



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

Re: St. Stephen’s Hill

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 St. Stephen’s Hill (omission site).
- 1.3 Robert Brett and Sons Limited would welcome the opportunity to discuss this significant land parcel 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 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. For instance, Land at Stephen’s Hill has a capacity for up to 300 dwellings and land at Folly Farm (which Brett are seeking a slightly modified allocation for in the short term) and is nearby could be significantly increased (above the 50 dwellings proposed), subject to a second point of access being agreed with the Highway Authority.
- 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 and medium sized 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.

2. St Stephen's Hill

- 2.1 This site of over 24 ha represents an extension to the northern edge of Canterbury and lies to the west of the University campus. The surrounding residential catchment has strong links to the University. This site, at the urban edge of Canterbury, is considered to be in a highly sustainable location for residential development and could deliver between 200-300 dwellings. It is therefore highly accessible to Canterbury city centre.
- 2.2 Bretts are pleased that KCC Highways have recently confirmed agreement for the proposed access strategy for the site from a technical standpoint.
- 2.3 Council policymakers have confirmed that this potential part substitute site for Blean has not been allocated in the emerging local plan and this is due to focused concerns regarding perceived heritage and landscape impacts. Brett's acknowledge that the St. Stephen's Hill site must satisfactorily mitigate heritage constraints which are principally due to the potential underlying archaeology which is mainly concentrated in the north west corner where there is evidence of kilns associated with historic tile production. The concept masterplan shows that no development is proposed in this portion of the site and potential underlying archaeology will therefore be safeguarded. It is evident that Canterbury Local Plan policy makers consider that because of the rising profile of the land the development of the site will have a significant landscape change upon the character of the surrounding area. The LPA's own landscape impact assessment is challenged by the specialist landscape consultants acting for Bretts whose input is reflected in the development zones and landscape buffer areas incorporated within the attached masterplan. For these reasons and the fact that the site is so well related to the edge of Canterbury and would minimise the need for car movements, it is asserted that this site should be reconsidered as an allocation to substitute for the "deselection" of Blean. The accompanying masterplan demonstrates that the site can safeguard the heritage setting of the site and the Scheduled Ancient Monument which occupies the northwest corner of the site. The proposed layout has also been developed following specialist landscape inputs and it is deemed that because of the ridgeline to the north any landscape impacts will be localised and can be addressed through the further refinement of the comprehensive masterplan attached. Further heritage and landscape assessment work will be undertaken and will form part of Brett's representations to the later Regulation 19 publication stage.

2.4 Robert Brett and Sons Limited will be seeking to work with LPA policy makers to develop the conceptual masterplan before the Regulation 19 Stage of the Local Plan and conclude that the site should be included as an allocation given its sustainable location and the consensus now reached on the access point to the site which has now been established with KCC as Highway Authority.