
**AVISON
YOUNG**

Representations to the Draft Canterbury District Local Plan Focused Consultation (Regulation 18), September 2025

The University of Kent

October 2025

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For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1 The purpose of this report is to set out representations to the draft Canterbury District Local Plan Focussed Consultation (Regulation 18) (September 2025). It has been prepared by Avison Young (with support from WSP) on behalf of the University of Kent (UoK).

1.2 It should be read in conjunction with our representations to previous local plan consultations, including

- Supplementary representations (March 2025, February 2025, February 2022, November 2023,
- Revised Draft Local Plan (Regulation 18), March 2024
- Draft Local Plan (Regulation 18), October 2022
- Draft District Vision and Local Plan Options, June 2021
- Our Future District: Issues, September 2020
- Call-for-Site (November 2024, July 2021, June 2020)

1.3 By way of summary, the representations demonstrate that if the new local plan were to progress on the basis of the changes set out in the August 2025 focussed Regulation 18 consultation, it would not be sound on the following grounds:

- (1) There is a **unique economic and social need** for land to the north of the University of Kent to be allocated for development as per Policy C12 of the 2024 Regulation 18 draft Local Plan.
- (2) The draft local plan does not include strategic policies that provide for objectively assessed economic needs (and positively and proactively encourage economic growth) in a manner that seeks to achieve net benefits by being aligned and interdependent with other strategic policies, including those that seek to meet social needs such as housing and education. It is therefore **not consistent with national policy**.
- (3) The removal of the allocation for Land North of the University of Kent (Policy C12) conflicts with the Spatial Strategy for the district, including the Vision and Strategic Objectives, making these unachievable. This will make the plan as a whole **not justified and not capable of being effective**.
- (4) The conclusions of the Strategic Land Availability Assessment (with regards to the suitability of Site C12) does not accord with the evidence provided to the Council by UoK as part of previous representations (particularly in respect to transport matters). The draft plan is therefore **not justified nor capable of being effective** as the basis upon which the allocation sites have been selected is not robust. Evidence has been submitted to the Council that demonstrates that land to the north of the UoK is suitable and further evidence to reinforce this point is enclosed as part of this representation.
- (5) The development of land to the north of the UoK (as proposed by Policy C12) is **deliverable**. Evidence has been submitted to the Council as part of previous representations to confirm this, and further (updated) evidence is submitted as part of these representations.
- (6) Land to the north of the UoK is demonstrably more suitable for development than a number of the other proposed site allocations, therefore the selection of the allocation sites is **not justified**.

(7) The removal of Site C12 (from the 2024 Regulation 18 draft) is not in the public interest as it would prevent significant public benefits from being achieved and would introduce the risk of substantial social and economic harm arising. It is therefore **not adequately justified**.

2. National Planning Policy Context

- 2.1 In order to be sound, the new local plan is required to be consistent with national planning policy (NPPF, para 36). For the reasons set out in these representations, our view is that if the new local plan were to progress on the basis of the Regulation 18 draft (March 2024), incorporating the amendments set out in the August 2025 focussed consultation, it would not be consistent with national policy particularly with regards to its economic policies. Therefore it would not achieve sustainable development and would not be sound.
- 2.2 As a starting point, the draft Local Plan is required to include economic policies consistent with national policy. We highlight the key national policy context as pertinent to this point below.

Achieving the Purpose of the Planning System

- 2.3 The purpose of the planning system is to contribute to the achievement of sustainable development. Achieving this means that the planning system has 3 overarching objectives which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). These are:
- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity, and by identifying and coordinating the provision of infrastructure;
 - A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
 - An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 2.4 As a starting point, the new local plan must be aligned with this purpose, and in order to do so it should pursue the above economic, social and environmental objectives in a mutually supportive way. This means that housing policies and objectives should support the achievement of economic policies and objectives where there is an opportunity to do so. If the plan does not do this, it will not be consistent with national planning policy and therefore will not be sound.

Sustainable Pattern of Development

- 2.5 In order to ensure that sustainable development is pursued in a positive way in Canterbury, the fundamental starting point for the preparation of the local plan is the application of the presumption in favour of sustainable development (NPPF para 11). This requires the local plan to promote a sustainable pattern of development that (among other points) seeks to align growth and infrastructure, and include strategic policies that, as a minimum, provide for objectively assessed needs for housing and other uses subject to exceptions (i) and (ii).
- 2.6 NPPF paras 15-22 expand upon this. The Local Plan is required to provide a framework for addressing housing needs and other economic, social and environmental priorities. This ‘framework’ should take the form of strategic and non-strategic local plan policies. The strategic policies are required to make

sufficient provision for housing, employment and education infrastructure among other requirements, which should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.

- 2.7 With specific regards to the economy, NPPF paras. 85-86 require significant weight to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 2.8 Accordingly, the new local plan is required to include policies that set out a clear economic vision and strategy that addresses identified needs and which positively and proactively encourage sustainable economic growth.

Evidence

- 2.9 NPPF para 32 requires the new local plan policies to be underpinned by relevant and up-to-date evidence. The PPG (Planning Practice Guidance) provides guidance on the necessary steps for building an evidence base for housing and business among other needs, which should cover the needs of the Higher Education sector.
- 2.10 The Council's Economic Development and Tourism Study (EDTS) (2020) forms part of the Council's evidence base that underpins the draft strategic economic policies (DS8-DS12) within the Draft Local Plan. The University is identified as a key economic driver in the study, which notably states the following:
- "The vision for Canterbury and Whitstable is for an economic identity to become established around art, design and crafts alongside an increasing emphasis on innovation, led by...the University of Kent".
- "As part of wider aspirations to diversify the District's economy and boost productivity in line with regional and national averages, the District would benefit from a clearer strategy for how 'spin out' activity and opportunities associated with the University are more effectively integrated into the local economy".
- 2.11 The Canterbury Economic Development Needs Assessment (2025) recognises that education is one of the district's key economic sectors and a major employer.
- 2.12 This evidence, insofar as it relates to the Higher Education (HE) sector and UoK in particular, is aspirational and does not provide an objective assessment of the needs of the HE sector in Canterbury. It does not account for the significant economic challenges currently being faced by UoK as set out in this and previous representations submitted by the UoK and therefore does not provide an adequately robust evidence base upon which local plan policies can be justified.
- 2.13 The absence of an adequate, proportionate, up-to-date evidence base upon which to base the new Local Plan's economic policies means that it is incapable of being sound.
- 2.14 In order to address this, the UoK has provided the Council with evidence in respect to its development needs (noting that the UoK is not the only HE provider in the district).

Summary

- 2.15 In summary, for the new Local Plan to be consistent with national planning policy it must include strategic policies that provide for objectively assessed economic needs and positively and proactively encourage economic growth, which should be fully aligned and interdependent with other strategic policies (including housing and education), and be underpinned by up to date evidence.

2.16 Not only is this necessary for the plan to be consistent with national policy, it follows that this will also be necessary for the new Local Plan to be considered positively prepared, effective and justified.

3. Economic and Social Need (the Higher Education Sector)

- 3.1 In line with the previous section, the starting point for the preparation of the local plan should be a robust evidence base that objectively assesses needs.
- 3.2 The Council's local plan evidence base does not include an objective assessment of the needs of the Higher Education sector.
- 3.3 This section (as well as representations previously submitted by the University to previous consultations) provide this evidence base. This section provides updated information on the following:
- (a) The economic and social impact of the UK Higher Education sector;
 - (b) The economic and social impact of the UoK to Canterbury, Kent and the rest of the UK;
 - (c) The economic threats to the UoK and its response;
 - (d) The public harm of doing nothing; and
 - (e) The need for development.

