



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

Re: Land at Westbere Lakes

Prepared by Hume Planning Consultancy Ltd.

Our Ref: HPC/1581

On behalf of: Robert Brett and Sons Limited

Date: October 2025

Contents

1. Introduction	3
2. Land at Westbere Lakes	5

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 the Land at Westbere Lakes (benefitting from a lawful use certificate for Class B2 use LPA Reference CA/22/01231 dated 29th July 2022)
- 1.3 Robert Brett and Sons Limited would welcome the opportunity to discuss this land parcels 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.

2. Land at Westbere Lakes

- 2.1 Robert Brett and Sons Limited representations with respect to this site relate more to a point of administrative regularisation following the permission issued for a certificate of Lawful Use under LPA application CA/22/01231. This permission identified the lawful use for general industry Class B2 Use of the area hatched on the attached plan which falls within Brett’s wider landholding. This permission effectively represents a “commitment”, and it is requested the site is allocated for employment uses in the emerging local plan.
- 2.2 This brownfield site is sustainably located, being situated adjacent to Sturry and within walking distance of the railway station and frequently served bus stops. The submitted

transport work (forming part of Bretts Reg 18 representations) demonstrates that the site access is suitable for the site to be used for employment purposes.

- 2.3 As currently drafted this part of the wider landholding is over washed with a number of environmental designations that are not consistent with its lawful use. Discussions with Natural England are ongoing regarding the operational areas (sanctioned by the Certificate of lawful use) future exclusion from the SSSI which currently over washes it.