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Date: 20th October 2025

consultations@canterbury.gov.uk

RE: Objection / Comment Letter Draft Canterbury District Local Plan – Focused consultation 2025 Regulation 18 “The Town and Country Planning (Local Planning) (England) Regulations 2012”

Dear Sir/Madam,

We are writing our objections/comments to the above Draft Canterbury District Local Plan. Specifically objecting to the Draft Local Plan Policies in the Whitstable Area Policy N21 and N24.

Firstly, in the introduction and context to the list of questions the council has provided for consultation it is stated:

“We’re also asking for feedback on what some of the other relevant changes to the National Planning Policy Framework (NPPF), which was **updated in December 2024**, might mean for Canterbury District.”

We would have expected the Local Planning Authority to have referenced the most up to date NPPF being 7th February 2025. However, our comments/objections are based on the following material planning considerations/

The Gypsy Traveller Site Assessment for Site N24 states the following:

The site is located close to the southern boundary of the Whitstable urban area. To the east and further north of the site is residential development, to the south and west of the site is open space. The site opens out onto a large field with views from the site extending across a further distance however the site itself is relatively shielded within the landscape due to being located behind residential development and the road to the south of the site being heavily lined with vegetation.

The assessment wording above is misleading:

“Shielded within the landscape due to being located behind residential development”.

However, the sites proximity to existing neighbouring residential properties, would have an overbearing impact on the outlook from my garden and neighbouring homes and gardens. There is also a likelihood of noise disturbance. This would significantly harm residential amenity and reduce the enjoyment of private outdoor space. This is contrary to the principles of good design set out in the National Planning Policy Framework and relevant local plan policies that seek to protect the living conditions of existing residents (Canterbury City Council Policy DS6 Sustainable Design 10(h)).

In addition to the above any landscaping to the east of N24 would overshadow neighbouring properties, significantly reducing natural light.

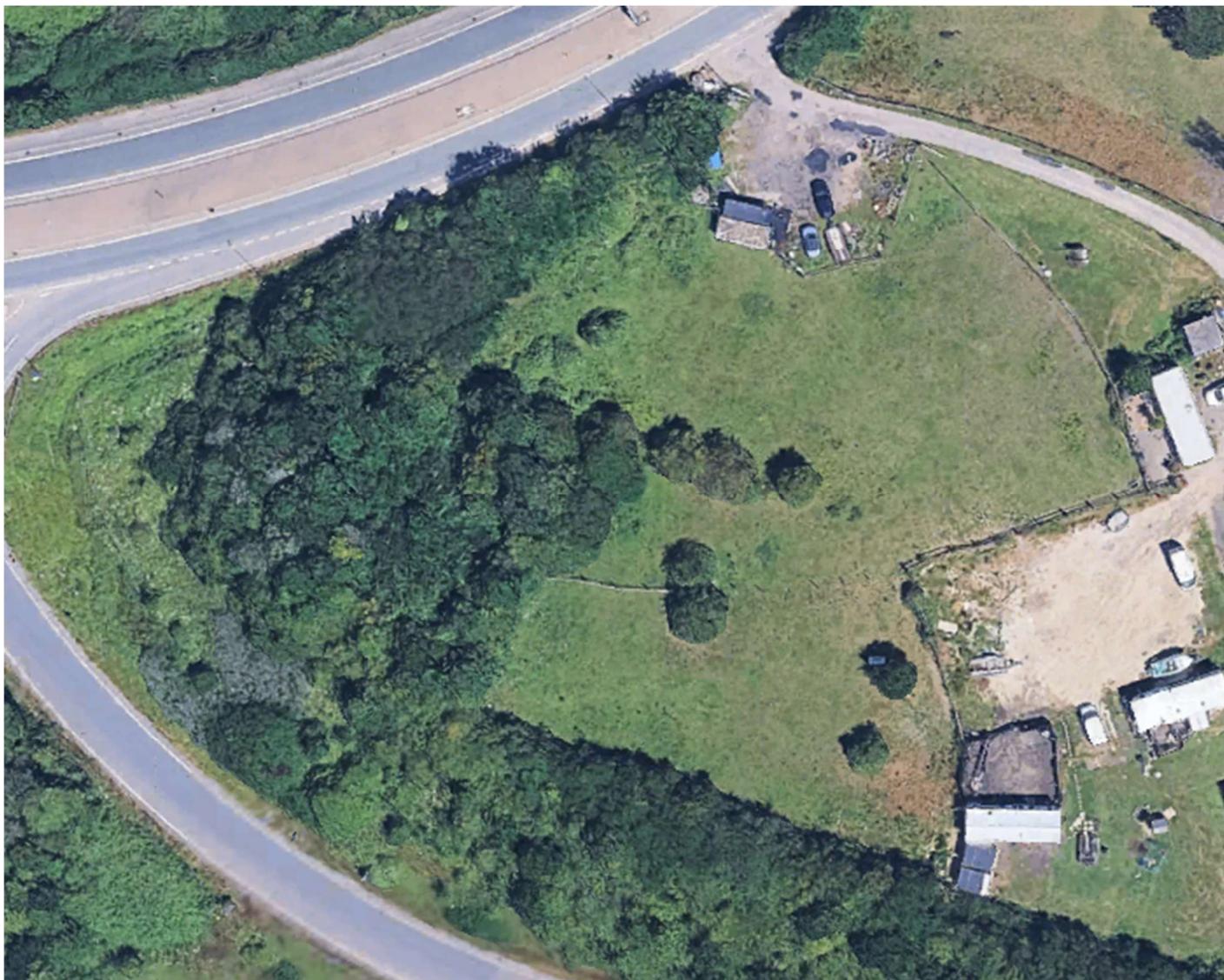
The proposal to provide a minimum of 20 Gypsy and Travellers pitches on N21 and 1 on N24 is in conflict with Previous Government Design Guidance [designinggypsysites.pdf](#). Although the guidance document has been withdrawn there is nothing yet to replace it in England and can still be considered. The guidance states:

“There is no one ideal size of site or number of pitches although experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. However, smaller sites of 3-4 pitches can also be successful, particularly when designed for one extended family.”

The guidance suggests from experience a site should be no more than 15 pitches maximum. So why a minimum of 20 on N21. To us as existing residents, this suggests the Local Planning Authority just wants to place nearly 50% of its Gypsy Traveller pitches that it needs developed, on one site and be done with, without much consideration for the local neighbourhood.

The GTAA (2024) recommended that existing gypsy and traveller sites are considered as a starting point to meet the identified need for Gypsy and Traveller pitches. Can we ask if the following land holdings were considered as part of this assessment as we can find no reference to either in the GTAA and if not, can they be considered.

Land identified as Riding Stables - adjacent to Benacre Wood Whitstable.



There are several mobile homes on the Riding Stables site. We are not sure if the site is a permanent Gypsy/Traveller site or not.

Land adjacent to the Thanet Way opposite the new Pearson Heights Development Whitstable



There appears to be caravans within the site.

Access and Ownership

There is no reference to how N24 will be accessed within the N24 Policy. Primary vehicular access to N21 will be via site W5 with cycling and walking access via Golden Hill. Yet the GTSA assessment states for Site N24:

“Access would preferably be from the Thanet Way and through the land to the west of the site. This access is secured through the granted planning application

CA/24/01296 for site 'Land North of Thanet Way Whitstable'. If temporary arrangements need to be made prior to the possible delivery of the adjacent site, appropriate vehicle tracking will be required to demonstrate the suitability of the access off Golden Hill. Pedestrian safeguarding will also be required by way of a footway on the access road. “

The access off Golden Hill is totally unsuitable for construction or other vehicular access. A pitch will require a mobile home and possibly 2 caravans and transportation of a mobile home via Golden Hill would not be feasible. In a recent Planning appeal decision: Appeal Ref: APP/J2210/W/24/3350215 Land to the west of Golden Hill, and south of the Old Thanet Way, Whitstable. The Government Planning Inspector stated:

The access point is close to the location where Golden Hill changes to a single width carriageway. This creates the potential for there to be conflict between vehicles travelling in opposite directions so it is necessary to ensure that there would be sufficient visibility for vehicles leaving the appeal site.