(a) The UK Higher Education Sector – Current Economic and Social Impact

- 3.4 Universities employ thousands of staff throughout the country and through their direct activities they generate and deliver taxes to the Exchequer ('direct impacts'). In addition, they also have a vital role in supporting a wide range of industries, with far reaching supply chains stretching through the wider UK economy ('indirect impacts'). In the wider consumer economy, the presence of universities is also significant, with Universities' own staff, employees, students and visitors all spending money on retail, accommodation, leisure, and transport ('induced' impacts). Each of these channels, in turn, generates more GDP, jobs, and tax receipts.
- 3.5 London Economics recently published a report in August 2023¹, which estimated that the 'economic footprint' of Higher Education providers in the UK, including 'direct', 'indirect' and 'induced' impacts, with a focus on the 2021-22 academic year, resulted in:
- 768,000 full-time jobs;
 - £71.3 billion of Gross Value Added; and
 - £115.7 billion in terms of general economic output.
- 3.6 Additionally, a recent research briefing published by Oxford Economics², found using their Local Economic Impact Model, the footprint of universities in the UK supported 1.2 million jobs and added £80 billion of Gross Value Added to national Gross Domestic Product in 2024.
- 3.7 Crucially for long-term sustainable economic growth, higher education creates a skilled workforce as evidenced by the latest Graduate Labour Market Statistics published by the Department for Education in June 2025³ which found that 87.6% of working age (16-64 years old) graduates were in

¹ The Impact of the Higher Education Sector on the UK Economy – London Economics (August 2023)

² Weaker Regions Most Dependent on Universities – Oxford Economics (September 2025)

³ <https://explore-education-statistics.service.gov.uk/find-statistics/graduate-labour-markets/2024>

employment, and 67.9% were in high-skilled employment in 2024, compared to 68% and 23.7% respectively for non-graduates.

- 3.8 As well as helping to fill skills shortages and sustain existing companies, graduates themselves often go on to create their own companies, leading to a significant employment diversification. According to Universities UK, using figures from Higher Education Statistics Agency (HESA), in the academic year 2022-23, 64,384 people were employed by start-ups that had emerged from universities.
- 3.9 At a local level, universities and colleges act as anchor organisations in their local economies, often having deep historic links with the places in which they are located, whereas other resources for economic growth – such as residents, workers, firms, and investors – are more mobile. Because of this rootedness, the scale of their operations, and related impacts on local economies, universities are often termed ‘anchor institutions’. Highly unlikely to relocate, they play a distinct role in creating the long-term conditions needed for economic growth. Often as the largest employers in their area, universities boost local consumer spending through student numbers, supporting local business, housing, and tourism.

The Role of Higher Education in Meeting Economic Growth Objectives

- 3.10 The role of higher education institutions in supporting economic growth and development has taken centre stage over recent years as governments around the world have pushed for private-sector led, innovation driven economic recoveries from the Global Financial Crisis, Covid-19, and other challenges.
- 3.11 The Government’s ‘Plan for Change’ sets out a number of missions to support the economy, including kickstarting economic growth. Under this mission are a number of milestones which are to be achieved partly through a drive of innovation, investment and the adoption of technology to seize the opportunities of a future economy, from AI to net zero. The Government states that they “will capitalise on the UK’s excellence in science and innovation to ensure our world-class research translates to commercial success. To promote innovation and harness the full potential of the UK’s science base, we are protecting record funding for research and development.”
- 3.12 In order to reach these milestones, the conditions for innovation and skilled workers is required. Higher education is central to these, creating the conditions for innovation by attracting inward investment, developing research infrastructure and supporting the commercialisation of research, and providing the skilled workforce necessary to stimulate private-sector growth.
- 3.13 We set out below a number of ways that the Government recognises the importance of education, and in particular higher education, as a key driver to the UK’s economic strategy:
- **The UK’s Modern Industrial Strategy (2025)** – The UK’s Modern Industrial Strategy recognises the role of universities as engines for innovation and skills and how they will play a critical role in delivering the Industrial Strategy, as well as recognises that universities are incubators of ideas that spur commercial success. The report also sets out that the Government will incentivise collaboration between industry and academia by applying research to real-world challenges, and continue investment in basic curiosity-driven research, which underpins technological transformations. It is clear through this report that universities are a key driver in ensuring the Government achieves its aims set out within the Modern Industrial Strategy to ensure economic growth. Reforms are to be later set out within the Post-16 Education and Skills White Paper which is expected to be published in late 2025.
 - **Higher Education Innovation Funding** – The Higher Education Innovation Funding (HEIF) supports knowledge exchange between higher education providers and the wider world, and is

partnered with Research England and Office for Students (OfS). The funding for 2024-25, worth £280m, will continue to support universities in England to work with business, charities and the wider community for economic and social benefit including by de-risking early-stage innovation, providing business development support and boosting entrepreneurship training.

- **Department for Education (November 2024)** – A package of measures to support students and stabilise the university sector were announced in November 2024. This included an increase to the domestic tuition fee cap by 3.1% for the academic year 2025/26 to increase the level of income for Higher Education providers. These measures came as part of an announcement from Education Secretary Bridget Phillipson, who stated that “Universities must deliver better value for money for students and taxpayers: that is why this investment must come with a major package of reforms so they can drive growth around the country and serve the communities they are rooted in.
- **Lifelong Learning Entitlement** – The Government have announced the introduction of the Lifelong Learning Entitlement (LLE) to transform the post-18 student finance system to create a single funding system. This will allow people to develop new skills and gain new qualifications, including traditional bachelor’s degrees, integrated master’s degrees, foundation degrees, and all higher technical qualifications. The reason is to ensure the country develops the skills needed to drive sustained economic growth, break down barriers to opportunities, and improve the living standards of hardworking people. This will enable individuals to learn, upskill, and retrain across their working lives. Universities and other Higher Education providers are rightly placed to provide this service in upskilling the UK’s workforce and those post-18.

3.14 Clearly, HE is a critically important economic sector for the UK. It follows that planning and other national Government policy is aligned to firmly protect and grow the sector.

(b) The University of Kent – Current Economic and Social Impact

Current Economic Impact

3.15 The University of Kent is an “anchor institution” within the social and economic ‘ecosystem’ of Canterbury and Kent. It is delivering on the needs of the local economy and for local people, while also have positive impacts at national and international level. At the same time it continues providing world leading research, delivering innovative and meaningful business collaborations with multi-nationals and local small and medium sized enterprises alike, and providing focussed employability experience to its students.

3.16 Key facts about the University of Kent:

- It was established in 1965. It has been subject to significant growth over this period and for the 2023/24 academic year, approximately 17,153 students studying at its various campuses of which Canterbury is its main campus (with 13,936 students);
- It offers an extensive range of undergraduate and postgraduate subjects;
- It is a research-intensive institution. It is ranked 38th in the UK for research intensity with 87% of its research being of international quality (Research Excellence Framework, 2021);
- The University has invested £60 million in facilities and resources over the last five years;
- The University has a further £18 million planned investments in facilities and resources over the next five years to 2030;
- In the academic year 2023/24, 33% of students were from the South East of England, 47% from the rest of the UK, and 20% international.
- It is ranked =40 out of 131 UK Universities (The Times and Sunday Times Good University Guide, 2025); and

- It is ranked 351-400 out of over 2,092 world universities (The Times Higher Education rankings, 2025).

3.17 Similar to previous representations made, the University commissioned Viewforth Consulting to assess its economic impact in the academic and financial year 2022/23 (report enclosed at Appendix AX). A summary of its findings are set out in Table 3.1 below.

