

From: Francesco Coccoli [REDACTED]
Sent: 18 May 2026 16:34
To: Consultations
Subject: Consultation for draft local plan

You don't often get email from [REDACTED] [Learn why this is important](#)

--Email From External Account--

Good evening,

I'm writing to take part in the consultation about the local plan on destroying wild orchards to make space for 2,000 houses (**Policy SS3 and Policy C10 (Merton Park)**).

I object to this plan in the strongest possible terms. It is both **Unsound** and **Legally Non-Compliant**, and it fails to meet fundamental planning requirements for the following reasons:

1. Increased traffic (Fails the "Duty to Cooperate" and "Effective" tests)

The Council has moved away from the originally proposed relief roads and is now relying on a "bus-led" strategy. However, even their own Draft Transport Strategy (Table 5.1) acknowledges that this approach will leave the A2/A28 Wincheap interchange and M2 Junction 7 under severe congestion. As a Canterbury resident, traffic already make life in our city unpleasant, and a worsening of the situation would be a real nightmare.

More importantly, there is no signed Statement of Common Ground with National Highways confirming that this level of traffic impact is acceptable. Without that formal agreement, there is clear evidence that the Duty to Cooperate has not been met. This means the plan is not only ineffective but also legally non-compliant.

2. Ignoring brownfield sites (Fails the "Justified" test)

National planning policy makes it clear that previously developed brownfield land should be prioritised before building on greenfield sites. Yet this plan proposes sacrificing the historic green setting of Canterbury, including valuable wild orchards, in favour of low-density sprawl at Merton Park.

At the same time, obvious brownfield opportunities are being overlooked—such as the regeneration of the **Wincheap Retail Estate, city-centre car parks, and vacant student accommodation**. These sites could provide higher-density, sustainable, and better-connected housing. Choosing not to pursue these options shows that the plan is not properly justified.

3. Ecological considerations (Fails "Legal Compliance" and "National Policy")

The Stodmarsh Nature Reserve is already under significant ecological pressure due to water pollution. The Council's own March 2026 Habitats Regulations Assessment (paragraph 5.5.22) admits

there is uncertainty about whether mitigation measures for approximately 1,950 homes can actually be delivered.

Under established UK planning law, **including the Waddenzee principle**, it is unlawful to approve a plan where there is uncertainty about its environmental impacts. This admission alone confirms that the plan fails the test of legal compliance and does not adhere to national policy protections for sensitive habitats.

I also wish to participate in the oral examination hearings.

Sincerely,

Francesco Coccoli

████████████████████

████████████████████