

Addendum to my comments and concerns Re N21 N24 sent 05/10/25

**John Blagden**

[REDACTED]

[REDACTED]

[REDACTED]

I have been researching available data specifically regarding the KCC Gypsy and Traveller Site proposal for N21 Golden Hill as it is by far the most complex part of the additional planned development on Golden Hill, and would like to register my concerns.

KCC has proposed, in its latest Draft Canterbury District Local Plan, that the site should be made available for '20+' pitches. The proposal also states that the pitches should be built and up and running before the planned estate of approximately 75 houses are built on the same site.

*2.53 - Land at Golden Hill is allocated as a mixed- use development to accommodate a **minimum** of 20 gypsy and traveller pitches, along with residential development and areas of open space, including an area of green space adjacent to the Thanet Way.*

**Objection 1 – The TLA’s own guidance to Gypsies and Travellers <https://is.gd/KISvHL> informs us in The Traveller Site Fund 2022/23 (latest available) FAQ that ‘For a permanent and transit site to be easily managed the ideal number of pitches should be 10 or less. Funding will only be considered for sites that exceed 15 pitches in exceptional circumstances.’**

**A) Other current KCC documents list N21 Gypsy & Traveller Pitches as ‘20+’, so I am concerned that KCC are not giving out accurate information. ‘Minimum of 20 pitches’ and ‘20+ pitches’ are not exact numbers and could easily mean 30 or even 40 pitches.**

**B) If the advice from the UK Government’s own Traveller Site Fund recommends 10 pitches as the ideal number on a new site with an outer limit of 15 pitches, under what, if**

any, guidelines does KCC come up with a '*Minimum of 20 Pitches/20+ Pitches*'?

- C) If the advice from the UK Government's own Traveller Site Fund recommends 10 pitches as the ideal number on a new site with an outer limit of 15 pitches, what specific criteria are KCC using to justify '*Minimum of 20 Pitches/20+ Pitches*'?
- D) 10-15 pitches are also the numbers suggested by several county councils as their ideal maximum on a site.
- E) If KCC is possibly eligible for Central Government Grants to help fund the purchase of the land, building, maintenance and running of the proposed site, how does the fact that the number of proposed pitches is far higher than their guidelines suggest (and we still don't have an accurate number) affect the funding?
- F) If this possible funding is curtailed or refused completely for the same reason that Gypsies and Travellers applying to the Traveller And Site Fund might be e.g. the number of pitches is greater than 15, does that mean KCC would have to fund it completely out of council tax income?

*2.54 - The draft policy sets out that the land for the gypsy and traveller pitches **must** be provided as fully serviced land **prior to the occupation of any residential dwellings.***

### **Objection 2 –.**

- A) 2.54 says the pitches must be finalised prior to the occupation of the planned 70/75 residential dwellings, but given no explanation for this stipulation.
- B) As we have no further explanation for this firm stipulation, it behoves KCC to provide the criteria of why this rule is a whole point on its own and supply all the discussion points for and against to the local residents.

*2.55 - If all of these sites are included, we've calculated that we can meet our overall needs for Gypsy (sic) and Traveller Accommodation through to 2042/43.*

### **Objection 3 –.**

- A) 2.55 This begins to sound very much like KCC has found a rather convenient quick and easy solution to their

responsibility for Gypsy and Traveller Accommodation through to 2042/43.

- B) It also sounds like this solution is being offered with less regard for the existing local residents or the future residents of N21 local housing than usual.
- C) If KCC have debated these last two points I would ask for the summary of the debate being made available to the local residents.
- D) N21 is very much a last-minute addition to the Draft Canterbury District Local Plan and gives local residents a very small amount of time to digest the information and form opinions, including opposition to some or all of the plan.

#### Objection 4 –

- A) KCC have not published the size of the individual pitches they intend to build at N21. As there is no standard size of pitch design, and they seem to range from 500m<sup>2</sup> to 1,500m<sup>2</sup>, with 1 or, more normally, 2 Touring Caravans, and may each include parking spaces for 2 or more vehicles (not specified) as well as amenities such as day rooms and washing facilities, I think KCC is obliged to publish the detailed plans for the Gypsy and Traveller Site before any decision on number of pitches is taken.
- B) As the intended number and size of pitches is not known outside KCC, how soon will local people be advised of the detailed plans?
- C) The published plan for N21 in Draft Canterbury District Local Plan does not give details of the layout of the proposed pitches in the area around The Downs Cottage which is where I presume the site will be located. To my inexpert eye that seems to be a very small space to put 40+ Touring Caravans along with 80+ vehicles.

#### Objection 5 –

- A) In KCC's Focused Regulation 18 Topic Paper (August 2025) Page 49 there is an interesting point at 6.95.
- B) 'Land at Golden Hill' was assessed as suitable and available for up to 75 pitches. However, there is only a remaining need for 19 pitches, following the proposal to

allocate 'Land lying to the West of Golden Hill'. Arc4, the council's specialist consultants, advised that sites over 20 pitches were not advisable due to the cultural preference to live on smaller sites. In addition, Land at Golden Hill is also available for residential development. Therefore, it is recommended that the site be allocated as a mixed use site for 20 pitches and residential dwellings.'