Table 3.1 – Summary of the Economic Impact of the University of Kent in the academic and financial year 2022/2023

	Canterbury	Kent	South East Region	UK
Output	University direct impact: £244.2m Secondary impact of University spend: £126.3m Off-campus student spend (international students): £25.8m Off-campus student spend (UK students): £86m Total of £482.3m	University direct impact: £271.3m Secondary impact of University spend: £193.7m Off-campus student spend (international students): £38.7m Off-campus student spend (UK students): £135.3m Total of £639m	University direct impact: £271.3m Secondary impact of University spend: £336.8m Off-campus student spend (international students): £66.8m Off-campus student spend (UK students): £236.8m Total of £911.7m	University direct impact: £271.3m Secondary impact of University spend: £388.2m Off-campus student spend (international students): £76.7m Off-campus student spend (UK students): £236.8m Total of £972.9m
Employment	2,606 FTE (direct) jobs 1,295 FTE (indirect) jobs 973 FTE generated by student expenditure Total 4,872 FTE jobs in Canterbury are dependent on the University	4,880 FTE (direct) jobs 1,512 FTE (indirect) jobs Total 6,392 FTE jobs in Kent are dependent on the University	6,346 FTE (direct) jobs 2,639 FTE (indirect) jobs Total 8,985 FTE jobs in the South East are dependent on the University	6,755 FTE (direct) jobs 2,707 FTE (indirect) jobs Total 9,462 FTE jobs in the UK are dependent on the University
GVA	£217.7m (directly or through knock-on effects) £52.7m generated by student expenditure Total: £270m	£268.3m (directly and through secondary knock-on effects) £81.9m by student expenditure Total £350.2m	£339.1m (directly and through secondary or knock-on effects) £142.9m by student expenditure Total £482m	£362.8m of GVA (directly and through secondary or knock-on effects) £147m by student expenditure Total £509m to UK GDP
International Students	International students paid over £57.7m in fees to the University (tuition and other payments) International student spending: estimated at £48.5m of off-campus personal spending Total £106.3m (£30,500 per capita)			

3.18 The direct and indirect economic impacts set out above are generated alongside more qualitative impacts.

3.19 Clearly, the University is a significant asset for the Canterbury economy, and one that the Council is required to support through its planning and other policies in order to accord with national planning and other economic policy.

Current Social Impact

3.20 The contribution of higher education towards achieving advancements in social mobility for its graduates has become the focus of greater attention over recent years. In the 2023/24 academic year,

the University issued £9.3 million in scholarships and bursaries to financially assist students from low socio-economic backgrounds.

- 3.21 The University has been awarded a silver rating in the UK Government's Teaching Excellence Framework (TEF), indicating a quality of teaching on par with a number of Russell Group Universities. The University's was also awarded silver for both student experience, and of particular note student outcomes.
- 3.22 The UoK is dedicated to improving social outcomes not only for its students but for both the local community and beyond. A number of the University's programmes seek to help in improving access to higher education, including:
- Working in partnership with schools in the local area where Key Stage 4 results are below the national average;
 - Working with care-experienced students, in partnership with other local universities and other partners, to ensure equality of opportunity for all students;
 - Being the lead sponsor for the Universities of Kent Academies Trust (UKAT), which enables the University to understand the needs and challenges faced by schools and multi-academy trusts;
 - Offering a wide range of integrated foundation courses to help build the core skills required for specialist degree-level study;
 - Launching the Kent Ambition Scholars Programme, which seeks to target support to all students who receive the Kent Financial Support Package; and
 - Entering a partnership with Beaconhouse International College in Pakistan, to provide HND Business Students the opportunity to complete a one-year top-up programme.
- 3.23 In addition to the above, the University has set up a number of initiatives or provided resource to assist in the creation of a number of facilities that provide positive social impact, including:
- Right to Food initiative received Green Gown recognition for its focus on sustainability;
 - Award-winning Law Clinic;
 - Parkinson's Centre for Integrated Therapy providing direct local services;
 - Centre for Advanced Diagnostics Development and Application, providing research into accelerating new ways of improving disease diagnosis;
 - Centre for Child Protection has been recognised with a National Impact Prize for collaboration and partnership with Kent Police;
 - Published a research informed guide to support care homes with providing inclusive care for older LGBTQ+ people;
 - Partnership in the development of the Docking Station, a new facility for creative industries in the South East, one of the key industries highlighted by the Government.
- 3.24 The above demonstrates that the University of Kent is not only an important institution for the economic stability of Canterbury and the surrounding region but also provides significant wider benefits to the community.

(c) Economic Threats to the University and its Response

- 3.25 The ability for the UoK to sustain the above social and economic contribution continues to be under very significant threat. This section updates the content provided in our previous representations, including the 2024 Regulation 18 consultation, as to the details of the threats and the University's response.

Context – External Factors

- 3.26 The University, along with the wider UK Higher Education sector, continues to be subject to significant financial challenges:
- The principal source of income for most Universities (including the UoK) is based on funding from the UK Government for domestic students. The UK Undergraduate tuition fee was originally set in 2012 at £9,000. The current rate is £9,535 (increased in August 2025), which is the equivalent of £6,500 in 2012 values and continues to be significantly loss making.
 - Universities also generate fees from international students, however these are also under threat. There is increasingly strong global competition for students, particularly for post graduate study. The newly imposed restrictions to access family and post-study visas acts as a disincentive to international students, which will likely be compounded by the proposed levy set out in the UK Government's Restoring Control over the Immigration System white paper (May 2025).
 - Universities also generate income from research, however the global competition for research funding is becoming increasingly significant.
 - Further challenges include a general decline in demand in some subject areas; inflation; higher than normal student attrition rates; student housing capacity; issues with the collection of student debt; and the success (or otherwise) of spin-off commercial activities.
- 3.27 All of the above challenges are affecting the ability of universities to generate income and maintain sustainable balance sheets. The threats to income are compounded by the need to continually invest in teaching/research quality and facilities in order to compete effectively for students and research funding.
- 3.28 According to the Office for Students, which publishes an annual financial sustainability report, 43% of institutions in England are expected to face a financial deficit for 2024-25⁴.

UoK Current Operating Position

- 3.29 While the above threats are affecting the UK Higher Education sector as a whole, the effects on the University of Kent have been particularly severe, compounded by the effects of Brexit as the UoK historically had a relatively large European cohort.
- 3.30 In the year up to July 2024, the University operated at a deficit of -£6.3m. As demonstrated in Table 3.2 below, a similar operating deficit has occurred in four out of the past five financial years.

⁴ Financial Sustainability of Higher Education Providers in England 2025 (published by Office for Students)

Table 3.2 UoK Underlying Financial Performance

Year Ending July	Underlying Financial Performance
2024	(£6.3m)
2023	(£12m)
2022	(£15.3m)
2021	£2.4m
2020	(£12m)
2019	(£7.9m)

Source: UoK Financial Statements: <https://www.kent.ac.uk/finance/financial-statements>

- 3.31 The University cannot continue operating in a deficit position – it is simply not sustainable.
- 3.32 In order to sustain itself as a key contributor to the Canterbury and Kent economies, the University must be able to access funding in order to invest in new facilities and pivot its academic offering to meet the changing requirements of the HE sector. Recent policy directional statements reinforce this requirement for agile change, and it remains vital that the university can demonstrate a robust financial position and projections in order to continue to access financial markets. Put simply, the UoK needs to invest in order to survive.

Responding to the Threat – the Transformation Plan

- 3.33 As set out in our June 2024 representations, the University adopted a Transformation Plan in February 2024 in agreement with its lenders and other stakeholders. This sets out a route map to secure its long term financial sustainability, including the aim of returning the University to an operating surplus by 2024/5 (which was not achieved) and to a sustainable operating position by 2027/8.
- 3.34 The recent announcement of a potential restructure and merger with the University of Greenwich is expected to help achieve the objectives of the Transformation Plan. It forms part of the delivery of this plan and represents an opportunity to grow and expand the economic contribution of the University in Canterbury. However, the potential for future investment at Canterbury is dependent on the University being able to demonstrate a robust, funded business model for the Canterbury campus alongside a supportive local environment. These conditions do not currently exist.
- 3.35 As per previous representations seeking to generate value from its estate would be one of the most significant in terms of the scale of ‘bullet’ funds that can be generated and the overall impact on the University’s operating position. The University is obliged to achieve ‘best value’ for the sale of any land and all receipt will be ‘ring-fenced’ to be reinvested back into the University to resolve its debt position and help fund its further expansion, helping to improve its student offer, position in the market, and ultimately ensure a long-term sustainable future for the University.