The plans before me indicate a typical visibility splay for a 30mph road. However, not all this land is within the red line of the appeal site. The Local Highways Authority has set out this land appears to be unregistered. While the appellant considers the sight lines all lie within highways land, there is no evidence of this before me. I therefore cannot be certain that suitable visibility splays could be provided and maintained to ensure that a safe access to the site could be provided. “

The inspector also concluded that he/she cannot be certain that safe and suitable access to the site could be provided, contrary to the advice in paragraph 115 of the NPP Framework.

Having lived in Golden Hill since 2003, we have witnessed the discussions and arguments over land holdings and land rights and witnessed the invitation to Gypsy Travellers by the landowner onto N21 many years ago. A nightmare for several days, rubbish left, no sanitation, noise and other disturbance.

I would suggest the LPA ensures before placing N21 for mixed development in the Local Plan, that the red line land is correct and is available for development. Even though the assessment states that the land is available by the dual owners of N21. I understand Civil proceedings were undertaken as recently as this year (2025). For N24 the evidence base assessment states the single owner has been contacted and agreed the land is available. The Land Registry title states dual ownership not single for this site.

I would suggest the LPA has its own surety regrading ownership. Ownership of the first 50 metres of the track at Golden Hill has always been contentious. The LPA would not want to be in breach of its targets if it came to fruition that the land was not actually available, especially as N21 is proposed to provide for nearly 50% of the Gypsy Traveller pitch need for the LPA. As the saying goes nearly all your eggs in one basket.

The February 2024 Topic Paper Natural Environment and Open Space states the following for the land currently within N24 and N21:

“The site is greenfield agricultural land and under the 2017 Local Plan it was considered within the countryside as it was outside the Whitstable Urban Area boundary. Due to the proposed allocation, Land South of Thanet Way (draft Policy W5) in the Regulation 18 draft Local Plan (2024), the Urban Area boundary of Whitstable is extended to the south to include the proposed allocated site. Therefore, this greenfield site is now within the urban area, but it is not allocated for development.

While public accessibility may not be possible for the entire site, the parcel of Land at Golden Hill provides an important function as green infrastructure in the built urban area, alongside the new A2290 Thanet Way as discussed above.

The site's location provides the opportunity to improve ecological connections between Whitstable urban area, Site 7: Land North of Thanet Way (which is under construction) carried forward from the 2017 Local Plan, the development proposed in draft allocation W7: Land South of Thanet Way, and to the countryside (including the Blean Woodland Complex). Therefore, it is recommended that the site be designated as a Green Infrastructure Space to protect the site from development and provide opportunities for biodiversity enhancements over the period of the Local Plan.”

The Canterbury District Open Space Strategy 2025 -2040 identifies shortfalls for Whitstable in all open space typology except for amenity green space as below:

Whitstable

- Has 105 open space sites equating to a total 418 hectares.
- Of the 41 assessed sites, 23 (56%) are below the quality threshold and 20 (49%) are below the value threshold. One site is highlighted as being just below the quality threshold.
- Gaps in catchment mapping are observed in parks and play provision. Within these gaps, eight existing sites of different typologies are noted as potentially helping to serve the areas. Of these, three are rated as lower quality.
- The area has shortfalls in quantity against most typologies with the exception for amenity.

I understand that the changes to the updated NPPF February 2025 and required Government housing numbers have impacted on the housing need within the district. However, the LPA should consider the words of the Cabinet Member for Environment and Climate Change in the Introduction to the Council's Open Space Strategy:

“Open spaces are more than just scenic spots –they are the lifeline for our health, culture, and environment. They offer refuge from hectic urban life, promote active lifestyles, provide space for sports and recreation, and serve as green lungs in the fight against climate change. From enhancing natural habitats to fostering community well-being, open spaces play a key role in shaping a vibrant district.”

I presume the reference to Functionally Linked Land in N24 and N21 is linked to the Blean Opportunity Area and or Blean Woodland Complex? if so, the council should not even consider development on sites at N21 or N24.

