

University of Kent

**Canterbury Local Plan Call for Sites Submission:
Addendum Report**

July 2021

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Prepared By: Kate Green (Associate) and Colin Sinclair (Associate Director)

Reviewed By: Nick Alston (Principal)

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For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1 The purpose of this Representation is to provide Canterbury City Council (CCC) with updated information regarding a series of sites in/around the University of Kent's (UoK) campus in Canterbury, details of which were previously submitted to the Council's Call-for-Sites in June 2020. It should be read as an Addendum to, and in conjunction with, the University's original Call for Sites submission (the 'Original Submission').

Structure of Statement

1.2 Following this introduction, the remainder of this Statement is structured as follows:

- **Chapter 2** describes the sites and the proposed development;
- **Chapter 3** considers the unique suitability of the sites and need for their development;
- **Chapter 4** considers the suitability of the sites;
- **Chapter 5** provides details on the availability of the sites;
- **Chapter 6** considers the achievability of the sites; and
- **Chapter 7** concludes the document.

2. The Sites and the Proposed Development

The Sites

- 2.1 The University now intends to dispose of Sites B, C, D, E, and F only. The extent of these 'Disposal Sites' is as per the Original Submission.
- 2.2 Site A (which was previously identified for disposal) is to be retained as part of the Retained Main Campus. The extent of this is also as per the Original Submission.

Proposed Development

Disposal Sites

- 2.3 An initial and high-level Concept Masterplan for the Disposal Sites was included in the previous Call for Sites Representation (June 2020). This is being updated. A revised, more detailed, Concept Masterplan will be submitted as part of the University's Representation to the Local Plan 'Options' consultation. In summary the updated masterplan comprises:
- **Sites BCD.** Site Area 93ha. Proposed development: new residential community comprising c.2,000 homes and associated uses.
 - **Sites EF.** Site Area 26.5ha. Proposed development: open space, recreational facilities, and environmental mitigation associated with development on Sites BCD and the Retained Main Campus.

Retained Main Campus

- 2.4 The development proposals for the Retained Main Campus (now including Site A) remain as per the University's current Masterplan.

3. Unique Suitability (Need)

- 3.1 The unique economic and social need for residential-led development to be delivered on UoK's Disposal Sites remains unchanged from that identified within the Original Submission.
- 3.2 On this basis, it is not the intention of this Representation to replicate the content of the previous submission, however, it is important to reiterate the reasons underpinning the need for the sale of the Disposal Sites.
- 3.3 Canterbury City Council, as the Local Planning Authority, have an incumbent objective to deliver housing need in line with the growth identified through the application of the standard methodology, (Paragraph 60 of the NPPF). The Disposal Sites detailed in this submission and subsequently promoted for residential-led development present an opportunity to bring forward substantial land for development that would go some way in addressing the housing challenges associated with Canterbury's future. In addition, and importantly, this would allow the University to raise capital receipts necessary to accelerate essential investment in the development of the institution so that it not only remains competitive as a thriving UK Higher Education Institute but continues to grow its substantial economic, social and cultural impact on the district and wider region.
- 3.4 With the above in mind, the Disposal Sites presented in this submission, are uniquely suitable for development and there is no other land within the District that is capable of satisfying this combined housing/education/economic need. As we note in the Original Submission, in our view, this is a significant material consideration in assessing the suitability of the sites.
- 3.5 The retained Main Campus has also been assessed as being the most suitable, available and achievable location for the development of a hotel / conference centre to support the identified need for such facilities (as detailed in the emerging Local Plan), but also the continued growth of the University.
- 3.6 As indicated above, the University has a continuous need to invest in its core business, that being teaching, research and student experience to allow it to compete effectively in the UK Higher Education Market. There is a further drive for innovation and sustainability in a changing social and technological world and this will require one off investments in facilities and infrastructure.
- 3.7 In this context, the sale of the Disposal Sites would increase the resilience of the University's balance sheet to be able to deal with the increasing financial pressures felt by the University and the UK Higher Education sector as a whole. These pressures, at present, are currently reducing its ability to invest in the identified growth and refurbishment needs (identified through the University's

Masterplan; Local Plan Policy EMP7). The identified financial pressures are a result of the University's operating costs, including the high fixed costs of staffing and delivering services across its extensive estate.