- C) Why then is KCC ignoring its own specialist consultants and describing the site as suitable for minimum 20 pitches?
- D) I will repeat that most councils advise 10 to 15 pitches as a maximum.

Thank you for reading this far. I have tried to be as objective as possible but this site is being proposed in an area that is undergoing huge increases in numbers of houses and demands on infrastructure. The proposed Benacre site below seems logical and obvious.



What is also obvious is that the two fields between the Benacre site and Golden Hill site and the A299 are going to become a target for developers. In which case, the proposed Gypsy and Traveller site(s) at Golden Hill are going to be surrounded by new build housing. I can

even see this extending to the south of the A299 to the edges of Bogshole lane.

In my previous comments I detailed poor accessibility to the proposed Gypsy and Traveller site via Golden Hill. If you have not read them or can't recall them I have listed them below.

=====

**John Blagden**

[REDACTED]

[REDACTED]

[REDACTED]

I would like to raise serious concerns regarding the proposals N21 and N24 on Golden Hill in Whitstable.

In my opinion Whitstable is already over-full with housing for the roads and many other services available, especially in the summer season. Efforts to shoe-horn more and more housing into the confined space will be detrimental and will affect everyone in the town, including the shops.

As you can see from my address I would be directly and adversely affected by the proposed changes as [REDACTED] has its only entrance and exit on Golden Hill, near to the 'Old' Thanet Way. Two other adjacent housing estates are Arum Close and Aurelie Way, and they have exactly the same problem.

**Traffic:**

1. It is already very difficult, dangerous and time-consuming to make a right turn out of Golden Hill onto the Old Thanet Way due to the amount of cars coming from both left and right.
2. If the decision is taken to turn left and go down to the small roundabout opposite Whitstable Heights to do a 180° turn the problem still exists as cars deciding to turn right at Golden Hill are blocking the exit.

3. I can safely predict there will be a very serious accident at this junction sooner or later due to the poor layout of the roads. I frequently see near misses and harsh use of brakes at this junction.
4. The only other exit/entrance is to risk the single-lane Golden Hill/Bogshole Lane route, but that is very poorly surfaced and the bridge over the New Thanet Way looks to be in very poor repair.
5. The exit from Bogshole Lane onto Clapham Hill/Pean Hill is concealed and poorly designed, and fast moving traffic, especially from the right, is very hard to see if you are trying to exit, especially when exiting to the right.
6. The exit is poorly designed as it rises steeply upwards just at the point where a car is waiting to exit, so quick exits have to be very carefully timed and are dangerous.
7. These problems in Golden Hill will only be exacerbated by construction traffic going to the proposed sites, especially with the very narrow turn from Golden Hill up the narrow cart track to the proposed pitches.
8. At the very least the site should have provision for an exit/entrance from the roundabout opposite Whitstable Heights **before** work begins on N21/N24.
9. 70 new dwellings and a minimum of 20 caravan pitches constitute a large rise in the number of cars using Golden Hill, and then add the movement of caravans, cars and vans from the pitches. It will severely affect an already poor and depressing situation.

### **Utilities and Amenities:**

1. Whitstable has just gone through a complete mains water cut-off, for over a week in some places, and I know this went as far as Dunkirk. I can't really see the logic of continually building large new residential estates when the most basic utilities are completely stretched beyond their capability.
2. There is an area of the Old Thanet Way around the Golden Hill traffic lights/pedestrian crossing leading down to the Millstrood Rd/Tesco roundabout that is frequently flooded by a broken water-main. I can count at least three major sets of road-works in the last five years. If the mains water supply is in such a bad state why are you adding even more stress on the area.
3. You could write a book about the problems of sewage in Whitstable and its effect on the bathing water and beaches in the area. I won't bother listing them but everybody on the council.

4. About a year ago there was an electrical fire under the road at the top of Aurum Close and Golden Hill. We lost electricity in the area and it took several days to fix. In the meantime, there was a portable generator connected to the mains electric supply to keep the houses going. Again, is the quality of the infrastructure good enough to take all these additional houses and people?
5. It takes a small amount of time to get a Doctor's appointment, but the best date I could get for my heart condition was 6 weeks in the future! This situation will only get worse unless some more local Doctors are allowed into the area. There is no point having a single huge health centre on Estuary View if the people wanting to use it can't drive or walk to it, or the traffic is so hideous it can take 30 minutes to drive from Golden Hill to Estuary View, or the initial problem is exacerbated because of the time between getting an appointment and the actual appointments so long..
6. If you are going to have multiple thousands more people living in Whitstable then I consider it the council's FIRST priority to make sure the correct infrastructure, utilities and amenities are sorted out BEFORE permission is given, and if they are not available or just pie-in-the-sky thinking from planners, then permission should be withheld.

### **Brooklands Farm Development:**

1. The fact that there is an additional massive housing project with 1,300 houses being strongly considered quite literally a stone's throw away from Golden Lane is just incredulous! Do you actually want the town to grind to a halt?
2. Which lucky London borough is going to be able to send its trouble-makers to these new houses, taking a home away from local people?
3. Brooklands Farm will take years to complete and if Golden Hill is going on at the same time it's going to get pretty miserable around here.
4. The road network is barely coping now, let alone if construction traffic is added on top. One small hiccup and it just grinds to a halt.