
Objection to Policy W3 – Whitstable Urban Area Strategy

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Date Tue 19/05/2026 10:45
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SOS Whitstable formally objects to Policy W3 on the grounds that the scale of development proposed is unsustainable in the context of severe water stress, inadequate wastewater infrastructure, and the increasing risk of pollution to Kent's internationally important natural environment.

Kent is one of the most water stressed areas in England. Existing water resources are already under significant pressure from population growth, climate change, drought risk, and over abstraction. The Local Plan fails to demonstrate that a secure and sustainable long term water supply exists to support the substantial level of housing growth proposed within Whitstable and the surrounding area.

The policy proposes major housing allocations without sufficient evidence that water supply infrastructure, sewerage systems, and wastewater treatment facilities can accommodate this scale of development without causing serious environmental harm.

Of particular concern is the impact additional development may have upon Kent's rare and fragile chalk stream environments. Chalk streams are globally scarce habitats, with approximately 85% of the world's chalk streams located in England. Kent contains around 2% of the world's chalk streams, making them an internationally significant environmental asset that should receive the highest level of protection.

These ecosystems are exceptionally vulnerable to:

- over-abstraction of groundwater;
- declining aquifer levels;
- nutrient pollution;
- sewage discharges;
- and increased surface water runoff associated with large-scale development.

The cumulative impact of continued housing growth without guaranteed infrastructure upgrades risks causing irreversible harm to these rare habitats and the wider water environment.

SOS Whitstable is also deeply concerned by ongoing sewage pollution and wastewater overflow incidents affecting coastal waters and sensitive habitats around Whitstable. Existing sewer networks and treatment infrastructure are already under pressure, yet the Local Plan does not provide certainty that:

- wastewater treatment capacity is sufficient;
- sewage infrastructure upgrades will be delivered in advance of occupation;
- or pollution risks can be adequately mitigated.

The proposed growth therefore risks worsening sewage discharge events and further degrading coastal and marine environments.

This is particularly concerning given the proximity of development to nationally and internationally protected ecological sites, including:

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

The council has a legal duty to apply the precautionary principle and ensure compliance with environmental protections and the Habitat Regulations. Development should not proceed where there is uncertainty regarding adverse impacts on protected habitats and water quality.

Policy W3 fails to demonstrate genuinely sustainable and infrastructure-led growth. There is insufficient certainty regarding:

- sustainable water supply;
- wastewater treatment capacity;
- sewage network upgrades;
- protection of sensitive aquatic environments;
- and the long-term environmental consequences of cumulative development.

For these reasons, SOS Whitstable considers Policy W3 unsound and requests that the council reconsider the scale and timing of development proposed unless and until robust evidence demonstrates that water resources, wastewater infrastructure, and protected ecosystems can be safeguarded from unacceptable harm.

Yours faithfully,

SOS Whitstable



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