(d) Public harm of Doing Nothing

- 3.36 The objectives of the University are defined by Royal Charter (1965) which are to *advance education and disseminate knowledge by teaching, scholarship and research for the public benefit*. Furthermore, and on account of its exempt charitable status, it is required to comply with the legal provisions of the Charities Act (2011) which includes the requirement to carry out its activities for the public benefit. By

legal definition, sustaining the University is in the public interest, and therefore any threats to this would be harmful to the public as a matter of principle.

- 3.37 Not allocating the land to the north of the UoK Site for development (Policy C12) would jeopardise the deliverability of the University's Transformation Plan, and place significant financial strain on the University. At best this would prolong the operating financial deficit by several years and lead to a likely down scaling of operations and any prospect of future investment in the Canterbury campus. At worst it would prevent the University's financial recovery being achieved, leading to its closure.
- 3.38 The closure of the University will result in:
- Loss of c. 5,000 direct/indirect jobs in Canterbury (c. 9,500 jobs in total).
 - Loss of c.£0.5billion economic output in Canterbury (c.£1 billion in total).
 - Loss of £270m of Gross Value Added (GVA) in Canterbury (c. £0.5 billion in total).
- 3.39 This will have a disastrous impact on the local economy and wellbeing of the local community. Even less extreme scenarios represent significant economic lost opportunity and social impact on Canterbury (and Kent), with the loss of direct and indirect knowledge economy, high quality jobs and so on which will likely be redirected to other campuses outside of the district.

(e) The Economic Need for Development

- 3.40 The planning system and the University are aligned in that they both operate in the public interest.
- 3.41 The purpose of the planning system is to contribute to the achievement of sustainable development, the objective of which is to meet the needs of the present without compromising the ability of future generations to meet their own needs. In meeting this purpose, the planning system has economic, social and environmental objectives which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).
- 3.42 Accordingly, the needs of the UoK should be treated as needs in planning terms.
- 3.43 From a planning perspective, the allocation of land to the north of the University for new homes (Policy C12) is a clear and unique opportunity to secure the 'net gains' that the planning system is required to pursue, specifically the generation of unique economic benefits associated with the University that otherwise would not be achieved. It enables the University to crystallise value from its land holdings as a means of funding future investment and reducing the level of debt that is outstanding with its lenders. As such it is a key component of the Transformation Plan discussed above which will secure the long term financial sustainability of the University. This is alongside making its surplus land available to accommodate much needed new homes in an environmentally sustainable manner, delivering the social and environmental objectives of the planning system alongside economic objectives.
- 3.44 Sustaining the University goes to the heart of the purpose of the planning system and achieving the economic objectives of sustainable development.
- 3.45 The matter is not just of local significance. It is of regional (if not national) significance, needs urgent resolution, and requires the support of stakeholders across the public and private sectors – particularly Canterbury City Council.

4. Conflict with the Spatial Strategy

- 4.1 The removal of the allocation for Land North of the UoK (Policy C12) (as proposed in the focused Regulation 18 consultation) would conflict with the Spatial Strategy for the district, including the Vision and Strategic Objectives, as set out in the March 2024 Regulation 18 draft. This risks making the plan as a whole not justified and not capable of being effective.
- 4.2 The Vision includes the following:
- 'A sustainable and resilient economy. The district will be stronger and more resilient by 2040, offering a diverse range of jobs through the development of our universities and colleges.....'
- 4.3 The strategic objectives go on to state that:
- 'Support the growth and development of our universities and colleges as a centre of innovation and learning excellence, which stimulates business start ups and generates skilled jobs,
- 4.4 Achieving this is dependent on ensuring the long-term financial sustainability of the UoK, which requires the new local plan to provide a more supportive policy basis than currently proposed.
- 4.5 There is little or no prospect of investment in the UoK unless its Transformation Plan is successfully executed, which is dependent on the development of land to the north of the campus for housing. The reality is that unless the new local plan provides a supportive policy framework for the University, any future investment in the newly merged Greenwich/UoK will likely be directed to other campuses (outside of the district). In this context, the contraction of operations on the Canterbury campus would be a likely possibility.
- 4.6 This conflict (or inconsistency) can be resolved by adding a strategic economic policy to the plan and re-inserting Policy C12 to allocate land to the north of the UoK.

5. The Need for a Strategic Economic Policy

The Need for a Strategic Economic Policy

- 5.1 Chapter 1 of the Draft Local Plan sets out a series of overarching policies for Canterbury. This includes 5 key policies which together comprise the overall strategy for managing growth and development across the district to 2045. These 5 policies cover matters of environmental, sustainable design, development strategy, movement/transport, and infrastructure.
- 5.2 There is not a policy that sets out a clear economic vision and strategy for the economy that positively and proactively encourages economic growth. This is surprising bearing in mind the evidence of the substantial threats to the University that have been reported to the Council which could have a disastrous effect on the local economy. Greater consideration should be given to the local plan. The economy must have a greater role in the preparation of the new local plan for it to be sound, with all policy mechanisms deployed to protect the future of the UoK otherwise the new local plan will simply not be effective and therefore not sound.
- 5.3 The suite of Strategic Policies set out in Chapter 6 include DS8-DS12 which together comprise the draft strategic policies concerning employment and the local economy. These policies do not provide a clear economic vision and strategy for the economy that positively and proactively encourages economic growth. As a consequence, the content of draft Policies DS8-DS12 is not anchored by a strategic framework (underpinned by evidence) as required by the NPPF and therefore are not capable of being effective or properly justified.
- 5.4 As a matter of principle, the absence of an overarching economic strategy is not consistent with national policy requirements and is therefore unsound. The insertion of a new policy to Chapter 1 that provides a clear economic vision and strategy for the economy that positively and proactively encourages economic growth would make the plan sound in this regard.

Content of the Policy

- 5.5 The strategic economic policy that we recommend is added to Chapter 1 of the draft Local Plan should provide a clear economic vision and strategy for the economy that positively and proactively encourages economic growth, underpinned by relevant evidence. The strategic policies (DS8-12) should be updated to align with this.
- 5.6 On the basis of the evidence submitted by the University, this should maintain support for the continued operation of the UoK and its potential future growth and development as per draft Policy DS9. However, this should be supplemented with an acknowledgement that this is only likely to be deliverable if the UoK recovers its financial position which is dependent on releasing its surplus land for development as part of its estate rationalisation programme. The economic policy should support the principle of such development, subject to the wider policies in the plan.

Alignment with Other Strategic Policies and Site Allocations

- 5.7 In order to deliver the fundamental principles underlying sustainable development, it is necessary for the strategic local plan policies to mutually support one another when read together. In practice this means that the new economic policy should support housing policy within the Local Plan, the housing policy support the economic policy and so on. The same principle applies for the site allocations and development management policies put in place to deliver the strategic policies.
- 5.8 For the reasons set out above, ensuring the long term financial viability of the UoK is dependent on generating value from its estate via the disposal of its surplus land for development. For the reasons

set out in the following sections of this Representation, Sites BCD is a demonstrably suitable, available, and achievable housing site which performs strongly when assessed against the social, economic and environmental objectives set out in the Sustainability Appraisal when compared with other allocations in the draft Local Plan. There are no other proposed allocations that can contribute to the Canterbury economy in the same way.

- 5.9 It follows that as a matter of principle the Council should treat Sites BCD as a preferable location for housing. When considered alongside economic considerations set out above, the case for this site to be allocated for housing is compelling and unignorable.
- 5.10 Put simply, the allocation of Site BCD for housing offers the district the unique opportunity to deliver an economic strategy that achieves significant and fundamental economic benefits which otherwise would be incapable of being achieved. No other allocation sites are capable of delivering these benefits. Furthermore, it would protect the district from the very real risk of substantial economic harm that would arise if UoK's financial improvement plan doesn't deliver its income priorities, which in the worst case could result in a significant reduction in the University's services and broader economic footprint.

