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Sent: 18 May 2026 10:53
To: Consultations
Cc: Richard
Subject: Regulation 19 Representation – Objection to Gypsy & Traveller Site Allocation at Golden Hill, Whitstable (Sites W6/W9)

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Submitted by: Emily Porter-Ward and Richard Knott, [REDACTED]
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1. Summary of Objection

The proposed allocation of a Gypsy & Traveller site at Golden Hill (N21/N24) is not legally compliant, not justified, not effective, and not consistent with national policy.

The site is heavily constrained, lacks supporting evidence, and conflicts with both the Local Plan's spatial strategy and national planning policy (NPPF & PPTS).

For these reasons, the allocation should be removed from the Local Plan.

2. Legal Compliance Failures

2.1 Sustainability Appraisal – No Assessment of Reasonable Alternatives

The Sustainability Appraisal (SA) does not provide a transparent or credible comparison of potential Gypsy & Traveller sites.

Key failures include:

- No clear audit trail explaining why Golden Hill was selected over less constrained sites.
- Highway, landscape, amenity, and environmental constraints were not properly weighted.
- Cumulative impacts on the surrounding residential area were not assessed.

This breaches the requirement for a lawful SA that evaluates reasonable alternatives.

2.2 Habitats Regulations Assessment – Stodmarsh Nutrient Neutrality

Whitstable lies within the Stodmarsh catchment. The HRA provides no site-specific evidence that nutrient neutrality can be achieved for this allocation. Without a mitigation strategy, the allocation fails the Habitats Regulations.

2.3 Failure to Comply With the Statement of Community Involvement (SCI)

Residents directly affected by the Golden Hill proposal were not notified that the site was being considered or added to the Local Plan.

This undermines the SCI requirement for early, meaningful engagement with affected communities.

3. Not Positively Prepared

3.1 Questionable Gypsy & Traveller Need Evidence

If the GTAA is outdated or based on limited engagement, the plan cannot be considered positively prepared.

The Council has not demonstrated that the need figure is robust.

3.2 Overreliance on a Highly Constrained Site

Golden Hill is one of the most constrained locations in the district.

Relying on it to meet need is unrealistic and undermines the plan's credibility.

4. Not Justified

4.1 Golden Hill Is an Inherently Unsuitable Location

The site suffers from multiple, severe constraints:

- Steep topography
- Narrow, substandard rural lanes
- Proximity to established residential properties
- High visual prominence
- Poor access to essential services
- Environmental sensitivity and wildlife corridors

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

4.2 No Transparent Site Selection Process

The Council has not shown:

- How Golden Hill scored against alternatives
- Whether cumulative impacts were considered
- Why less constrained sites were rejected

This lack of evidence means the allocation is not justified.

4.3 Conflict With the Local Plan's Spatial Strategy

Golden Hill lies outside the built-up area and contributes to Whitstable's semi-rural northern edge.

Allocating a Traveller site here conflicts with:

- Settlement hierarchy
- Countryside protection policies
- Landscape character objectives

5. Not Effective

5.1 Highways and Access – A Fundamental Deliverability Barrier

Golden Hill and surrounding lanes are:

- Narrow, steep, and poorly lit
- Lacking pavements
- Unsuitable for towing vehicles
- Already under traffic pressure

There is no evidence that safe access can be achieved.

5.2 Infrastructure and Utilities – No Evidence of Deliverability

Traveller sites require reliable:

- Water supply
- Drainage
- Electricity
- Wastewater capacity

Whitstable already experiences:

- Severe water shortages (including 3,000+ households without water in 2025)
- Long-term hosepipe bans
- Sewage discharges at Tankerton and Swalecliffe due to capacity failures

No evidence shows these services can be delivered at Golden Hill.

5.3 No 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)

6.1 Conflict With PPTS – Location and Scale

PPTS requires that:

- Traveller sites in rural areas must not dominate nearby settled communities.
- Sites should promote peaceful and integrated coexistence.
- Sites should avoid undue pressure on local infrastructure.

Golden Hill fails all three tests.

6.2 Landscape and Visual Harm

The site is elevated and visible from across Whitstable.

Development would harm:

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

This conflicts with NPPF requirements to protect valued landscapes.

6.3 Amenity Impacts on Existing Residents

Likely impacts include:

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

PPTS requires protection of local amenity. Golden Hill cannot achieve this.

7. Site-Specific Impacts at Golden Hill

7.1 Traffic and Safety

The site would increase risks for:

- Children walking to nearby schools
- Pedestrians using narrow, pavement-less lanes
- Drivers negotiating steep gradients

7.2 Drainage and Surface Water Runoff

Hard surfacing on a steep slope will worsen runoff and increase flood risk in lower-lying areas.

7.3 Environmental Sensitivity

The site forms part of a wildlife corridor and semi-natural habitat. Development would fragment this network.

7.4 Cumulative Impact

Golden Hill already faces pressure from:

- Traffic
- Parking
- Residential intensification
- Limited access to main roads

A Traveller site would significantly worsen these issues.

8. Additional Concerns Raised by National Policy

8.1 Green Belt and Countryside Protection

PPTS and NPPF require that:

- Traveller sites in Green Belt are inappropriate unless all alternatives are exhausted.
- Green spaces should be protected for health and wellbeing.

No evidence shows that all reasonable alternatives have been examined.

8.2 Pressure on Local Services

Whitstable already faces:

- Overloaded roads
- Strained GP and hospital capacity
- Water shortages
- Sewage system failures

A large Traveller site would exacerbate these pressures.

9. Conclusion

For the reasons above, the proposed Traveller site at Golden Hill (W6/W9) is:

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

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

Thank you and best regards
Emily Porter-Ward and Richard Knott