

Pre-Application Meeting Briefing Note

Land to the North of University of Kent, Canterbury

1. Introduction

- 1.1 The purpose of this note is to set out the case for the development of Land to the North of University of Kent, Canterbury ('the Site') (as outlined in white in Figure 2.1). It has been prepared on behalf of the University of Kent (UoK) to inform a pre-application meeting with Canterbury City Council (CCC), the Local Planning Authority (LPA).
- 1.2 The purpose of the pre-application meeting is to seek CCC Planning Officer advice on the principle of development of the Site for a residential-led scheme of up to 2,000 homes. It should be noted that this Site has been promoted by UoK as part of the preparation of the draft Local Plan since 2020 and has therefore been subject to extensive discussions with Planning Policy Officers at CCC.
- 1.3 This note is structured as follows:
 - Section 2 provides a description of the Site.
 - Section 3 provides an overview of the planning history of the Site
 - Section 4 provides an overview of the proposed development
 - Section 5 sets out the planning policy context
 - Section 6 provides an overview of material considerations, including housing supply and delivery
 - Section 7 sets out the case for the principle of the Proposed Development
 - Section 8 provides a summary and next steps
- 1.4 In addition to this Cover Note, the pre-application request is supported by the following documents:
 - Appendix A – Concept Masterplan prepared by PRP
 - Appendix B – Appeal Decision APP/J2210/W/25/3373183
 - Appendix C – Updated Transport Strategy, prepared by WSP
 - Appendix D – Agreed Highways Position with KCC, prepared by WSP
 - Appendix E – Ancient Woodland Strategy, prepared by WSP
 - Appendix F – Cultural Heritage and Archaeology Constraints and Opportunities Appraisal, prepared by WSP

- Appendix G – Preliminary Ecological Assessment, prepared by WSP
- Appendix H – Ecological Mitigation Strategy, prepared by WSP
- Appendix I – SANGs Technical Note, prepared by WSP
- Appendix J – Nutrient Neutrality Assessment, prepared by WSP
- Appendix K – Air Quality Assessment, prepared by WSP
- Appendix L – Economic Impact of the University of Kent, prepared by Viewforth

2. Description of the Site

The Site

- 2.1 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 2.1). It comprises 3 separate parcels of land identified as Sites B, C, and D, as identified in Figure 2.1:
- 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).

Location

- 2.2 The Site is located approximately 2.5km north of Canterbury City Centre and 6km south of Whitstable (refer to Figure 2.2). The village of Blean is immediately to the west and the village of Tyler Hill immediately to the east.
- 2.3 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 3.5km 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.
- 2.4 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 2.1 Aerial Photograph (Site Outlined in White)



Figure 2.2 Aerial Photograph (Site Outlined in Red)



3. Planning History

- 3.1 The Site has no recent planning application history relevant to the Proposed Development.
- 3.2 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.
- 3.3 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.
- 3.4 The above works are being proposed by South East Water, who is in regular dialogue with the UoK.
- 3.5 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.

4. Proposed Development

- 4.1 The proposal seeks pre-application advice in relation to the principle of development for the delivery of up to 2,000 new homes alongside a new local centre, primary school, and associated open space/play space/green infrastructure.
- 4.2 Further details of the proposal can be found in the high-level master plan document submitted in support of this pre-application request (Appendix A).

5. Planning Policy Context

Planning Policy Framework Overview

- 5.1 The Government's national planning policies for England are set out in the National Planning Policy Framework (NPPF) (2024), which should be read in conjunction with the associated Planning Practice Guidance (PPG).
- 5.2 The Development Plan affecting the Site comprises the Canterbury Local Plan (2017) which has an operative period of up to 2031 and is currently under review. The Kent Minerals and Waste Local Plan (2016) is the relevant Minerals and Waste Plan. The Local Plan is supported by numerous strategies, Supplementary Planning Documents (SPDs) and other guidance which expand on policies in the Local Plan and/or cover specific areas of the district.

National Planning Policy and Planning Reforms

- 5.3 The Government recently consulted on a draft revised version of the NPPF (December 2025). This is a wholesale re-write of the current NPPF which is aligned with the Government's broader planning reforms (which include a system of 'new style' local plans) and local government reform. It is focussed on supporting the delivery the Government's well publicised objectives associated with increasing housing supply (1.5m new homes in 5 years), boosting the economy, and environmental protection/recovery.

