



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

Re: Land West of Hersden (Westbere Butts)

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 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 Land West of Hersden (Westbere Butts) (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.
- 1.5 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. Land West of Hersden (Westbere Butts) could deliver up to 100 dwellings, alongside sporting and community facilities.

- 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. This Brett's site is in single ownership and can be delivered within the early years of the plan period.

2. Land West of Hersden (Westbere Butts)

- 2.1 Significant development growth was directed to Hersden as part of a planned expansion in the adopted Canterbury Local Plan (2017). Hersden's elevated position in the settlement hierarchy for the District (as a 'Rural Service Centre') is also reflected in the existing draft allocation of the Bread and Cheese Field site to the southeast of Hersden (allocation Policy R6), and the recent draft allocation of Land at the former Spires Academy (allocation Policy R8) immediately adjoining this site.
- 2.2 The emerging local plan continues to recognise the potential for growth at Hersden, as a sustainable location and the desirability of creating a permanent boundary to control sporadic outward expansion. These are objectives which can be met by the additional allocation of the identified Brett landholding to the west of Hersden (north of the A28). The potential yield of this site (circa 100 dwellings) would, with other medium sized sites, offer a short term sustainable spatial growth substitute for larger scale sites that are reliant on significant infrastructure investment.
- 2.3 Alongside housing growth, this site has the potential to deliver new sporting (football) and community facilities for the District, meeting an identified need. Brett's are supported in this aim by both Canterbury Eagles FC and Sturry Parish Council. The development of a football facility at the site would provide a permanent home for Canterbury Eagles and

establish a facility directly serving Sturry Parish through shared use and management of the site by both organisations.

- 2.3 This site was submitted as a larger landholding that would be comprehensively master-planned in our earlier representations highlighting the opportunity for both housing and new sporting (football) facilities to be delivered as part of a comprehensive approach to the site, alongside biodiversity enhancements, public access and long-term management of the existing woodland blocks to provide a permanent buffer between the settlement edges on either side.
- 2.4 However, the comprehensive approach to the landholding has been unfairly disadvantaged as the assessment of the site in the Council's February 2026 update to the Strategic Land Availability Assessment (SLAA) has not assessed the site as a whole. The proposed housing and sporting elements of the site have been considered as separate distinct submissions under site references SLAA164 'Westbere Butts' and SLAA386 'Land adjacent to Westbere Butts' respectively. The latest SLAA assessment has therefore failed to evaluate the benefits of the proposal as a whole and the underpinning objective of the masterplan which is to create a permanent and managed corridor separating the western side of Hersden from the eastern side of Sturry, delivering 100 dwellings and new sporting & community facilities as part of a comprehensive masterplan for the wider corridor.
- 2.5 Since the previous representations regarding the site were submitted, Bretts have continued to explore how best to deliver a comprehensive approach to the totality of the landholding. This has encompassed further discussions with both local football club Canterbury Eagles FC and with Sturry Parish Council to ascertain how the site can best serve the local area, as well as engagement with the local community of Sturry to determine how local residents would like to see the site brought forward. Canterbury Eagles FC remain supportive of the proposals, as set out in their supporting letter. Sturry Parish Council are also supportive of the proposals.
- 2.7 Brett's overall aim remains to ensure that a comprehensive approach is taken to the development of the site. Taking a comprehensive approach enables the site to deliver multiple benefits comprising: the delivery of housing to meet the District's needs and requirements; the delivery of new sporting (football) and community facilities; improved public access; biodiversity enhancements and; long-term management of the wider site.

