

Regulation 19 Canterbury Local Plan Representation

Objection to Gypsy & Traveller Site Allocation at Golden Hill, Whitstable N21/N24

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1. Introduction

I am submitting this representation in response to the Regulation 19 consultation on the Canterbury District Local Plan. I object to the proposed allocation of a Gypsy & Traveller site at **Golden Hill, Whitstable** (site reference N21/N24 depending on final numbering).

This representation sets out why the allocation is **not legally compliant, not justified, not effective**, and **not consistent with national policy**, and therefore should be removed from the Local Plan.

2. Legal Compliance

2.1 Sustainability Appraisal (SA) – Failure to Assess Reasonable Alternatives

The SA does not provide a transparent or robust comparison of all potential Gypsy & Traveller sites. In particular:

- There is no clear audit trail explaining why Golden Hill was selected over less constrained alternatives.
- The SA does not demonstrate that highway, landscape, amenity, and environmental constraints were properly weighted.
- Cumulative impacts on the surrounding residential area have not been assessed.

Without a transparent assessment of reasonable alternatives, the allocation is **not legally compliant**.

2.2 Habitats Regulations Assessment (HRA) – Stodmarsh Nutrient Neutrality

Whitstable lies within the wider Stodmarsh catchment. The HRA must demonstrate that this specific allocation can achieve nutrient neutrality. No such evidence is provided.

Without a site-specific mitigation strategy, the allocation fails the requirements of the Habitats Regulations.

2.3 Statement of Community Involvement (SCI)

All residents in the immediate vicinity of Golden Hill were not directly notified that this site was being considered for a Traveller site or given a clear, well communicated opportunity to voice their opinions about the proposal before it was included in the Local Plan, or that it

had been officially added to the Local Plan, despite being materially affected. This raises concerns about compliance with the Council's SCI.

3. Not Positively Prepared

3.1 Uncertain Gypsy & Traveller Need Evidence

If the Gypsy & Traveller Accommodation Assessment (GTAA) is outdated or based on limited engagement, the plan cannot be considered positively prepared.

3.2 Over-reliance on a Highly Constrained Site

Golden Hill is heavily constrained by access, landscape, and infrastructure limitations. Relying on this site to meet district need is not realistic or deliverable.

4. Not Justified

4.1 Golden Hill Is an Inherently Unsuitable Location

The site is:

- Located on a steep hill
- Served by narrow, substandard rural lanes
- Surrounded by established residential properties
- Visually prominent in the landscape
- Poorly connected to essential services

These constraints make Golden Hill objectively inferior to other potential sites.

4.2 No Transparent Site Selection Process

The Council has not demonstrated:

- How Golden Hill scored against alternative sites
- Whether cumulative impacts were considered
- Why this location is preferable to less constrained options

Without this evidence, the allocation is **not justified**.

4.3 Conflict With the Local Plan's Spatial Strategy

Golden Hill lies outside the built-up area of Whitstable and contributes to the semi-rural character of the town's northern edge. Allocating a Traveller site here conflicts with:

- Settlement hierarchy principles
- Countryside protection policies

- Landscape character objectives

5. Not Effective

5.1 Highways and Access – Major Deliverability Constraint

Golden Hill and surrounding lanes are:

- Narrow and steep
- Lacking pavements
- Poorly lit
- Unsuitable for towing vehicles or larger vehicles
- Already under pressure from existing traffic

There is no evidence that safe access can be achieved. This alone renders the site **undeliverable**.

5.2 Infrastructure and Utilities

Traveller sites require reliable provision of:

- Water
- Drainage
- Electricity
- Wastewater capacity

No evidence is provided that these services can be delivered at Golden Hill.

5.3 No Identified Delivery Mechanism

The plan does not identify:

- Landowner agreement
- Funding
- Management arrangements

Without these, the allocation is not effective.

6. Not Consistent With National Policy (NPPF & PPTS)

PPTS requires sites to be in suitable locations. Golden Hill is not.

6.1 Landscape and Visual Harm

The site is elevated and visually exposed. Development would harm:

- The rural edge of Whitstable
- Long-distance views
- Local landscape character

This conflicts with NPPF requirements to protect valued landscapes.

6.2 Amenity Impacts on Existing Residents

The site is close to established homes. Likely impacts include:

- Noise
- Lighting
- Traffic
- Loss of privacy
- Loss of tranquillity

PPTS requires peaceful and integrated coexistence. Golden Hill does not provide this.

7. Site-Specific Impacts at Golden Hill

7.1 Traffic and Safety

- Golden Hill is unsuitable for increased traffic.
- No safe pedestrian access.
- No capacity for towing vehicles.
- Increased risk to children walking to nearby schools.

7.2 Drainage and Surface Water Run-off

The steep gradient creates run-off issues. Hard-surfacing a Traveller site would worsen this.

7.3 Environmental Sensitivity

The area supports wildlife corridors and semi-natural habitat. Development would fragment these.

7.4 Cumulative Impact

Golden Hill is already under pressure from:

- Traffic
- Parking
- Residential intensification

- Access to main road

A Traveller site would exacerbate these issues.

8. Conclusion

For the reasons set out above, the proposed Gypsy & Traveller site at Golden Hill, Whitstable is:

- **Not legally compliant**
- **Not justified**
- **Not effective**
- **Not consistent with national policy**

The allocation should therefore be **removed from the Local Plan** unless substantial new evidence is provided that addresses all of the issues identified.