The Current Local Plan (2017)

Site Specific Policies

- 5.4 Site B falls within the boundary of a site-specific policy for the UoK which includes the Retained Campus (Policy EMP7). Policy EMP7 supports development of educational buildings for teaching and office space; student accommodation; business accommodation (compatible with the University's role in research and development and business innovation); sports facilities and other facilities directly related to the University's core business. It does not expressly support housing development on the Site.
- 5.5 Sites C and D are not subject to any site-specific local plan policies.

Policy Designations

- 5.6 The Site is subject to numerous policy designations as identified on the adopted Local Plan Policies Map, 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.

5.7 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).

Draft Planning Policy

5.8 The adopted Local Plan is currently under review with CCC commencing preparation of a new Local Plan in 2020, with the Regulation 19 version recently being published on 23rd March 2026 with the consultation period ending on 18 May 2026.

5.9 Previous versions of the draft Local Plan identified the Site as an 'Opportunity Area' for a new garden community (Draft Policy C26 within the Regulation 18 Draft Local Plan Consultation (October 2022)) and later allocated for a comprehensive mixed-use development including approximately 2,000 homes, a community hub as a focal area for the community containing a mix of uses (local centre including commercial, local shopping and community uses, office and business space including flexible working space, and a mobility hub to serve residents and businesses), a new 3FE Primary School, re-siting and provision of a new 2FE Primary School, a new high quality waste water treatment works, and on-site open space (Draft policy C12 within the Regulation 18 Revised Draft Local Plan (March 2024)). Within the latest draft Local Plan, the allocation of this site has been removed with the reason being that the site is no longer considered suitable for allocation due to concerns regarding provision of suitable access, impact on the highway network, and impact on ecology, including the loss of ancient woodland.

5.10 All policy designations in the current local plan (as set out above) have been carried forward into the draft Local Plan.

6. Material Considerations

Housing Delivery Test

- 6.1 1,718 homes were delivered within the administrative area of CCC over the period April 2020 to April 2023 (an average of 573 homes per annum), set against a requirement of 2,557. This results in a Housing Delivery Test (HDT) score of 67% for this period (the most recently published result).
- 6.2 The Government has indicated that it intends to publish the HDT results for 2024 and 2025 'later' in 2026.
- 6.3 The Ministry of Housing, Communities and Local Government (MHCLG) publishes Building Control data regarding new housing completions. It indicates that 705 homes were completed (April 2023 to April 2024) and 556 homes were completed (April 2024 to April 2025) in Canterbury, set against an annual requirement of 1,215. This suggests that Canterbury will likely score well below 75% in the forthcoming 2024 and 2025 HDT results.

Five-Year Housing Land Supply

- 6.4 Canterbury's latest published Authority Monitoring Report (AMR) covers the period from April 2024 to March 2025. It includes a Housing Land Supply Statement at Appendix F which includes details of the Council's 5 Year Housing Land Supply (5YHLS) position, which has a base date of 1st April 2025. Key points are as follows:
- The housing requirement set out in the Local Plan is **900** dwellings per annum. The Local Plan was adopted in 2017 (more than 5 years old) and is therefore out of date for the purposes of calculating 5YHLS.
 - The relevant Local Housing Need figure for the purposes of calculating 5YHLS is calculated on the basis of the Standard Method (**1,215** dwellings per annum).
 - A 20% buffer applies owing to the most recent HDT score (67%), which results in an annual housing requirement (including buffer) of **1,458**.
 - CCC claim to be able to demonstrate a deliverable supply of 5,275 homes, which equates to a **3.62 year** supply.
- 6.5 A recent appeal decision (ref. APP/J2210/W/25/3373183) was allowed on 26th February 2026 and planning permission granted for an Outline planning application for up to 300 residential dwellings at Land off The Hill, Littlebourne, CT3 1UX (enclosed at Appendix B). Whilst the appeal considered a number of issues, it is clear that there was no dispute between the parties that Canterbury City Council cannot demonstrate a deliverable five-year supply of housing sites in the area based on its current housing requirement. The appeal confirmed that CCC are only able to demonstrate a 3.62 year's supply of housing and therefore paragraph 11d of the Framework is engaged, alongside the fact that the 2023 Housing Delivery Test shows that the delivery of housing was at 67%.
- 6.6 In terms of the weight to be given to the delivery of the 300 dwellings on the site, the Inspector afforded very significant weight in the overall planning balance.
- 6.7 We anticipate that CCC will be in a position to demonstrate a 5YHLS if/when the new local plan is adopted.

