

From **Dr William Rowlandson**

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Committee Member: Canterbury District Biodiversity Network; Save the Blean; Friends of Old Park & Chequers Wood; Friends of Neals Place & Dukes Meadow.

I write in my capacity as Canterbury resident, employee of the University of Kent, and an active member of several local environmental and community groups. My deep professional and personal investment in this district's landscape, ecology, and sustainable future underpins this representation.

My submission focuses exclusively on one critical matter: the permanent removal of former Policy C12 (Land North of the University of Kent) from the Local Plan. I state clearly and unambiguously that this land must not be reinstated or replaced by any other allocation in the Blean area. The Council's decision to exclude this site is sound, justified, and evidence-based, and it must be defended robustly at Examination. I am not commenting on other allocations, nor am I commenting on the impossible task that Canterbury City Council faces in attempting to allocate land – much of it agricultural and environmentally sensitive – with an unworkable, unviable and unnecessary housing target set by the Government.

The Council's own assessment proves the site is unsuitable. The City Council's [Strategic Land Availability Assessment \(SLAA319\) - Summary of Site Submissions \(February 2026\)](#) pages 324-326 unequivocally concluded that this 102-hectare site is "unsuitable for the land use proposed" for three consolidated reasons, which I summarise here:

- **Provision of Suitable Access:** The proposed primary access would require the loss of irreplaceable ancient woodland (Long Thin Wood). The SLAA correctly notes that NPPF Paragraph 193(a) states compensatory schemes (e.g., soil translocation) are only a last resort where harm cannot be avoided. The promoter has not demonstrated that avoidance is impossible, and the Council rightly judged that the harm could not be justified.
- **Impact on the Highway Network:** Representations from KCC Highways and National Highways raised insurmountable concerns regarding the design and delivery of the necessary A2 slip roads at Harbledown. The promoter failed to provide evidence that these concerns could be overcome. Furthermore, KCC Highways confirmed that no detailed designs or updated capacity assessments had been provided, and there was insufficient evidence that the proposed sustainable transport strategy was deliverable or would achieve the required levels of mode shift.

- **Impact on Ecology & Ancient Woodland:** The site lies at the heart of the Blean Woodland Complex, an internationally designated SAC, SSSI, and National Nature Reserve. The Council acknowledged that the access strategy would result in the loss of ancient woodland and that the promoter's subsequent evidence confirmed this. The objections from Natural England, the Forestry Commission, and the Woodland Trust were rightly given significant weight.

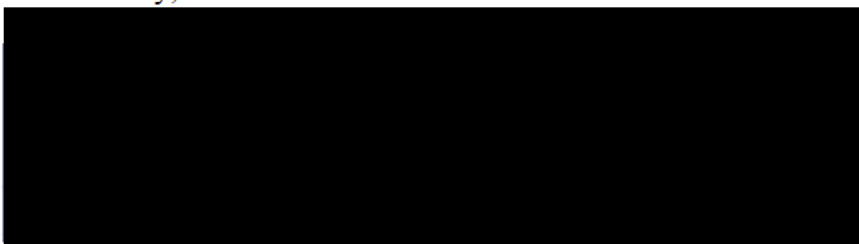
The Council's own SLAA assessment is unequivocal. A site that fails on access, highways, and ecology simultaneously is fundamentally undeliverable. To re-insert it would be to ignore the Council's own professional, evidence-based judgement and would render the Plan unsound.

It was suggested by Avison Young on behalf of the University of Kent in previous Reg18 consultation that the university's financial position necessitates this development. This is not and cannot be a material planning consideration. The financial strategy of a landowner does not outweigh proven and severe environmental and transport constraints. Moreover, the viability of the site is demonstrably non-existent. The SLAA explicitly notes that while the promoter made an allowance for relocating Blean Primary School, no allowance was made for the multi-million-pound cost of the required Harbledown slip roads. When added to the cost of an on-site wastewater treatment works, the relocation of a successful primary school, and the loss of development land to ancient woodland buffers, the scheme is financially unviable.

The removal of Policy C12 is a sound, justified, and effective decision. It is based on the Council's own rigorous assessment, which confirms the site is unsuitable. To reinstate this site would be to ignore the evidence and would render the Local Plan unsound.

I urge the Inspector to endorse the Council's decision to delete this allocation permanently and to reject any attempt to have the policy proposal reinstated in this environmentally sensitive area. The land north of the University of Kent must be left as green space – for the sake of all residents, and for the sake of evidence-based planning.

Yours faithfully,



Dr William Rowlandson