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Sent: 16 May 2026 21:02
To: Consultations
Subject: Objection to Policy W3 – Whitstable Urban Area Strategy

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I wish to formally object to the scale of development proposed under Policy W3 on the grounds that the necessary sewage, water, healthcare, and community infrastructure capacity has not been adequately demonstrated and the proposals therefore fail to constitute sustainable development.

The policy proposes substantial housing and associated growth within the Whitstable urban area, including major allocations at Brooklands Farm and Bodkin Farm. However, insufficient evidence has been provided to demonstrate that the existing foul drainage network, pumping stations, wastewater treatment infrastructure, healthcare services, and portable water supply systems can accommodate this level of development without causing unacceptable harm to existing residents, public services, and the environment.

Whitstable and the surrounding coastal area already experience significant concerns relating to sewer capacity, storm overflows, coastal water quality, pressure on utilities infrastructure, and overstretched healthcare provision. Local GP surgeries already face considerable difficulty meeting existing demand, with residents experiencing delays in obtaining appointments and increasing pressure on primary care services. In addition, there is no adequate provision within the policy to demonstrate that local hospital services have sufficient capacity to accommodate the substantial population growth proposed.

The policy refers generally to support for health infrastructure; however, there is no certainty regarding:

- the delivery of new GP surgeries or expanded primary care facilities;
- additional NHS staffing and funding;

- hospital capacity increases;
- or the timing of healthcare infrastructure relative to occupation of new homes.

Without guaranteed healthcare provision delivered alongside development, the proposal would place unacceptable strain on already overstretched public services and would fail to create balanced and sustainable communities.

Furthermore, insufficient evidence has been provided to demonstrate that the existing foul drainage network, pumping stations, and wastewater treatment infrastructure can accommodate this level of growth. In the absence of confirmed and fully funded upgrades delivered in advance of occupation, the proposed development risks exacerbating existing infrastructure failures and increasing sewage discharge events into environmentally sensitive coastal waters.

The policy area is closely connected to nationally and internationally important ecological designations, including:

- Thanet Coast and Sandwich Bay SPA/Ramsar/SSSI,
- The Swale SPA/Ramsar,
- Tankerton Slopes SSSI,
- Seasalter Levels Local Nature Reserve.

Any increase in untreated or insufficiently treated wastewater has the potential to adversely affect these protected habitats through nutrient enrichment and pollution. The council must apply the precautionary principle and ensure compliance with the Habitat Regulations before supporting growth of this scale.

In addition, southeast England is recognised as an area under serious water stress. The policy does not provide sufficient certainty that a sustainable long-term water supply exists to support the cumulative housing growth proposed between 2024/25 and 2042/43.

Policy W3 states that infrastructure improvements will accompany development; however, there is inadequate certainty regarding:

- the scope of required sewer and water upgrades;
- delivery timescales;
- funding mechanisms;
- healthcare infrastructure delivery;

- and whether essential infrastructure will be operational before occupation of new dwellings.

As such, the policy fails to demonstrate genuinely infrastructure-led development.

For these reasons, Policy W3 is considered unsound because:

- it is not justified by adequate infrastructure evidence;
- it is not effective or deliverable;
- it would place unacceptable pressure on healthcare services;
- and it is inconsistent with principles of sustainable development and environmental protection.

The council should therefore withhold support for the proposed scale of development unless and until robust evidence demonstrates sufficient wastewater, water supply, GP, and hospital infrastructure capacity, together with guaranteed mitigation and upgrades delivered ahead of occupation.

Yours faithfully,

B Carter

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