7. The Planning Case

The Presumption in Favour of Sustainable Development

- 7.1 In accordance with s.38(6) of the Planning and Compulsory Purchase Act (2004), a future planning application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 7.2 National planning policy, as set out in the NPPF is a key material consideration for the purposes of s.38(6) (i.e. in the determination of planning applications). NPPF para. 11(d) is engaged in this instance as the policies that are most important for determining the planning application are out of date on the grounds that CCC cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer) and the most recent Housing Delivery Test indicated that the delivery of housing was significantly below (less than 75% of) the housing requirement over the previous three years.
- 7.3 This means that the application should be determined on the basis of the ‘tilted balance’. For the reasons set out in this statement, it is our judgement that there are no ‘Footnote 7’ policies that would provide a strong reason for refusing the application and it is clear that the adverse impact of granting planning permission would not significantly and demonstrably outweigh the very significant benefits of the development when assessed against the policies of the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination.
- 7.4 We note that the above presumption in favour of sustainable development would continue to apply under the provisions of the draft revised NPPF Policies S3 and S5(j) (development outside settlements).

Overview

- 7.5 By way of summary, the case for the development is as follows:
1. There is an economic need for the development
 2. There is a housing need for the development
 3. In the context that local plan policies that restrict development outside of settlements are out of date, the Site is particularly suitable for development in terms of (a) being in a sustainable location that is well related to an existing settlement, and (b) in broader environmental and technical terms. This is subject to resolving outstanding issues relating to highway impact and Ancient Woodland which in our view are resolvable and, on balance, do not provide a strong reason to refuse the application subject to reasonable mitigation.
 4. It is a unique opportunity which will generate significant public benefits that are incapable of being achieved if the Site is not developed.
 5. The alternative (do-nothing) scenario would risk generating very substantial economic and social harm and would be a failure of the planning system.
- 7.6 Each of the above points is explained below.

Economic Need

- 7.7 The University of Kent is an ‘anchor institution’ within the economic ecosystem of Canterbury. It is delivering on the needs of the regional economy and for local people, at the same time as 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.

7.8 Its economic contribution is substantial. Headlines include:

- Economic Output – The impact on overall economic output:
 - o University's own direct output: £271.3m (£257.7m within Canterbury)
 - o Secondary output impact of University expenditure: £388.2m (£132.9m within Canterbury)
 - o Personal student off-campus expenditure: £313.5m (£119.9m within Canterbury)
 - o Total economic output (per annum): £972.9m (£510.5m within Canterbury)
- Gross Value Added (GVA) – The regional measure of Gross Domestic Product (GDP):
 - o University's own direct output: £172.5m (£163.8m within Canterbury)
 - o Secondary impact of University expenditure: £190.3m (£65.8m within Canterbury)
 - o Personal student off-campus expenditure: £147m (£56.4m within Canterbury)
 - o Total GVA (per annum): £509.8m (£286m within Canterbury)
- Jobs:
 - o Direct jobs within the University: 3,330 (3,164 within Canterbury)
 - o Jobs generated through the secondary impact of University expenditure: 5,666 (2,003 within Canterbury)
 - o Jobs generated by personal student off-campus expenditure: 3,978 (1,531 within Canterbury)
 - o Total job generation: 12,974 (6,697 within Canterbury – approximately 10% of all jobs within Canterbury).

7.9 The ability to sustain the above economic contribution is under very significant threat as the University is operating at an unsustainable financial position. It requires an injection of funds to address its debt liabilities and a reduction in operating costs (and/or increase in income) to repair its balance sheet on an ongoing basis. If its financial position is not resolved, the University will cease to operate.

