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VIA EMAIL: consultations@canterbury.gov.uk

21 October 2025

Dear Sir/Madam

CANTERBURY DISTRICT LOCAL PLAN REGULATION 18 FOCUSED CONSULTATION (SEPTEMBER 2025) –

On behalf of our client, Shaptor, please find enclosed our representations to the Regulation 18 'Focused Consultation' of Canterbury District Local Plan which is currently being undertaken by Canterbury City Council (the Council).

These representations relate to Land Adjacent to the A2 Dover Road and Kent Motorcycles, Barham ('The Site'), which is currently being proposed to be allocated under draft Policy N34 for a vehicle rest area, with capacity to provide up to 20 HGV parking spaces.

The need for the provision of additional HGV parking spaces has been identified by National Highways (NH) to address the general need for additional facilities across the County, but also to ensure there is scope to mitigate the closure of the eastbound rest area on the A2 Dover Road at Wincheap as a consequence of the 4th slip works as part of Canterbury's current Local Plan and the potential future closure of other rest areas as a consequence of junction improvement works.

INTRODUCTION

Shaptor supports the decision to bring forward a new Local Plan as the importance of creating an up-to-date Plan-led approach to planning for development cannot be understated. The Council's current Local Plan was adopted in 2017 and is out-of-date on the basis that many significant planning legislative changes have occurred since its adoption, including several significant changes to the NPPF within the most recent revisions published in December 2024.

It is notable that the revised NPPF, published in December 2024, has clearly set out the Government's pro-growth commitment to support the delivery of infrastructure. The Planning and Infrastructure Bill, introduced in 2025 and is still progressing through the legislative process, has set out the approach to speed up and streamline the delivery of critical infrastructure.

In this context, we fully support the continued work to bring forward an up-to-date Local Plan in-principle, it is critical to ensure the new Local Plan is legally compliant and sound. It should respond to and reflect the Government's ambition to ensure the future economic needs in the District can be met through a sustainable delivery of infrastructure.

Barham Rest Area

The Site is located on the A2 corridor which is part of the Strategic Road Network (SRN) managed by NH. The A2 corridor provides a strategic connection between London and the Port of Dover, which is infrastructure of national significance.

The adoption of Canterbury's current 2017 Local Plan requires the provision of the 4th slip road on the A2 at Wincheap, to provide an all-movement junction and facilitate growth in the area, which will result in the loss of a rest area which is used for car, van and lorry parking.

In this context, the draft allocation at Barham Layby will compensate for the lost rest area, provide scope for the loss of other rest areas resulting from junction improvement works and strengthen the general capacity of vehicle rest area provision along the A2 in the interests of road safety.

The proposal would be capable of delivering significant public benefits, including reducing the likelihood of collisions, enabling National Highways to enhance the safety and resilience of the A2 corridor, and minimising the likelihood of HGV parking within residential areas. It would also provide wider benefits in terms of security, environmental quality, and driver welfare.

Regulation 18 Local Plan responses

The Council has invited comments on the Draft Local Plan, and our response is set out below and structured by reference to the consultation questions.

The decision to proceed with the production of an updated Local Plan is supported in principle. The importance of creating a Plan-led approach to planning for development in Canterbury will ensure that the future needs of residents and businesses in the area can be met through the sustainable development of sites.

Part 1: Aligning the Local Plan with new NPPF requirements

3. Do you have any comments about how the new Local Plan should plan for economic growth in the district, including in respect of modern economy uses?

We welcome the identification within the draft Plan that economic growth and supporting job creation is a key objective over the next period. We also support the Plan's vision to provide opportunity to support and manage the delivery of the industrial sectors and modern economy uses in the district and could identify specific locations.

In the context of national policies, the economic objective is one of the key overarching objectives under paragraph 8 the NPPF, which include "*identifying and coordinating the provision of infrastructure*".

Paragraph 24 of the NPPF also makes clear that:

*"Effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, **delivering strategic infrastructure and building economic and climate resilience.** ... "*

Paragraph 85 further notes that planning policies should "*help **create the conditions** in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.*"

Paragraph 86 also stipulates that planning policies should have particular regard to facilitating development to meet the needs of a modern economy, which include freight and logistics, and seek to address potential barriers to investment, such as inadequate infrastructure.

In light of this, and in order for the draft Vision to be deliverable and effective, it is imperative to secure all the necessary infrastructure to be delivered to enable economic growths, particularly those that are located in key strategic connections, such as the draft allocation at Barham rest area along the A2.

