

Response to “Draft Canterbury District Local Plan: focused consultation 2025”

Respondent: Kevin Rotherham, [REDACTED]

I have the following comments on two aspects of the latest draft plan:

1. **Barham Layby.** Referred to in the Draft Plan (para 2.67 and Policy N34) and Appendix G, being the Sustainability Appraisal prepared by WSP (ref.SLAA375).
2. **Gypsy and Accommodation Strategy.** Specifically paragraph 3.51 in the Draft Local plan.

1.Barham Layby.

There is no justification for providing additional capacity. Para 2.67 of the draft plan refers to “an opportunity for a small lorry parking facility along the A2,..to offset the loss of the existing lorry parking through the delivery of the new A2 slip road at Wincheap”, while Policy N34 expands on this and refers to “accommodating this loss, and provide additional capacity”. I assume that the loss refers to the current layby on the A2 West approaching Wincheap from Bridge, a facility providing for a maximum of four lorries. This proposal is for a vehicle rest area for up to 20 HGVs- so where, in the plan or supporting documentation, is the justification for the additional capacity?

Approval was granted in 2022 for a 24 hour lorry park, for 26 vehicles, at Coldharbour lane, near Bridge (application reference CA/22/00096). Although it too was criticised for a lack of justification there was some reference to the fact that “it would free up laybys”. So why do we need another lorry park only 5 minutes drive from this one?

The M20 is the designated lorry route for traffic from the Channel Ports to London and this has been reinforced by the recent approval on appeal, despite fierce local resistance, of the creation of a 24 hour parking facility for up to 197 lorries at the junctions of the A20/M26. Development of a layby at Barham would seem to contradict this development, only serving to encourage more lorry traffic away from the M20 onto the less suitable A2.

The proposal has also been justified as it would not be a “major development” (Appendix G,SLAA375) because it is less than 0.5 hectares. If it were to be considered a “major development” then NPPF para.190 applies “permission for major developments in National Landscapes should be refused other than in exceptional circumstances”.

This justification is not accurate. As per NPPF note 67, “for the purposes of paras. 190 & 191, whether a proposal in a National Landscape is a “major development” is a matter for the decision maker, taking into account its nature, scale and setting and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined”.

In other words, acreage is not the sole determinant of “major development” status and, as argued below, the proposal has certain “major development” characteristics.

Inappropriate location for a lorry park.

Impact on residential amenity. The proposed development would be within 200 metres of Ropersole Park, a residential caravan site with 20 households. Would the enlargement of the parking facility, with increased vehicle movements across the access to Ropersole, at all times of the day and night, be welcomed by the residents?

The description of the proposal in the draft plan refers to improving the landscape e.g. “responding to the sites sensitive location within the Kent Downs AONB” and “incorporate opportunities where possible for landscape and biodiversity enhancements”. Is it really conceivable that an expanded lorry park will lead to a 20% biodiversity improvement and landscape enhancement, particularly when it is likely that the existing trees, which partially shelter Ropersole from the noise of the A2, will be removed to accommodate the expansion of the site?

Further the weak wording used such as “incorporating opportunities **where possible**” is simply not good enough. The Council has a statutory responsibility to conserve and enhance landscape and scenic beauty in the Kent Downs National Landscape, “landscapes which have the highest state of protection in relation to these issues”(NPPF para. 189).

The reality is this proposal will not improve the environment nor the lives of the residents of Ropersole. A more likely outcome is another eyesore to parallel the layby on the other side of the A2 (Macs Café).

Impact on protected landscapes. The site is on the edge of the North Downs High Landscape Value area and the Kent Downs National Landscape. Perhaps it is felt that its peripheral location means it is of lesser landscape value and less worthy of protection.

However the history of the AONB’s development suggests the case for protecting this location is very strong. Over a period of 20 years much time and effort was spent in the process of defining and approving the boundary of the AONB. In March 1966 the County Council opposed the proposed “use of motorways (like the M2) and trunk roads like the A2 as AONB boundaries in their own right, seeking the automatic designation of land on both sides of such routes to preserve the views therefrom, and to prevent the creation of **eyesores** on the sides of routes not designated”.

The National Planning Council’s advisor commented on these proposals as follows “Further east, on the A2 towards Dover, I support Kent’s case and recommended that the inclusion of a strip of territory in the AONB on the N.E. side of the A2 between

Patricbourne and Shepherdsweil would be justified on landscape grounds” (Comments in quotes from “Kent Downs AONB” by Ray Woolmore May 2002).

Part of the site currently has permission for one traveller pitch and, within the current planning process the Council has reviewed the case for site intensification and their findings are included in the “Gypsy and Traveller Site Assessment Approach and Outcomes 2025,” a document containing evidence supporting the current draft plan. At Appendix A to this document reference is made to this site (GTSA12) and the question is posed “Is the site suitable for intensification?”. The conclusion “No – access to the site is not suitable for intensified use and increased residence on the site would exacerbate any landscape impact within the AHLV and the Kent Downs National Landscape”. If it is deemed unsuitable for another caravan or two in one part of the draft plan how is it suitable for a 20 vehicle lorrypark in another?

So in summary the case from protecting this location from further development is very strong. The proposal would represent an eyesore, in an area where protection was originally and specifically afforded to avoid such things. And in the context of “major developments” (discussed above) it clearly would “have a significant adverse impact on the purposes for which the area has been designated or designed” (NPPF note 67).

2.Gypsy and Accommodation Strategy.

I am glad to see that this issue has been addressed in some detail in this version of the draft plan and that the Council can now demonstrate a credible strategy for traveller provision and, importantly, a five year supply of sites, according to paras.7.89 -7.102 of the “Focused Regulation Topic Paper (August 2025)”.

Paragraph 51. However I do find the wording of this paragraph both confusing and lacking emphasis on the protection afforded to the Kent Downs National Landscape.

The statement “Development in the KDNL....is required to” can be interpreted as implying that we must have development in the KDNL. Of course the opposite is the case as is clear from the NPPF where it explicitly states that National Landscapes have the highest level of protection and that “major developments” will not be permitted unless there are exceptional circumstances.

Suggest the following wording “In considering any proposed development in the KDNL, including the siting of Gypsy and Traveller pitches, great weight will be attached to furthering the conservation and enhancement of the landscape, scenic beauty and tranquillity in the designated area, and ensuring that sites are sensitively and sustainably located.”