7.10 Sustaining the University goes to the heart of the purpose of the planning system. The matter is of regional (if not national) significance, needs urgent resolution. This is a significant material consideration in the determination of a future planning application.

7.11 This is not a unique experience to the University of Kent as the entire of the UK Higher Education sector is facing very challenging and sustained financial pressures which have been well reported.

7.12 The University's principal income is based on funding from the UK Government for domestic students (which is loss-making) combined with fees from international students, research income, income from student housing, and spin-off commercial activities. These income streams are under threat:

- Government funding is becoming increasingly insecure;
- Domestic tuition fees (despite recent increases) are falling in real-value terms (accounting for inflation);
- There are disincentives to international students due to newly imposed visa restrictions and the proposed levy set out in the UK Government's Restoring Control over the Immigration System white paper (May 2025);
- There is increasing national and international competition for students; and

- The competition for research funding is significant.

- 7.13 These 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.
- 7.14 These threats are affecting the UK Higher Education sector as a whole, however the effects on the University of Kent have been particularly severe and as noted above, it is continuing to operate at an unsustainable financial position. Over the years, the University has put in place a strategy to respond to this and has most recently confirmed its merger of resources with the University of Greenwich to battle ongoing economic challenges through economies of scale related efficiencies.
- 7.15 However, more needs to be done, and seeking to generate value from its estate would be one of the most significant in terms of the scale of 'bullet' funds that can be generated and the overall impact on the University's operating position. The University is obliged to achieve 'best value' for the sale of any land, and has confirmed that 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.

The ability to address this economic need as part of the future development of the Site would require the continued involvement of the University, which is its intention.

Housing Need

- 7.16 There is a clear and demonstrable need to boost the supply of housing across England, Kent, and Canterbury as evidenced by the Council's 5YHLS position and HDT results. The need is significant and must be addressed urgently to address the substantial social harm associated with inadequate housing. This is reflected in the Government's priority to build 1.5 million homes within this Parliament.

Suitability of the Site

Development in the Countryside

- 7.17 Policy SP4 of the Local Plan sets out that the urban areas of Canterbury, Herne Bay and Whitstable are to be the principal focus for development, with large scale development outside of these areas (i.e. in the countryside) restricted.
- 7.18 However, this policy should be treated as **out of date** (on the basis of NPPF para 11(d)), as confirmed by a recent appeal in relation to proposals for residential development at 'Land at The Hill, Littlebourne, CT3 1UX'.¹

Transport (Sustainable Location)

- 7.19 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 set out within the proposed masterplan, has been to develop a new north-south route through the University Campus. 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, 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. It is our view that up to around

¹ Paragraph 142 of Appeal Decision APP/J2210/W/25/3373183

200/300 homes could be supported from the single southern access point. Kent County Council (KCC) (in its capacity as highway authority) has confirmed that it supports the proposed access strategy.

- 7.20 The Site is located in a **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 City's Transport Strategy and national planning policy:
- The University benefits from an existing high frequency bus service which can be extended into the Site. 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).
- 7.21 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 Retained Campus.
- 7.22 The University's Transport Advisor (WSP) considers that this will allow the development to proceed **without generating a 'severe' highway impact**, as set out within Appendix C.
- 7.23 Through extensive liaison, KCC have confirmed that they do not oppose the principle of residential development on the Site and have indicated that its concerns could be overcome. The statement enclosed at Appendix D sets out the agreed position with KCC.
- 7.24 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 how these could be secured/maintained); further highway modelling/assessment work; additional/alternative highway upgrade works; and (as a last resort) reductions in the quantum of development. Whilst further technical work is required to demonstrate that the quantum of development can be accommodated within the Site, the **principle of development for a residential scheme is considered acceptable in highways terms**.

Ancient Woodland

- 7.25 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).
- 7.26 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 very 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.
- 7.27 A package of compensatory measures are set out within the Ancient Woodland Strategy prepared by WSP (Appendix E), which include the creation of new and extended woodland (including soil translocation), and through habitat enhancement of unaffected areas of retained Ancient Woodland.

Further to this, the unique economic and social (housing related) public benefits which are set out later within this note which will be realised from the development of the Site comprise wholly exceptional reasons to justify the loss of the Ancient Woodland.

