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T: [REDACTED]

Your ref: Policy R22
Our ref: Barham Rest Area

Canterbury City Council Offices
Military Road
Canterbury
CT1 1YW

VIA EMAIL: consultations@canterbury.gov.uk

15 May 2026

Dear Sir/Madam

CANTERBURY DISTRICT LOCAL PLAN REGULATION 19 CONSULTATION (APRIL 2026) – BARHAM REST AREA

On behalf of our client, Shaptor, please find enclosed our representations to the Regulation 19 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 R22 for a vehicle rest area, with capacity to provide up to 20 HGV parking spaces.

These representations are consistent with the previous submissions to the Council in response to the Regulation 18 'Focused Consultation' in October 2025 and the Call for Sites exercise in September 2025.

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 The Council's current Local Plan was adopted in 2017 and is out-of-date on the basis that many significant planning legislative changes have occurred since its adoption, including several significant changes to the NPPF within the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, which will ensure that the future needs of residents and businesses in the area can be met through the sustainable development of sites. Notwithstanding this, it is also critical to ensure the new Local Plan is legally compliant

and sound, in order to respond to and reflect the Government's ambition to ensure the future economic needs in the District can be met through the sustainable delivery of infrastructure.

The Opportunity

Barham Rest Area 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 Site represents a unique opportunity to offset the loss of a strategic rest area previously utilised for car, van and lorry parking arising from the adoption of Canterbury's current 2017 Local Plan. The draft allocation would strengthen the general capacity of vehicle rest area provision along the A2 in the interests of road safety and flexibility to accommodate displacement arising from future junction improvement schemes.

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.

In light of the above, the Site is deliverable, i.e. available, suitable and achievable, and is capable of delivering a significant number of consequential benefits to the area.

Local Plan Regulation 19 Representation

The Council has invited comments on the Draft Local Plan, and our response is set out below:

Barham Rest Area

We support the draft Policy R22 allocation at Barham Rest Area, which we consider will contribute significantly to the Council's Vision to *"take advantage of and improve our links to and from London and the Continent, while creating a transport network which enables most residents, particularly those in the urban areas, to access their day-to-day needs locally through healthy, environmentally-friendly journeys"* and to *"positively exploit the delivery of infrastructure needed to support growth to maximise the benefits for existing residents and businesses while ensuring critical infrastructure is delivered at the right time to support development."*

As stated in our representations in September and October 2025, 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.

In light of the above, Shapton 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, to secure these benefits in practice, and as set out in our detailed comments below, it is essential that proper regard is had to highways requirements, supported by early engagement with National Highways to ensure the policy requirements are effectively worded insofar as the deliverability and viability of allocated sites will not be undermined.

In this context, while we support Policy R22 to be carried forward, it is imperative for the following matters to be adequately addressed to avoid any potential risk of soundness in the Examination.

Indicative Concept Masterplan

We have significant concerns in relation to the introduction of a requirement for “open space / biodiversity opportunities” as illustrated on the indicative concept masterplan on page 220 of the draft Plan.

By reason of the Site’s proposed use as a strategic rest area for Heavy Goods Vehicles, and its location immediately adjacent to the A2, the inclusion of such a requirement is neither appropriate nor justified. In particular, the provision of open space in this location gives rise to an inherent tension with operational and highways safety requirements.

The identification of “open space / biodiversity opportunities” within the north-eastern part of the Site results in the sterilisation of land required for vehicle manoeuvring, as shown on the submitted tracking plan dated September 2025 (**Appendix 1** and also **Figure 1** below). This encroachment materially constrains the functional layout of the Site and gives rise to serious concerns regarding the usability and deliverability of the allocation.

In that context, it is imperative that the allocation has regard to operational requirements and is not burdened by policy expectations which would undermine its primary function.

