026,

see link <https://www.gov.uk/government/publications/nature-security-assessment-on-global-biodiversity-loss-ecosystem-collapse-and-national-security/national-security-assessment-on-global-ecosystems-accessible-version#biodiversity-loss-impacts-national-security>

the UK can no longer afford to lose arable land to housing developments, without exposing its population to the serious risk of food shortages from as early as 2030, but no later than 2050. See key judgment no. 7, "Without significant increases in UK food system and supply chain resilience, it is unlikely the UK would be able to maintain food security if ecosystem collapse drives geopolitical competition for food. The UK relies on imports for a proportion of both food and fertiliser and cannot currently produce enough food to feed its population based on current diets. Countries best placed to adapt are those that invest in ecosystem protection and restoration, and resilient and efficient food systems."

The recent geopolitical events and conflicts involving Ukraine and Iran are painfully confirming this key judgement.

Kind regards,

Michael Kaufmann



