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Sent: 18 May 2026 16:27
To: Consultations
Subject: Objection to Policy C10 - Land at Merton Park

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Good afternoon

Please find below my objection to inclusion of Policy C10-Merton Park in the local plan.

Kind regards

Leen Chanet

Representation to the Regulation 19 Examination of the Draft Canterbury District Local Plan (2042/43)

Policy C10 – Land at Merton Park

Submitted by: Leen Chanet, [REDACTED] on 18 May 2026

1. Introduction

I am a resident living in immediate proximity to the land proposed for allocation under Policy C10 (Land at Merton Park). I formally object to the inclusion of this site in the Local Plan.

This is not an abstract planning matter. The land in question forms part of our daily lives. As a family, we use this area regularly for walking, informal recreation, and children's play. It is an open, freely accessible landscape that provides direct contact with the countryside from our home.

The proposal would permanently remove this resource. For the reasons set out below, Policy C10 is not sound as it is:

- Not justified – lacking proportionate, robust and up-to-date evidence
- Not effective – undeliverable given infrastructure constraints
- Not consistent with national policy – particularly in relation to transport, biodiversity, green space and sustainable development

2. Failure to Plan Positively and Reliance on an Unrealistic Transport Strategy

The Local Plan relies heavily on a projected modal shift away from private car use in order to justify the scale of development.

This is fundamentally flawed. Even the Council's own evidence base acknowledges that the development will generate significant additional traffic flows, particularly affecting Hollow Lane, Wincheap, and surrounding routes.

The strategy assumes that the majority of journeys will be made by walking, cycling or public transport. This is not a credible assumption, as 1) the existing road network is already congested and constrained; 2) cycling infrastructure is fragmented, unsafe and incomplete; 3) there is no coherent, city-wide strategy capable of delivering the required behavioural shift.

I grew up in Belgium, where cycling is a primary mode of transport. For many years I did not even own a car but in Canterbury the conditions for cycling are just not there. From seeing changes in continental cities, I fully understand what is required to enable such modal shift and those conditions do not exist here.

Achieving comparable levels of cycling would require a fundamental redesign of infrastructure across the city, including road hierarchy, segregation, and safety improvements, which is not proposed.

Instead, the Plan depends on behavioural change without the enabling infrastructure — a high-risk and unproven approach, which is unsound and ineffective.

Conclusion

The transport strategy is not justified and not effective. It therefore fails the NPPF test of soundness.

3. Congestion issues

The area already suffers from chronic congestion around the ring road gyratory system; daily bottlenecks along Wincheap towards the A2 in both directions; and limited alternative routes due to the historic street pattern. The slip road from the A2 in Wincheap, which has been extended, is already now only barely able to support the extra traffic coming towards Canterbury.

The proposed development will introduce substantial additional vehicle movements, yet no outer ring road is planned; no major junction upgrades are secured; no real structural capacity improvements are identified

The road network is already at or beyond capacity and cannot absorb further demand.

With the new houses being built in Thanington, the development of extra houses in South Canterbury and the Merton park development, the slip road will become too short again, with dangerous buildups on the A2. More generally, the area will not be able to deal with all the extra traffic and it will become unliveable. Including a one-way system in Wincheap won't solve the issue as the bottlenecks (the roundabout towards the city centre and the traffic lights on the other side) will remain. I am also worried about rat-running through residential streets,

reduced pedestrian safety (particularly near schools) and worsening air quality (which is already bad in Wincheap).

Moreover, the traffic during construction will be problematic as the roads are unfit to deal with lorries (e.g. Hollow Lane, Merton Lane etc.)

Conclusion

The Plan fails to ensure that residual cumulative transport impacts are acceptable, contrary to national policy. It does not look at cumulative impacts from different new sights. It is therefore unsound.

4. Unsound Access Strategy

The proposed reliance on residential roads such as Hollow Lane, Homersham, and unrounding local streets is inappropriate and unsupported by adequate evidence.

These routes are narrow and constrained, lack pavements and were not designed to accommodate through-traffic of this magnitude

There is no credible evidence demonstrating that these routes can operate safely or effectively as primary access corridors.

