

Canterbury City Council Local Plan Regulation 19 Pre-Submission Consultation

Policy R22, Barham Layby

Representation submitted on behalf of Oakborough Ltd

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1. These representations are submitted on behalf of Oakborough Ltd in respect of Policy R22 – Barham Layby.
 2. Policy R22 – Barham Layby is a draft allocation for a heavy goods vehicle (HGV) rest area. Part of the site incorporates the existing layby and highway verge adjacent to the A2 dual carriageway. But the large majority of the site is owned by Oakborough Ltd.
 3. We therefore submit representations against this draft allocation which we consider fails the test of soundness.
 4. Our first point is that there has been no consultation with Oakborough Ltd, the owners of the land. And as a result, no discussion or consideration with them about whether such an allocation is acceptable to them and crucially, whether this draft allocation is realistic and deliverable.
 5. The site has the benefit of two relatively recent planning permissions for a 100 room hotel including outline planning permission 10/0052 comprising the refurbishment and extension of hotel to create a 100 room hotel.
 6. Subsequently, because of the very poor structural condition of the existing hotel building on the site, a detailed planning permission was submitted and granted on 27th March 2017 for a proposed three storey building to form hotel following demolition of existing hotel. That planning permission has not been implemented. However, Oakborough Ltd have sought to revive the proposal with the submission of a similar proposal. Architects have been instructed, a scheme has been prepared and all necessary specialist reports, including ecology, biodiversity and highways have been prepared.
 7. We attach a drawing prepared by the architects showing these proposals which will shortly be the subject of a planning application.
 8. This scheme will deliver significant benefits, including improvements to the provision of hotels not only within the district but also within the adjacent Dover District, the boundary of which is close by. There will be initial jobs in construction and permanent direct jobs at the hotel. The tourism and economic benefits will greatly overshadow and outweigh any benefits resulting from a truck stop.
 9. In our opinion, Policy R22 is not sound. It fails to take into account the recent planning history of the site and the intentions of the landowners.

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10. The policy contains no explanation by the council why this rest area is required. And even if there were a requirement, there is no evidence that the council has considered other potentially suitable sites and that, as a result of that assessment, this is demonstrated to be the best of those sites.
 11. By not seeking the agreement and participation of the landowner, the Plan is not effective.
 12. Such an allocation could prevent the delivery of a roadside 100 bed hotel which would meet a specific demand for hotel beds within the district.
 13. The proposal is also inconsistent with national policy by failing to support tourism as required by the NPPF.
 14. The proposal also ignores the suitability of this site as a hotel, on the site of a previous hotel, grouped with other roadside facilities, adjacent to the A2 trunk road and well located in relation to the city and to Dover.
 15. The draft allocation would also create far fewer jobs than would be created in a 100 bed hotel.
 16. In summary, the draft Local Plan by including this policy, is not sound.
 17. We therefore suggest a modification to this policy to reflect the recent planning permissions, the owners' intention and the imminent submission of a detailed planning application for a hotel as illustrated in the attached proposed site plan.

Appendix : Proposed Site Plan