



Representations of Robert Brett and Sons Limited to the Canterbury City Council Local Plan Regulation 19 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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Contents

1. Introduction	3
2. Folly Farm	4

1. Introduction

- 1.1 This representation is prepared on behalf of Robert Brett and Sons Limited and responds to the Regulation 19 consultation draft of the Canterbury Local Plan dated March 2026.
- 1.2 Robert Brett and Sons Limited have an extensive landholding within the District and this representation focuses on 'Land at Folly Farm' (site allocated under Policy C30 of the Regulation 19 version of the Local Plan).
- 1.4 The adjustment in the local plan spatial strategy as a consequence of the “de-selection” of the previous draft strategic allocation at Land North of the University of Kent at Blean (in response to significant local opposition) 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 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.
- 1.9 The revised spatial strategy first set out in the “focused” Reg 18 consultation (September 2025) and carried forward in the current Regulation 19 version of the Local Plan 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 Bretts. 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 C30) with a suggested capacity of approx. 35 dwellings. Representations were previously submitted to the 2025 Regulation 18 consultation which highlighted that there was scope to increase the capacity of the allocation, as it was considered that the previous allocation policy for the site did not fully utilise the site opportunity. These previous representations were accompanied by a concept layout plan which sought to extend the allocation boundary eastwards as this was considered the best opportunity for extending the allocation to increase the capacity and ensure the optimal contribution of the site to the District’s housing requirements.
- 2.2 The site, and these previous representations, were considered in the February 2026 update to the Council’s Strategic Land Availability Assessment (SLAA) under site reference SLAA379. It was raised by the Council that the eastern portion of Bretts’ wider landownership of the site is situated within an open space/green infrastructure designation ‘Land to the northeast of Kemsing Gardens’ and that the extension of the

allocation into this area would not be suitable. It was also recognised that an area of the site (within Bretts' ownership) to the north of the previous allocation boundary (adjacent Folly Farm Gardens) was not subject to any other designations and provided a suitable area for the extension of the site allocation boundary, allowing for an increase in the capacity of the allocation from approx. 17 dwellings to approx. 35 dwellings. The Council's reasoning for the capacity increase is set out at Paragraph 4.37 of the Development Strategy Topic Paper (March 2026) which forms part of the Local Plan Evidence Base.

- 2.3 Bretts are pleased that the Council has considered the extension and increased capacity of the site allocation and are pleased that this has been confirmed by the allocation of the site under Policy C30. It is confirmed that the development of approx. 35 dwellings on the site is considered to be both achievable and deliverable.
- 2.4 It is also asserted that an alternative approach to accommodating the increased capacity of the site should be considered. This alternative approach, as shown in Figure 1 below, would adjust the allocation boundary such that a more lateral band of development is delivered. This would ensure that the higher ground to the north is kept free from development, minimising any potential landscape impact associated with the development of the site.



Figure 1: Extract of plan showing alternative development pattern and allocation site boundary (dashed)

- 2.5 The assessment of the site under SLAA site ref. SLAA379 suggests that an eastwards direction to the development of the site could potentially lead to the loss of the entire protected open space to the east. This would not be the case, as a small eastwards adjustment to the allocation site boundary (as shown in Figure 1 above) would maintain a limit to development, while allowing for a superior housing layout to be achieved. This would not compromise the function of the protected open space as only a minor encroachment would be made. The boundaries of the open space could be adjusted to wrap around the proposed developable area.
- 2.6 Bretts maintain that a development of 35 dwellings can be delivered within their landholding at Folly Farm and welcome the Council's maintained support for the site. In terms of taking the site forward, it is envisaged that a 1-2 year build programme would be needed to complete the development of the site, following the relevant permissions being secured. This would result in the full housing completions being delivered well within the first 5 years of the plan period and would ensure that early housing deliveries are made.
- 2.7 Hume Planning Consultancy, on behalf of Robert Brett and Sons Ltd, welcomes the opportunity to comment on this stage of the Council's Pre-Submission Local Plan and would like to reserve the right to attend the Examination in Public in due course.