

Tabled Update for Item 2.4 - 23/504375/FULL – Former Travelodge, Canterbury West

As set out in the report, this application is being reported back to the Planning Committee due to the receipt of third party highway representations received on the day that the application was originally reported to the Planning Committee (22 May 2025) . Very recently, and since the publication of the updated Committee Report provided on the Agenda for the 4th December 2025 Planning Committee Meeting, further highway comments from the same third party highway consultant have been received.

The latest comments from the third party highway consultant (which are provided in full as Appendix A to this update), in summary, reiterates the points that were previously made, in that the number of ‘new trips’ onto this section of the highway have been underestimated. In addition, they set out that survey data has not been provided by the applicant to demonstrate their position.

As a result of these further comments, the applicant’s agent has been given the opportunity to respond, in addition to National Highways (who are responsible for the section of the A2 from where access to the site is obtained), and also KCC Highways, who are responsible for the local highway network.

The applicant’s highway consultant has provided a further response (also provided in full as Appendix B to this update) and the applicant’s agent has summarised this as follows:

“The level of proposed traffic has been robustly assessed based on data from a comparable restaurant which is also located on a dual carriageway. The population of customers which could be attracted to the restaurant has been carefully considered. The level of net additional traffic impact on the A2 westbound would be 10-44 vehicles during the weekday peak hours. Compared to the volume of traffic already on the A2 this level of traffic increase is not significant.”

In addition to the above, National Highways have provided further comment as follows:

“I can confirm that National Highways assessment of the application, as summarised in our response dated 29 December 2023, would have, as part of our standard processes, taken into account

- *The history of the site as a roadside services, including the application part of the site’s former use as a Traver Lodge and the likely difference in movement types, quanta and timings compared to the proposed use.*
- *The safety track record of that part of the A2, including the slips.*
- *Our experience of the TAs submitted by companies promoting drive through type restaurants.*

- *Our experience of the propensity of customers to drive to favoured branded sites rather than necessarily their closest site for any given service/shop/restaurant etc.*

Taking into account the above, national policy contained in DfT C1/22 and MHCLG NPPF(2024) and all other material considerations, we concluded that there was not sufficient evidence to demonstrate that the proposed use would result in safety and/or congestion related concerns warranting a requirement for more evidence or an objection from the SRN perspective. Hence our 29 December 2023 response of No Objection subject to a Construction Traffic Management Plan (mainly aimed at avoiding waste/ detritus etc being deposited on the SRN).

It will also be noted that an absence of an objection from National Highways does not necessarily mean we agree with all the evidence submitted. Rather, it can mean that even if we were to require more/ different evidence, our final recommendation wouldn't change."

KCC Highways have also commented on the latest information as follows:

"Kent County Council (KCC) Highways has reviewed the comments provided by the independent transport consultant, specifically those relating to trip generation associated with the proposed McDonald's facility.

Having considered these comments alongside the original submission, KCC Highways confirms that our position of no objection remains unchanged. We have concluded that there is insufficient evidence to demonstrate that the proposed use would result in highway safety or congestion concerns that would warrant either a requirement for further evidence or an objection to the application.

This position is consistent with Paragraph 111 of the National Planning Policy Framework (NPPF), which states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. Based on the information provided, we do not consider these thresholds to be met."

On the basis of the above, it is considered that the conclusions drawn in the committee report remain valid in that the scheme complies with the relevant transport and highway related conditions.

PG – 03/12/2025