6. Suitability of Land to the North of the UoK

- 6.1 The conclusions of the Strategic Land Availability Assessment that the Site is not suitable are not justified. The draft plan is therefore not justified nor capable of being effective.
- 6.2 Evidence has been submitted to the Council as part of previous representations that demonstrates that the Site is suitable, achievable and available. The following further evidence to reinforce this point is enclosed as part of this representation:
- Nutrient Neutrality Assessment Update (Appendix C)
 - Ancient Woodland Strategy (Appendix D)
 - Ecological Strategy (Appendix E)
 - Updated Transport Strategy (Appendix F)
 - Updated Air Quality Strategy (Appendix G)
- 6.3 The majority of land that surrounds Canterbury is significantly constrained by heritage, landscape, and other environmental policy designations whose purpose is to restrict development on such land in order to protect assets of significance. The Site is unusual in that it comprises a 'gap' of land which is much less constrained by such designations than is typically the case.
- 6.4 A summary of the site's suitability is set out below:

Transport

- The Site is located in a **sustainable location** in transport terms, circa 2km from Canterbury West station and the City Centre. Development here offers a genuine opportunity for significant modal shift away from cars as per the aims of the City's Transport Strategy.
- The University benefits from an existing **high frequency bus service** which can be extended into the Site. Positive discussions have already been held with Stagecoach, and no other large-scale residential site can offer the frequency and density of public transport.
- It is within cycling distance of the City Centre and station with amenities close by on the University campus. Improvements to **walking and cycling** infrastructure will be delivered as part of the development (cycle links, e-bikes etc).
- The **access strategy**, focusing on access to the south on Whitstable Road is agreed in principle with Kent County Council (as highway authority).
- The new development will generate additional car trips, however KCC has advised that with an appropriate package of mitigation measures these can be accommodated without a severe impact on the **highway network** (the relevant planning policy 'test').
- The University is exploring ways of **compensating** for any increase in vehicular trips by imposing greater car parking restrictions alongside other initiatives on its campus as part of its staff and student travel plan (to minimise the net change).

Heritage

-
- The Site is not visible from the **World Heritage Site**, and therefore incapable of affecting its setting.
 - A **Scheduled Ancient Monument** falls partly within the Site, however this will not be directly affected by development.
 - The Site does not include any **Listed Buildings**. Development on the Site has the potential to affect the setting of a number of Listed Buildings that are in close proximity. Careful design should ensure that there is no substantial harm.
 - The western part of the Site falls within the Blean **Conservation Area**; the south western part of the site within the Hothe Cort conservation area; and the site is within the setting of the Tyler Hill and Amery Court Conservation Areas. Development within the Conservation Area will be limited to the provision of an access road however the development as a whole has the potential to effect the setting of the Conservation Areas. Careful design should ensure that there will be no substantial harm to the conservation areas or their settings.
 - Development on the Site also has the potential to affect the setting of a number of **non-designated heritage assets** (Locally Listed Buildings) that are in close proximity. Again, careful design should ensure that there is no substantial harm.

Landscape

- The Site is not subject to any protective **landscape designations** other than the far southwest corner which is designated as an Area of High Landscape Value. No development is proposed for this land other than an access road, which in our view can be designed in a manner that avoids substantial landscape harm.

Ancient Woodland

- Providing vehicular access on to the site requires the loss of approximately 25sqm of land that meets the definition of **Ancient Woodland** (land that has been continuously wooded since 1600). Some photographs of the affected woodland are enclosed at Appendix B. The affected land is on the edge of the designated area and is of poor quality in Ancient Woodland terms (with only a rare occurrence of botanical species that indicate ancient woodland presence). While the significance and extent of the woodland affected are both low, its loss is harmful in planning terms. A package of compensatory measures is proposed, to include the creation of new and extended woodland (including soil translocation), and through habitat enhancement of unaffected areas of retained Ancient Woodland. These compensation measures should be considered alongside the significant public benefits that the loss of the woodland will facilitate (as set out later in this section). A balanced judgement is required as to whether the benefits outweigh the harm – it is our view that they do.

Ecology

- The Site predominantly comprises grassland used for arable farming, which is bio-diverse poor. However, parts of the Site include habitats that have the potential to support **protected species**. It is anticipated that further species-specific survey work will be required but that this can be managed appropriately via standard (non-exceptional) mitigation measures.

- A small part of the Site is designated as a **Local Wildlife Site**. This will be protected with no development in this area.
- Land to the West of the village of Blean comprises the Blean Woodland Complex, which is designated as a **Special Protection Area SPA, RAMSAR Site, Special Area for Conservation (SAC), SSSI, and National Nature Reserve**. Assessment work indicates that the proposed development will not lead to relevant air quality benchmarks being exceeded. The provision of Alternative Natural Recreational Greenspace (ANRG) will manage recreational pressure. The proposed landscape and biodiversity gain strategy offers the opportunity to improve ecological connectivity between the Complex and surrounding areas, to deliver net benefits. Accordingly, the development of the Site should not adversely effect the Complex.
- The Site may be located within the Sarre Penn River catchment which, by virtue of being a tributary of the Great Stour, may therefore be hydrologically connected to the Stodmarsh Lakes. The Stodmarsh Lakes are designated as a Special Protection Area (SPA), SAC, Ramsar Site and SSSI and are at risk of deterioration caused by eutrophication from elevated nitrogen and phosphorus in the River Stour. A **nutrient neutrality** mitigation strategy has been identified, including the provision of an on-site waste water treatment facility (as one option) to ensure that the development of the Site will not have an adverse impact on the Stodmarsh site.

Air Quality

- Predicted concentrations of nitrogen oxide (NO_x) are below the Critical Level of 30µg/m³ in all scenarios including with the implementation of the Local Plan and development of the Site. As concentrations do not exceed the Critical Level⁵ no adverse effects are predicted at any of the designated ecological sites within the study area (including Habitats sites that are subject to Habitats Regulations Assessment), irrespective of the change in concentrations predicted due to the development of the Site either 'alone' or 'in-combination' with other plans and projects.
- Predicted concentrations of ammonia (NH₃) are also below the Critical Level of 3µg/m³⁶ which is typically applicable to all habitats, except those where lichens and bryophytes may be present (where a Critical Level of 1µg/m³ applies). It should be noted that background concentrations alone exceed 1µg/m³ (i.e. the exceedances are not caused by either the Local Plan or development of the Site).
- The only Habitat sites where exceedances of 1% of the Critical Level (of 1µg/m³) occur, either 'alone' due to the development of the Site or 'in-combination' with other plans and projects, and where there is sensitivity to NH₃ concentrations and a Critical Level of 1µg/m³ could apply, are Stodmarsh SAC and Blean Complex SAC. Further work would be undertaken at planning application stage to determine the presence (or otherwise) of lichens and bryophytes within these SACs, in locations affected by forecast changes in traffic.
- For N deposition, the results indicate potential for exceedances of 1% of the relevant Critical Load due to the development of the Site 'alone' at the following Habitats sites: The Swale SPA and Stodmarsh SAC. Two additional sites are screened in (Stodmarsh SPA and Blean Complex SAC) when considering exceedances of the 1% criterion 'in-combination'. Exceedances of 1% are also predicted at a number of the SSSI's, LNRs and Ancient Woodland units where they fall within 200m of the affected road network. In all cases, predicted rates of N deposition are lower in the

⁵ Above which direct adverse effects on receptors, such as plants and ecosystems, may occur.

⁶ With an uncertainty range of 2-4µg/m³.

future scenarios , including with the implementation of the Local Plan and development of the Site , than they are in the 2019 baseline case. This is due to forecast future improvements in background rates of N deposition and emissions of NO_x. The development of the Site therefore results in a retardation of future improvements in rates of N deposition rather than a worsening of total N deposition rates, when compared to the current (2019) baseline.

- These results do not take into account mitigation for the development of the Site or strategic mitigation that may be required following the completion of the Local Plan HRA (that may result in more widespread improvements in traffic/emissions).