- 7.28 The acceptability of this case is a matter of judgement for CCC, nonetheless it is our view that through the application of a balanced judgement, the loss of this minor area of Ancient Woodland would meet the requirement of an **exceptional justification and therefore should not provide a strong reason for refusing the application.**

Heritage

- 7.29 The Site is not visible from the Canterbury City Centre World Heritage Site, and therefore incapable of affecting its setting.
- 7.30 A Scheduled Ancient Monument falls partly within the Site, however this will not be directly affected by future proposed development (with appropriate design/masterplanning).
- 7.31 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.
- 7.32 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 Concept Masterplan (enclosed at Appendix A), 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.
- 7.33 Our view, as evidenced within the Cultural Heritage and Archaeology Constraints and Opportunity Appraisal (WSP, May 2021) (Appendix F) 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

- 7.34 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.**

Ecology

- 7.35 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 G) and it is anticipated that further species-specific survey work will be required at application stage and the potential impact can be managed appropriately via standard (non-exceptional) mitigation measures, as set out within the Ecological Mitigation Strategy (Appendix H).
- 7.36 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.

- 7.37 Land to the West of the village of Blean comprises the **Blean Woodland Complex**, which is designated as a Special Protection Area SPA, RAMSAR Site, Special Area for Conservation (SAC), SSSI, and National Nature Reserve. The Air Quality Impact Assessment prepared by WSP (Appendix K) 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 I) will manage recreational pressure. The proposed landscape and biodiversity gain strategy offers the opportunity to improve ecological connectivity between the Complex and surrounding areas, to deliver net benefits. Accordingly, the development of the Site should not adversely affect the Complex.
- 7.38 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), 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.
- 7.39 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

- 7.40 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.
- 7.41 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.
- 7.42 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). 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.
- 7.43 This will ensure that the proposed development is acceptable in national planning policy terms.

Air Quality

- 7.44 An Air Quality Assessment has been undertaken, included in Appendix K, 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 level² no adverse effects are predicted at any of the designated ecological sites within the study area (including Habitats sites that are subject to Habitat

² Above which direct adverse effects on receptors, such as plants and ecosystems, may occur.

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.

7.45 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).

7.46 Our view is that this matter can be fully managed and satisfied as part of a future planning application and should not pose an in-principle constraint to development.

Flood Risk

7.47 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.

7.48 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.

7.49 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.

Planning Benefits

³ With an uncertainty range of 2-4µg/m³

- 7.50 The proposed development would generate significant unique public benefits. Preventing the development would likely lead to significant public harm.
- 7.51 The overarching public benefit of developing the Site for housing is that it enables economic and housing planning policy objectives to be achieved in a complementary joined up manner, which will realise net additional benefits over and above what could otherwise be achieved.
- 7.52 As set out within the NPPF (paragraph 8), the overarching objectives to achieving sustainable development are set out as three interdependent categories, which are economic, social, and environmental. In terms of the public benefits of the development of this site, these are set out below under these three categories.

Economic

- 7.53 The key economic benefit is that the development of the Site, owned by UoK, will support the continuation (and potential improvement) of the economic contribution that the UoK currently makes to the local, regional and national economy. Development will protect against the substantial economic harm that would undoubtedly arise if the University's Transformation Plan were not successful.
- 7.54 Headlines from The Economic Impact of The University of Kent, prepared by Viewforth (Appendix L) include:
- **Economic Output** – The impact on overall economic output:
 - o University's own direct output: £271.3m (£257.7m within Canterbury)
 - o Secondary output impact of University expenditure: £388.2m (£132.9m within Canterbury)
 - o Personal student off-campus expenditure: £313.5m (£119.9m within Canterbury)
 - o Total economic output (per annum): £972.9m (£510.5m within Canterbury)
 - **Gross Value Added (GVA)** – The regional measure of Gross Domestic Product (GDP):
 - o University's own direct output: £172.5m (£163.8m within Canterbury)
 - o Secondary impact of University expenditure: £190.3m (£65.8m within Canterbury)
 - o Personal student off-campus expenditure: £147m (£56.4m within Canterbury)
 - o Total GVA (per annum): £509.8m (£286m within Canterbury)
 - **Jobs:**
 - o Direct jobs within the University: 3,330 (3,164 within Canterbury)
 - o Jobs generated through the secondary impact of University expenditure: 5,666 (2,003 within Canterbury)
 - o Jobs generated by personal student off-campus expenditure: 3,978 (1,531 within Canterbury)
 - o Total job generation: 12,974 (6,697 within Canterbury – approximately 10% of all jobs within Canterbury).
- 7.55 The development of the Site will also generate broader economic benefits, including:
- Construction stage expenditure, jobs and training opportunities.
 - Future investment in the University's retained campus to deliver education and complementary uses (for example hotel/conferencing facilities to support the wider economy).

