



Representations of Robert Brett and Sons Limited to the Canterbury City Council Local Plan Regulation 18 “Focused” Consultation

Re: Land at Folly Farm

Prepared by Hume Planning Consultancy Ltd.

Our Ref: HPC/1581

On behalf of: Robert Brett and Sons Limited

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1. Introduction

- 1.1 This representation is prepared on behalf of Robert Brett and Sons Limited and responds to the “focused” consultation draft Canterbury Local Plan (Regulation 18) dated September 2025.
- 1.2 Robert Brett and Sons Limited have an extensive landholding within the District and this representation focuses on Folly Farm (site allocated under Policy C16 of the Draft Local Plan Regulation 19 Version (2024)).
- 1.3 Robert Brett and Sons Limited would welcome the opportunity to discuss this land with the Policy Makers of Canterbury City Council, before the plan progresses to the next Regulation 19 Stage for public consultation.
- 1.4 The adjustment in the local plan spatial strategy, the subject of this current consultation, is a consequence of the “de-selection” of the previous draft strategic allocation at Land North of the University of Kent at Blean (as a response to significant local opposition). The current focused response of policy makers purports to move the overall spatial strategy away from a ‘road building’ derived strategy to a walking, cycling, public transport and park and ride strategy that recognises that Canterbury itself represents the most sustainable location within the district. This is combined with the increase in the housing delivery requirements for the District following the Government’s revisions to the NPPF and the Standard Method at the end of 2024.
- 1.5 Bretts are fully supportive of this non-car mode-based strategy which is fully in accordance with national planning guidance. However, it is considered that Canterbury’s Policy Makers have focused the proposed substitute draft allocations on a limited number of large strategic sites and have not fully considered the range of suitable sites available to help spread the development needs of the district. These representations highlight peripheral locations within their land control which are easily accessible to the City of Canterbury and which Bretts can readily bring forward to serve the district’s development requirements whilst being of a scale that will be attractive to SME Builders.
- 1.6 These representations demonstrate that there is capacity at the fringes of the urban area of Canterbury and western edge of Hersden for further small and medium-sized sites to be allocated for housing, employment and recreational development, relieving some pressure on the large strategic allocations to the east and south of Canterbury to deliver

completions in order to meet the District's development targets and housing trajectory profile. This objective is of greater importance given the anticipated medium term economic conditions and the level of upfront infrastructure investment that is necessary (affecting cash flow) before completions can start to be delivered.

- 1.7 The potential for edge of city centre opportunities to complement the revised spatial strategy (for the "without" Blean scenario) and better serve the stated policy objective of reducing car journey movements is more realistically achievable at the Brett site opportunities that we identify. These sites are of a smaller size and would not be reliant on upfront infrastructure investment and therefore would be more attractive to local SME's thereby increasing the prospects of earlier housing delivery in the challenging economic conditions that will affect the plan period.
- 1.8 For these reasons, before progressing to the Regulation 19 Stage of plan production Brett's would support a further review of the opportunities at the edges of Canterbury and assess these critically as part of the Sustainability Appraisal 'retesting process' which would include a comparison of benefits with the larger draft strategic allocations that have been selected. This comparative exercise needs to be undertaken before the plan evidence base can be considered robust and the plan spatial testing can be concluded to be 'sound', notwithstanding the positive impact these sites inclusion will have on the housing trajectory profile and 5-year land supply position which itself must be demonstrated before the local plan can be adopted.
- 1.9 The spatial strategy set out in the "focused" Reg 18 consultation is rightly ambitious and underpinned by a desire to deliver on the objective of reducing car-based travel and this objective is strongly supported by Brett's. The large strategic allocations to the east and south of Canterbury rely on land uses such as hospitals, sports grounds, park and ride or Fastway bus links alongside new junctions to major roadways which will be complicated to deliver. This increases the need for a balancing mix of smaller sites to deliver the housing trajectory profile over the lifetime of the shortened plan. This Brett's site is in single ownership and can be delivered within the early years of the plan period and offers increased capacity to an existing allocation.

2. Folly Farm

- 2.1 This site represents a draft allocation (draft Policy C16) with a suggested capacity of approx. 17 dwellings which fails to fully utilise the site opportunity, a decision which is of particular concern given the site's close proximity to the centre of Canterbury. Our representations to the "without Blean" draft spatial strategy emphasise the importance of placing more reliance on urban fringe sites to meet the district's development needs and ensuring deliverability so that Canterbury's development needs are accommodated in the most sustainable way. The supporting Transport Technical Note by C&A Transport (forming part of our earlier Regulation 18 representations) demonstrated that with a single point of access, the capacity of this allocation could be increased to 28 dwellings, and the capacity could be further increased (i.e. up to 50 dwellings) with a secondary point of access.
- 2.2 There is also a wayleave running diagonally north to south which affects part of the allocation and the draft allocation also extends close to the overhead pylon (identified on the associated topographical plan).
- 2.3 These representations are supported by a layout drawing demonstrating how the 'reshaping' of the allocation in the draft plan could address the technical and site constraints and respond to landscape considerations by placing development on the lower contours of the rising ground which would increase the capacity by at least 11 dwellings whilst delivering open space, strategic landscaping and BNG. This increase in site yield would also deliver additional affordable housing and a superior layout as reflected in the attached draft layout.
- 2.4 We have been advised that our earlier representations to increase the housing capacity will only be reviewed as part of the Regulation 19 Stage of plan making because this site is already, in part, allocated for housing.
- 2.5 Bretts look forward to discussing this Site further with the CCC policy team as the draft local plan progresses, particularly at the upcoming Regulation 19 stage.