



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

Re: St. Stephen's Hill

**Prepared by Hume Planning Consultancy Ltd.**

Our Ref: HPC/1581

On behalf of: Robert Brett and Sons Limited

Date: May 2026

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## **1. Introduction**

- 1.1 This representation is prepared on behalf of Robert Brett and Sons Limited and responds to the consultation draft Canterbury Local Plan (Regulation 19) dated March 2026.
- 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 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.
- 1.4 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 from comparatively

smaller sized sites that are not reliant on such significant 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. The site "Land at Stephen's Hill" the subject of these representations has a capacity for up to 300 dwellings.

- 1.8 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 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. The St Stephens site, the subject of these representations, is in single ownership by Bretts and can be delivered within the early years of the plan period.

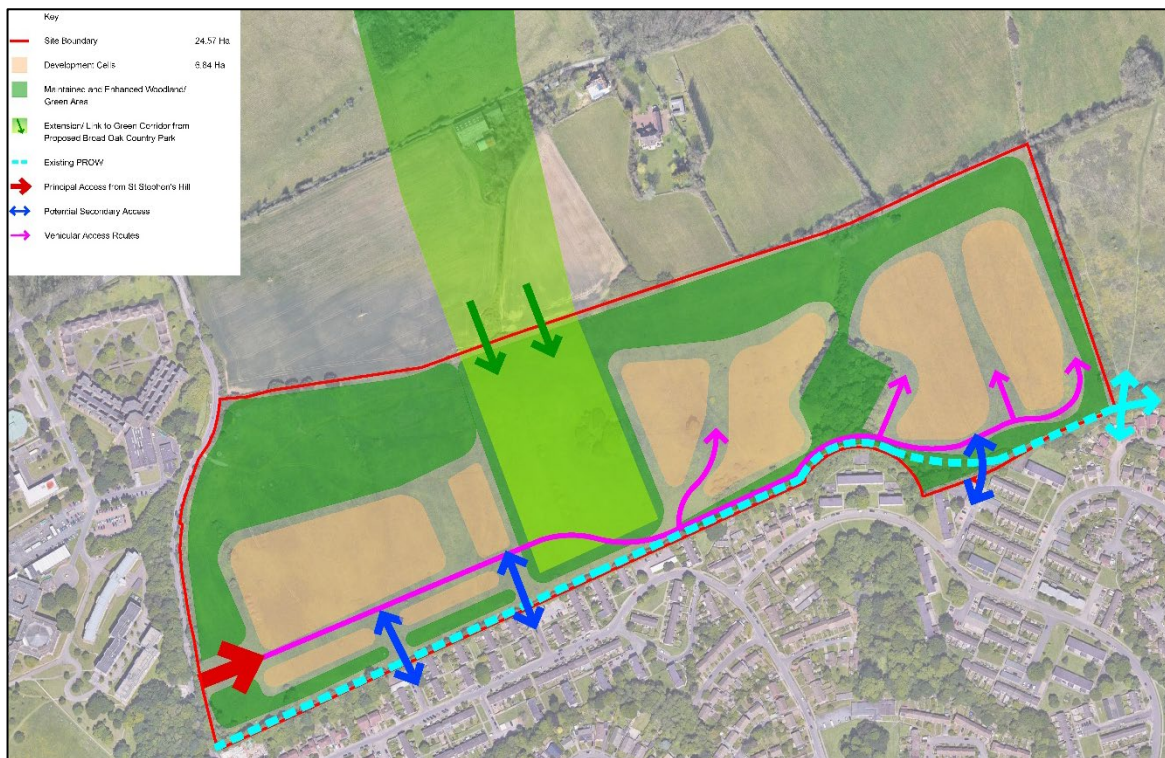
## **2. St Stephen's Hill**

- 2.1 This site of circa 24.5 hectares represents an extension to the northern edge of Canterbury and lies to the east of the University of Kent campus. The surrounding residential catchment has strong links to the University. This site, being on the urban boundary of Canterbury, is considered to be in a highly sustainable location for residential development and could deliver between 200-300 dwellings. It is 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, and that following the submission of additional archaeological assessment reports for the site, the Council's Heritage Officer is satisfied that the proposed indicative concept masterplan will appropriately safeguard the Scheduled Ancient Monument which occupies the northwest corner of the site.
- 2.3 The Council has undertaken a further assessment of the site in the February 2026 update to the Strategic Land Availability Assessment (SLAA) under site reference SLAA160 and it is understood that policymakers have not allocated this potential housing site because