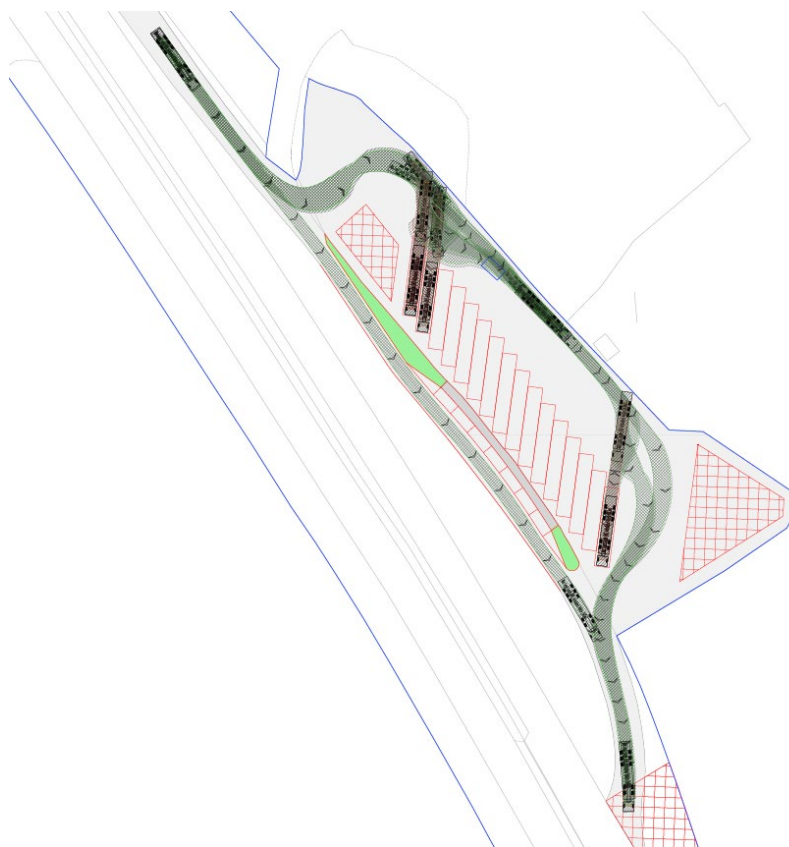


Figure 1 – Tracking Plan of Barham Rest Area

Policy R22

While Policy R22 retains the reference “layby” rather than “rest area” as proposed in the last representations, it is significant to note that the Design Manual for Roads and Bridges (DMRB) draws a clear distinction between the two, by stating:

“Lay-bys provide stopping opportunities for road users needing to stop for a short duration. Service areas or rest areas can be more appropriate than lay-bys for longer duration stops.”

In light of the nature of the proposed development, which seeks to provide a broader range of benefits including welfare facilities, it is considered that the policy terminology should be amended to “rest area” to align with DMRB terminology and to reflect the nature of the proposal.

In relation to part 2b, whilst it is acknowledged that the detailed layout will appropriately respond to the Kent Downs National Landscape and relevant guidance, we have concerns regarding the characterisation of the site as a “sensitive location.”

As widely established in caselaw, whether a site constitutes a sensitive location within a National Landscape is a matter of planning judgment, which would need to be determined on the basis of site-specific evidence. The latter will be robustly tested through the development management process, supported by detailed technical assessments.

In the absence of such evidence at this stage, and to ensure that the policy is positively prepared, the wording should be amended to avoid prejudging the sensitivity of the site. In this instance, the site lies adjacent to the strategic road network. It is on a busy stretch of highway, and the proposed development is for critical supporting infrastructure. It is important to weigh these matters into any judgement on the comparative sensitivity of the location.

Turning to part 3 of the policy, the requirement for a blue infrastructure strategy is not considered to be justified in the context of the proposed development, particularly given the constrained highway environment. Such blue infrastructure would inevitably introduce additional maintenance access and water management requirements which are not proportionate to the nature of the proposal. The relevant reference should therefore be removed.