Technical

- The Site is at low risk of flooding.

7. Deliverability (Availability and Achievability) of Land to the North of the UoK

- 7.1 Evidence has been submitted as part of previous representations to demonstrate that the development proposed under Policy D12 is deliverable, in that the land is available (or can be made available) for development and that development would be achievable, including from a financial viability perspective.
- 7.2 The following further updated evidence is submitted as part of these representations:
- Updated Viability Assessment (Appendix H)
 - Updated Delivery Strategy (Appendix I)
 - Updated Availability Report (Appendix J)
 - Updated Market Report and Programme (Appendix K)
- 7.3 The development of the Site is demonstrably deliverable from a financial viability, technical, and land assembly perspective. The University has selected a development partner, Croudace Homes, who (working in partnership with the University) intends to commence the preparation of a site wide outline planning application immediately, The intention is to progress the development as quickly as possible, with first completions expected by 2029.

8. Alternative Allocations

8.1 The proposed site allocations to meet the district's housing needs are not justified, on the grounds that land to the north of the UoK (Policy C12) is demonstrably suitable, and more suitable than some of the proposed other allocations.

Suitability

8.2 A review has been undertaken of the suitability of the sites proposed for allocation, in the context of the proposal to delete Policy C12. This comprises sites allocated in the 2024 Regulation 18 draft that have been retained plus 'new' allocations proposed in the 2025 focussed Regulation 18 consultation. Our review has focused on sites with capacity 100+ homes. Table 8.1 below provides a summary of the findings of the review

Table 8.1 Alternative Allocations – Suitability Review

Site	Site Allocation	No. of homes	Constraint					
			Area of High Landscape Value	Grade 1/2 Agricultural Land	Setting of World Heritage Site	Flood Zone 2/3	Green Gap	Access/ Highways/ Transport Constraints
Land at Merton Park, Canterbury	N1	1,737	Y	Y	Y			Y
Land South of Littlebourne Road, Canterbury	N4	1,368	Y	Y	Y			Y
Land South of Bekesbourne Lane, Canterbury	N5	774	Y	Y	Y			Y
Land at Military Road, Canterbury	N10	180			Y			Y
Wincheap Commercial Area, Canterbury	C19	1,000			Y	Y Majority		Y
Land East of Chestfield Road, Whitstable	N20	150	Y					Y
Land at Home Farm Strode Park, Herne Bay	N29	200						Y
Chartham Paper Mill, Rural Area	N31	165				Y Majority		Y
Land at Rattington Street, Rural Area	N32	170						Y
Land at Brooklands Farm, Whitstable	W4	1,260	Y			Y Part		Y
Land South of Thanet Way, Whitstable	W5	220					Y	Y
Land East of Bodkin Farm, Whitstable	W6	250				Y Majority	Y	Y
Land to the West of Thornden Wood Road. Part of Land at Greenhill	HB4	150					Y	Y

adjacent Thornden Close, Herne Bay								
Bread and Cheese Field, Rural Area	R5	150						Y
Land off The Hill, Littlebourne, Rural Area	R7	270		Y				Y
Land North of Popes Lane, Rural Area	R9	110						Y
Total		8,154						Y
Land to the north of the University of Kent	-	2,000	N	N	N	N	N	Y

8.3 Our review has identified 5 principal issues:

- (1) The district is reliant on greenfield land to meet a large proportion of its housing land requirement.
- (2) The focussed changes increase the number of homes directed towards the northern part of the district, which conflicts with the spatial strategy which is to focus development in/around Canterbury as the most sustainable location to accommodate growth.
- (3) Sites outside of Canterbury are subject to restrictive policy designations which make them less suitable for development (in the context more suitable alternatives which are not subject to such constraints):
 - o Flood Zone 2/3
 - o Green Gap
 - o Area of High Landscape Value
- (4) There are 3 strategic scale greenfield allocations on the edge in Canterbury. These are all subject to restrictive policy designations that make them less suitable for development (in the context of more suitable alternatives which are not subject to such constraints):
 - o Designated as being within an area of High Landscape Value
 - o Comprise the highest quality agricultural land
 - o Are located within the setting of the World Heritage Site
- (5) All are subject to access/ highways/ transport constraints, particularly N1, N4, N5 and W4.

Access, Highways and Transport Constraints

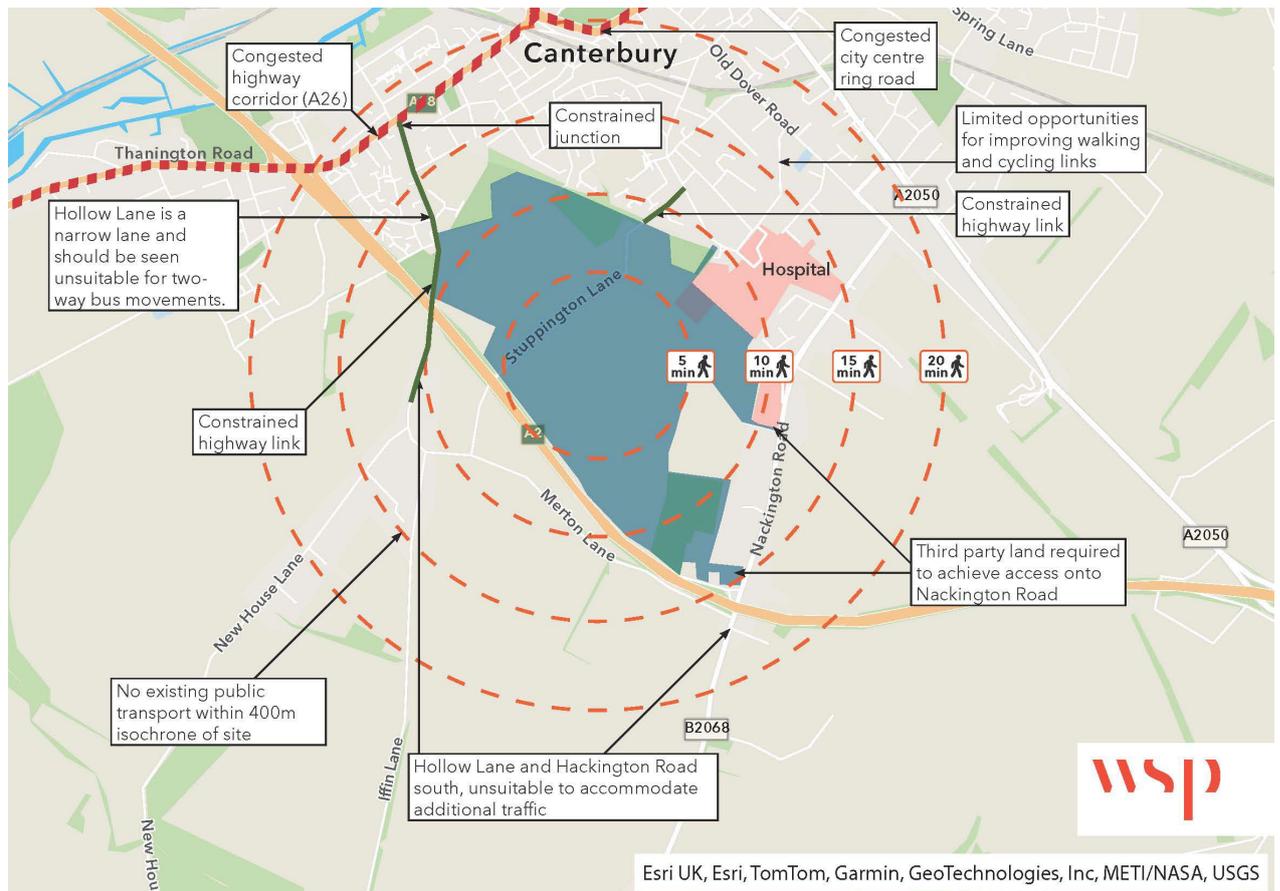
8.4 We have explored the access, highways, transport constraints of N1, N4, N5 and W4 in further detail, as considered below:

