

Representation as part of the Canterbury City Council Reg 19 draft Local Plan consultation.

This objection relates to a part of the CCC Local Plan, specifically the site off Golden Hill in Whitstable (N21 and N24), from a Soundness and Legal Compliance perspective

The proposal for one site in particular in the local plan is of grave concern. The proposal of a traveller site on a field just off Golden Hill in Whitstable (sites N21 and N24) is in direct conflict with the Government's Planning Policy for Traveller Sites (PPTS). The plan conflicts with the objectives laid out in this policy.

In the PPTS (Policy H 26.) it is clearly stated that Traveller Sites should be located in Open Countryside (or equivalent local designation), and are away from existing Settlements. The PPTS requires local authorities to "very strictly limit" new traveller site developments in even appropriate locations. These proposals for this location, which isn't just close, but butts up against a long established settled community, contravenes the spatial strategy of the Government's Planning Policy for Traveller Sites.

The PPTS also states (Policy C 14.) that "when assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community". Being on such an elevated site that at present remains at a level that is unseen by local residences, once site pitches, with caravans placed on them, as well as houses and other buildings are built, the whole site will loom over the settled communities that are in very close proximity to the whole site, as well as the whole town of Whitstable.

The PPTS states (Policy B 13. a) that chosen sites for Traveller sites should "promote peaceful and integrated co-existence between the site and the local community" and (Intro 4.i) to reduce tensions between settled and traveller communities in plan-making and planning decisions; At such close proximity to a settled community that strongly opposes these proposals, this will prove to be very difficult, if not impossible, to accomplish.

Stress on local amenities and services

The PPTS states (Policy B 13.f) proposals for Traveller Sites should "avoid placing undue pressure on local infrastructure and services" and (Intro 4.k) for local planning authorities to have due regard to the protection of local amenity and local environment. In relation to amenity, the following parts of this objection relate to specific areas of amenity that will be significantly affected and impaired should this development be approved. The Whitstable area is already well known to be stretched in many areas of infrastructure in particular, sewage, traffic and well publicised issues relating to water supply affecting homes across the whole of the Whitstable area.

Water shortages

Water shortages in the Whitstable area have been a very serious problem in recent years. Some 3000 households in Whitstable and Seasalter experienced no water in early July 2025 and up to 500 households were still without water for a second week. The shortage was due to depleted water tanks. This area continually experiences hose pipe bans as the water available cannot sustain normal household usage. We were, until 9:00 on February 5th 2026, still in a hose pipe ban that had been in place since July 18th 2025 – 6.5 months. The Southeast of England is considered to be one of the most water-stressed areas in the country. The Environment Agency states that England needs to find almost 5 billion extra litres of water a day by 2050, just to maintain water supplies, more than half of that –

2.6 billion litres a day is needed in the Southeast. If it isn't possible to keep up with current requirements, what chance is there that there will be enough water to service all the new building and development that is being proposed for this area, and the Canterbury area as a whole. The stated sites, being a proposed development that would incorporate a very large number of new dwellings, would significantly add to this burden of provision.

Sewage

We have an immense problem with sewage being piped into the sea at Tankerton and Swalecliffe due to there being an excess of sewage the local plant is unable to contain, process and manage. More households mean even more sewage being beyond capacity, which will find its way into the sea.

Traffic and Road Safety

The increase in traffic that the local plan in its entirety, will generate, is unthinkable. In the small towns of Whitstable and Herne Bay and the villages within the Canterbury district, the capacity for the traffic presently on our roads is already being challenged beyond what is reasonable for functioning communities. In relation to the site off Golden Hill, adding further vehicles, which will include trucks, trailers and caravans in great number, is impossible to imagine and is unrealistic. To place a traveller site, and particularly one of the size proposed, in a confined area close to busy roads and limited access points would only increase congestion and inflame resentment of those already residing in the local area who have been hard pressed to accommodate an increase in traffic brought on by increase in population over the past 5 -10 years.

The level of traffic that is apparent already is affecting the quality of driving due to drivers having to negotiate busier and busier roads that are congested and unable to facilitate smooth, free moving traffic. Many roads in Whitstable, Millstrood Road being an obvious example, have been inaccessible for extended periods, some because of water leaks and other deeper issues, but some in order to maintain increasingly busy roads.

Flooding Risk

The N21 and N24 site will pose a flooding risk to lower lying areas of Whitstable. The PPTS states (Policy B 13.g) "do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans". Although the field in question may not be at risk of flooding, the site is located in an elevated position above the town of Whitstable, and the Whitstable area in general has experienced flooding in localised lower lying areas due to burst water pipes. The old clay water pipes installed many years ago have many times been both pressurised beyond capacity as well as are crumbling due to age.

Whitstable town historically experienced severe flooding, and the risk of placing more residential sites, of any nature in elevated areas of the town, will only place further pressure on a fragile water management infrastructure. Given that the PPTS acknowledges that caravans pose a particular risk in areas becoming flooded, it seems irresponsible to place further pressure on this fragile system.

Refuse

Refuse collection and disposal is yet another provision that will be put under pressure from a Traveller site. Access to the site could pose challenges and there is a risk of an increase in refuse that may remain uncollected. The immediate surrounding areas would therefore very likely experience a spillover into communities that presently have refuse systems well established.

Visual harm to the town

As stated previously, the PPTS makes clear (Policy C.14) that, “when assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community”.

The site proposed for the Traveller site off Golden Hill risks severe visual harm to the landscape and vista of both South Whitstable, and Whitstable as a whole. The site is located at the highest point of Whitstable and can be seen from across the whole town. Housing and caravans being placed in such a pivotal part of the landscape will reduce the attractiveness of the area and give a feeling of claustrophobic over-development in such a small town.

The policy also details (Intro 4.d) “that plan-making and decision-taking should protect Green Belt from inappropriate development”; and (Policy E16) that “inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development unless the exceptions set out in Chapter 13 of the National Planning Policy Framework apply” (which is, “that all other reasonable options for meeting identified need have been fully examined”, which is not at all clear in relation to this development). The area in these proposals form part of a green band that has surrounded Whitstable and separated it from settlements close to the nearby area of Canterbury. The plan allows for the development of urban sprawl which is gradually eroding the important green areas so necessary for human physical, mental and emotional well being, as well as the destruction of local natural habitats.

Promoting healthy and safe communities

The National Planning Policy Framework which was updated in December 2024 and which informed plan making from March 2025 states that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas.

It is unlikely that any of these objectives will be achieved by placing a Traveller site so close to a settled community. Placing a large site of this nature close to a settled community will impact local residents in the following ways: noise, lighting, traffic, loss of privacy, loss of tranquillity and fears of an increase in criminal activity.

Additionally, with a decrease in visible important green spaces for local people, mental and emotional health are becoming negatively affected. The reduction of these important spaces that offer psychological access to open space and a connection with the natural world, threaten the general well being of all those living within the areas.

Site allocation

The National Planning Policy Framework states as a requirement for development planning:

4.2 Transparent Site Selection Process

There has been no clear evidence how Golden Hill scored against alternative sites, whether cumulative impacts were considered or why this location is preferable to less constrained options. Without this evidence, the allocation is not justified.

There are a number of existing Traveller sites scattered around the Whitstable area. It is unclear why existing sites can't be expanded to meet the alleged need for further sites in the Whitstable area.

As a resident of the Golden Hill area of Whitstable for over 20 years, I'm very much against the above proposed development and request your consideration of the reasons given above.

Regards

Helen Hooles [REDACTED]