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To: Consultations
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Subject: Response to the Regulation 19 Local Plan Consultation

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Louise Tomlin [REDACTED]
17th May 2026

Consultations Team
Canterbury City Council
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Response to the Regulation 19 Local Plan Consultation

Dear Sir or Madam

I have the following objection to Site C10 (Land at Merton Park) within the Canterbury District Local Plan (Regulation 19 Submission Draft) on the grounds that this is **unsound**.

As a resident of Lancaster Road for several decades my specific objections are as follows: The Canterbury Draft Local Plan (2042/43) Regulation 19 states that: "The district will be stronger and more resilient by 2042/43, offering a diverse range of jobs through the development of our universities and colleges" (p.7) and it describes the universities as a major employer for the area (p.17). However, the UK university sector is suffering from declining student numbers (HESA, Jan 2026), and with three universities in the city, this has impacted the rental market for houses in multiple occupation (HMO). Due to trends in commuting and partnership teaching the number of students living in the city has dropped. Only 22% of CCCU's 38,385 students are taught at the Canterbury campus. with 17.6% of their students from the Kent and Medway area (Canterbury Christ Church University Financial Statement, 2025).

This means that there is only a small proportion of their students who live in the city. The University of Creative Arts also reported that student numbers in the 2025-26 academic year were lower than expected and the University of Kent is on the brink of economic collapse, merging with the University of Greenwich. The current Labour government has offered no emergency financial support to the higher education sector and seems intent on allowing its decline. The number of academic staff in higher education has also fallen (HESA, Feb 2026) and Canterbury provides few opportunities for employment beyond the retail, tourism and hospitality sector. Canterbury's employment rate has dipped slightly year-on-year, and although it still performs better than the national picture, unemployment has been rising (ONS).

The unitarization of the local authorities could also impact employment opportunities in local government. Based on this economic picture, the housing allocation in the local plan

seems disproportionate to job prospects and the local plan is **unsound**. Canterbury City Council have failed to identify actual need for housing within the city.

Furthermore, plans to create active travel corridors have not been planned sympathetically. The City Council has deemed that the stretch of Lime Kiln Road, which runs at the back of Lancaster Road is not suitable for cycling and so the path diverts onto Lancaster Road, which is a mixed use road, and parking will be removed from either end to accommodate a traffic calming table. This area is densely populated due to a high number of HMOs and so there are regular shopping deliveries and car movements. The council's promise that "2.7 Land at Merton Park (Policy C10) will deliver an extensive suite of improvements to encourage active travel, including upgrades to Hollow Lane, Lime Kiln Road" (p.45) are a sham, as the top end of Limekiln near the chip shop will remain mixed road use, the middle section diverts onto Lancaster Road which is mixed road use and there is a lack of clarity about the bottom section leading into Gordon Road which is a single-track road used by many residents. There is nothing to suggest there will be any improvements on Lime Kiln. Therefore the plan lacks any credibility and is **unsound**.

I have many other concerns, such as:

Loss of countryside, biodiversity, treasured green space and prime farmland

Roads already being overloaded, Increased traffic congestion and pollution

Insufficient provision for increased water demand

Pressure on schools, hospitals and other local services

Unfortunately I don't know how to begin to tackle raising objections to everything that worries me, I am hoping that many other people in the area will be raising their objections as I know there is a groundswell of support for saving Wincheap Orchards and Fields.

Yours faithfully

Louise Tomlin