- 2.8 It is acknowledged that the southern portion of the site is overwashed by the existing designated ‘Green Gap’ between Sturry and Hersden, and that this designation has been carried forward in the current emerging Local Plan. The proposed strategy for the Westbere Butts site therefore seeks a minor adjustment to the Green Gap to accommodate the ‘enabling’ housing development. It is further asserted that the retention and safeguarding (in perpetuity) of the remainder of the Green Gap can be inbuilt into the strategy for the site, ensuring that there will be no development within the site other than that which relates to sporting and community uses, due to Brett’s single-entity ownership of the land.
- 2.9 Part of the refinement of the site strategy that has followed the continued discussions with Canterbury Eagles FC, Sturry Parish Council and public engagement has been to explore alternative locations within the site for the location of the sporting & community facilities. As such (and as shown on the submitted strategy plan) it is considered that these facilities could be located either in the central portion of the site to the rear of the existing adjoining car showroom, or within the western portion of the site. These locations would serve to further maintain the existing undeveloped site frontage along the A28 Island Road, which is an important feature of the Green Gap, and could ensure that the sporting and community facilities are situated mostly outside of the Green Gap. Notwithstanding this, sports and recreation uses are recognised as being acceptable within Green Gaps as set out in Policy DS22 of the emerging Local Plan.
- 2.10 This comprehensive approach to the site will also ensure that the majority of the site remains undeveloped. The ‘developed’ portions of the site will comprise the housing development (circa 3.3 ha) and the sporting facilities (circa 2.5 ha), which represent just 24% (5.8ha) of the total 24-hectare area of the site.
- 2.11 The site is unconstrained in access terms. A single access from the A28 serving the housing portion of the site has been established as technically acceptable through previous iterations of the SLAA. Further highways advice has been sought regarding (vehicular) access to the sporting facilities. The submitted site strategy plan identifies where a suitable access could be introduced from the A28 to serve the sports pitches. This access would be stepped from Church Lane to ensure the maintenance of highway safety by avoiding the creation of a crossroads. An access in this position, serving the potential central location of the sports pitches would also allow for a bollard access to be established between the housing parcel and sports pitches, allowing for emergency

access to both portions of the site. It has also been established that a suitable access to the western portion of the site from Hoath Road could be established should the sports pitches be brought forward on this portion of the site. Hoath Road has suitable width and forward visibility from the junction with the A28 up to point where an access to the site could be introduced.

- 2.12 The supporting letter provided by Canterbury Eagles FC sets out the need for a permanent home for the Club, which is a significant sporting and community institution within the District for the reasons outlined. The site plan appended to these representations identifies two potential areas (of circa 2.5ha) within Brett's wider landholding that could suitably accommodate 2 x full-sized football pitches alongside club facilities.
- 2.13 Canterbury Eagles FC's supporting letter details the established shortfall in football pitch provision within Canterbury District. As set out in the letter, the establishment of sporting facilities at the site will not only serve to benefit Canterbury Eagles, but a range of local football clubs via sharing agreements including Canterbury City FC, Sturry FC, Sturry Kings and East Kent Football Academy. Bretts propose that the land for the sports facilities will be made available and leased long-term to Canterbury Eagles FC in partnership with Sturry Parish Council.
- 2.14 It is clear that the vision for the site could deliver substantial recreational, community, housing, biodiversity and economic benefits for the District through the securing of a permanent home for the Canterbury Eagles Football Club, as well as sporting and community facilities serving Sturry Parish and a number of local football clubs. The site would also function as part of a wider undeveloped buffer separating Sturry and Hersden as reflected in the submitted site strategy plan.
- 2.15 We would like to reiterate that unlike the SLAA assessment it is critical for policy makers to consider the totality of the Bretts landholding in this area and that the "enabling" housing component and potential sporting/community facility comprise part of the overall comprehensive vision that would better serve to permanently safeguard the overriding objective of preventing coalescence between Sturry and Hersden.
- 2.16 Bretts would welcome the chance of discussing this vision with LPA Policy Officers and the Leisure Development Officer in advance of the submission of the Local Plan. In addition, Hume Planning Consultancy, on behalf of Robert Brett and Sons Ltd, would like to reserve the right to attend the Examination in Public in due course.