



Monday 18th May 2026
665/A3/JJA

Planning Policy - Consultations Team
Canterbury City Council
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By Email Only
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Dear Sirs

**Re Regulation 19 Draft Canterbury District Local Plan – March 2026
Representations on behalf of Catesby Strategic Land Ltd
Land at Thanet Way Whitstable**

I write with reference to the above. I act for Catesby Strategic Land Ltd who have an interest in land situated to the south of the A2990 Thanet Way, proposed allocation W5 / SHLAA site 132, which as you will be aware is subject to an outline planning permission (all matters reserved), for the erection of up to 220 dwellings, a 300 space park and bus facility, 400sqm local shopping/ community facility and associated infrastructure including (but not limited to) spine road, internal roads and car/cycle parking, allotments, open space and play facilities, utilities infrastructure, drainage infrastructure and earthworks with access from the Thanet Way (A2990), CA/23/00379 refers.

Having regard thereto, and further to our representations on the Regulation 18 Draft Canterbury District Local Plan (October 2022), and the Regulation 18 Draft Canterbury District Local Plan (March 2024), we have reviewed the Regulation 19 Draft Canterbury District Local Plan – March 2026 and associated evidence base, especially the Sustainability Appraisal and associated appendices (March 2026), Duty to Cooperate Compliance Statement (February 2026) and associated SoCG with ABC, FHDC, DDC, SBC and TDC, Meeting Development Needs Topic Paper (March 2026), Development Strategy Topic Paper and associated appendices (March 2026), Strategic Land Availability Assessment (February 2026), Infrastructure Delivery Plan (March 2026), Viability Study Update (February 2026), Consultation Statement Topic Paper (March 2026) and Draft Housing Strategy 2026 to 2030 (2026); and as a result have the following comments on the Regulation 19 Draft Canterbury District Local Plan (March 2026), and associated evidence base.

1 The Housing Requirement, Supply and Trajectory and Policy SS3

1.1 Whilst supporting the proposed Reg 19 Plan and the allocation of the land at Thanet Way Whitstable for development pursuant to policy W5 we would nonetheless draw your attention to our comments on the matter of the Housing Requirement, Supply and Trajectory and Policy SS3 in our reps on the land at Whitstable Road, Herne Bay (SHLAA site ref 073), which we believe to be just as pertinent to this site.

2 Site Specific Representations on the Proposed Allocations in Whitstable

2.1 Whilst supporting policy W5 and noting that it in effect mirrors the terms of the planning permission that was granted pursuant to CA/23/00379, we do have some concerns about how Land at Golden Hill is now being promoted pursuant to policy W6.

2.2 Whilst identified as a proposed residential allocation (120 dwellings) in the Reg 18 Draft Canterbury District Local Plan (Oct 2022), the Land at Golden Hill was deleted from the Reg 18 Draft Canterbury District Local Plan (March 2024), it resurfaced in the Draft Canterbury District Local Plan Focused consultation (Reg 18) (Sept 2025) under N20 for a mixed use scheme comprising a mix of housing and gypsy and traveller pitches. Policy W6 thus provides for approximately 70 new

dwellings and a minimum of 20 gypsy and traveller pitches, the land for which should be provided as fully serviced land prior to occupation of any residential dwelling.

2.3 Within the context of the above we note that the Gypsy and Traveller and Travelling Showperson Accommodation Assessment Update (June 2025) indicates at para 4.11 that there are a total of 36 Gypsy and Traveller sites with 100 pitches (92 currently occupied by 90 households and 8 vacant), within the district, of which 4 are Private Temporary sites containing 5 pitches occupied by 5 households, and 5 are Unauthorised Sites containing 5 pitches occupied by 5 households. From Table 4.4 of the Gypsy and Traveller and Travelling Showperson Accommodation Assessment Update (June 2025) it is clear that the largest of these sites is Greenbridge Park, Vauxhall Road, Canterbury which is owned and run by KCC and contains 18 pitches (17 occupied), the next largest being a private site containing 12 pitches at Romany Green Acres, Well Lane, Fordwich. The majority being substantially smaller private sites.

2.4 In assessing the future needs of the Gypsy and Travellers the Gypsy and Traveller and Travelling Showperson Accommodation Assessment Update (June 2025) indicates at Table 6.3 that the Gypsy and Traveller pitch need 2025/26 to 2042/43 is for 43 pitches, 22 of which are required within the period 2025/26 to 2029/30. Para 6.31 of the Gypsy and Travellers the Gypsy and Traveller and Travelling Showperson Accommodation Assessment Update (June 2025) goes on to indicate that: *'There is a potential supply of additional pitches through:*

- *Regularisation (12 pitches)*
- *Potential expansion/intensification (30 to 32 pitches)*
- *One vacant pitch on a private temporary authorised site'*

2.5 Para 6.32 thus concludes that *'This potential supply could provide between 43 and 45 additional pitches'* which *'has the potential to meet both the five-year and longer-term needs.'*

2.6 Having regard to the above we note that the Gypsy and Traveller Site Assessments 2024/25 (July 2025) which looked at the potential supply in further detail indicates at para 2.4 that *'The site assessment has identified the following potential pitches:*