With regard to part 3(b), there is a significant risk that the requirement to retain and enhance the landscaped frontage along the A2 will introduce practical concerns. Particularly, the relevant frontage is already densely vegetated, and therefore any further enhancement will be located closer to the egress point to the south, which will create visibility constraints for exiting vehicles. As such, the policy should incorporate sufficient flexibility to ensure that highway safety is not compromised.

Similarly, part 3(c), which seeks to minimise the loss of mature trees to retain a wooded character, does not adequately reflect the operational requirements of the site as the presence of mature trees may present constraints to safe vehicle manoeuvring. Furthermore, since this matter will be more appropriately addressed through the planning application process, informed by detailed arboricultural surveys and supported by mitigation where required, part 3(c) should be reworded to avoid placing undue constraints on the deliverability of the allocation.

As set out in the Call for Sites submission (February 2025), the concept of the proposed rest area was proposed by National Highways, we would strongly urge early and ongoing engagement with National Highways to be undertaken to ensure that the draft policy is appropriately framed to reflect operational requirements for the proposed rest area, without introducing any impediments to highways safety or the effective delivery of the allocation.

In this context, to ensure that the policy is both effective and deliverable, while maintaining appropriate regard to highway safety and operational requirements, the following amendments are proposed to enhance the deliverability of the HGV parking spaces:

“Policy R22 – Barham ~~Layby~~ Rest Area

...

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;
- 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 DS21; and
- c. Consider the adjacent residential uses at Ropersole Park.

3. Landscape and Green Infrastructure

The green ~~and blue~~ 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 and supporting guidance (and subsequent updates);
- b. Retain and, *where possible*, enhance the existing landscaped frontage with the A2 *provided that this does not prejudice highway safety or the operational requirements of the rest area* to help reduce the visual impact of the enlarged rest area within the wider landscape; and
- c. Keep to a minimum the loss of mature trees across the site *where feasible and subject to no adverse impacts on highway safety or the operational requirements of the rest area* in order to retain its wooded character, *where practicable*.

...”

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 to ensure the proposed landscape and biodiversity requirements will not lead to unnecessary impediment to highway safety and the functionality of the proposed rest area.

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 Rest Area under draft Policy R22 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 growth 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

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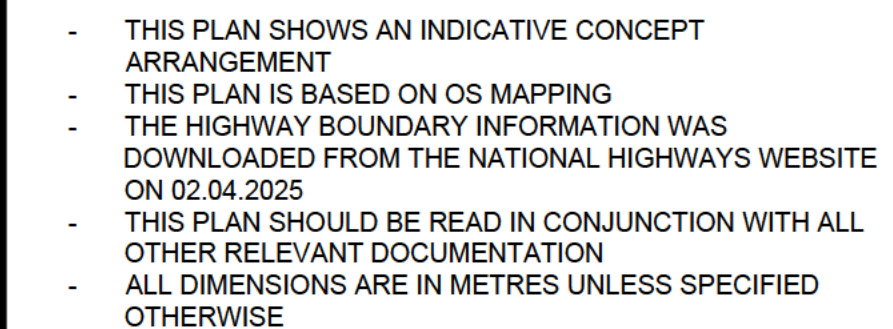
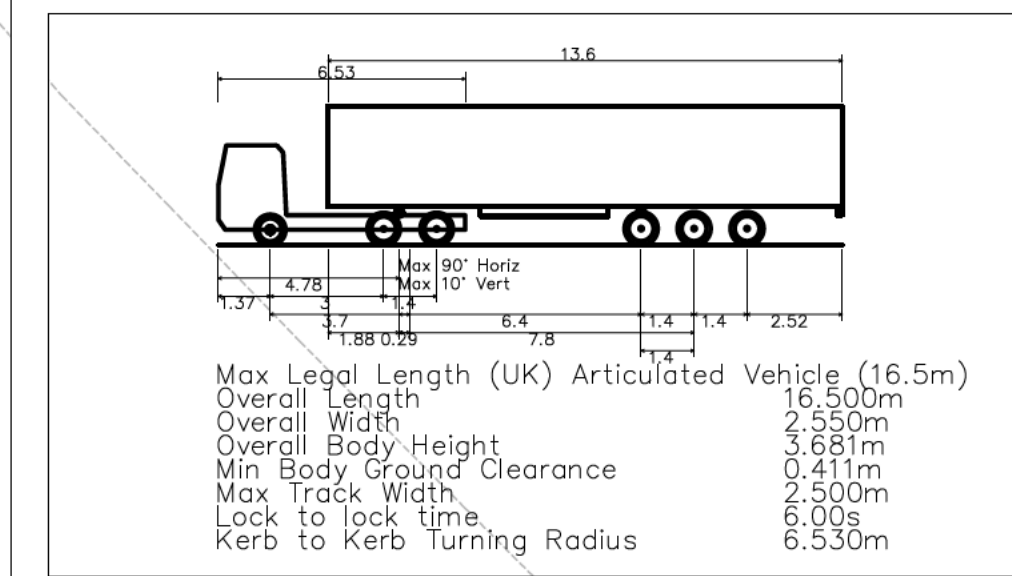
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David Churchill
Partner