of perceived concerns regarding perceived heritage and landscape impacts. Bretts rely on the landscape input of their specialist consultants who have also assisted in shaping the concept masterplan and the siting of residential development in the most visually contained pockets of the site leaving a generous landscaping framework within which the potential housing areas will be positioned.

- 2.4 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 a housing allocation. 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.
- 2.5 The additional landscape work undertaken for the site establishes a set of key principles to govern the future development of the site, demonstrating that the delivery of the site is achievable while remaining sensitive to the site's landscape and heritage settings. This includes limiting the development footprint to the southern portion of the site and establishing a new, softer settlement edge to Canterbury that will blend into the more open landscape beyond the site while ensuring that the existing ridgeline and skyline remain unaffected by the development proposals.
- 2.6 The western and central portions of the site are located within the Tyler Hill Conservation Area. The Conservation Area covers these portions of the site as they form part of the setting of the Scheduled Ancient Monument. The part of the Tyler Hill Conservation Area that covers the site was designated in 1995 as an extension to the original 1989 designation of the Tyler Hill Conservation Area. The original designation of the Conservation Area was focused on the village of Tyler Hill, which lies some 800 metres to the north of site at a lower elevation, beyond the ridgeline which forms the northern site boundary. As such, the site is both visually and functionally separate from the village of Tyler Hill, as it is situated on a south-facing hill slope which is well related to the existing settlement edge of Canterbury. The residential neighbourhood of Hales Place, which adjoins the southern boundary of the site, was constructed in the 1960s and comprises a large area of modern dwellings which are of limited architectural and heritage interest. As such, the heritage setting and context of the site comprises the Scheduled Ancient Monument and the existing settlement edge of Canterbury, and any potential heritage impacts of the development of the site must be assessed in this context.

2.7 It has been shown that the Scheduled Ancient Monument and its setting can be safeguarded from an archaeological perspective and with the proposed development following the findings and principles of the landscape assessment (which has informed the indicative masterplan for the site) it is deemed that any potential heritage and landscape impacts can be appropriately safeguarded and mitigated. As shown on the submitted indicative masterplan (see Figure 1 below), the proposed developable areas of the site have been sensitively located on the lower slopes adjoining the existing settlement edge, leaving the higher northern portion of the site as an open area to which new landscaping could be introduced.



*Figure 1: Indicative masterplan for the site*

2.8 The accompanying landscape assessment finds the site to be visually enclosed - any new buildings would occupy a small portion of longer views and would be read as a minor continuation of the existing settlement. Placing development on the lower southern edge of the site and restricting building heights will keep new built form below the existing ridgeline. The site sits on the Conservation Area edge and has a strong relationship with the modern development to the south. A sensitive, well-designed development will conserve the area's character while reflecting the existing urban edge. Bretts therefore state their disagreement with the non-allocation of the site on the basis of perceived landscape and heritage impacts.

- 2.9 Robert Brett and Sons Limited would request that further consideration is given to the allocation of the site and conclude that the site should be included as an allocation given: the highly sustainable urban-edge location; conformity with the overarching spatial strategy for the District which seeks to reduce car-based travel; medium size and capacity which suits delivery in the early stages of the plan period and helps to reduce the reliance on large-scale strategic sites and; the emerging masterplan strategy which has been shown to be acceptably accessed (now accepted by KCC Highways) and the updated concept masterplan shows that archaeological, heritage and landscape impacts can be appropriately safeguarded and mitigated.
- 2.10 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.