- *12 through regularisation of existing sites*
- *40 to 43 through intensification or expansion of existing sites*
- *At least 27 on land identified through the council's call for sites exercise (which assumes a minimum of 10 pitches on Land south of Golden Hill but this number could be much higher)'*

2.7 Para 4.6 goes on to advise at that: *'Overall the Site Assessment has identified that across Canterbury district there is considerable potential to increase the provision of Gypsy and Traveller pitches for residential occupation. The overall total of potential pitches is between 79 and 82 which assumes 10 pitches at Golden Hill. If sites do not meet all three of the appraisal criteria (A construction, B Biodiversity and C Built Environment) then the potential pitch reduced to between 64 and 67.'* Our emphasis. We also note that para 1.19 of the Gypsy and Traveller Site Assessments 2024/25 (July 2025) advises that: *'It is generally accepted amongst the Travelling communities that private sites of up to 6-10 pitches are appropriate. Public sites tend to be larger and have policies and procedures in place to ensure the effective management of sites. Furthermore, larger private sites may also be feasible providing there is effective management in place.'*¹ As the Gypsy and Traveller Site Assessments 2024/25 (July 2025) indicates that the land at Golden Hill is to be a

¹ We note that the Gypsy and Traveler Site Assessments 2024/25 (July 2025) at para 3.44 recommends a 10+ pitch development be considered further at Golden Hill, and in the preceding paragraph that *'Given the potential scale of the site, effective site management will be critical.'*

private site the above is germane to considering the size of the facility to be delivered on this site, if indeed it is needed given the scale of the need and level of supply that has been identified.

2.8 Having regard to the above and having reviewed the Meeting Development Needs Topic Paper (March 2026) Catesby would in the first instance question the need to release this site for Gypsy and Traveller accommodation. It appears to us that sufficient sites have already been identified to meet the need and that this site is in effect being put forward to bolster the supply. To this end we would question the statement contained in para 4.204 of the Development Strategy Topic Paper which advises that: *'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.'*

2.9 Catesby also note that the proposed allocation of the land at Golden Hill would accommodate nearly 50% of the identified need (43 pitches), with, as set out in Table 2.19 of the Meeting Development Needs Topic Paper, the majority of the residual being accommodated via the regularisation and/or intensification of existing sites. Whilst Catesby further note that land at Golden Hill was submitted for this use through the Call for Sites, they would question the scale of provision being promoted in one place, there already being other such facilities locally, and the actual scale of development on one site, this being over 3 times the size of any other proposed allocations/expanded facilities, and whether this has been discussed and agreed with the gypsy and traveller community give the comments in Gypsy and Traveller Site Assessments 2024/25 (July 2025) about both the preference for smaller sites and the management issues associated with larger sites. In Catesby's opinion a site of this size, which will add to the existing concentration of pitches in the local area does nothing to assist in supporting the gypsy and travelling fraternities' way of life.

2.10 Notwithstanding our comments above, if this site is required to meet an identified need we would question whether looking to focus over 50% of the need in one place is sensible as if delivery fails for any reason, such as the residential element of W6 not coming forward, which could well occur given the terms of the policy, which in the current climate would not in Catesby's opinion be very attractive to any housing developer; the council would have a significant shortfall to address.

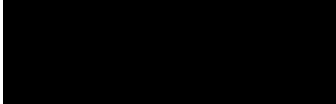
2.11 In the context of the above we note from appendix F of the Meeting Development Needs Topic Paper that W6 is not due to start delivering housing until 2031/32 i.e. the last year of the 5 yr period post adoption, and that whilst policy W6 requires the gypsy and traveller pitches should be provided as fully serviced land prior to occupation of any residential dwellings, there is no guarantee that the proposed phasing set out in appendix F of the Meeting Development Needs Topic Paper will come to fruition, and that the gypsy and traveller pitches will be delivered in the 5 yr period post adoption, which is the period within which the main need for gypsy and traveller pitches has been highlighted.

2.12 In order to ensure a long term and meaningful supply of gypsy and traveller pitches Catesby would suggest that if additional sites are required, they are identified elsewhere and that the level of provision here is reduced to circa 6 pitches to reflect the highest level of provision found elsewhere on the Thanet Way, and the preference of the gypsy and traveller community for smaller private sites.

To conclude, we do not believe a need exists to release this site for gypsy and traveller accommodation. Sufficient provision exists elsewhere as evidenced above. There is thus no justification for the scale of gypsy and traveller pitch provision proposed in policy W6. If a need did exist this site is too large to be a private site and does not reflect the needs of the gypsy and traveller

community for smaller more manageable private sites. Policy W6 is thus ineffective in that it does not reflect the needs of the gypsy and traveller community for smaller more manageable private sites. The release of this site for gypsy and traveller accommodation is totally dependent on the delivery of the associated residential accommodation, and if this does not come forward the site will fail to deliver. Policy W6 is not therefore positively prepared. In order to ensure a long term and meaningful supply of gypsy and traveller pitches additional, smaller sites should be identified elsewhere, with a maximum of 6 pitches provided for here, and policy W6 amended accordingly.

Yours sincerely



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