Part 2 – Draft Local Plan policies for consultation

Draft Policy N34 – Barham

41. Do you have any comments on this policy? Please provide any evidence you have to support your comments.

The decision to include the Site as an allocation for up to 20 HGV parking spaces is strongly supported as it will enhance and improve the existing facility in a convenient location. It is therefore imperative Policy N34 is carried forward through to allocation.

There is an acute need for additional HGV parking in the South East Region. The National Survey of Lorry Parking (2022) commissioned by the Department for Transport (DfT) confirms that lorry parking at on-site facilities is nearly at critical level, having reached 83% utilisation level across the network with a 94% utilisation in the southeast of England. This capacity constraint is further compounded by a 14% increase in total HGV parking demand over the period from 2017 to 2022.

The 2022 report makes clear that

“The South East is also at critical utilisation levels for MSAs (98 per cent) and independent truckstops (93 per cent), with TRSAs practically at critical utilisation levels at 84 per cent”

The report further highlights that:

“The South East has 27 sites at critical utilisation levels, 11 sites at serious utilisation levels, and 26 sites at acceptable utilisation levels (Figure 5-10). Although having sites with an acceptable utilisation level in a busy region like the South East suggests that theoretically there should not be a problem, more detailed analysis shows that this “spare capacity” is not necessarily in the place where it is needed. The spare capacity is on or near the M4 and the north western part of the South East rather than being in Kent where it is most needed.”

Our initial study indicates that poor quality facilities at parking locations, sub-standard security, and the cost of parking are all areas of great concern for the drivers, which indicates an acute need for additional and improved HGV parking to be provided at such a key strategic connection in the South East of England, especially in the southeast on routes to towards Port of Dover and Eurotunnel.

In light of the above, Shaptor is fully supportive of the draft allocation at Barham rest area, which is capable of delivering the much-needed infrastructure improvements in this key strategic connection to address the unmet lorry parking needs, create capacity for upgrading inadequate infrastructure along the A2 and create conditions to support modern economy uses such as freight and logistics.

However, the deliverability of the HGV parking spaces would be enhanced through the following amendments to the policy:

“Policy N34 – Barham ~~Layby~~ Rest Area

Site N34 is allocated for a heavy goods vehicle (HGV) rest area. Planning permission will be granted for development which meets the following criteria:

1) Development mix

Across the site, the development mix will include:

a) A heavy goods vehicle rest area containing up to 20 HGV parking spaces and essential facilities for drivers.

2) Design and layout

The design and layout strategy for the site should:

a) Improve the layout and legibility of the existing layby rest area

3) Landscape and green infrastructure

a) Responding to the site's sensitive location within the Kent Downs National Landscape, the landscape and green infrastructure strategy for the site should incorporate opportunities where possible for landscape and biodiversity enhancements.

~~b) Respond to the site's sensitive location within the Kent Downs National Landscape and further the conservation and enhancement of its natural beauty, in line with Policy DS18.~~

~~3) Landscape and green infrastructure~~

~~The landscape and green infrastructure strategy for the site should:~~

~~a) Incorporate opportunities where possible for landscape and biodiversity enhancements with regard to The Kent Downs AONB Management Plan.~~

4) Access and transportation

The access and transportation strategy for the site should:

a) Provide access via the existing link road between Kent Motorcycles and the A2 eastbound carriageway."

The basis for these proposed changes is to seek to better reflect the purpose of the allocation and remove the elements that could result in a lack of clarity for the decision maker. Specifically, the reference to 'natural beauty' under part b is unclear and ambiguous. The matter of the proposed landscape and biodiversity of the site can be adequately controlled through the planning process without reference to other materials. The reference "rest area" is proposed to align with the terminology used in the Design Manual for Roads and Bridges (DMRB).

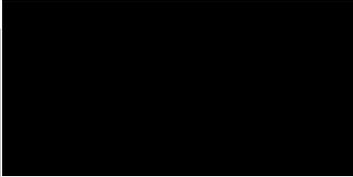
Summary

The decision to proceed with the production of an updated Local Plan is supported in principle. To support and enhance the Council's Vision to create a thriving economy, we are supportive of the Council's decision to allocate Barham Layby under draft Policy N34 to meet the unmet lorry parking and rest needs. It is considered that the draft allocation, once amended for soundness in line with the proposed changes above, would be capable of improving the safety and resilience of the A2 corridor and creating conditions for enabling growths and supporting modern economy uses such as freight and logistics.

We would be grateful if you could confirm receipt of these representations and keep us informed on the progress of the production of the Local Plan.

If you have any queries on any points covered in this submission, please do not hesitate to contact me or my colleague [REDACTED]

Yours faithfully



Pp

David Churchill
Partner

