

**Beard, Tom (Avison Young - UK)**

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**From:** Ceri Williams [REDACTED]  
**Sent:** 14 May 2026 16:03  
**To:** Beard, Tom (Avison Young - UK)  
**Cc:** Simon Thomas; Stevie Andrews  
**Subject:** University of Kent (PRE/26/00050)  
**Attachments:** UoK- principle & highways May 2026.pdf; Appendix 1- KCC and WSP position statement.pdf

**CAUTION: External Sender**

Dear Tom,

Following our meeting on the 22nd of April, please see attached our response in relation to the principle of development and highways associated with the above site.

As set out in the response, it will be beneficial to understand your timeframes for addressing the outstanding highway matters.

I also look forward to hearing your thoughts on the proposed schedule of meetings.

Kind regards,

Ceri

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Thank you for your pre-application enquiry, which seeks advice regarding the development of your site for 2000 homes. Following on from our meeting on 22<sup>nd</sup> April 2026, the focus of this initial advice is the principle of development with a schedule of topic-based meetings to follow.

As agreed, we have discussed the outstanding highways matters with KCC. The Council's position regarding this is set out below.

## **The Site**

The site subject of this pre-application enquiry is located to the east of Blean and north of the UoK sports pitches. The site is largely undeveloped, save for the Grade II\* Church of St Cosmus and St Damian and the Grade II listed Church Cottage. Part of the site surrounding those designations is a Scheduled Ancient Monument, whilst the southern part of the site falls partially within the Blean Conservation Area, with the northern half of the site immediately adjoining the Amery Court Farm Conservation Area and Tyler Hill Conservation Area to either side.

The wider site is dissected by a number of PROWs that run through the site, with the Crab and Winkle national cycle route the most prominent of the routes. This runs from the south of the site and adjacent to sites C and D. Parts of the site to the north are relatively flat, whilst the topography of site B varies, with a decline towards the university some 50m south of the St Cosmus Church.

Ancient Woodland is located both within and adjacent to site B. The site is not covered by any local or national landscape designations but forms part of the Amery Court Farmland Landscape Character Area. The site comprises the Blean Pastures Local Wildlife Site (LWS) to the south and adjoins the Tyler Hill Pastures LWS to the northeast.

The majority of the site (other than the southern third or so) falls within the zone of influence for both the Thanet and Sandwich Bay SPA and Thames, Medway and Swale SPA. In close proximity to the west of the site lies the Blean Complex SAC, Church Woods SSSI and Blean Woods National Nature Reserve. It is also located within the Stour Catchment therefore potentially impacts upon Stodmarsh SPA, SAC and RAMSAR.

## **Principle**

### *Location of Development*

The site falls outside of the urban boundary of Canterbury and local centre of Blean on unallocated land, however, it is well located to ensure that day to day services including transport links can be accessed. Whilst the site is located outside of the confines of settlements, as part of the Regulation 18 consultation on the emerging Local Plan 2040, the site was put forward as a proposed allocation. Whereby, it was recognised that the site presents an opportunity to deliver a highly sustainable, freestanding settlement that reflects the Council's spatial strategy for development. The site was, however,

subsequently omitted from the Regulation 19 version of the emerging Local Plan because of unresolved highway matters.

#### *Local Shopping and Community Facilities*

The application includes the provision of a new local centre, primary school and associated open/ play spaces. This needs to be complimented by improving connectivity to existing services and wider transport links at Blean and towards the city.

Careful consideration needs to be given to connectivity via sustainable transport measures as part of the master planning for the site. It needs to be ensured that community facilities and day to day facilities are well located across the development. The benefits of this will be two-fold in that it will embed modal shift into the day to day lives of new residents and will play an important part in developing sustainable and healthy communities. Equally, consideration needs to be given to the sustainable transport strategy for the site to ensure that all parts of the site have access to sustainable transport methods to access wider services including the City Centre. The purpose of this is to ensure that the sustainability credentials of the site are fully achieved.

