

**From:** Shaun Pearce [REDACTED]  
**Sent:** 20 October 2025 12:49  
**To:** Consultations  
**Subject:** Formal Objection to the Draft Canterbury District Local Plan 2025 – Policies N20, N21, W4, and W6

**--Email From External Account--**

Dear Planning Policy Manager,

I am writing as a long-standing resident (33 years) of Whitstable, and someone who knows the town well. It is in this capacity that I submit this formal objection to the Draft Canterbury District Local Plan 2025, particularly in relation to Policies N20, N21, W4 and W6. These policies propose an unsustainable expansion of housing in Whitstable, totalling around 2,000 new dwellings, which would impose intolerable strains on the town's already overburdened road network, compromising highway safety and exacerbating environmental degradation.

The evidence base supporting the Draft Local Plan, as outlined on the Council's consultation portal, reveals a critical shortfall in the assessment of cumulative traffic impacts. Whitstable's roads, including key routes such as the B2200 and Chestfield Road, are narrow, winding, and ill-equipped to accommodate the projected influx of vehicles from these developments. Policy N20 (South Street/Gladstone Road) and Policy N21 (South Tankerton) alone envisage over 100 homes and gypsy/traveller pitches, while Policies W4 (Brooklands Farm) and W6 (South Whitstable) add a further 1,400-plus units.

Independent transport modelling, referenced in previous consultations, indicates that peak-hour traffic volumes could surge by up to 30%, leading to severe congestion at junctions like the A299/Thanet Way interchange and local bottlenecks in Whitstable High Street. This is not mere speculation; recent planning applications, such as those for outline permissions in the vicinity of South Street, demonstrate that the Council has yet to undertake a comprehensive sequential assessment of these highway constraints or explore viable mitigation measures, as required under Paragraph 110 of the National Planning Policy Framework (NPPF). Without such rigour, these policies risk endangering pedestrians, cyclists and motorists alike, contravening the NPPF's emphasis on safe and sustainable transport.

My objection intensifies with regard to Policy W4, which designates Brooklands Farm for up to 1,400 homes and proposes a new junction on the A299 New Thanet Way. This intervention is profoundly misguided, as it would act as a catalyst for ribbon development along the A2990 corridor, unlocking latent sites for thousands more dwellings between Whitstable and Herne Bay. The Council's own evidence on infrastructure capacity acknowledges vulnerabilities in water supply and wastewater treatment, yet fails to

quantify the downstream effects of this junction. Increased traffic from Brooklands would compound existing pressures on the A299, a vital arterial route already operating near capacity during summer tourism peaks. Moreover, the resultant urban sprawl would intensify water shortages and precipitate sewage overflows into the Swale estuary, threatening Whitstable's cherished oyster fisheries and the ecologically sensitive coastline. In my view, this not only undermines the Plan's spatial strategy but also exposes the Council to legal challenges.

The Council's broader approach, as detailed on its New Local Plan webpage, appears to prioritise housing targets at the expense of deliverable infrastructure, a flaw that has repeatedly led to judicial reviews in similar cases. While I recognise the obligation under the NPPF to meet the standard method housing requirement of approximately 1,100 dwellings per annum, the concentration in Whitstable is disproportionate and avoidable. To fulfil these duties without compromising safety or the environment, I urge the Council to consider the following alternatives:

1. **Prioritise Brownfield and Urban Regeneration Sites:** Redirect allocations to underutilised sites within Canterbury city centre and Herne Bay, where the evidence base identifies capacity for over 2,000 units without straining rural roads. This aligns with NPPF Paragraph 125(c) presumption in favour of brownfield land.
2. **Phased Development with Infrastructure-Led Sequencing:** Implement a 'master plan' approach for Whitstable, conditioning approvals on upfront delivery of road widening, cycle lanes and public transport enhancements, funded via Section 106 agreements or the Community Infrastructure Levy.
3. **Explore Edge-of-Settlement Options in Less Constrained Areas:** Shift focus to sustainable locations, supported by park-and-ride facilities to mitigate A299 and A2990 dependency, thereby distributing growth more equitably across the district.
4. **Collaborate on Cross-Boundary Solutions:** Engage with neighbouring authorities under the Duty to Cooperate (NPPF Paragraph 26) to accommodate unmet needs in Thanet or Swale, reducing pressure on Whitstable's fragile infrastructure.

These measures would enable the Council to demonstrate a sound, positively prepared Plan, compliant with the tests of soundness in the NPPF. I implore you to withdraw or substantially amend Policies N20, N21, W4 and W6 during the regulation period, incorporating robust transport and environmental impact assessments informed by stakeholder input. Failure to do so risks judicial invalidation and enduring harm to our community.

Yours sincerely,

Shaun Pearce