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Appendix 1 – Tracking Plan (As Submitted in September 2025)



P01 FIRST ISSUE	DS	JSL	2024.04.03
Issued/Revision	By	Appd	YYYY.MM.DD
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Issue Status

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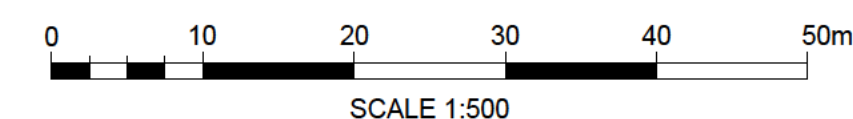
Client/Project
SHAPTOR CAPITAL

WINTERBOURNE FIELDS
(LAND ADJACENT TO THE A2 DOVER ROAD
AND KENT MOTORCYCLES, BARHAM)

Title

CONCEPT VEHICLE REST AREA PROPOSED
ACCESS AND PARKING ARRANGEMENT
HGV SWEPT PATH ANALYSIS

Project No. 332610560	A1 Scale 1:500
Revision P01	Drawing No. 332410560-STN-GEN-XX-DR-TP-5501



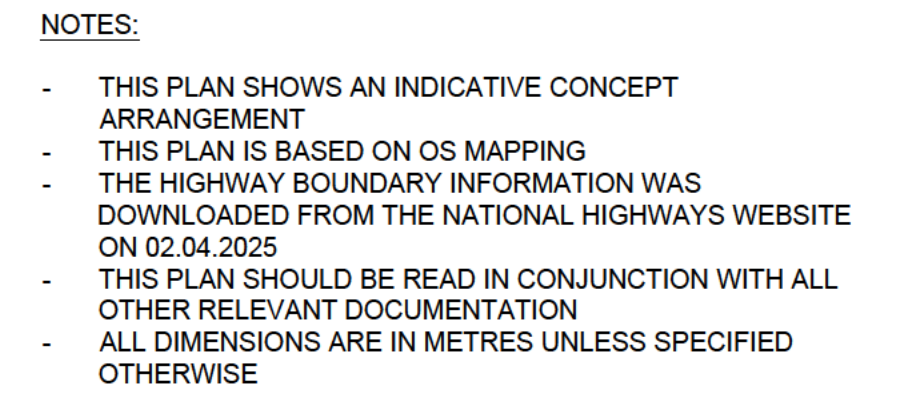
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Appendix 2 – Concept Plan (As Submitted in September 2025)



 GRASS VERGE



Project No. 332610560	AT Scale 1:500
Revision P01	Drawing No. 332410560-STN-GEN-XX-DR-TP-5502