

From: Thomas Crowther [REDACTED]
Sent: 18 May 2026 15:23
To: Consultations
Subject: Response to Canterbury City Council Regulation 19 Consultation:
Unsoundness of the Local Plan

--Email From External Account--

I am writing in opposition of Canterbury city councils Local plan as It is UNSOUND. In particular site C10 (Merton Park) or as the many people who use the space call it Wincheap orchards and fields.

The process of the local plan has failed as it has not been transparent and the local community has not been listened to or involved in the process. The council made a poor almost non-existent attempt to make Canterbury residents aware of the plan, through web content and social media but most finding out by word of mouth from other residents, this is a massive failure on their part. Not only this but leading figures in the council have deliberately ignored and been uncooperative with local groups in opposition. There has been no efforts by the council to explain how the thousands of replies to the regulation 18 consultation have been taken into consideration to the point where many local residents don't believe that the council even read any of them. This is undemocratic and unsound and a failing of the process. I also believe that it is undemocratic that all regulation 18 comments from locals regarding C10 won't be submitted by the council to the inspectorate as the plan regarding C10 has not been changed in this regulation 19 submission. The most unsound of all the councils failings in the process has been the behaviour of the council leader Alan Baldock who during meetings time and again told councillors that they could not be predetermined in their views on the plan but it has recently been exposed (Kent online, Esson, 2026) that he himself told other councillors not to vote against the plan. Not only does this show pre-determination on his and other councillors parts but this corrupt behaviour also shows that the planning process is UNSOUND because the Plan is not consistent with national policy. The NPPF emphasises transparency, public trust, and meaningful engagement; the perception that decisions are being influenced behind closed doors, particularly on controversial sites such as Merton Park, demonstrates a clear failure to uphold these principles. The tests of soundness set out in the NPPF, requires that a plan is "positively prepared, justified, effective and consistent with national policy" (NPPF, 2024, 3 PLAN MAKING, Examining plans, 36). The conduct of Alan Baldock and his conspirators in the council does not merely raise political concerns; it exposes a fundamental flaw in the Plan itself. It shows that the strategy lacks robust justification, cannot be delivered without improper influence, and undermines confidence in the planning process. The plan has certainly not been positively prepared. A plan must also be "developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics." (NPPF, 2024, 12, 132) Zero cooperation with Local groups shows that the council has already failed this. The NPPF also encourages developers as well as the council to "engage with local communities" (NPPF 2024, 4.41) yet neither council nor developer have engaged with the community. For all these reasons, the Local Plan must be found UNSOUND.

Site C10 would cause traffic chaos. With Ridlands farm, Cockering development, Saxon fields and the south Canterbury development already approved it is irresponsible to develop site C10. The number of houses from the already approved developments would exceed 4000 dwellings,

add on the proposed 2000 from Merton Park and not only is it unnecessary but it will cause major traffic problems to south Canterbury especially on Wincheap road. The railway bridge that crosses the A28 by Wincheap roundabout is a bottleneck in the road which cannot be widened. Traffic here is already horrendous and an additional 6000 houses in south Canterbury will no doubt result in an extreme increase in road users who will make this road more congested and polluted than it is already. The plan therefore will make the lives of current residents hellish and this is UNSOUND as planning decisions should avoid unacceptable harm to existing communities (NPPF, 2024, 12,135). The NPPF also states that developments should be well designed; the road infrastructure and how it fits with the existing infrastructure is very poorly designed and therefore the plan is UNSOUND.

The NPPF states that a plan should “protect and enhance valued landscapes, sites of biodiversity or geological value and soils” Building on Site C10 would irreversibly destroy a valued landscape. Valued for its famous and historic view of the cathedral, for its biodiversity and for its chalk downland geology. Wincheap Orchards and fields which would be destroyed in the plan are a community asset for recreation, residents of Wincheap and South Canterbury use the space daily to run; walk their dogs; travel to work or school; play football; and learn about nature and enjoy scenic views of the city. The destruction of a valued landscape such as this is UNSOUND. The NPPF says that:

“Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards)” (NPPF, 2024, 12,136) The destruction of the orchards for housing shows that the council haven’t followed the NPPF carefully and are disregarding the importance of these orchards to the community. This is UNSOUND.

The Local plan proposes 23,000 houses across the whole of the Canterbury district a number that southern water and south east water both say that they would struggle to meet the needs of. Developing sites before the infrastructure is able to cope with the development is UNSOUND. The flooding risk and inevitable increase in sewage spills due to the infrastructure not being properly in place would result in nutrient neutrality targets at Stodmarsh nature reserve (SSSI) not being met; this will cause an ecological catastrophe on the river Stour. I have worked on the river Stour as a Kayaking and Canoeing coach for 5 years. In those years there has been no improvement in the water quality, only deterioration. During the winter months spills are regular, many unrecorded illegal spills. The Local plan will exacerbate the Stour sewage problem as 23,000 proposed houses will result in extremely high levels of sewage discharge that will be pumped into a sewage system that is already at capacity. (NPPF, 2025, 10 W1) The development plan should be informed by early engagement between the relevant plan-making authority, utility providers, regulators and network operators. Canterbury City Council have ignored advice from Southern water, South East Water and Natural England in regards to the water issues. Because of this the plan must be deemed UNSOUND.

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Councillors have a duty of care to the people of Canterbury and the people of Wincheap. They should protect its residents, wildlife and preserve the heritage of our UNESCO world heritage site. They should campaign for a water and road infrastructure which meets the needs of residents and not advocate a plan which would plunge residents into potential water poverty and unmitigated traffic disaster. They have chosen to plough on with this catastrophic plan regardless of major concerns, and detrimental consequences to the people of Canterbury. Please stop the Local plan and save Canterbury from this act of ecological and cultural terrorism that is the 'Merton park development'. You have the power to stop this and make Canterbury City Council rethink their plan to make Canterbury into an environmentally conscious city with responsibly built infrastructure and allowances for nature that residents will support. I love the culture and beauty of Kent and the city of Canterbury. I don't want to wake up one day to find that there are no orchards left in the garden of England!

As changes to the plan regarding C10 have been minimal to non-existent, I consider that all regulation 18 responses remain relevant to the regulation 19 consultation I think that all responses to the reg 18 should also be read and considered in the regulation 19 here is a link to the regulation 18 responses: <https://haveyoursay.canterbury.gov.uk/previous-local-plan-consultations>

Here also is a link to the Overview committee on Thursday 5th March 2026 where 15 Canterbury Residents including myself spoke against the local plan. All applause from the packed Guildhall for these residents' speeches was censored by being muted in the video by the council:

<https://www.youtube.com/watch?v=gKzxqkvRb9s&t=1189s>

I believe that this plan is not fit for purpose and that it is profoundly unsound,
Thank you for reading,
Yours,
Thomas Crowther

Esson, D. (2026) Canterbury City Council coalition collapses over Labour leader's WhatsApp message asking Lib Dems not to vote against key planning bids. Kent Online, Available at: <https://www.kentonline.co.uk/canterbury/news/coalition-collapses-over-leader-s-whatsapp-message-on-planni-339909/> (Accessed: 18 May 2026)

NPPF(2024)

https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf