

Representations to the Canterbury Local Plan (2042/43) Regulation 19 Consultation [DRAFT]

University of Kent and Croudace Homes

May 2026

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For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 These representations have been prepared by Avison Young (AY) (with support from WSP and PRP Architects) on behalf of the University of Kent (UoK) and Croudace Homes. The representations set out our comments on the soundness of the Regulation 19 draft Canterbury Local Plan (March 2026) (referred to as the '**DLP**' from hereon).

Background

- 1.2 The UoK operates from a 230ha site located on the northern edge of Canterbury. Approximately 93ha of this comprises greenfield land which has been identified as surplus to its requirements (referred to as the '**Site**' from hereon). Refer to the Site Plan at Appendix A.
- 1.3 It intends to dispose of the Site in order to make it available to meet local development needs (particularly housing) and to generate a receipt to be invested back into the University. This forms a critical part of a 'transformation plan' that the UoK is implementing to address significant financial challenges and to secure its long term future.
- 1.4 A consultant team was appointed by the UoK in 2020 to prepare an evidence base and associated concept masterplan to define the development opportunity for the Site, which has formed the basis of discussions with Canterbury City Council (CCC) and other stakeholders in the period since. The evidence (as submitted as part of these representations) demonstrates that the Site is a suitable location for housing development, which is available for development now, and has a reasonable prospect of delivering new homes at scale within the next 5 years.
- 1.5 The UoK has submitted representations to each public consultation associated with the emerging local plan since 2020. Its aim has been to secure a site-specific policy within the new Local Plan that supports the development of the Site for a residential-led new neighbourhood (c. 2,000 homes and associated development) (the '**Proposed Development**').
- 1.6 The Site was identified as an 'Opportunity Area' in the Regulation 18 consultation draft (October 2022) (Policy C26), which was revised to an allocation for c.2,000 homes in the Revised Draft Regulation 18 consultation (March 2024) (Policy C12). The allocation was subsequently removed in the Focussed Regulation 18 consultation (September 2025), and the Site is not allocated in the DLP.
- 1.7 For the reasons set out in these representations, it is our view that the inclusion of a site-specific policy that supports the development of the Site for housing (and associated development) is necessary for the DLP to be sound.
- 1.8 The UoK has recently entered into a joint working arrangement with Croudace Homes which has been selected as the intended developer for the Site. Accordingly, these representations are submitted jointly on behalf of the UoK and Croudace Homes.
- 1.9 The joint parties (UoK/Croudace) have recently commenced pre-application discussions with CCC in respect to the preparation of a planning application for the Proposed Development, which it aims to submit in summer 2027. It aims to commence development in 2029 with the first homes expected to be completed by early 2030.

Overview of Representations

- 1.10 These representations demonstrate that parts of the evidence base that informs the DLP are not robust and that a number of the policies contained within the DLP are not sound.
- 1.11 With regards to the evidence base:
- The evidence base does not include an **assessment of the needs of the Higher Education (HE) sector** (including the UoK), which plays a substantial and crucial role in the local economy. In the absence of a robust understanding (evidence) of the needs of the University and the local HE sector as a whole, the DLP is incapable of being positively prepared nor consistent with national policy with particular regard to the requirements of National Planning Policy Framework (NPPF) paras. 11, 15, 20, 23, 85, and 86.
 - The **transport** evidence (as set out in the Canterbury Transport Strategy (2026); Canterbury Transport Modelling Forecast Report (2026); and the Canterbury District Bus Action Plan) is not robust. As a consequence, the DLP is incapable of being properly justified or effective. In summary:
 - o The spatial pattern of development (which concentrates growth to the southeast of Canterbury) results in significant congestion on the A257, A28 and the City Centre Ring Road, with modelling indicating that traffic will divert to rural/secondary roads as a consequence. These representations demonstrate that:
 - The severity of the congestion on the aforementioned roads has been under-estimated.
 - The rural/secondary roads (to which traffic is expected to divert) do not have sufficient capacity to accommodate the anticipated volume of additional traffic without significant upgrades (which have not been identified/planned for).
 - The severity of the impact would be significantly reduced if the spatial distribution of development was different. To specifically include directing a proportion of growth to the north of Canterbury (to include the Site), as this would better account for the spatial origin and destinations of trips.
 - o Proposed allocations in/around Whitstable will lead to unacceptable levels of congestion on rural roads in the northern parts of the district.
 - o The Bus Action Plan is inadequate to support the assumed modal share (shift) assumptions upon which the Transport Strategy is based, which indicates that the likely highway impacts have been under-estimated.
 - The **Strategic Land Availability Assessment (SLAA)** underestimates the supply of suitable available land for housing. As a consequence, the DLP policies that rely upon this evidence base are not capable of being adequately justified. Specifically, its conclusion that site SLAA319 (the Site) is not suitable for development due to 'concerns regarding provision of suitable access; impact on the highway network and impact on ecology, including the loss of ancient woodland' is not robust. On the basis of the evidence set out in these representations, the Site should be treated as a suitable location for housing development, which is available for development now, and has a reasonable prospect of delivering new homes within the next 5 years.
 - The conclusions of the **Sustainability Appraisal (SA) of the SLAA Sites**, specifically with regards to the Site (which tally with the conclusions of the SLAA), are not robust. As a consequence, the DLP policies that rely upon this evidence base are not capable of being adequately justified.

1.12 Our view is that the fundamental flaws in the evidence base are of such significance that the DLP is incapable of being sound.

1.13 In terms of the DLP policies, our view is that the Vision; Strategic Objectives; Policy SS3 (Development Strategy) including the Housing Trajectory at Appendix 6; Policy SS4 (Economic Strategy); Policy SS5 (Movement and Transport Strategy); Canterbury Vision; Policy C9 (Canterbury Urban Area Strategy); and the site allocations (referred to as the '**Policies**' from hereon) are individually and collectively not sound. This is on the following grounds:

- The overall DLP policy approach (including the selection of site allocations for housing) does not adequately account for the interdependencies between meeting economic, social, and environmental objectives and does not pursue these in a mutually supportive way in order to secure net gains. As a consequence, the DLP fails to adequately seek to meet the **needs of the HE sector**. Accordingly, the Policies are not positively prepared, not justified, and not consistent with national policy.
- Insufficient land has been allocated to meet assessed housing needs in the period to 2032, with the **housing requirement** following a 'stepped approach'. The stepped annualised housing requirements are not justified in the context of there being additional suitable and available sites that have a reasonable prospect of delivering homes within the period to 2032 that could be allocated for development. Compounding this are issues with the robustness of the assumptions of capacity and anticipated rates of delivery of the site allocations, which indicate that the Housing Trajectory may be over-ambitious. The Policies are therefore not positively prepared, not justified and not consistent with national policy.
- The prioritisation of **previously developed land** and restrictions over development outside of tightly defined **settlement boundaries** is not justified, positively prepared, nor in consistent with national planning policy.
- The **Economic Strategy** does not acknowledge the economic needs and financial challenges faced by the HE sector and does not seek to support/protect this sector, as a consequence the DLP does not plan positively to meet the district's economic needs. The Policies are therefore not justified, not positively prepared and not consistent with national policy.
- The deliverability of the Policies is dependent on a **transport strategy** that is fundamentally flawed, which poses a risk to deliverability (particularly in terms of number of homes and anticipated timescales/completion rates), which introduces further uncertainty over the achievability of the Housing Trajectory. Therefore, the Policies are not justified or effective.

1.14 The Policies can be made sound by either:

- (a) Allocating the Site for a 2,000-home new neighbourhood; or (as a less preferable alternative)
- (b) Designating the Site as an Opportunity Area (Broad Location for Growth) suitable for the provision of new homes (and associated development).

Scope and Structure of Representations

1.15 These representations comprise this report plus a series of appendices which provide evidence to underpin the representations. This report is structured as follows:

-
- **Section 2** provides a summary of representations submitted by UoK to previous public consultations associated with the preparation of the DLP.
 - **Section 3** provides information regarding the UoK and its landholdings in Canterbury as necessary to provide the context for the representations.
 - **Sections 4-7** provide our comments on the DLP evidence base:
 - o Higher Education (Economic) Needs (Section 4)
 - o Transport evidence (Section 5)
 - o Strategic Land Availability Assessment (SLAA) (Section 6)
 - o Sustainability Appraisal of the SLAA Sites (Section 7)
 - **Section 8** provides our comments on the soundness of the Policies and the modifications required to make them sound.

1.16 This report is supported by the following appendices:

- **Appendix A** – Site Plan
- **Appendix B** – Transport Response to Regulation 19 DLP
- **Appendix C** – Transport Position Statement (7th April 2026) (including email from KCC confirming its agreement).
- **Appendix D** – Supplementary Transport Note (Outstanding Items yet to be agreed with KCC) (6th May 2026)
- **Appendix E1** – Land Agent Letter (May 2026)
- **Appendix E2** – Developer Letter (May 2026)
- **Appendix F1** – CCC pre-application meeting pack (April 2026)
- **Appendix F2** – Pre-application advice from CCC (May 2026)
- **Appendix G** – University of Kent Annual Review and Financial Statement (2024)
- **Appendix H** – UK Modern Industrial Strategy
- **Appendix I to T** – Representations previously submitted to CCC (refer to Table 2.1 for full list)

2. Previous Representations

- 2.1 The UoK has been engaged in active ongoing discussions with CCC since 2020 with regards to the Site, the Proposed Development and the emerging local plan. Kent County Council (KCC) (as Highway Authority) has been included in this with regards to transport (and education) matters.
- 2.2 The approach has involved working collaboratively with CCC Officers to define the development proposition for the Site; seek to agree an appropriate policy basis to be included in the new local plan; and ensure that there is an appropriately robust evidence base to underpin this.
- 2.3 An extensive package of evidence (assessments, surveys, strategies) has been prepared by the UoK team. This has formed the basis of representations submitted to CCC in response to the formal public consultations for each stage of the DLP preparation. In addition to representations to formal consultations, supplementary representations have been made to CCC (February 2022, November 2023, February 2025, and March 2025) in relation to specific matters.
- 2.4 Table 2.1 below, provides an overview of the representations submitted, which are enclosed as appendices to this representation (Appendices I to R). These representations form part of the evidence base that underpins the points made in these representations.

Table 2.1 Overview of Representations Submitted to CCC

	Consultation	Date	Scope of Representations Submitted by UoK
Appendix I	Supplementary Submission	December 2025	An updated Transport Strategy was submitted to KCC/CCC in December 2025. (Appendix I)
Appendix J	Regulation 18 Focussed Consultation	October 2025	Overarching updated (AY) Planning Report (Appendix J(i)) (including a review of alternative (competing) allocations) supported by the following: - Economic Impact of the UoK (June 2024) (Appendix J(ii)) - Photographs of Ancient Woodland (Appendix J(iii)) - Nutrient Neutrality Assessment Update (Appendix J(iv)) - Ancient Woodland Strategy (Appendix J(v)) - Ecological Strategy (Appendix J(vi)) - Updated Transport Strategy (Appendix J(vii)) - Updated Air Quality Assessment (Appendix J(viii)) - Viability Assessment Appendix J(ix) - Update Delivery Strategy Report Appendix J(x) - Updated Availability Report (Appendix J (xi)) - Updated Market Report and Programme (Appendix J (xii))
Appendix K	Supplementary Submission	March 2025	An updated Transport Strategy was submitted to CCC in March 2025. (Appendix K)
Appendix L	Supplementary Submission	February 2025	Updated Preliminary Ecological Appraisal (WSP, 2025) (Appendix L(i)) Ecological Mitigation Strategy (WSP, 2025) (Appendix L(ii))

			Sarre Penn and Stodmarsh Connectivity Assessment (Nutrient Neutrality Strategy) (WSP, 2024) (Appendix L (iii))
Appendix M	Regulation 18 Revised Draft Local Plan Consultation	June 2024	Overarching (AY) Planning Report (Appendix M(i)) including updated details of public benefits; updated details of site suitability, availability and achievability; and comments on draft local plan policies. Supported by the following evidence reports: - Updated Economic Impact Assessment (Viewforth Consulting, 2024) (Appendix M(ii)) - Transport Appraisal (WSP, 2024) (Appendix M(iii)) - Environmental Update Report (WSP, 2024) (Appendix M(iv)) - Site Delivery Report (AY, 2024) (Appendix M(v)) - Updated Illustrative Masterplan document (PRP, 2024) (Appendix M(vi))
Appendix N	Supplementary Submission	November 2023	Masterplan Delivery note (AY, 2023) (Appendix N(i)) Viability Assessment (AY, 2023) (Appendix N(ii)) Transport Strategy Summary (WSP, 2023) (Appendix N (iii)) Nutrient Neutrality Assessment Update (WSP, 2023) (Appendix N(iv)) Recreation Pressure on Blean Woods Technical Note (WSP, 2023) (Appendix N(v))
Appendix O	Regulation 18 Draft Local Plan Consultation	January 2023	Overarching (AY) Planning Report providing comments on draft policies. (Appendix O(i)) Supported by the following: - Updated illustrative masterplan (PRP, 2023) (Appendix O(ii)) - Preliminary Transport Appraisal Update (WSP, 2023) (Appendix O(iii)) - Air Quality Assessment Note (WSP, 2022) (Appendix O(iv)) [Some other evidence reports that had previously been submitted, as listed below, were resubmitted.]
Appendix P	Supplementary Submission	February 2022	Preliminary Transport Appraisal (WSP, 2022) (Appendix P (i)) Access Road Alignment Appraisal (WSP, 2022) (Appendix P(ii)) Air Quality Assessment (WSP, 2022) (Appendix P(iii))
Appendix Q	Vision and Preferred Options Consultation	August 2021	Response to CCC consultation questionnaire. (Appendix Q(i)) Updated (AY) overarching Planning Report 'Sustainable Development Opportunity – the University of Kent'. (Appendix Q(ii)) Supported by the following evidence reports: - A 'Vision for Development' masterplan document (PRP, 2021) (Appendix Q(iii)) - Environmental Constraints and Opportunities Report (WSP, 2021) (Appendix Q(iv))

			- Transport Strategy (WSP, 2021) (Appendix Q(v)) - Note on Ancient Woodland Policy Matters (AY, 2021) (Appendix Q(vi)) - Delivery Strategy (AY, 2021) (Appendix Q(vii))
Appendix R	Call-for-Sites	July 2021	Further information to supplement the June 2020 call-for-sites submission (update to cover report to account for additional evidence submitted as part of Preferred Option local plan consultation – see below). (Appendix R)
Appendix S	Our Future District 2040	July 2020	Response to CCC consultation questionnaire. (Appendix S)
Appendix T	Call-for-Sites	June 2020	Overarching (AY) planning report (Appendix T(i)) setting out the unique need to develop the Site for housing, including a case demonstrating suitability, availability and achievability. Supported by the following evidence reports: - The Economic Impact of the UoK (Viewforth Consulting, 2018) (Appendix T(ii)) - Property Market Appraisal (AY, 2020) (Appendix T(iii)) - UoK Masterplan (2019), including supporting documents: Place-making Strategy; Planning and Environment Strategy; Biodiversity and Landscape Strategy; Movement and Transport Strategy; Baseline Mapping; Building Analysis (including historical evolution) and University Benchmarking Study; Landscape Setting and Views Appraisal; and Preliminary Ecological Appraisal (Appendix T(iv)) - Title Plans (Appendix T(v))

3. Context – The University of Kent

3.1 This section sets out the context to the representations in terms of:

- (a) The Site (description, location, planning history, planning policy designations).
- (b) The Proposed Development.
- (c) Site suitability, availability, and the achievability of the Proposed Development.
- (d) The need for the Proposed Development and the unique public benefits.

(a) The Site

Description

3.2 Refer to site plan at Appendix A.

3.3 The Site extends to approximately 93ha and lies immediately to the north of the UoK's main built-up campus (the 'Retained Campus', as outlined in blue in Figure 3.1). It comprises 3 separate parcels of land identified as Sites B, C, and D, as outlined in white in Figure 3.1:

- Site B extends to approximately 63.4ha. It comprises a number of fields used for agriculture (arable farming) separated by hedgerows, areas of woodland, and a stream (which runs east-west across the southern part of the Site through a shallow valley). It can be accessed from the Retained Campus and Tyler Hill Road. It is bound to the north by Tyler Hill Road; to the east by open fields, beyond which is the disused Crab and Winkle railway line; to the south by the Retained Campus; and to the west by open fields and the rears of properties fronting Whitstable Road (including Blean Primary School).
- Site C extends to approximately 7ha. It lies to the north of Tyler Hill Road (from which it can be accessed) and comprises a single irregular shaped field enclosed by a hedge. It is surrounded on all sides by open fields in agricultural use (arable farming).
- Site D extends to approximately 22.9ha. As per Site C, it lies to the north of Tyler Hill Road (from which it can be accessed), comprises a single irregular shaped field enclosed by a hedge, and is surrounded on all sides by open fields in agricultural use (arable farming).

Figure 3.1 Aerial Photograph (Site Outlined in White)



Location

- 3.4 The Site is located approximately 2.5km north of Canterbury City Council and 6km south of Whitstable (refer to Figure 2.2, which identifies the extent of the Site outlined in red). The village of Blean is immediately to the west and the village of Tyler Hill immediately to the east.
- 3.5 The A2 is approximately 2.5km to the southwest and the A299 5km to the north. Canterbury West railway station is 2km to the south and Canterbury East railway station 2.5km to the south. Frequent bus services, which are accessible from the surrounding road network (Whitstable Road and the UoK Retained Campus), connect the Site to the City Centre.
- 3.6 It lies within the administrative area of Canterbury City Council (CCC) (the Local Planning Authority (LPA)), and Kent County Council (the Local Minerals and Waste Planning Authority, Highways Authority, and Education Authority).

Figure 2.2 *Aerial Photograph (Site Outlined in Red)*



Planning History

- 3.7 The Site has no recent planning application history relevant to the Proposed Development.
- 3.8 However, the southern part of Site B falls within a larger area ('land to the north of Broad Oak, Kent') that is covered by a request for an EIA Scoping Opinion:
- This was submitted to Canterbury City Council (ref. CA/25/02340) and Dover District Council (ref. 25/01353) in December 2025 and a further to Dover District Council (ref. 26/00023) in January 2026.
 - It relates to proposals for the creation of water storage reservoir with a storage capacity that would be approximately 5,126 million litres and a surface area of approximately 70 hectares, engineering operations including erection of up to 17m high embankments, creation of raw water abstraction points and pipelines, erection of common high lift transfer pumping station, installation of potable water pipeline running approximately 7.5km west connecting the reservoir water treatment works (WTW) with the existing Blean Service Reservoir, and associated non-water infrastructure elements such as bypass channel of the Sarre Penn and a fish pass, site access and internal access roads, visitor amenities hub, car parking, open spaces, wetland storage area, improvement to footpath, cycleway and bridleway networks, landscape and biodiversity habitat proposals, such as woodland, scrub, hedgerows, grassland, wetland and other habitat features, utility diversion and diversion of minor roads and footpaths within the footprint of the reservoir. A decision is still pending.
 - The above works are being proposed by South East Water, who is in regular dialogue with the UoK.

- The preliminary proposals comprise the provision of a sub-surface pipeline running east-west across the southern part of Site B, broadly along the alignment of the Sarre Penn river. The pipeline requires a no build zone either side and permanent access for maintenance purposes.

Planning Policy Designations

3.9 The Site is subject to numerous policy designations as identified on the adopted Local Plan Policies Map which are all proposed to be carried forward into the DLP, as summarised below:

- The Site is located outside of the defined **Urban Area Boundary** of Canterbury.
- It is subject to numerous heritage designations:
 - o The Site does not include any **Listed Buildings**. However, immediately to the north of Site B (south of Tyler Hill Road) is the Grade II* Church of St Cosmus and St Damian and the Grade II Church Cottage. There are numerous further Listed Buildings within the villages of Blean and Tyler Hill, and elsewhere within the surrounding area, however none which are directly adjacent to the Site.
 - o A **Scheduled Ancient Monument** is located within Site B, immediately to the south west of St Cosmus and St Damians Church.
 - o The western part of Site B is located within the Blean **Conservation Area**. The Tyler Hill Conservation Area lies to the east of the Site. The Amery Court Conservation Area covers land in between Sites C and D.
- Part of Site B falls within the designated Blean Pastures **Local Wildlife Site**.
- The Site is located within the applicable 6km/7.2km **Zone of Influence** of the Thames, Medway and Swale Estuaries **Special Protection Area (SPA)** and the Thanet Coast and Sandwich Bay SPA respectively.
- Land to the far south of the Site is designated as a **Green Gap**.
- Site B includes land designated as **Ancient Woodland**.
- The Site is identified as being in **Flood Risk Zone 1** (low risk from fluvial or tidal flooding). However, Site B includes an area that is identified as being at risk from surface water flooding within the 1 in 30 year annual likelihood where the stream crosses the Site. Other smaller areas are also identified as being at risk from surface water flooding across the Site.
- Part of Site B and the entirety of Sites C and D are designated as a **Minerals Safeguarding Area**.

3.10 There are numerous designations affecting land in the surrounding area that are relevant to the planning potential of the Site:

- The central part of Canterbury City Centre is designated as a **World Heritage Site** (approximately 3km to the south). Owing to the topographical characteristics of the area, there is little/no visibility of the Site from the World Heritage Site and therefore the potential for development to affect its setting is limited.
- The majority of greenfield land surrounding the defined Canterbury Urban Area is designated as an **Area of High Landscape Value (AHLV)**. However, the designation does not apply to the Site.

- Land to the west of the village of Blean comprises the Blean Woodland Complex, which is designated as a **SPA, RAMSAR Site, Special Area for Conservation (SAC), Site of Special Scientific Interest (SSSI), and National Nature Reserve**.
- A series of **Local Nature Reserves** are located to the north, east, and west of the Site.
- Land to the north east of the village of Tyler Hill is designated as a **Site of Special Scientific Interest (SSSI)**.

(b) The Proposed Development

- 3.11 The Proposed Development is presented in the Proposed Vision Masterplan prepared by PRP (enclosed at Appendix M(vi)).
- 3.12 This seeks to create a new neighbourhood in a green environment providing approximately 2,000 new homes, alongside a new local centre, primary school, and associated open space/play space/green infrastructure.

Figure 3.1 Illustrative Masterplan



(c) Site Suitability, Availability and Achievability

Suitability

- 3.13 Evidence is submitted as part of these representations to demonstrate that the site is suitable for the Proposed Development. This is considered in detail as part of our comments on the SLAA (refer to Section 6).
- 3.14 Our view is supported by pre-application written advice received from CCC in May 2026 in response to a pre-application meeting held in April 2026. Refer to meeting 'pack' prepared by the Applicant and issued to CCC to inform the meeting (Appendix F1) and written advice received from CCC (Appendix F2).

Availability

- 3.15 The Site is available for development now. Refer to the following evidence:
- Site Deliverability Report, June 2024 (Appendix M(v))
 - Update Delivery Strategy Report, October 2025 (Appendix J(x))

Achievability

- 3.16 The UoK appointed Avison Young in 2020 to act as its Land Agent and Development Consultant, responsible for providing commercial (viability) advice to inform the preparation of the Concept Masterplan and overall development proposition.
- 3.17 Evidence submitted as part of these representations demonstrates that the Proposed Development is viable and attractive to the market. Refer to the following:
- Site Deliverability Report, June 2024 (Appendix M(v))
 - Update Delivery Strategy Report, October 2025 (Appendix J(x))
 - Viability Assessment (2025) (Appendix J(ix))
 - Updated Availability Report (2025) (Appendix J(xi))
- 3.18 The UoK has entered into a joint working arrangement with Croudace Homes which has been selected as the intended developer for the Site (the 'Developer'). Details of the arrangement are set out in the letter prepared by the UoK's Land Agent (Avison Young) at Appendix E1.

Anticipated Rate of Delivery (Programme)

- 3.19 The Developer intends to bring the Site forward and deliver the Proposed Development in line with the following programme:
- Commence preparation of hybrid planning application (outline with Phase 1 in detail): Summer 2026
 - Submission of planning application: Summer 2027
 - Planning permission granted: Summer 2028

- Discharge of Phase 1 pre-commencement conditions and site preparation/enabling works: Up to Summer 2029
- Housing completions: Early 2030 onwards
- Completion of development: 2041/42

3.20 The Developer anticipates an average rate of delivery of around 170 homes per annum (broadly comprising 120 market and 50 affordable homes). It is anticipated that this will be slightly lower in the early years and gradually increase (e.g. with more than one 'outlet' coming on stream). For the purposes of the DLP, this would add the following additional supply to the Housing Trajectory:

Table 3.1 Anticipated Rate of Housing Delivery

Year	Net Additional Housing Completions
2029/30	Nil/limited
2030/31	+100*
2031/32	+150*
2032/33	+175
2033/34	+175
2034/35	+175
2035/36	+175
2036/37	+175
2037/38	+175
2038/39	+175
2039/40	+175
2040/41	+175
2041/42	+175

*Note that the Transport Strategy anticipates that up to 300 homes can be delivered prior to the need for a secondary access point which may require the reprovision of Blean Primary School (refer to Appendix C and I). No other 'strategic infrastructure' is needed to deliver the first 300 homes.

3.21 Refer to letter from the Developer at Appendix E2 for further details.

(d) The Unique Public Benefits

The Need for the Development

3.22 Refer to Section 4 of these representations for details of the economic need to bring the Site forward for the Proposed Development.

Benefits

- 3.23 The overarching unique public benefit associated with the Proposed Development is that it enables economic, social and environmental 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

- 3.24 The key economic benefit is that the Proposed Development 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 (this is explained in Section 4).
- 3.25 This includes:
- Maintaining c. 5,000 direct/indirect jobs in Canterbury (c. 9,500 jobs in total).
 - Maintaining c.£0.5billion economic output in Canterbury (c.£1 billion in total).
 - Maintaining c.£270m of Gross Value Added (GVA) in Canterbury (c. £0.5 billion in total).
- 3.26 Refer to the Economic Impact of the University of Kent (Viewforth, 2024) (enclosed at Appendix J(ii)) which sets out the University's current contribution to the local economy. Refer to the UoK's Annual Review and Financial Statements (2024) (particularly pages 8-20) (enclosed at Appendix G) for details of the economic threats to the University and its response (the 'Transformation Plan').
- 3.27 The Proposed Development 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

- 3.28 The key social benefits of the Proposed Development 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

3.29 Key environmental benefits of the Proposed Development 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 (unlike many other locations in/around Canterbury)).
 - 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.
- 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

- 3.30 The non-inclusion of site-specific policy support for the Proposed Development in the DLP adds significant risk to the deliverability of the University's Transformation Plan.
- 3.31 The likelihood is that this risk will lead to ongoing financial challenges which will likely lead to a down scaling of operations and significantly reduced prospect of future investment in the Canterbury campus. This risk exists even in the context of the University's recent proposed merger with the University of Greenwich and the consequential review of the merged institution's estate requirements going forwards, with future investment likely to be directed to the location with the least planning risk.
- 3.32 At worst it would prevent the University's financial recovery of its Canterbury-based operations being achieved, which is dependent on sustainable growth, underpinned by ongoing investment.
- 3.33 This would represent a significant lost opportunity in terms of achieving the 'net gains' of pursuing economic and social objectives in a mutually supportive way as required by NPPF para. 10.

4. The Needs of the Higher Education Sector

National Planning Policy Context

- 4.1 At the heart of national planning policy is a presumption in favour of sustainable development, which (on the basis of NPPF para.11) means that:
- (a) The DLP should promote a sustainable pattern of development that seeks to **meet the development needs** of the area, **align growth and infrastructure**, improve the environment; mitigate climate change (including by making effective use of land within urban areas) and adapt to its effects.
 - (b) The strategic policies within the DLP should, as a minimum, provide for **objectively assessed needs** for housing and other uses, as well as any needs that cannot be met within neighbouring areas unless (i) or (ii) apply.
- 4.2 NPPF para. 15 requires the DLP to provide a framework for meeting housing needs and addressing **other economic, social and environmental priorities**.
- 4.3 NPPF para. 20 goes on to require the strategic policies within the DLP to make sufficient provision for a broad range of development including **homes, employment and education facilities**, with para. 23 going on to require that strategic policies 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.
- 4.4 Para. 85 goes on to require that the DLP's policies should help create the conditions in which businesses can invest, expand and adapt. It adds that significant weight should be placed on the **need to support economic growth** and productivity, taking into account both local business **needs and wider opportunities** for development. It requires the DLP to take a policy approach that allows Canterbury to **build on its strengths, counter any weaknesses and address the challenges of the future**.
- 4.5 Para. 86 requires the DLP to set a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the UK's Modern Industrial Strategy (enclosed at Appendix H) which stresses the crucial role that universities play in regional and local economies. It also requires the DLP to pay particular regard to **facilitating** development to meet the needs of a modern economy and to seek to address barriers to investment.

CCC Evidence Base

- 4.6 The evidence base prepared by CCC to inform the DLP does not include an assessment of the needs of the Higher Education sector, nor specifically the UoK. The Economic Development and Tourism Study and Modern Economy Needs Study are both silent on the needs of the University and are predicated on an assumption that the UoK will continue to operate (as existing). This point also applies to other evidence base documents.
- 4.7 In the absence of a robust understanding (evidence) of the needs of the University and the local HE sector as a whole, the DLP is incapable of including policies that meet the requirements of NPPF paras. 11, 15, 20, 23, 85, and 86 as referred to above.

UoK Evidence Base

4.8 In order to address this evidence gap, the University has submitted evidence to CCC as part of its representations to previous DLP consultations (refer to Table 2.1).

4.9 This evidence covers the following points:

- (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.
- (e) The need for development.

4.10 Up to date details are set out below:

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

4.11 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.

4.12 London Economics 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.
- £115.7 billion in terms of general economic output.

4.13 Research published by Oxford Economics², found that 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.

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

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>

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- 4.15 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.
- 4.16 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

- 4.17 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.
- 4.18 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.”
- 4.19 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.
- 4.20 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 (as specifically referenced at para. 86 of the NPPF) 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 that universities are a key driver in ensuring the Government achieves its aims set out within the Modern Industrial Strategy to ensure economic growth.
 - **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.

4.21 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

4.22 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.

4.23 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).

4.24 The University commissioned Viewforth Consulting in 2024 to assess the economic impact of the UoK (report enclosed at Appendix J(ii)). A summary of its findings are set out in Table 4.1 below.

Table 4.1 – 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)			

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

4.26 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

- 4.27 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.
- 4.28 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.
- 4.29 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.
- 4.30 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.
- 4.31 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

- 4.32 The ability for the UoK to sustain the above social and economic contribution continues to be under very significant threat. Refer to the UoK's Annual Review and Financial Statement (2024) (particularly pages 8-20) (enclosed at Appendix G).

Context – External Factors

- 4.33 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 International Student Levy set out in the November 2025 Budget. The levy will require higher education providers to pay £925 per international student per year of study (with an allowance for the first 220 international students per year), which is likely to be covered by an increase in fees for international students. This levy will take effect from 1 August 2028.
 - 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.
- 4.34 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.
- 4.35 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

- 4.36 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.
- 4.37 In the year up to July 2024, the University operated at a deficit of -£6.3m. As demonstrated in Table 4.2 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 4.2 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>

- 4.38 The University cannot continue operating in a deficit position – it is simply not sustainable.
- 4.39 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

- 4.40 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.
- 4.41 The recent proposed 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 planning environment. These conditions do not currently exist on the basis of the current and DLP.
- 4.42 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. As a charitable organisation, the University is obliged to achieve ‘best value’ for the sale of any land and all receipts 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

- 4.43 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, supporting the University is in the public interest, and therefore any threats to this would be harmful to the public as a matter of principle.

- 4.44 Not allocating the land to the north of the UoK Site for development would jeopardise the deliverability of the University's Transformation Plan, and with the ongoing and increasing challenges impacting on the Higher Education sector, would place significant financial strain on the University. At best, the consequent reduced funding availability would prolong the financial recovery of Canterbury-based operations by several years and lead to a likely down scaling of operations and any prospect of future investment in the Canterbury campus.
- 4.45 Even the least extreme scenario would involve a 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 or lost entirely.

(e) The Economic (Planning) Need for Development

- 4.46 The planning system and the University are aligned in that they both operate in the public interest.
- 4.47 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).
- 4.48 Accordingly, the needs of the UoK should be treated as needs in planning terms.
- 4.49 From a planning perspective, the allocation of land to the north of the University for new homes 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.
- 4.50 Sustaining the University goes to the heart of the purpose of the planning system and achieving the economic objectives of sustainable development.
- 4.51 The matter is not just of local significance. It is of regional (if not national) significance and needs urgent resolution.

DLP Policy Response

- 4.52 The above evidence has not been acknowledged nor accounted for in the DLP nor included as part of the Council's suite of evidence base documents.
- 4.53 As a consequence, the DLP has not been informed by a robust understanding (evidence) of the needs of the University and the local HE sector as a whole. It is therefore incapable of including policies that

meet the requirements of NPPF paras. 11, 13, 20, 23, 85, and 86 as referred to above. As a consequence it does not plan positively to meet the economic and social needs of the district.

- 4.54 As a matter of principle, the DLP is therefore not positively prepared; not justified; incapable of being effective; and incapable of being in accordance with national planning policy.

5. Transport Evidence Base

- 5.1 The transport evidence (as set out in the Canterbury Transport Strategy (2026); Canterbury Transport Modelling Forecast Report (2026); and the Canterbury District Bus Action Plan) is not robust.
- 5.2 The report enclosed at Appendix B explains this in detail, however in summary:
- The spatial pattern of development (which concentrates growth to the southeast of Canterbury) results in significant congestion on the A257, A28 and the City Centre Ring Road, with modelling indicating that traffic will divert to rural/secondary roads as a consequence. These representations demonstrate that:
 - o The severity of the congestion on the aforementioned roads has been under-estimated.
 - o The rural/secondary roads (to which traffic is expected to divert) do not have sufficient capacity to accommodate the anticipated volume of additional traffic without significant upgrades (which have not been identified/planned for).
 - o The severity of the impact would be significantly reduced if the spatial distribution of development was different. To specifically include directing a proportion of growth to the north of Canterbury (to include the Site), as this would better account for the spatial origin and destinations of trips.
 - Proposed allocations in/around Whitstable will lead to unacceptable levels of congestion on rural roads in the northern parts of the district.
 - The Bus Action Plan is inadequate to support the assumed modal share (shift) assumptions upon which the Transport Strategy is based, which indicates that the likely highway impacts have been under-estimated.
- 5.3 As a consequence, the DLP is not justified nor likely to be effective.

6. Strategic Land Availability Assessment

- 6.1 The conclusions of the Strategic Land Availability Assessment (SLAA), which have informed the DLP (in particular the selection of the site allocations), are not robust. As a consequence, the DLP is not justified nor likely to be effective.
- 6.2 Our specific area of concern relates to the assessment of site ref. SLAA319 (the Site). The SLAA concludes that the Site is not suitable for development on the grounds of 'concerns regarding provision of suitable access; impact on the highway network and impact on ecology, including the loss of ancient woodland'.
- 6.3 For the reasons set out below with reference to the evidence submitted as part of these representations, it is our view that the SLAA should have concluded that the Site is, in fact, **'suitable'** for development.
- 6.4 Our view is supported in-principle by the pre-application written advice from CCC which confirms that the Council considers the Site to be a suitable location for development (refer to Appendix F2).

The Key Issues

- 6.5 A 'position statement' that provides an overview of access and transport related matters as relevant to the Site and the Proposed Development is enclosed at Appendix C. This has been agreed with KCC. It should be read in conjunction with the supplementary information set out in Appendix D. This draws upon discussions with KCC over a period of several years and the evidence set out in the Updated Transport Strategy (December 2025) (Appendix I) which should be read in conjunction with earlier iterations of this:
- Updated Transport Strategy (December 2025) (Appendix J(vii))
 - Updated Transport Appraisal (March 2025) (Appendix K)
 - Transport Appraisal (May 2024) (Appendix M(iii))
 - Transport Strategy Summary (November 2023) Appendix N (iii))
 - Preliminary Transport Appraisal Update (January 2023) Appendix O(iii))
 - Preliminary Transport Appraisal (February 2022) (Appendix P (i))
 - Transport Strategy (August 2021) (Appendix Q(v))
- 6.6 This evidence demonstrates that:
- Suitable access to the Site can be achieved.
 - The Proposed Development is not likely to have a severe adverse impact on the highway network.
 - Wholly exceptional reasons exist to justify the loss of Ancient Woodland (if this is necessary).
- 6.7 A summary of the evidence is set out below:

Suitable Access

- 6.8 The only existing point of connection to the public highway for the Site is Tyler Hill Road. However, in its current form it is not considered suitable to accommodate a significant increase in volumes of traffic. The access strategy proposed to date, as explained in the Transport Position Statement (Appendix C) and the illustrated within the Updated Illustrative Masterplan (Appendix M(vi)), has been to develop a new north-south route from Whitstable Road through the University Campus and into the Site. The initial point of access would be delivered onto Whitstable Road in the far south of the Site with a second point of access delivered via Blean Primary School (or similar location), which would be delivered at an appropriate point in the development's build-out to provide additional permeability to the Site. This second access point will be dependent on 3rd party land, nonetheless the landowner (KCC) has expressed interest in making its land available subject to appropriate compensation and re-provision of the primary school (refer to Site Availability Report appended to Appendix J(xi)). Up to around 300 homes could be supported from the single southern access point.
- 6.9 Kent County Council (KCC) (in its capacity as Highway Authority) has confirmed that it supports the proposed access strategy (which is confirmed within Appendix C).

Highway Impact

- 6.10 The Site is located in a particularly sustainable location in transport terms being located circa 2km from Canterbury West station and the City Centre. Development at this Site offers a genuine opportunity to provide new homes in a location that would support a significant modal shift away from cars as per the aims of the DLP Transport Strategy and national planning policy:
- A key benefit is that the University already benefits from an existing high frequency bus service which can be extended into the Site, which makes it particularly suitable for development. Discussions have been held with the local bus operator Stagecoach which indicate that this is feasible in principle.
 - The Site is within cycling distance of the City Centre and station. Improvements to walking and cycling infrastructure can be delivered as part of the development (cycle links, e-bikes etc).
 - Local scale facilities can be provided on site (primary school, retail, community facilities) in order to 'internalise' a proportion of trips.
- 6.11 The new development will generate additional car trips, nonetheless these will be lower than would otherwise be the case on account of anticipated modal shift and internalisation of trips and could be (at least) partly offset by imposing car parking restraint and other travel planning measures on the University's Retained Campus (to be detailed in a future Transport Assessment and secured via s.106 obligations at the planning application stage).
- 6.12 The University's Transport Advisor (WSP) considers that this will allow the development to proceed without generating a 'severe' highway impact (refer to Appendices C, D and I).
- 6.13 Through extensive liaison, KCC Officers have confirmed that they do not oppose the principle of residential development on the Site nonetheless they have outstanding concerns. It is our view (as also indicated by KCC) that these could be overcome. The statement enclosed at Appendix C sets out the agreed position with KCC.
- 6.14 Our view is that the matter of highway impact is likely to be resolvable via the provision of further evidence as part of a future planning application to justify the modal shift assumptions (including

provisions for how these could be secured/maintained); further highway modelling/assessment work; additional/alternative highway upgrade works; and (as a last resort) reductions in the anticipated quantum of development.

Ancient Woodland

- 6.15 Providing vehicular access on to the site (from the southern access point) requires the loss of c.25sqm of land that meets the definition of Ancient Woodland (land that has been continuously wooded since 1600). Refer to details at Appendix C, I, J(iii) and J(v)).
- 6.16 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 policy terms. NPPF para 193(c) requires development proposals that involve the loss of Ancient Woodland to be refused unless there are wholly exceptional reasons and where a suitable compensation strategy exists.
- 6.17 Whether or not wholly exceptional reasons exist to justify the loss of Ancient Woodland is a matter of judgement for the decision maker at the planning application stage. It is our view that the substantial and unique public benefits (as set out in Section 3) that cannot otherwise be realised represent wholly exceptional reasons.
- 6.18 A package of compensatory measures are set out within the Ancient Woodland Strategy prepared by WSP (Appendix J(v)), which include the creation of new and extended woodland (including soil translocation), and through habitat enhancement of unaffected areas of retained Ancient Woodland.
- 6.19 Pre-application advice from CCC indicates that the loss of the ancient woodland would be acceptable, subject to the provision of a suitable compensation strategy and detailed consideration of the wider benefits of the scheme (refer to Appendix F2).

Other Suitability Considerations

- 6.20 The University has submitted extensive evidence to the Council as part of representations to previous local plan consultations to demonstrate the suitability of the site for development (including the Proposed Development). This evidence is enclosed as part of these representations, and includes the following:
- Nutrient Neutrality Assessment Update (2025) (Appendix J(iv))
 - Ecological Strategy (2025) (Appendix J(vi))
 - Updated Air Quality Assessment (2025) (Appendix J (viii))
 - Updated Preliminary Ecological Appraisal (2025) (Appendix L(i))
 - Ecological Mitigation Strategy (2025) (Appendix L(ii))
 - Sarre Penn and Stodmarsh Connectivity Assessment (Nutrient Neutrality Strategy) (2024) (Appendix L (iii))
 - Environmental Update Report (2024) (Appendix M(iv))
 - Updated Illustrative Masterplan document (PRP, 2024) Appendix M(vi))

- Nutrient Neutrality Assessment Update (2023) Appendix N(iv))
- Recreation Pressure on Blean Woods Technical Note (2023) (Appendix N(v))
- Air Quality Assessment Note (2022) Appendix O(iv))
- Air Quality Assessment (2022) Appendix P(iii)
- Environmental Constraints and Opportunities Report (2021) (Appendix Q(iv))

6.21 For ease of reference, a summary of the key site suitability considerations is set out below:

Heritage

- 6.22 The Site is not visible from the Canterbury City Centre World Heritage Site and is therefore incapable of affecting its setting.
- 6.23 A Scheduled Ancient Monument falls partly within the Site, however this will not be directly affected by future proposed development and the potential for substantial harm to its setting can be avoided through appropriate design/masterplanning.
- 6.24 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, however careful design should ensure that there is no substantial harm.
- 6.25 The western part of the Site falls within the Blean Conservation Area and is within the setting of the Tyler Hill and Amery Court Conservation Areas. On the basis of the Illustrative Masterplan (enclosed at Appendix M(vi)), the extent of development within the Conservation Areas would be limited to the provision of an access road however the development as a whole has the potential to affect the setting of the Conservation Areas. 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.
- 6.26 Our view, as evidenced within the Cultural Heritage and Archaeology Constraints and Opportunity Appraisal (WSP, May 2021) (Appendix C of Appendix Q(iv)) is that the Site can be developed without causing substantial harm to the significance of the identified heritage assets or their setting, through appropriate design informed by heritage advice. Additionally, the proposal would bring forward significant public benefits that would outweigh the level of harm.

Landscape

- 6.27 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. The extent of development in this area can be limited and can be designed in a manner to avoid substantial landscape harm.
- 6.28 A Landscape Setting and Views Appraisal was carried out and has previously been submitted as part of the University's representations (Appendix T(iv), which sets out how the existing landscape character can be embraced as part of masterplanning and harm avoided.

Ecology

- 6.29 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. A Preliminary Ecological Assessment was completed by WSP in 2025 (Appendix L(i)), and it is anticipated

that further species-specific survey work will be required at application stage. The Ecological Mitigation Strategy (Appendix L(ii) and J(vi)) indicates that any potential impact can be managed appropriately via standard (non-exceptional) mitigation measures.

- 6.30 A small part of the Site is designated as a Local Wildlife Site. However, the Site could be brought forward for development without directly affecting this area, and appropriate mitigation measures could be put in place to manage any potential indirect impacts.
- 6.31 Land to the West of the village of Blean (i.e. not within the Site) 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. The Air Quality Impact Assessment prepared by WSP (Appendix J(viii)) demonstrates that the proposed development will not lead to relevant air quality benchmarks being exceeded within the Blean Woodland Complex. The provision of Alternative Natural Recreational Greenspace (ANRG), in accordance with the University of Kent Land Disposal Plan: Recreational Pressure on Blean Woods prepared by WSP (Appendix N(v)) demonstrates how recreational pressure associated with the increased population can be managed. 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 affect the Complex.
- 6.32 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 prepared by WSP (Appendix J(iv)), which includes the provision of an on-site wastewater treatment facility (as one option) to ensure that the development of the Site will not have an adverse impact on the Stodmarsh site.
- 6.33 Our view is that the impact of the proposed development on ecology and designated sites will be acceptable in national planning policy terms.

Nutrient Neutrality

- 6.34 The Site is located within the catchment of the River Stour and is therefore hydrologically connected with the Stodmarsh Lakes, which are internationally designated as Special Protection Areas (SPAs), a Special Area of Conservation (SAC) and a Ramsar site.
- 6.35 The November 2018 European Court of Justice decision regarding the Habitats Directive has resulted in Natural England (NE) requiring all new developments containing overnight accommodation, and which are in catchments affecting SPAs and SACs that are deteriorating because of nutrients, to demonstrate nutrient neutrality.
- 6.36 A range of avoidance, mitigation, and offsetting options are available to demonstrate nutrient neutrality for the proposed development, as set out within the Nutrient Neutrality Assessment Update (Appendix J(iv)). This includes the provision of an on-site waste water treatment facility. Other options are to purchase Natural England Nutrient Mitigation Scheme credits, conversion of existing agricultural land to a low nutrient land use, diversion of surface water flows from the scheme to the Sarre Penn catchment, and use of an off-site wastewater treatment facility.
- 6.37 This will ensure that the proposed development is acceptable in national planning policy terms.

Air Quality

- 6.38 An Air Quality Assessment has been undertaken, included in Appendix J(viii)) which concludes the following:
- 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 the development of the Site. As concentrations do not exceed the Critical level no adverse effects are predicted at any of the designated ecological sites within the study area (including Habitats sites that are subject to Habitat 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/m³ which is typically applicable to all habitats, except those which 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 need to 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% if the relevant Critical Load due to the development of the Site 'alone' at the following Habitat 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 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.
- 6.39 It is important to note that these results do not consider 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).
- 6.40 Our view is that this matter can be fully managed and satisfied as part of a future planning application and should not constrain the site from potential development.

Flood Risk

- 6.41 The main source of flood risk to the Site is surface water flooding. A more detailed assessment and further consultation will need to be undertaken in the next design stages of the proposed development as part of the preparation of a planning application.
- 6.42 Fluvial flooding, groundwater flooding, and underlying geology have been assessed, and it has been concluded that they are to either be of no risk or between low to medium.

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- 6.43 Our view is that with suitable mitigation, any flood and drainage issues can be successfully addressed to comply with the appropriate standards through provision of appropriate flood risk management and suitable drainage systems.

7. Sustainability Appraisal of the SLAA Sites

- 7.1 The conclusions of the Sustainability Appraisal (SA) of the SLAA sites, which have informed the SLAA and DLP, are also not robust. As a consequence, the draft LP is not capable of being properly justified.
- 7.2 The SA concludes that the Site (ref. SLAA319) would have significant and minor negative impacts and when reviewed alongside the SLAA there are concerns that these impacts cannot be suitably addressed. There are concerns regarding provision of suitable access; impact on the highway network and impact on ecology, including the loss of ancient woodland. On the basis of the evidence referred to in Section 6 of these representations (comments on the SLAA), our view is that this is not a robust conclusion on the following grounds:
- A suitable access strategy to the Site has been set out and agreed with KCC.
 - The evidence prepared by WSP has set out a number of mitigation measures that could be adopted that would reduce the impact on the highway network to an acceptable level.
 - Appropriate mitigation measures could be adopted that would protect the ecological designations of the surrounding area.
 - As previously stated, a package of compensatory measures have been set out to reduce the level of harm to the Ancient Woodland and our judgement is that the unique economic and social public benefits from the development of the Site comprise wholly exceptional reasons to justify the loss of the Ancient Woodland.

SA Criteria

- 7.3 Our view is that the Site should have scored strongly on each of the SA criteria, based on the SA matrix criteria set out within Appendix G of the SA, particularly in light of the significant evidence that has been provided as part of previous representations (as set out in Table 2.1) on the following grounds:

Air Quality

- 7.4 The Site is not located within an Air Quality Management Area (AQMA) with the closest being located 2.15km to the south near the junction of A229 Whitstable Road and Forty Acres Road near the centre of Canterbury.
- 7.5 As set out within the SA appraisal matrix criteria, the development would be scored as being neutral, as it is in excess of 500m of one of the AQMAs. However, an Air Quality Impact Assessment has been carried out and previously submitted to Canterbury (Appendix J(viii)) which as previously set out, demonstrates the development would not have an adverse impact upon the surrounding air quality.

Biodiversity

- 7.6 It is noted that the Site includes an area of land that is designated as Ancient Woodland and is within 400m of a number of designations, including the Blean Complex SAC, West Blean and Thornden Woods SSSI, Church Woods SSSI, Blean Woods NNR, and the Blean Pastures LWS is located within the Site. Based on the criteria matrix, development of the site is therefore scored as having a significant negative effect.
- 7.7 Notwithstanding the above, it is only a small part of the Site that is designated as a Local Wildlife Site, and the proposed masterplan of the Site has taken this into consideration and development could be

brought forward without directly affecting this area, and appropriate mitigation measures could be put in place to manage any potential indirect impacts.

- 7.8 As previously set out within these Representations, the Air Quality Impact Assessment prepared by WSP (Appendix J(viii)) demonstrates that the proposed development will not lead to relevant air quality benchmarks being exceeded within the Blean Woodland Complex. Further to this, the provision of Alternative Natural Recreational Greenspace (ANRG), as set out within the University of Kent Land Disposal Plan: Recreational Pressure on Blean Woods (Appendix N(v)) demonstrates how recreational pressure on these designations will be managed. Further to this, the proposed landscape and biodiversity gain strategy offers the opportunity to improve ecological connectivity between the Blean Woodland Complex and surrounding areas, delivering a net benefit to these biodiversity designation.
- 7.9 It is therefore evident that suitable mitigation introduced as part of the development of this Site could mitigate any potential effects and would in fact introduce a number of biological and ecological benefits that would meet the Sustainability Appraisal objectives.

Geology

- 7.10 The Site is noted as being partly covered by the River Terrace Mineral Safeguarding Area. Whilst a Mineral Resource Assessment (MRA) identified that the proposed development would sterilise the underlying land in the context of mineral extraction, however, there are a number of reasons set out within the Environmental Update Report that has previously been submitted to Canterbury (Appendix M(iv)) to justify this.
- 7.11 In particular, given the overriding need for residential development, the difficulties in extracting from land immediately adjacent to existing residential areas, and the lack of requirement for Brickearth now and in the future, it is considered that in terms of the balance between the need for development and the safeguarding of mineral resources (sub-objective 4.2 set out within the SA), the allocation of this site would not have a significant negative effect.

Landscape

- 7.12 The Site is not subject to any landscape-based policy designations (other than a small area in the far south of the Site) and comprises the only significant area of land adjacent to the built-up part of Canterbury that is not designated as an Area of High Landscape Value.
- 7.13 To inform the University masterplan, a Landscape Setting and Views Appraisal was carried out and has previously been submitted as part of a Call for Sites submission (Appendix T(iv)).
- 7.14 The land is also considered more broadly in the Canterbury Landscape Character and Biodiversity Appraisal (2020) and forms part of Landscape Character Type E3 (Amery Court Farmlands). It is important to note that within this Landscape Character Type, only 40% of it is located within an area with an Area of High Landscape Value, as confirmed within the Canterbury District Local Landscape Designations Review and Recommendations (January 2021).
- 7.15 Overall, the Site is visually contained by virtue of the complex of woodland to the north, west and east, plus the topography of the Site, which dips down to the north of the University's main campus. Therefore, long distance views to the north/east/west will be blocked by woodland and would not be visible from Canterbury City Centre due to the topography of the land.

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- 7.16 Notwithstanding, the adverse impact upon short distance views of the site and along Public Rights of Way could easily be minimised through appropriate masterplanning which will be informed by further landscape/visual impact assessment work.

Water

- 7.17 There are water bodies within the Site, however through appropriate masterplanning, these waterbodies can be protected, if not enhanced, through development of this Site meeting sub-objective 6.1.

Flood Risk

- 7.18 It is noted that the main source of flood risk to the Site is surface water flooding, as noted within the Sustainability Appraisal, that the Site intersects with a 1 in 30 risk of flooding from Surface Water Hazard area. As part of the next design stage of the proposed development a more detailed assessment and further consultation will need to be undertaken.
- 7.19 Fluvial flooding, groundwater flooding, and underlying geology have been assessed, and it has been concluded that they are to either be of no risk or between low to medium.
- 7.20 Suitable mitigation would be able to successfully address any flood and drainage issues to comply with the appropriate standards through provision of appropriate flood risk management and suitable drainage strategies.

Heritage

- 7.21 It is noted that there are a number of heritage assets within the site and in close proximity to the site, including a Schedule Ancient Monument in the northern part of Site B, and the Grade II* listed 'Church of St Cosmus and St Damian' and the Grade II listed 'Church Cottage'. Further to this, part of the western part of Site B is located within the Blean Conservation Area, whereas Site C is located directly adjacent to the Blean Conservation Area and both Site C and D adjoining the Amery Court Conservation Area. Site D also abuts the Canterbury and Whitstable Railway (Hackington & Blean) Conservation Area along its eastern boundary.
- 7.22 Notwithstanding, an initial Heritage Appraisal (Appendix C of Appendix Q(iv)) has been prepared to assess the significance of these assets and has informed the preparation of the Concept Masterplan. Whilst it is noted that there is potential for impacts to occur on the setting/character of nearby heritage assets, it is considered that they could be successfully mitigated through careful design and masterplanning. As such, the impact on the identified heritage assets is likely to be minimal with opportunities to enhance these. This would therefore lead to the development of this Site having a positive effect on these heritage assets.

Housing

- 7.23 The allocation of this site is sought for the delivery of up to 2,000 new homes which would be considered a significant positive effect in accordance with the Sustainability Appraisal objectives.

Land Use

- 7.24 The majority of the Site is greenfield land, with small sections of brownfield land that would be used for access. However, the NPPF does not prevent the use of greenfield land for development, in particular where there is a clear need for land to deliver the needs of an area, including housing.

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- 7.25 As previously set out, there is a significant need within Canterbury, and therefore the use of greenfield sites should not be considered as a negative impact where proposals would deliver a significant amount of housing to address this need.

Economy

- 7.26 The SA is limited in regard to the measures used to understand the impact on the economy from the development of land, focusing on the distance from the site to existing centres. This does not however consider the economic benefits, as previously set out within The Economic Impact of The University of Kent, prepared by Viewforth (Appendix J(ii)) that would come forward through the development of this site. Furthermore, the SA does not consider the impact that not seeking development on this site would have on the wider local economy, were the functions of the University of Kent to be relocated out of the area.
- 7.27 Accordingly, our view is that the SA methodology is flawed in respect to this indicator. If the benefits, as previously set out were taken into consideration, the conclusions of the SA would therefore be significantly positive.

Transport

- 7.28 The Site is located in a sustainable location in transport terms, as previously set out, being circa 2km from Canterbury West station and the City Centre.
- 7.29 Whilst it is recognised that improvements would be required to the surrounding highway network, it is evidenced through reports prepared by WSP (Appendix B, C, and D) that appropriate mitigation measures can be introduced that would ensure that the development would not have a severe adverse effect on the surrounding highway network, and the development of this site can come forward in a sustainable manner in relation to transport. The development would therefore not have a negative effect.

Health and Sustainable Communities

- 7.30 The focus of the SA relates to the loss of open space (most of which is not publicly accessible) within the site, however the Proposed Development would include extensive areas of publicly accessible open space, as set out within the Concept Masterplan, with improvements to the usability of these spaces.
- 7.31 Further to this, as previously set out, there are a number of social benefits that would be delivered through the development of this Site which would create a new community, as well as support the continued delivery of a number of social benefits from the University. The assessment of the development of a site should be taken into consideration, where the proposal would bring forward a number of social and environmental benefits that would positively impact the health and sustainability of communities.

8. Soundness of Specific Policies

- 8.1 For the reasons set out in this section, our view is that the Vision; Strategic Objectives; Policy SS3 (Development Strategy); Policy SS4 (Economic Strategy); Policy SS5 (Movement and Transport Strategy); Canterbury Vision; and Policy C9 (Canterbury Urban Area Strategy) (including carried forward Policies CF1-2 and Policies C10-33) (referred to as the '**Policies**' from hereon) are individually and collectively not sound.

Vision and Strategic Objectives

Soundness Issues

- 8.2 The Vision and Strategic Objectives each set out a series of policy matters that appear to act independently of one another without having regard to the interdependencies between each matter and the opportunity to secure net gains by pursuing these in a mutually supportive way (as required by NPPF para 8).
- 8.3 This siloed approach fails to adequately plan to meet the needs of the HE sector (specifically the UoK) which requires a joined-up approach to be taken to the setting of economic development policies and housing policies in order to support its long term economic sustainability.
- 8.4 As a consequence, the 'growth and development' of the district's Universities supported by the Vision/Objectives is unlikely to be deliverable, meaning that the Vision and Strategic Objectives are **not positively prepared, not effective, and not consistent with national policy** as currently drafted.

Modifications Required

- 8.5 The Vision and Strategic Objectives should be amended to make clear that a joined up approach will be taken in setting policies for economic development and housing provision (with particular regard to the UoK), recognising their interdependencies, in order to ensure that objectively assessed economic and housing needs are met in a complementary manner that seeks to optimise economic, social and environmental outcomes in accordance with Paras 8 and 11 of the NPPF.

Policy SS3 – Development Strategy for the District

SS3(2) – The Stepped Approach to the Annualised Housing Requirement

Soundness Issues

- 8.6 The DLP does not allocate sufficient land to meet housing needs in the early part of the plan period.
- 8.7 Policy SS3(2) proposes a stepped housing requirement, requiring provision at well below assessed levels of housing need in the period up to 2032 which is to be compensated for by higher levels of provision later on in the plan period. In practice this means that the DLP is planning for a delay in meeting the district's housing needs.
- 8.8 The Housing Trajectory (Appendix 6) identifies a total supply of 25,407 homes, which is above the housing requirement of 23,065 (i.e. it includes a buffer).
- 8.9 In terms of 5 year housing land supply (5YHLS) the paper states that at the anticipated point of adoption the identified land supply is expected to represent between a 4.41 and 4.84 year housing

land supply on the basis of housing need (1,215 homes per annum), depending on whether the Liverpool or Sedgefield method is adopted.

- 8.10 The DLP's solution is to simply change the housing requirement to match the estimated capacity of the identified supply of deliverable sites in order to be able to demonstrate a 5YHLS upon adoption. This is not a sound approach in the context of evidence that demonstrates that there are additional suitable available sites that have a realistic prospect of delivering new homes prior to 2032 that could be allocated for development.
- 8.11 The PPG allows for a stepped housing trajectory in limited circumstances, including where there is a significant change between previous and emerging housing requirements and /or where delivery is reliant on strategic sites that are likely to come forward later in the plan period. However, it is explicitly clear that this should not 'unnecessarily delay meeting identified housing needs.'
- 8.12 In practice this means ensuring that all suitable available sites with a realistic prospect of delivering homes in the early part of the plan period are allocated for development, before considering a stepped approach that delays delivery (and/or determining the extent of any 'step' that may be necessary).
- 8.13 The Council seeks to justify its position by evidence set out in the SLAA (and associated SA of the SLAA sites). For the reasons set out in Section 6 of these representations, our view is that this evidence base is not robust and that there are additional suitable available sites that have a realistic prospect of delivering homes prior to 2032 that could be brought forward. The land to the north of the University of Kent is a clear example of additional suitable available land that could deliver homes prior to 2032. It would therefore make a meaningful contribution to meeting housing need in the early part of the plan period. The exclusion of such sites from the Local Plan undermines national planning policy objectives to meet housing needs in full without delay.
- 8.14 As a result, the Council's evidence base does not provide adequate justification for the proposed stepped housing requirement. It is not an appropriate strategy when reasonable additional sites exist and appears to function primarily as a mechanism to manage and constrain housing delivery, rather than to respond to genuine delivery constraints. By deferring delivery of housing to later years, the Plan risks shielding an under-allocation of sites from scrutiny while discouraging the timely delivery of sustainable and deliverable sites, including the land to the north of the University of Kent. This approach conflicts with national policy objectives to significantly boost the supply of homes without delay and maintain flexibility and choice in the housing land supply.
- 8.15 For the reasons set out in these representations, it is clear that there is additional suitable available land within the district that has a reasonable prospect of delivering homes prior to 2032 (specifically the Site). Accordingly, the stepped housing requirement (as currently drafted) is not positively prepared, justified or consistent with national policy.

Modifications Required

- 8.16 Additional suitable, available sites capable of delivering homes prior to 2032 should be allocated in the Local Plan, to specifically include the Site. The housing trajectory and annualised housing requirements should be updated to account for this additional capacity.
- 8.17 The aim should be to identify sufficient additional land to support an annualised requirement of 1,215 homes consistently throughout the plan period, in order to meet local housing needs without delay. The principle of a stepped approach would only be justified if it could be demonstrated that all

additional suitable/available land with a realistic prospect of delivering homes within the period to 2032 had been allocated and there remained a shortfall.

- 8.18 The additional supply from the Site should be assumed as +150 homes per annum for 2030/1 and 2031/2, followed by +170 per annum for years 2032/33 to 2041/42. The Housing Trajectory and annualised housing requirement should be updated to account for this.

SS3(2) (Appendix 6) – The Achievability of the Housing Requirement (Robustness of the Housing Trajectory)

Soundness Issues

- 8.19 As explained above, the DLP does not allocate sufficient land to meet housing needs in the early part of the plan period. This is not sound as a matter of principle in the context of there being additional suitable available sites that could be allocated (as discussed above).
- 8.20 This is compounded by evidence that indicates that the extent of the shortfall in the first few years could be greater than anticipated due to over-ambitious assumptions on capacity and delivery rates of the DLPs identified supply particularly the 'new' allocations.
- 8.21 We have undertaken a review of the assumed capacity (number of homes) of the site allocations which has suggested that the assumptions on rates of delivery that feed into the Housing Trajectory (and justify the annualised housing requirement) may be over ambitious. In other words, higher than reasonably likely to be achievable.

Site Capacity

- 8.22 14 out of the 55 DLP site allocations currently benefit from planning permission or are subject to an application that is pending determination (Table 2.7 of the Council's Meeting Development Needs Topic Paper). In a number of instances the applications have sought approval for a lower number of units when compared to that supported in the corresponding DLP site allocation and as assumed in the Housing Trajectory.
- Draft Policy C19 (Military Road) is allocated for 180 units, however permission has been sought under application ref. CA/25/01058 for just 125 units.
 - Similarly, an application has been submitted for a reduced number of units compared to the allocation in draft Policy W4 (Brooklands Farm) which is allocated for 1,400 units however permission has been sought for 1,350 under application ref. CA/25/00779. As set out within the Planning Statement submitted to support application ref. CA/25/00779, it was only through detailed technical work, masterplanning, and seeking to comply with all provisions of the emerging policy (open space requirements, BNG, and tree canopy coverage) that the true quantum of the site could be realised.
- 8.23 Further to this, within the latest Strategic Land Availability Assessment (2025) (SLAA), a column has been included which sets out the expected yield from each of the site allocations. There are a number of sites where the expected yield is in fact lower than what has been allocated, with limited justification. This is particularly of note in relation to draft Policies C10 and C15 (Land at Merton Park and Land south of Littlebourne Road). These sites are allocated for 1,950 and 1,700 units respectively, however the SLAA yield states that these sites would only be capable of accommodating 1,370 and 1,433 units respectively. Neither of these sites benefit from planning approval, nor an application that is pending a decision.

- 8.24 The Housing Trajectory indicates that the capacity of the overall supply of housing land in the DLP exceeds the housing requirement (i.e. there is a buffer). However, in light of the above observations there would appear to be doubt over the robustness of the assumptions on capacity of the allocation sites. This brings into question whether the identified supply is a reasonable estimate and is capable of meeting housing needs over the local plan period as a whole.

Assumed Rate of Delivery

- 8.25 Appendix F of the Council's Meeting Development Needs Topic Paper sets out assumptions for each of the 'new' allocations, in terms of site capacity and delivery rates. These figures are summarised in Table 2.8 and underpin the corresponding figures on the Housing Trajectory at Appendix 6 of the DLP (although we note that there are some minor inconsistencies).
- 8.26 Annex 2 of the NPPF requires that sites with outline planning permission or that are allocated in local plans should only be treated as 'deliverable' where there is clear evidence that housing completions will begin on site within five years.
- 8.27 The Meeting Development Needs Topic Paper identifies that, of the new residential allocations proposed in the Plan, the vast majority (52 out of 55 new sites) are assumed to be deliverable within the first five years. We have reviewed the assumptions regarding the capacity of the 'deliverable' sites set out in Table 2.7 of the Meeting Development Needs Topic Paper and set out our findings in Table 8.1 below:

Table 8.1 Analysis of CCC Identified 'Deliverable' Capacity

	Limited Planning Activity	Planning Application Pending Determination	Planning Permission Granted (or approved subject to s106)	Total
No. of Sites	38	11	3	52
Total Site Capacity (homes) (excluding older persons and G&T pitches)	5,360	2,014	610	7,984**
Assumed Number of Homes Completed in period up to 2031/32*	-	-	-	1,596

*Table 2.8 Meeting Development Needs Topic Paper

**Table 2.8 of the Meeting Development Needs Topic Paper identifies a total capacity of 8,964 from the new allocations comprising 7,984 from deliverable sites and 980 from developable sites

- 8.28 Firstly, we note that the majority of these sites do not benefit from planning permission and, furthermore, a number of the larger allocations are subject to significant infrastructure requirements, environmental mitigation, and other delivery dependencies, including nutrient neutrality.
- 8.29 Notwithstanding this, the Housing Trajectory assumes that around 18% of the assumed capacity of the 'new' site allocations will be completed within the first five years of the plan (by 2031/32). This could be achievable, but we question whether this is a realistic prospect and whether there is clear evidence to demonstrate that housing completions will be delivered in these timescales (having regard to the definition of 'deliverable' in NPPF Annex 2).

8.30 Our view is that there is a risk that the Council has over-estimated the likely timescales and rate that new homes will be delivered on the 'new' site allocations.

8.31 This brings into question the robustness of the Housing Trajectory and therefore the achievability of the housing requirement particularly for the first few years of the plan period which is already reduced to a level that is well below assessed housing needs.

8.32 Policy SS3(2) is therefore **not positively prepared, not justified and not consistent with national policy**.

Modifications Required

8.33 The Housing Trajectory should be reviewed to ensure it represents a realistic assumption of likely delivery rates.

8.34 Additional suitable, available sites capable of delivering homes prior to 2032 should be allocated in the Local Plan, to specifically include the Site. The housing trajectory and annualised housing requirements should be updated to account for this additional capacity.

8.35 The additional supply from the Site should be assumed as +150 homes per annum for 2030/1 and 2031/2, followed by 170 per annum for 2032 to 2042. The Housing Trajectory and annualised housing requirement should be updated to account for this.

SS3(3) – Prioritisation of Previously Developed Land

Soundness Issues

8.36 Policy SS3(3) prioritises the development of previously developed land over greenfield land. This is at odds with the remainder of the policy (and subsequent site allocations) which support the development of greenfield sites; may prejudice the ability to achieve the windfall site allowance relied upon by the Housing Trajectory; is not justified by the evidence base; and is not a requirement of national planning policy.

8.37 Policy SS3(3) is therefore **not positively prepared, not justified and not consistent with national policy**.

8.38 The second sentence of Part 3 of the policy duplicates Policy DS11 and is therefore unnecessary.

Modifications Required

8.39 Delete part 3 of Policy SS3

SS3(4) to (7) – Distribution of Development

Soundness Issues

8.40 Insufficient suitable available housing land is identified in Policy SS3 (when read in conjunction with the site allocations) to meet the district's objectively assessed housing needs and the modified housing requirement discussed above.

8.41 It does not cross refer to the Economic Strategy (Policy SS4) nor seek to deliver the housing and economic strategies in a mutually supportive way that seeks to achieve net gains over and above

what could otherwise be achieved. It is also not adequately justified by the transport evidence for the reasons set out in Section 5 of these representations.

- 8.42 Policy SS3(4) to (7) is therefore **not positively prepared, not justified and not consistent with national policy**.

Modifications Required

- 8.43 Additional suitable available sites should be allocated in the DLP to address the shortfall in the modified housing requirement (as set out above) and to meet other (economic) needs (delivering the Economic Strategy at Policy SS4) which should be accounted for in Policy SS3. Site selection should seek to optimise the opportunity to generate net gains/benefits through taking a joined up approach to planning for new homes and meeting economic needs. It should, furthermore, seek to support a more sustainable pattern of development in transport terms which avoids unnecessarily adverse highway impacts.
- 8.44 For the reasons set out in these representations the Site should be allocated for housing development on the grounds of its suitability; availability; expectation that it will deliver new homes prior to 2032 (achievability); its ability to generate significant unique public benefits that would otherwise not be capable of being achieved by following a joined-up approach to planning to meet economic and housing needs; and to support a more sustainable pattern of development.
- 8.45 This should be captured in Part (4) of Policy SS3, with the final sentence re-worded to: 'this plan allocates land for three Strategic Development Areas: one at South West Canterbury, one at East Canterbury, and on to the north of the University of Kent'.

SS3(8) – Restriction on Development Outside of Settlement Boundaries

Soundness Issues

- 8.46 Part 8 of Policy SS3 (read in conjunction with para 1.47) imposes a restriction on development outside of defined settlement boundaries. This would introduce a presumption against housing anywhere outside of settlement boundaries, regardless of site-specific merits, housing need, or other relevant planning considerations.
- 8.47 Our view is that this is unnecessarily restrictive. This is inconsistent with national planning policy and in practice this will prejudice the ability to meet the housing requirement (including with regards to meeting the windfall site assumptions in the associated Housing Trajectory).
- 8.48 Policy SS3(8) is therefore **not positively prepared, not justified and not consistent with national policy**.

Modifications Required

- 8.49 Delete paragraph 1.47.
- 8.50 Amend the second sentence of Policy SS3(8) to the following: 'In this context, appropriate agriculture and viticulture development will be supported while housing will be supported on suitable sites where a need can be demonstrated (by the Council being unable to demonstrate a five year housing land supply or by scoring less than 100% in the most recent Housing Delivery Test)'.

Policy SS4 – Economic Strategy for the District

Soundness Issues

- 8.51 Policy SS4 is incapable of being effective, as defined within the NPPF, as it has not been informed by a robust or proportionate assessment of the needs of the Higher Education sector within Canterbury, specifically the UoK, which represents one of the largest and most strategically significant employers within the area.
- 8.52 Despite evidence having been submitted to the Council as part of previous representations to the emerging local plan, Policy SS4 does not acknowledge the economic needs and challenges faced by the HE sector and UoK in particular. The policy is dependent upon the assumed continued operation and success of the University which is not a realistic expectation unless the University's Transformation Plan is successfully implemented. As drafted, the policy is unlikely to be deliverable and is simply not effective.
- 8.53 The policy does not support the delivery of the University's Transformation Plan and therefore does not seek to meet the economic needs of the University (as set out in our evidence). As the UoK is such a large and crucial component of the local economy, in practice this means that the policy does not seek to meet the economic needs of the district as a whole.
- 8.54 It is positive that Part 9 of the policy recognises that the education sector plays a significant part in the local economy and that it supports new university-related development that will help to improve the academic offer and student experience. However, this will not be possible if significant functions of the University and future investment were to be relocated out of the District (as part of its merger with the University of Greenwich), which is highly likely if its Transformation Plan is not successfully delivered.
- 8.55 It does not cross refer to the housing strategy set out in Policy SS3 nor seek to deliver the housing and economic strategies in a mutually supportive way that seeks to achieve net gains over and above what could otherwise be achieved.
- 8.56 Policy SS4 is therefore **not positively prepared, not justified and not consistent with national policy**.

Modifications Required

- 8.57 Add text to paras 1.48-1.54 that acknowledges the economic challenges and needs of the UoK and the opportunity that the rationalisation of its estate can play in helping to secure its long-term operations and in meeting the district's broader development needs (particularly housing) in line with Policy SS3.
- 8.58 Add the following text to the end of Part (9) of the policy: 'The rationalisation of the University of Kent's estate will be supported in order to help achieve the objectives of this policy, as well as the role this could play in meeting the district's housing and other development needs'.

Policy SS5 – Movement and Transport Strategy for the District

Soundness Issues

- 8.59 Policy SS5 (when read in conjunction with the site allocations) sets the development plan policy through which the Canterbury Transport Strategy is to be delivered. For the reasons set out in Section 5 of these representations (and as further explained in Appendix B), our view is that the Canterbury Transport Strategy is fundamentally flawed and does not provide an adequate strategy to deliver the growth/development proposed by the DLP. As a consequence, Policy SS5 is not capable of being adequately justified, nor effective or consistent with national planning policy.
- 8.60 For the reasons set out in Section 5 and (Appendix B) of these representations, the scope of infrastructure requirements set out in Part (2) of Policy SS5 are not adequate to support the growth/development set out in the DLP (i.e. without leading to unacceptable highway impacts). Accordingly, the policy is not positively prepared, justified or consistent with national policy.
- 8.61 Furthermore, the policy (including when read in conjunction with the site allocations and the Canterbury Transport Strategy) does not set out how the infrastructure works set out in Part B are to be delivered or funded (some but not all are secured via site allocations). Accordingly, the policy is not effective.
- 8.62 The Transport Strategy is based upon the principles of a 'vision and validate' approach, whereby the effectiveness of interventions are to be monitored and additional measures employed or brought forwards if necessary. The policy does not define what these additional measures will be. This is secured via a commitment to undertake 5-yearly reviews (as per Policy SS7). Our view is that this is an inadequate approach due to the length of time between each review, the risk of delays, and length of time typically taken to progress a local plan review (i.e. a target of 30 months under the new local plan system).
- 8.63 Refer to Section 2.3 of Appendix B for further details.

Modifications Required

- 8.64 The transport related evidence base (including the Transport Strategy) requires revisiting (as per the comments in Section 5 of these representations) and Policy SS5 updated to account for the revised conclusions/provisions of the updated evidence. To include:
- Updating the list of infrastructure requirements.
 - Adding policy provisions to secure the provision of the infrastructure requirements.
 - Adding monitor and manage provisions, to include details of what additional measures will be secured (and how) should the measures identified in Part (2) be inadequate.

Canterbury Vision

Soundness Issues

- 8.65 The Vision is predicated on 'intensifying and capitalising' on the district's academic institutions (i.e. the UoK). As currently drafted, the Policies do not seek to meet the needs of the UoK which will prejudice the deliverability of the Vision.

8.66 Accordingly, when read in conjunction with the DLP as a whole, the Canterbury Vision is **not effective**.

Modifications Required

8.67 The Vision would be made sound via the modifications to other policies set out in these representations.

Policy CS9 – Canterbury Urban Area Strategy and Site Allocations

Soundness Issues

8.68 As previously set out in relation to Policy SS3, the sites that have been allocated as part of the Local Plan have insufficient capacity to meet local housing needs and do not support the delivery of the DLP's Economic Strategy.

8.69 Furthermore, the selection of site allocations for housing does not adequately account for the interdependencies between meeting economic, social, and environmental objectives and does not pursue these in a mutually supportive way in order to secure net gains. As a consequence, the DLP fails to adequately seek to meet the needs of the HE sector.

8.70 Finally, the transport strategy that supports the Canterbury Urban Area Strategy and the proposed allocations is fundamentally flawed for the reasons set out in Section 5 of these representations.

8.71 Accordingly, the Policies are not positively prepared, not justified, and not consistent with national policy.

Modifications Required

8.72 The DLP would be made sound if it included site specific policy support for the development of the Site for the Proposed Development. In our view there are 2 alternative approaches for this:

(1) Allocate the Site for a 2,000-home new neighbourhood; or

(2) Designate the Site as an Opportunity Area (Broad Location for Strategic Growth) suitable for the provision of new homes (and associated development) to meet housing needs.

8.73 We have prepared draft policy wording for each option below

Option (1) – Allocation

8.74 The following is broadly in line with Policy C12 contained within the Revised Regulation 18 draft Local Plan (October 2022):

Policy:

Land to the north of University of Kent is allocated for a comprehensive mixed use development. Planning permission will be granted for development which meets the following criteria

1. Development mix

Across the site, the development mix will include:

a) Approximately 2,000 new dwellings including affordable housing, older persons housing, accessible housing, self-building housing and an appropriate housing mix in line with Policies X and X.

b) Non-residential development:

- i. Provision of a community hub as focal area for the community containing a mix of uses including:
 - a. Local centre including commercial (minimum 1,250sqm) and local shopping and community uses (minimum 500sqm);*
 - b. Office and business space (minimum 4,000sqm) including flexible working space; and*
 - c. A mobility hub to serve residents and businesses.**
- ii. Provision of a new 3FE Primary School (3 ha) with early years provision, located adjacent to the community hub;*
- iii. Resiting and provision of a new 2FE Primary School (2.05 ha) to replace existing capacity at Blean Primary School;*
- iv. Provision of new high quality waste water treatment works at an appropriate location within the site unless alternative, suitable mitigation can be clearly evidenced; and*
- v. Proportionate land and build contributions towards early years, primary, secondary and SEND education plus proportionate contributions for primary healthcare and other necessary off-site community infrastructure.*
- vi. Open space: on-site open space will be provided in line with Policy DS28.*

2. Design and Layout

The design and layout of the site should:

- a) Be developed with garden city principles and be in accordance with a masterplan and detailed design code, demonstrating a comprehensive approach to development, long-term management and stewardship*
- b) Create a complete, compact and well-connected neighbourhood, where everyday needs can be met within a 15 minute walk or short cycle, to support the local economy, to promote health, wellbeing and social interaction and to address climate change by reducing car dependency;*
- c) Provision a high quality built environment, in line with Policy X, with an average net density of around 35dph outside of the community hub. Higher density development will be encouraged within and around the community hub;*
- d) Create a new mixed use local centre as an easily accessible focal point of the development in the format of a high street or village/town square containing flexible outdoor space to use for community events, with pedestrian and cycles prioritised. A "Changing Places" facility should be located within community facilities;*
- e) Older persons housing should be located within the community hub, taking account of any specific identified needs; and*
- f) Assess Areas of Archaeological Potential and mitigate any impacts on heritage assets such as the scheduled ancient monument adjacent to the St Cosmus and Damian Church, the Grade II* listed church and other Grade 2 Listed Buildings adjacent to the site, and Conservation Areas within and adjacent to the site.*

3. Landscape and Green Infrastructure

The green and blue infrastructure strategy for the site should:

- a) Provide a comprehensive coordinated and multi-scale sustainable urban drainage network, including a linear park with integrated SUDS components running through the development using the existing valley formation running through the centre of the site;*
- b) Provide 20% biodiversity net gain, in line with Policy DX;*
- c) Assess the site's potential to be functionally linked land for golden plover, in line with Policy X;*
- d) Retain substantial areas of the existing tree cover and incorporate opportunities for landscape and biodiversity enhancements identified within the Local Character Areas F2: Stour Valley Slopes and E3: Amery Court Farmlands set out in Canterbury Landscape Character and Biodiversity Appraisal;*

- e) *Provide the majority of open space in the western part of the site, to avoid coalescence with the settlement of Blean and to minimise adverse impacts on the Blean Conservation Area. No residential development shall take place within 400m of the Blean Woods SAC;*
- f) *Provide green corridors to link wider countryside to the city centre including enhancements to the potential habitat connectivity offered by the disused Crab and Winkle railway and along the Sarre Penn valley;*
- g) *Minimise and where necessary mitigate damage to the Blean and Rough Common Green Gap through the provision of the primary access;*
- h) *Minimise loss of or damage to ancient woodland at "Long Thin Wood" through the provision of the primary access. Retain all other ancient woodland and ancient or veteran trees, ensuring they are not damaged nor is their future retention threatened, unless there are wholly exceptional reasons, in line with Policy DS18;*
- i) *Ensure that development does not adversely affect the landscape, ecology or setting of the Blean Woodland Complex, in line with Policy X;*
- j) *Enhance biodiversity interest from watercourses, and conserve, enhance and create neutral grassland, heathland and deciduous woodland, where appropriate. Expand and enhance fragmented areas of woodland to improve connectivity;*
- k) *Conserve and enhance historic field patterns and features, including the earthworks at St Cosmus and Damian church (Scheduled Monument) and other isolated boundaries and features representing the Medieval landscape pattern. Retain parts of existing orchards on the site for their landscape, biodiversity, historic and social value where appropriate;*
- l) *Conserve the PRoW network across the site ensuring key views from the network are protected and that the network provides multiple benefits such as being designed as part of a green ecological corridor; and*
- m) *Provide visual integration of development edges, through native wooded boundaries and mature trees to provide screening and reduce visual and landscape impact.*

4. Access and Transportation

The access and transportation strategy for the site should:

- a) *Provide safe and convenient pedestrian and cycle connectivity*
- b) *including:*
 - a. *Improved walking and cycle connections to the city centre via the Crab and Winkle cycle route and PRoWs through the UoK estate;*
 - b. *Improved cycle connections to Whitstable via Crab and Winkle cycle route;*
 - c. *New and improved walking and cycling connections to Blean, Tyler Hill, Broad Oak and the wider countryside to the east; and*
 - d. *Improvements to PRoWs within and around the site as required.*
- c) *Provide a Transport Hub within the site to facilitate good access to public transport facilities for new residents, with a new bus route connecting residential areas and the community hub to Canterbury West railway station and the city centre;*
- d) *Provide improvements to Canterbury West Station to include facilities for cycle parking and passenger flows;*
- e) *Provide a primary access point to the site at the junction of Whitstable Road and Rough Common Road and secondary access to the site from Whitstable Road through land at Blean Primary School;*
- f) *Minimise traffic flow onto Tyler Hill Road in both directions;*
- g) *Provide highways improvements to Rough Common Road; and*
- h) *Provide a Transport Assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars.*

5. Phasing and Delivery

- a) Waste water treatment works, if required, should be delivered at the earliest possible stage in the development.
- b) Secondary access should be delivered at an early stage of the development and, in any case, prior to occupation of 300 dwellings, unless otherwise agreed with the Council.
- c) Rough Common Road improvements should be delivered prior to occupation of 50% of the total dwellings.
- d) The Local Centre, including commercial and community space, must be delivered prior to occupation of 25% of the total dwellings, unless otherwise agreed with the Council.
- e) The business space should be provided as fully serviced land prior to the occupation of 50% of the total dwellings together with a robust Delivery Strategy, unless otherwise agreed with the Council.
- f) The new primary school site must be transferred to KCC at 'nil consideration' and fulfil KCC's General Transfer Terms, prior to the occupation of 100 dwellings, unless otherwise agreed with the Council.
- g) The new facility for Blean Primary School should be provided prior to the occupation of 25% of the total dwellings. The new facility must be operational prior to redevelopment of the existing school facilities, unless otherwise agreed with the Council.

Supporting Text:

Development of a new neighbourhood on land to the north of the University of Kent's Canterbury campus provides an opportunity to deliver a highly sustainable, new neighbourhood that reflects the council's spatial strategy for development which is to direct new development to the most sustainable locations focussed in/around Canterbury.

Investment in movement and transportation infrastructure is needed to support delivery of the new neighbourhood, including in respect of an extension of high frequency bus services which can connect the site to Canterbury West rail station and the city centre. Upgrades would also be required at Rough Common Road alongside a range of measures to maximise walking and cycling.

The new neighbourhood should create large new areas of publicly accessible open spaces, creating significant separation from Blean and Tyler Hill, and improve ecological connectivity to key natural assets in the area, including Blean Woods.

A new community hub will provide a focal point for the new neighbourhood, meaning that residents will be able to access key day-to-day services within walking and cycling distances. A new 2FE primary school will be needed to serve new residents, along with the re-provision of the existing Blean Primary School (if required).

Community services and facilities alongside business and commercial spaces, including flexible workspace, will provide opportunities for local employment to further enhance the sustainability of the new settlement, together with a range of housing to meet local needs such as for facilities, older persons housing accommodation and affordable housing of a range of tenures.

Option (2) – Broad Area for Strategic Growth or Opportunity Area

- 8.75 The alternative option would be to designate the site as an Opportunity Area or Broad Area for Strategic Growth. The following proposed policy wording is broadly as per Policy C26 of the Regulation 18 consultation draft of the Local Plan (October 2022):
- 8.76 Proposed policy wording is as follows:

Working with stakeholders and local communities, the council will proactively explore opportunities for the development of land to the north of the University of Kent campus, as indicated on the Policies Map, for a strategic scale mixed residential-led development.

The Council will prepare a detailed development brief (or a similar approach) for this Opportunity Area to quantify development potential and ensure attractive and sustainable design in line with other policies in this plan.

Appendices

Appendix A – Site Plan

Appendix B – Transport Response

Appendix C – Transport Position Statement

Appendix D – Supplementary Transport Note

Appendix E1 – Land Agent Letter

Appendix E2 – Developer Letter

Appendix F1 – CCC Pre-application Meeting Pack (April 2026)

Appendix F2 – Pre-application Advice from CCC (May 2026)

Appendix G – University of Kent Annual Review and Financial Statement (2024)

Appendix H – UK Modern Industrial Strategy

Appendix I to T – Representations previously submitted to CCC (see table below)

	Consultation	Date	Scope of Representations Submitted by UoK
Appendix I	Supplementary Submission	December 2025	An updated Transport Strategy was submitted to KCC/CCC in December 2025. (Appendix I)
Appendix J	Regulation 18 Focussed Consultation	October 2025	Overarching updated (AY) Planning Report (Appendix J(i)) (including a review of alternative (competing) allocations) supported by the following: - Economic Impact of the UoK (June 2024) (Appendix J(ii)) - Photographs of Ancient Woodland (Appendix J(iii)) - Nutrient Neutrality Assessment Update (Appendix J(iv)) - Ancient Woodland Strategy (Appendix J(v)) - Ecological Strategy (Appendix J(vi)) - Updated Transport Strategy (Appendix J(vii)) - Updated Air Quality Assessment (Appendix J(viii)) - Viability Assessment Appendix J(ix) - Update Delivery Strategy Report Appendix J(x) - Updated Availability Report (Appendix J (xi))

			- Updated Market Report and Programme (Appendix J (xii))
Appendix K	Supplementary Submission	March 2025	An updated Transport Strategy was submitted to CCC in March 2025. (Appendix K)
Appendix L	Supplementary Submission	February 2025	Updated Preliminary Ecological Appraisal (WSP, 2025) (Appendix L(i)) Ecological Mitigation Strategy (WSP, 2025) (Appendix L(ii)) Sarre Penn and Stodmarsh Connectivity Assessment (Nutrient Neutrality Strategy) (WSP, 2024) (Appendix L (iii))
Appendix M	Regulation 18 Revised Draft Local Plan Consultation	June 2024	Overarching (AY) Planning Report (Appendix M(i)) including updated details of public benefits; updated details of site suitability, availability and achievability; and comments on draft local plan policies. Supported by the following evidence reports: - Updated Economic Impact Assessment (Viewforth Consulting, 2024) (Appendix M(ii)) - Transport Appraisal (WSP, 2024) (Appendix M(iii)) - Environmental Update Report (WSP, 2024) (Appendix M(iv)) - Site Delivery Report (AY, 2024) (Appendix M(v)) - Updated Illustrative Masterplan document (PRP, 2024) (Appendix M(vi))
Appendix N	Supplementary Submission	November 2023	Masterplan Delivery note (AY, 2023) (Appendix N(i)) Viability Assessment (AY, 2023) (Appendix N(ii)) Transport Strategy Summary (WSP, 2023) (Appendix N (iii)) Nutrient Neutrality Assessment Update (WSP, 2023) (Appendix N(iv)) Recreation Pressure on Blean Woods Technical Note (WSP, 2023) (Appendix N(v))
Appendix O	Regulation 18 Draft Local Plan Consultation	January 2023	Overarching (AY) Planning Report providing comments on draft policies. (Appendix O(i)) Supported by the following: - Updated illustrative masterplan (PRP, 2023) (Appendix O(ii)) - Preliminary Transport Appraisal Update (WSP, 2023) (Appendix O(iii)) - Air Quality Assessment Note (WSP, 2022) (Appendix O(iv)) [Some other evidence reports that had previously been submitted, as listed below, were resubmitted.]
Appendix P	Supplementary Submission	February 2022	Preliminary Transport Appraisal (WSP, 2022) (Appendix P (i)) Access Road Alignment Appraisal (WSP, 2022) (Appendix P(ii)) Air Quality Assessment (WSP, 2022) (Appendix P(iii))

Appendix Q	Vision and Preferred Options Consultation	August 2021	Response to CCC consultation questionnaire. (Appendix Q(i)) Updated (AY) overarching Planning Report 'Sustainable Development Opportunity – the University of Kent'. (Appendix Q(ii)) Supported by the following evidence reports: - A 'Vision for Development' masterplan document (PRP, 2021) (Appendix Q(iii)) - Environmental Constraints and Opportunities Report (WSP, 2021) (Appendix Q(iv)) - Transport Strategy (WSP, 2021) (Appendix Q(v)) - Note on Ancient Woodland Policy Matters (AY, 2021) (Appendix Q(vi)) - Delivery Strategy (AY, 2021) (Appendix Q(vii))
Appendix R	Call-for-Sites	July 2021	Further information to supplement the June 2020 call-for-sites submission (update to cover report to account for additional evidence submitted as part of Preferred Option local plan consultation – see below). (Appendix R)
Appendix S	Our Future District 2040	July 2020	Response to CCC consultation questionnaire. (Appendix S)
Appendix T	Call-for-Sites	June 2020	Overarching (AY) planning report (Appendix T(i)) setting out the unique need to develop the Site for housing, including a case demonstrating suitability, availability and achievability. Supported by the following evidence reports: - The Economic Impact of the UoK (Viewforth Consulting, 2018) (Appendix T(ii)) - Property Market Appraisal (AY, 2020) (Appendix T(iii)) - UoK Masterplan (2019), including supporting documents: Place-making Strategy; Planning and Environment Strategy; Biodiversity and Landscape Strategy; Movement and Transport Strategy; Baseline Mapping; Building Analysis (including historical evolution) and University Benchmarking Study; Landscape Setting and Views Appraisal; and Preliminary Ecological Appraisal (Appendix T(iv)) - Title Plans (Appendix T(v))

Contact details

Enquiries

Nick Alston

[Redacted]

[Redacted]

Visit us online

avisonyoung.com

Avison Young

The Met, 24 Percy Street, London W1T 2BS

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