Social Benefits

- 7.56 The key social benefits of developing the Site include:

- Significant support for the continuation and ongoing improvement of the provision of higher education and research at the University (to include future investment in its estate), including the funding of programmes which seek to provide additional support and access to higher education.
- 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 amounts 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

7.57 Key environmental benefits of developing the Site include:

- Provides for the development needs of the district in a manner that minimises 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 within household energy consumption and transport (noting the unique opportunity to take advantage of the University's existing transport infrastructure to deliver an active travel based transport strategy for the Site).
 - o Support for the University's estate strategy to decarbonise its estate.
- Avoiding the need to develop land of higher landscape value to meet development needs.
- Heritage, including:
 - o Accommodating new development on land which is not visible from the World Heritage Site (and therefore does not affect its setting).
 - o Protection of the significance of other existing heritage assets include the Grade II* listed Church of St Cosmus and St Damian, Grade II listed Church Cottage, Scheduled Ancient Monuments and Conservation Areas.
- Minimum 20% biodiversity net gain compared to the existing position and opportunities to deliver strategic objectives including improved 'green' connectivity between existing green infrastructure.

7.58 Significant public harm would arise if the proposed development was not delivered, as this would place significant financial strain on the University. The worst (but reasonably possible) case is that the University will be forced to close. The impact will be:

- Loss of c.£1 billion of economic output.
- Loss of c.£0.5 billion of Gross Value Added.

- Loss of c.13,000 jobs, including c. 6,700 jobs in Canterbury (10% of all jobs in the district).

7.59 This will have a disastrous impact on the local economy and wellbeing of the local community.

8. Summary and Next Steps

8.1 Our view is that there is a sound planning case to be made to underpin the development of the site for around 2,000 homes and associated development.

8.2 NPPF para. 11(d) is engaged in this instance as the policies that are most important for determining the planning application are out of date on the grounds that CCC cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer) and the most recent Housing Delivery Test indicated that the delivery of housing was significantly below (less than 75% of) the housing requirement over the previous three years.

8.3 This means that the application should be determined on the basis of the 'tilted balance'. For the reasons set out in this statement, it is our judgement that there are no 'Footnote 7' policies that would provide a strong reason for refusing the application and it is clear that the adverse impact of granting planning permission would not significantly and demonstrably outweigh the very significant benefits of the development when assessed against the policies of the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination. This presumption would continue to apply under the provisions of the draft revised NPPF.

8.4 By way of summary:

- There is an economic need for the development
- There is a housing need for the development
- In the context that local plan policies that restrict development outside of settlements are out of date, the Site is particularly suitable for development in terms of (a) being in a sustainable location that is well related to an existing settlement, and (b) in broader environmental and technical terms. This is subject to resolving outstanding issues relating to highway impact and Ancient Woodland which in our view are resolvable and, on balance, do not provide a strong reason to refuse the application subject to reasonable mitigation.
- It is a unique opportunity which will generate significant public benefits that are incapable of being achieved if the Site is not developed.
- The alternative (do-nothing) scenario would risk generating very substantial economic and social harm and would be a failure of the planning system.

Next Steps

8.5 The UoK is seeking to discuss and agree the principle of the proposed development with CCC Officers at the first pre-application meeting.

8.6 Further discussions will be required regarding Ancient Woodland, transport, and other design and technical matters in due course. The UoK is keen to discuss the option of entering into a Planning Performance Agreement to cover the pre-application process and submission of an application for outline planning permission.