N1 – Merton Park

- Third Party land appears to be required to achieve adequate access to serve a development of nearly 2000 units from Nackington Road.
- No existing Public Transport opportunities within close proximity of the site
- Limited opportunities for improving walking and cycling connections to the City Centre

- Hollow Lane is a narrow road and is unsuitable for two-way bus movements
- Hollow Lane/ A26 priority junction is constrained with limited potential for enhancements.
- Access strategy will place additional pressure on already congested Canterbury City Centre Ring Road
- Road network to the south of the development unsuitable for increases in traffic

Figure 8.1 Merton Park Access/Transport Analysis

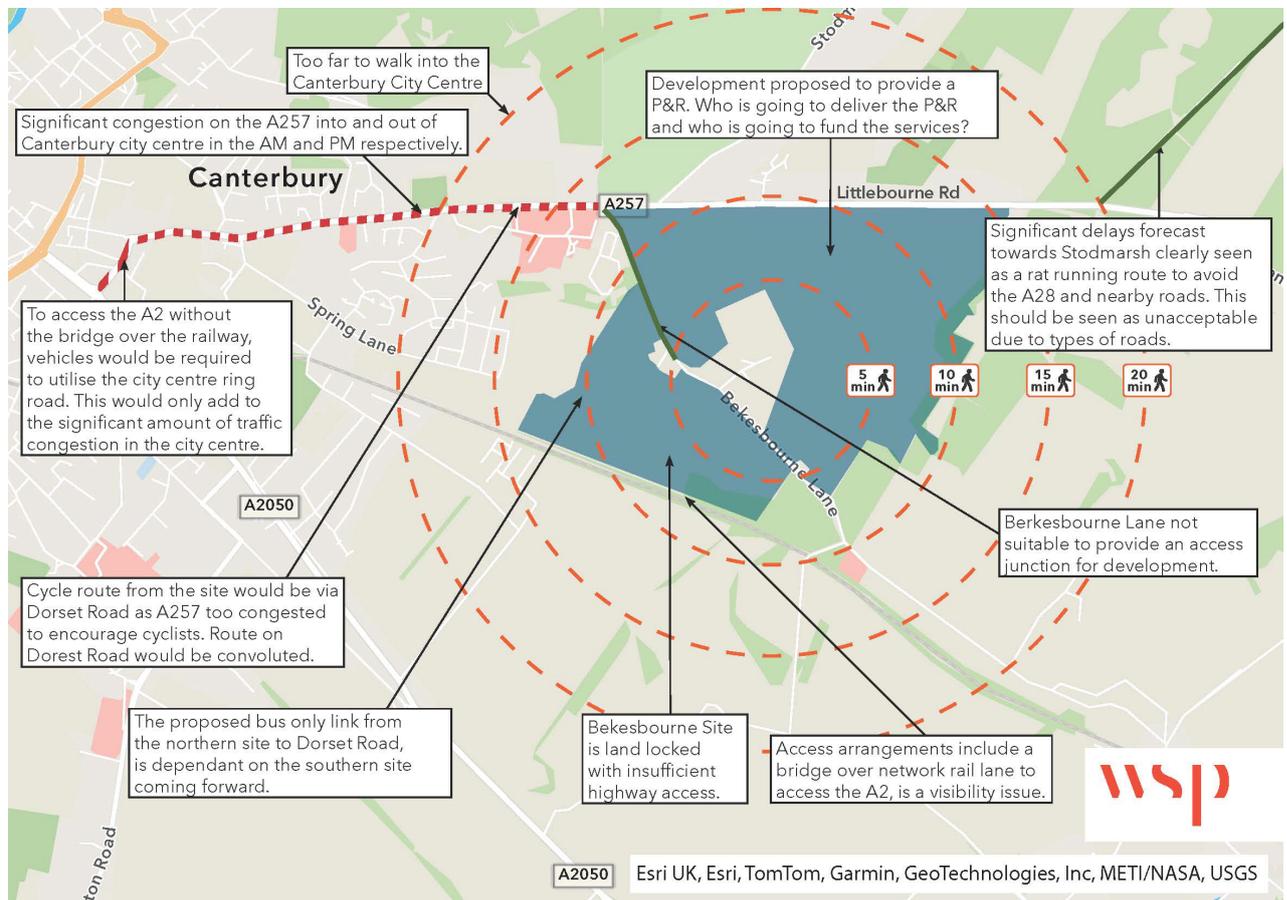


N4/N5 – Land South of Littlebourne Road and Land South of Bokesbourne Lane

- Congestion on the A257 into and out of Canterbury city centre constrains the potential for this site to come forwards.
- Development proposed to provide a park and ride. It is unknown who will deliver this expensive infrastructure nor who will fund the services in the future.
- Significant delays forecast towards Stodmarsh within the strategic modelling places additional traffic on an inappropriate road link.
- Access strategy will place additional pressure on already congested Canterbury City Centre Ring Road.
- Access arrangements including a bridge over Network Rail land to access the A2 is unlikely to be achievable.

- Bekesbourne Site is land locked with insufficient highway access and therefore would rely on the neighbouring site to be brought forwards despite being in separate ownerships.
- The proposed bus only link from the northern site to Dorset Road, is dependent on the southern site coming forward.

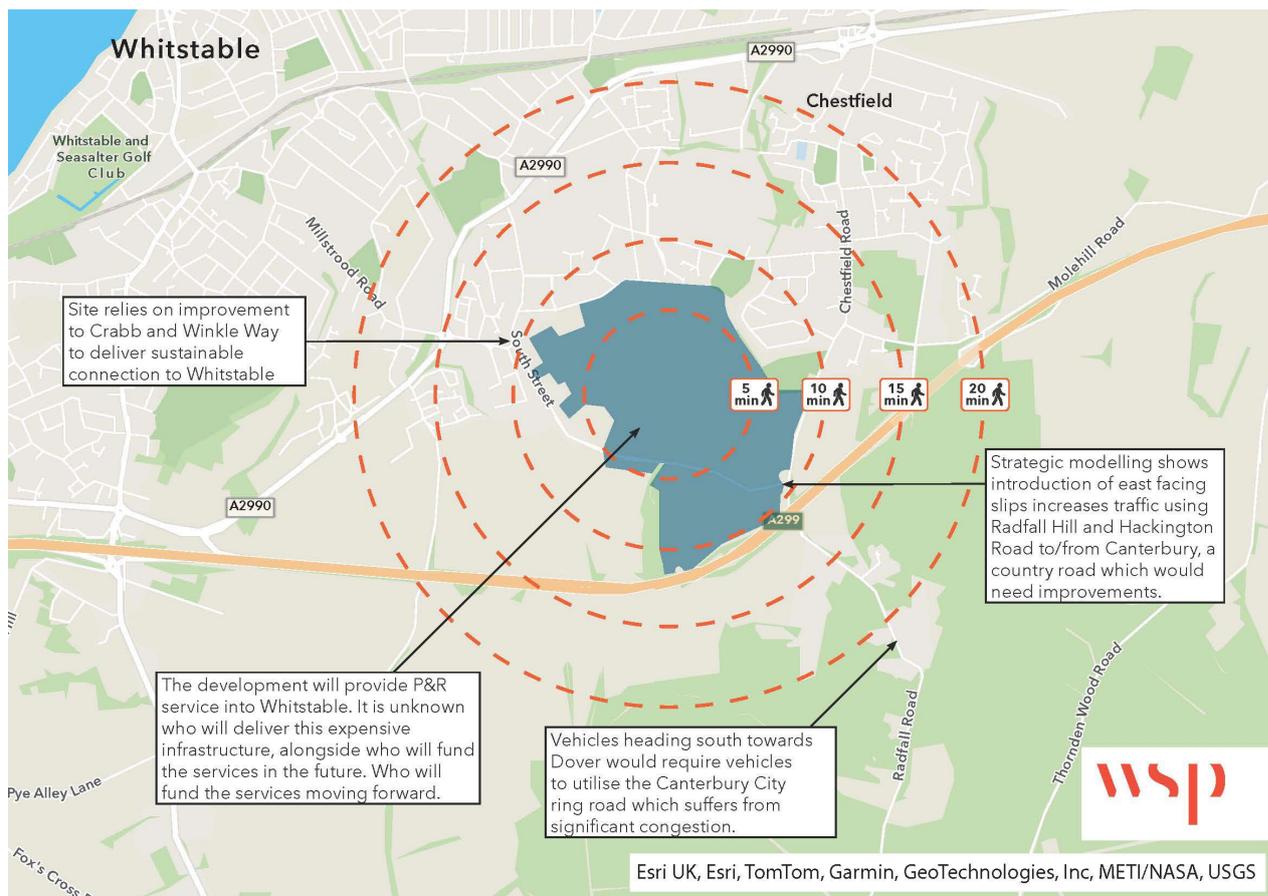
Figure 8.2 East of Canterbury Access/Transport Analysis