Conclusion

The access proposals are unsound, unjustified, and impractical.

5. Loss of Publicly Accessible Green Space and Harm to Wellbeing

The site currently functions as open, freely accessible green space, which is widely used by local residents.

For my own family, this is part of everyday life — walking (for pleasure or to school), playing, and spending time outdoors in a natural environment.

The Plan proposes a play park and green infrastructure, but these do not replace the scale of the existing landscape (it is much smaller); the open access of a wide country side area; and the experience, also important to wellbeing of open countryside. The orchards are absolutely beautiful and a pleasure to walk around in.

Under the NPPF:

- Access to open space is essential to health and wellbeing
- Existing open space should not be lost unless clearly justified
- Development should support healthy and inclusive communities

No evidence has been provided that this land is surplus and that equivalent or better provision will be delivered.

This is particularly significant given that this part of Canterbury is already deficient in accessible green space.

Conclusion

The proposal results in unjustified loss of valued open space, contrary to national policy, and is therefore **unsound**.

6. Biodiversity Impacts and Red-Listed Species

The orchards and fields support a rich ecological network, including orchards, hedgerows and open farmland habitats.

It is known for instance to support Birds of Conservation Concern (Red List) species, including:

- Skylark (*Alauda arvensis*)
- Linnet (*Linaria cannabina*)
- Yellowhammer (*Emberiza citrinella*)
- Starling (*Sturnus vulgaris*)
- Spotted Flycatcher (*Muscicapa striata*)

The presence of multiple red-listed species is a material planning consideration, indicating high conservation value.

Under the NPPF, plans must identify and safeguard wildlife-rich habitats and significant harm must be avoided or mitigated. However, the Local Plan did not properly assess biodiversity prior to allocation, relies on mitigation at a later stage and provides no credible Biodiversity Net Gain strategy

This is inconsistent with the mitigation hierarchy and the Council's duties under the NERC Act 2006 (s.40).

Conclusion

The allocation is not consistent with national policy and is therefore **unsound**.

7. Failure to Demonstrate Deliverable Biodiversity Net Gain

The Environment Act 2021 requires a minimum 10% Biodiversity Net Gain.

The Plan provides no biodiversity baseline, no metric calculations, no deliverable strategy

Given the ecological value of the site, achieving genuine net gain is highly uncertain and likely to rely on speculative off-site mitigation.

Conclusion (BNG)

This fails the test of effectiveness and is therefore **unsound**.

8. Impact on Healthcare Provision

The Plan fails to address the impact on healthcare services.

The East Kent Hospitals University NHS Foundation Trust is already under severe pressure, including long waiting times and capacity issues. Lots of people are cared for in corridors and the trust is one of the worst performing in the country.

The proposed development will significantly increase demand for GP services, hospital care and emergency services

No evidence is provided demonstrating that this demand can be accommodated.

Conclusion (Healthcare)

The Plan fails to ensure adequate infrastructure provision and is therefore **not effective**.

9. Harm to Landscape Setting and UNESCO World Heritage Site

The site forms part of the open landscape setting of Canterbury Cathedral, a UNESCO World Heritage Site.

It currently provides unrestricted, panoramic views, including on the Cathedral.

The proposed development would obstruct these views, replace open landscape with built development and reduce panoramic views to narrow “viewing corridors”.

Under the NPPF, great weight must be given to conserving heritage assets of the highest significance and harm must be clearly and convincingly justified.

No such justification has been provided.

Conclusion (Heritage)

The allocation is inconsistent with national policy and therefore **unsound**.

10. Overall Conclusion

Policy C10 fails all key tests of soundness:

- It is not justified, relying on unrealistic assumptions and incomplete evidence
- It is not effective, given infrastructure, transport and service constraints
- It is not consistent with national policy, particularly in relation to biodiversity, green space and sustainable development

The harm caused by this allocation is immediate, tangible, irreversible and cannot be justified within the framework of sustainable development.

11. Requested Remedy

Policy C10 should be:

- Removed from the Local Plan, or
- Subject to comprehensive reassessment based on robust and proportionate evidence