#### *Loss of Agricultural Land*

In terms of loss of agricultural land, the adopted Local Plan seeks to protect the best and most versatile land, defined as land in Grades 1, 2 and 3a (Grade 1 being land which is of the highest quality, providing the best inherent properties for agricultural production).

An agricultural classification assessment will need to be undertaken to be able to assess the loss of agricultural land, the associated economic impact will need to be considered.

#### *Loss of Ancient Woodland*

There is a clear evidenced need for housing, including affordable housing in the district. The Council cannot demonstrate a 5-year supply of housing, nor has the amount of housing that is needed to meet local housing needs, as identified in the adopted Local Plan, been delivered. The Council is in the position whereby the presumption in favour of sustainable development applies.

The legal effect of this is that when planning applications for housing are being considered there is a 'tilted balance' in favour of sustainable development. This means that planning applications that will help to make up the shortfall in housing supply and lack of delivery should be given significant weight in the decision-making process.

Footnote 7 sets out the circumstances that constitute a strong reason for refusing a development when the tilted balance applies, one of those circumstances is where a development could harm an irreplaceable habit. The NPPF identifies ancient woodland as an irreplaceable habitat.

To provide the access 25sqm of ancient woodland will need to be lost. For the purposes of decision making, while the NPPF sets out that this is a strong reason for refusing planning permission. It does, however, also set out that any adverse impacts of doing so would need to significantly and demonstrably outweigh the harm when the framework is taken as a whole.

Paragraph 193c is equally clear that development resulting in the loss of irreplaceable habitats should be refused unless there are wholly exceptional circumstances. Footnote 70 sets out that a wholly exceptional circumstance could be an infrastructure project where the public benefits would clearly and demonstrably outweigh the loss or deterioration of the habitat. This is in addition to a compensation scheme being provided.

The scheme will constitute an infrastructure project therefore the threshold for a wholly exceptional circumstance is met. Subject to the provision of a suitable compensation strategy, and detailed consideration of the wider benefits of the scheme, the loss of the ancient woodland is considered to be acceptable.

It is expected that your Environmental Statement will include a section on Ancient Woodland. As part of this, it would be beneficial to understand the impact of the residential development upon the ancient woodland and whether there is scope to improve the quality of the remaining ancient woodland through appropriate management. If this is the case it could add to the benefits of the scheme.

### *Conclusion*

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning law requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. For the reasons set out the presumption in favour of sustainable development applies in this case. Therefore, you will be relying upon the Council's under delivery of housing and seeking to demonstrate that the benefits of the scheme are outweighed by the harm to reach a positive recommendation.

Notwithstanding this, for the reasons set out the location of the site is considered to be suitable for development subject to the detailed consideration of other planning matters.

Careful thought will need to be given to the master planning of the scheme to ensure that all dwellings are well located to local services and sustainable transport links.

It is important to note that should planning permission be forthcoming it would be granted on the basis that the Council does not have a five-year housing land supply, it would therefore be beneficial to understand how much housing would be delivered in the first 5 years.

## Highways

The impact of any future application will need to demonstrate that a severe impact upon the highway network is avoided. The agreed Transport Position Statement between Kent County Council and WSP sets out further work that needs to be undertaken to ensure that a suitable evidenced based mitigation scheme is established. It is essential that this work is undertaken and is submitted alongside a planning application, the note is available at Appendix 1.

A key attribute of this site is its location to the City and its proximity to existing bus links associated with the University. There is the opportunity to build on these existing links through the proposed park and bus sites and a more frequent bus service along the Uni 1 route. It is, however, important to ensure that existing residents at Blean continue to be suitably served by the 400/ 401 service. Overall, this approach is considered to fit in well with the Council's bus led strategy for transport, however, you need to ensure that you have the necessary agreements with Stagecoach so that the service improvements can be delivered. You also need to consider how the park and bus sites will operate to ensure that they form an attractive transport alternative into the City.