Kent Wildlife Trust refers Functionally Linked Land as:

“Areas of land that, while not officially designated as protected, play a vital role in supporting the biodiversity and ecological processes of nearby protected sites and a

landscape overall. Functionally linked land is crucial because, as you might imagine, species don't (and shouldn't have to) adhere to man-made boundaries. A wetland bird, for example, might nest within a designated reserve but forage in surrounding marshes or farmland. Though these areas are not given formal protection, they still provide essential ecological services that sustain many species. To interrupt the functionality of these lands is to **fragment habitats**, disrupting these natural processes and ultimately destroying the biodiversity of the protected areas themselves."

The possible loss of Church Street Green Space for a SEND school soon, will further exacerbate existing shortfalls in open space in Whitstable.

The council clearly previously assessed that N24 and N21 were both suitable to contribute to the Green Infrastructure of the town and these two sites need to be reverted to the previous decision to provide for Green Infrastructure.

The districts Landscape Character Assessment and Biodiversity Appraisal (2020) states that the council should:

"Improve the appearance of the transport corridors of the Old Thanet Way and A299 New Thanet Way. Conserve the open rural setting along corridors, resisting any unsympathetic linear development along corridors to help reinforce the open rural setting."

The proposed policy N21 and N24 assessment does not recognise that they are part of the highest point in Whitstable hence Golden Hill, that provides views over the open sea in one direction, and a panoramic view over a broad rural valley in the other direction with the wooded hills of the Blean in the distance. The development sites at N21 and N24 will be viewed from most of Whitstable. As a tourist town, we do not believe these two sites are suitable sites for this mixed development and are much more suited to green infrastructure.

With planning permission granted at Benacre View for 220 houses and a park and ride the addition of 70 houses and 21 Gypsy Traveller pitches will increase pollutant emissions emanating from on-site cars, caravans, trucks, goods and passenger service vehicles.

The Old Thanet Way is already congested, with traffic queuing at points between the Tesco roundabout and Borstal Hill roundabout. This is without the planned 220 houses at Benacre View and the Park and Ride. Additional vehicles moving into and out of N21 and N24 via Benacre View onto the Thanet Way will exacerbate this situation. Trying to get out of Golden Hill onto the Thanet Way in any direction has become a nightmare with elongated waiting to exit onto the

Thanet Way and is dangerous. Benacre View has not been built yet nor has the park and ride and the new development at Whitstable Heights although almost completed, several properties remain empty. A further 70 houses with 21 Gypsy Traveller pitches will again exacerbate the already struggling traffic system. If the Brooklands Farm development proposal is agreed, then the construction traffic along with N21 and N24 construction traffic would grind the traffic system to a halt. The Transport Assessment for Benacre view identified that at certain times capacity of the surrounding road system would be at capacity. Mitigation has been agreed to improve transport capacity from the development but there is only so much mitigation that can take place. A further 70 houses and 21 Gypsy Traveller pitches would again exacerbate the problem.

As previously stated, Golden Hill due to its construction and sunken single lane design is not suitable for any vehicular access as this would become a rat run and danger to the safety of residents.

The activities that take place on the proposed sites N21 and N24 are also likely to give rise to noise, these include but are not limited to, on-site traffic, nearby road traffic, activities within and external to buildings, mobile homes and caravans and possibly operating machinery if Gypsy Travellers are working from home. This can be particularly problematic when a site has mixed activities, such as described, and the impact to residents on the site and existing residents could potentially give rise to annoyance and/ or nuisance.

Development of N21 and N24 along with the approved development of Benacre View and the Park and Ride will add to the existing sewage effluent pollution problems on the beach at Swalecliffe. The LPA will no doubt say that this is not a planning issue, unfortunately the residents of Whitstable, Tankerton and Swalecliffe do not agree. In the real world how can it be just a Southern Water issue. There needs to be more joined up thinking when it comes to planning the delivery of infrastructure. The answer is not to push the drain into the sea further out.

If N21 and N24 were to go ahead then the existing open landscape will be lost for ever alongside its eco system there are bats within Site N24, Site N21 has pheasants, adders, slow worms, lizards foxes and hares. We have seen herons, owls, sparrow hawks, red kites and kestrels feeding from the land at Site N21.

For the above reason, we respectfully request that the proposed development Policy Sites N21 and N24 are refused and removed from the Draft Local Plan

Yours Faithfully

Philip and Tracey Barefoot

PS: Please take this as an objection from two persons.PS.