W4 - Land at Brooklands Farm

- The development will provide a park and ride service into Whitstable. It is unknown who will deliver this expensive infrastructure nor who will fund the services in the future.
- The site relies on improvements to the Crabb and Winkle Way to deliver sustainable connection to Whitstable.
- Vehicles heading south towards Dover would need to utilise the Canterbury City ring road which suffers from significant congestion.
- Strategic modelling shows introduction of east facing slips increases traffic using Radfall Hill and Hackington Road to/from Canterbury, a country road which would need improvements.

Figure 8.3 Land at Brooklands Farm Access/Transport Analysis



Deliverability

- 8.5 We have also undertaken a review of the deliverability of the sites proposed for allocation. This review has identified that (with the exception of site ref. N10) that all of the proposed allocation sites are being promoted by either landowners or strategic land promoters – none of which have house building capability. This brings into question the likelihood of new homes being delivered on these sites in the short term.

Conclusion

- 8.6 The above analysis firmly indicates that the UoK site is a more suitable site than many of the other sites (particularly N1, N4, N5 and W4) from a transport, technical and environmental perspective.
- 8.7 It is, furthermore, demonstrably more deliverable in the short term than the majority of the other proposed allocations (on account of having a development partner on board with house building capability).

9. Public Benefits

9.1 The removal of Policy C12 is not in the public interest as it would prevent significant public benefits from being achieved and will generate the risk of significant social and economic public harm.

Benefits

9.2 The overarching unique public benefit of developing land to the north of the UoK for housing is that it enables economic and social (housing) planning objectives to be achieved in a complementary joined up manner, which will realise net additional benefits over and above what could otherwise be achieved.

Economic

9.3 The key economic benefit is that the allocation of the Site will support the continuation (and potential improvement) of the economic contribution that the UoK currently makes, and protects against the substantial economic public harm that would undoubtedly arise if the University's Transformation Plan is not successful.

9.4 Headlines include:

- Maintain c. 5,000 direct/indirect jobs in Canterbury (c. 9,500 jobs in total), with the potential for future growth.
- Maintain c.£0.5billion economic output in Canterbury (c.£1 billion in total), with the potential for future growth.
- Loss of £270m of Gross Value Added (GVA) in Canterbury (c. £0.5 billion in total), with the potential for future growth.

9.5 The development of the Site will also generate broader economic benefits, including:

- Construction stage expenditure, jobs and training opportunities.
- Future investment in the University's retained campus to deliver education and complementary uses (for example hotel/conferencing facilities to support the wider economy).

Social Benefits

9.6 The key social benefits of developing the Site include:

- Significant support for the continuation and ongoing improvement of the provision of higher education and research at the University (to include future investment in its estate).
- Provision of new more functional and cost/energy efficient accommodation and associated facilities for Blean Primary School.
- Provision of 2,000+ homes in a range of sizes, types and tenures (including affordable homes) to help meet current and future local housing needs.
- Provision of well-designed and well specified homes set within a masterplanned environment with generous amount of green open space that promotes healthy living.

-
- Provision of new social infrastructure necessary to provide for the needs of future residents, including a new local centre, primary school and other community facilities.

Environmental Benefits

9.7 Key environmental benefits of developing the Site include:

- Provides for the development needs of the district in a manner that minimises the contribution that this would make to climate change and which is resilient to the effects of a changing climate, including:
 - o Provision of 2,000 homes planned, designed, and specified in a manner that will enable their occupants to live sustainable lifestyles, including in respect to carbon impacts associated with household energy consumption and transport (noting the unique opportunity to take advantage of the University's existing transport infrastructure to deliver an active travel based transport strategy for the Site).
 - o Support for the University's estate strategy to decarbonise its estate
- Avoiding the need to develop land of higher landscape value to meet development needs.
- Heritage, including:
 - o Accommodating new development on land which is not visible from the World Heritage Site (and therefore does not affect its setting).
 - o Protection of the significance of other existing heritage assets including the Grade II* listed Church of St Cosmus and St Damian, Grade II listed Church Cottage, Scheduled Ancient Monuments and Conservation Areas.
- Minimum 20% biodiversity net gain compared to the existing position and opportunities to deliver strategic objectives including improved 'green' connectivity between existing green infrastructure.

The Public Harm of Doing Nothing

- 9.8 Not allocating the land to the north of the UoK Site for development (Policy C12) would jeopardise the deliverability of the University's Transformation Plan, and place significant financial strain on the University. At best this would prolong the operating financial deficit by several years and lead to a likely down scaling of operations and any prospect of future investment in the Canterbury campus. At worst it would prevent the University's financial recovery being achieved, leading to its closure.
- 9.9 This will have a disastrous impact on the local economy and wellbeing of the local community. Even less extreme scenarios represent significant economic lost opportunity and social impact on Canterbury (and Kent), with the loss of direct and indirect knowledge economy, high quality jobs and so on.

10. Conclusions

- 10.1 By way of summary, the representations demonstrate that if the new local plan were to progress on the basis of the changes set out in the August 2025 focussed Regulation 18 consultation, it would not be sound.
- 10.2 For the plan to be progressed on a sound basis, the following is required:
- Insertion of a strategic economic policy that provides for objectively assessed economic needs (and positively and proactively encourages economic growth) in a manner that is aligned and interdependent with other strategic policies, including those that seek to meet social needs such as housing and education. Specifically, this should support the continuation and growth of the UoK and the delivery of new homes in/around the UoK campus (as a means of supporting the delivery of the economic strategy).
 - Re-insertion of Policy C12 (as per the 2024 Regulation 18 draft Local Plan) to support the development of land to the north of the UoK for new homes.
- 10.3 The above changes are justified by the evidence provided as part of these representations which demonstrate that:
- Land to the north of the UoK is demonstrably suitable for the development proposed.
 - Land to the north of the UoK is more suitable than a number of the other allocation sites which are subject to significant environmental, heritage and transport constraints which make them less suitable for development.
 - Overall, the above changes are clearly in the public interest. They will deliver significant public benefits and protect the public from the risk of substantial economic harm.
 - The changes are necessary for the new local plan to be effective, justified, and consistent with national policy,

- Appendix A** The Economic Impact of the University of Kent, June 2024
- Appendix B** Photographs of Ancient Woodland, October 2025
- Appendix C** Nutrient Neutrality Assessment Update
- Appendix D** Ancient Woodland Strategy
- Appendix E** Ecological Strategy
- Appendix F** Updated Transport Strategy
- Appendix G** Updated Air Quality Assessment
- Appendix H** Viability Assessment
- Appendix I** Update Delivery Strategy Report
- Appendix J** Updated Availability Report
- Appendix K** Updated Market Report and Programme

Contact details

Enquiries

Nick Alston



Visit us online

avisonyoung.com

Avison Young

The Met, 24 Percy Street, London W1T 2BS

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