In terms of other sustainable transport options there will be fundamental challenges in encouraging residents to shift to bikes and scooters due to the topography of the area and the constrained nature of the surrounding highway network. Should issues in relation to topography be managed through the inclusion of an e-bike and/ or e-scooter scheme, there is limited opportunity for the inclusion of dedicated sustainable transport corridors along the A290 into the City. You will need to look at internal routes away from the main carriageway to ensure that cycling and scooting options can be fully utilised. Careful consideration will, however, need to be given to the effects that such routes could have on crime and other impacts from the associated paraphernalia e.g. effects of lighting on ecology.

For the purposes of your Transport Assessment the level of modal shift should be consistent with the draft Canterbury Strategic Transport Assessment. While it is accepted that there are key opportunities there are equally challenges that could impact upon how a higher modal shift target can be achieved. It is encouraged that the evidenced local plan led approach be adopted for the purpose of your Transport Assessment.

Turning to the matter of highway capacity, a key challenge is the limited scope to improve the mini roundabout at London Road. Mitigation will be required across the highway network to avoid a severe impact. The agreed position statement clearly sets out, which junctions need further work to be undertaken.

The junctions of particular concern are: -

- The Rough Common and Whitstable Road mini roundabout

- Giles Lane and Whitstable Road junction
- University Road and Whitstable Road junction

#### *Rough Common and Whitstable Road Mini Roundabout*

At our meeting a two-lane approach at this mini roundabout was discussed. We have discussed the issues associated with the two-lane approach with KCC and are advised that the approach is contrary to national highways guidance. In addition to this due to the alignment of the road from the coast heading towards the city, we have been advised that a two-lane approach would not pass the KCC safety audit therefore an alternative solution is required.

Following on from your discussions with KCC, we understand that a revised scheme that includes the construction of a larger roundabout is being modelled- it is encouraged that this be progressed and it is understood that there is sufficient highway land to accommodate this.

#### *Giles Lane and Whitstable Road Junction*

Mitigation to this junction is required, the junction is already at capacity and the impact here is compounded by the narrowness of Giles Lane where it can be difficult for two-way traffic to pass at points. During the PM peak, waits at this junction onto Whitstable Road will result in a 5 minute delay therefore when turning right drivers will take unnecessary risks.

A potential solution may be to make Giles Lane one-way with traffic being routed through University Road where a roundabout arrangement or signalised junction could be put in place to allow coast bound traffic to access Whitstable Road safely. If you were to consider this option, this will require further discussion with KCC Highways and appropriate modelling.

#### *University Road and Whitstable Road junction*

No mitigation at this junction has been identified. The junction at present features a ghost island right turn, which is not appropriate given the additional traffic flow that will be utilising this junction. There appears to be sufficient land within the highway and within the ownership of the University to deliver the necessary mitigation.

As set out previously the inclusion of a new roundabout/ signalised junction to accommodate a one-way system around Giles Lane (off Whitstable Road) onto University Road should be fully explored. Should this approach be suitably modelled to the satisfaction of the highway's authority, it would represent a benefit to the scheme that could potentially be weighed in favour of granting planning permission as it could resolve an existing highways problem within the City.

#### *Creating headroom in the highway network*

While it is acknowledged that the University can create some capacity within the highway network through its own Travel Plan. It needs to be clear how this is going to be achieved along with associated timeframes e.g. increased charging on the University campus along with associated parking controls off campus. While a level of parking will be required at the University a clear disposal plan for its car parks will need to be provided so that any headroom can be accurately included within the Transport Assessment.

A robust approach to this matter is required should any capacity created by the University itself be relied upon within your Transport Assessment.

### *Conclusion*

At this stage further work is required to be able to conclude that the impact of the proposal upon highway safety and amenity is acceptable. The further work that WSP has agreed with KCC needs to be undertaken in full. We encourage you to continue to engage with KCC and ourselves on this matter so that we can ensure that any future scheme is fully mitigated.

Given the importance of this topic, it will be beneficial for timeframes as to when we should be expecting the additional work (agreed with KCC) will be completed so that any future meeting can be properly informed.

### **Schedule of meetings**

Please see the proposed schedule of meetings below: -

- Heritage and Design including a design review panel
- Highways and sustainable transportation
- Infrastructure
- Ecology and Biodiversity

**N.B** other stakeholders may have their own charging schedules for attendance at meetings.