- 3.8 It should be noted that the University's income is principally based on funding from the UK Government for domestic students¹, combined with fees from international students, research income, student accommodation and spin-off commercial activities.
- 3.9 Whilst the University has weathered the impacts of COVID-19 relatively well, there remain significant economic pressures on the sector and on UoK as a direct consequence of the pandemic. These include those relating to income generated from the University's student accommodation. Due to the lockdowns enforced by Central Government, together with international travel restrictions and social distancing measures, many students have had to move and / or remain at home during term-time. There are concerns that these changes could have a longer-term effect, with students choosing to remain at home in the long-term rather than renting accommodation on or in close proximity to the University. This could result in a reduction to the University's current income (outside of course fee income streams).
- 3.10 In addition to the above, courses have also been delivered virtually which has necessitated investments and improvements to the technology used by the University, supporting online learning and assessment, student support and IT equipment for staff to enable them to work at home. Buildings have also had to remain operational, which has been at the cost of the University.
- 3.11 In summary, the Disposal Sites present a unique opportunity which would not only help to accommodate a significant proportion of the identified housing need within the District as part of the emerging Local Plan, but they would also provide valuable capital receipts that would help the University release itself from debt obligations and open up opportunities for reinvestment back into the University, further supporting its core business functions, (teaching, research and the UoK student experience) and maintain and grow its vital regional impact.

¹ It is likely that funding from domestic fees is likely to be reduced further following the publication of the Augar Report (May 2019) which provides recommendations to review post-18 education and funding structures.

4. Site Suitability

4.1 The purpose of this section is to provide an update on the suitability of the proposed Disposal Sites for future development.

Retained Main Campus

4.2 No update (refer to Original Submission).

Disposal Sites

4.3 Over the period since the Original Submission was prepared, the University has prepared an up to date evidence base to assess the suitability of the Disposal Sites for development; to inform the preparation of a new concept masterplan; and to demonstrate the achievability of the masterplan proposals. The evidence base includes the following:

- Transport and Access Strategy;
- Initial Air Quality Assessment;
- Heritage Constraints Assessment;
- Preliminary Ecological Assessment;
- Minerals Assessment;
- Noise Assessment;
- Agricultural Land Classification Report; and
- Commercial Deliverability Assessment.

4.4 This newly prepared evidence will be submitted to the Council as part of the University's Representations to the Local Plan 'Options' Consultation. However, in advance of this submission and because the outcomes of the new evidence have a bearing on the assessment of the sites' suitability for development, we have updated the site suitability matrix for Site BCD (Table 5.1) which, as discussed above, is now the focus of the University's development plans.

Sites B, C and D

4.5 The updated suitability matrix for Sites BCD is set out below and is intended to replace Table 5.1 of the Original Submission. It takes account of the updated evidence and should be read in conjunction with the forthcoming Local Plan Representation.

- 4.6 It provides a high-level appraisal of the suitability of Sites B, C and D (combined) for the development of a new residential-led community comprising 2,000 homes and associated uses.
- 4.7 The appraisal is consistent with the previous matrix submitted as part of the Original Submission in that it draws upon a review of local plan policy designations and existing evidence; identifies where further survey work and assessment work has been undertaken; and identifies any further work that will be undertaken. It then goes onto provide a 'RAG Rating' against each criteria on the following basis:
- Green: suitable for development;
 - Green / Amber hatched: suitable for development but with known constraints / policy issues that can be satisfied;
 - Amber: likely to be suitable for development – further work and discussions with the Local Planning Authority likely to be required;
 - Red – unlikely to be suitable for development.

Table 4.1: Suitability Appraisal (Sites BCD)

Criteria	Appraisal	Rating
Previously developed land	<ul style="list-style-type: none"> • Sites B, C, and D are wholly greenfield land. • National planning policy supports the development of greenfield land where there is no alternative suitable, available and achievable previously developed land. The evidence on land supply prepared to inform the current Local Plan confirms that there is a very limited supply of suitable, available and achievable previously developed land in the district. While this evidence base is being updated, we do not consider the position to have changed significantly. • In the absence of an alternative supply of suitable available achievable previously developed land, greenfield land should be treated as suitable for development in principle (by necessity). 	
Agricultural land designation	<ul style="list-style-type: none"> • An up-to-date agricultural land classification assessment has been undertaken, which provides an in-depth analysis relating to each site. • Agricultural Land Classification is graded 1 (best) to 5 (worst), with grades 1, 2 and 3a considered the Best and Most Versatile (BMV) agricultural land in planning terms. • The majority of Site B is classified as a mix of Grade 3a and 3b (Good to Moderate), alongside limited areas of Grade 2 (Very Good). Site B also includes some areas of non-agricultural land. • Site C includes a mix of Grade 2 (Very Good) and subgrade 3a (Good). • Site D is classified as part Grade 2 (Very Good) and part subgrade 3a. Part is classified as non-agricultural land. • NPPF Paragraph 171 (with reference to footnote 53) requires that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of higher quality. While preferred, policy does not preclude the development of better-quality land where this is justified by economic and other benefits. • This matter was tested as part of the current Local Plan, where several of the Strategic Site Allocations comprise BMV agricultural land. The Inspector accepted that allocating such land was justified by housing need and broader sustainability considerations. 	

	<ul style="list-style-type: none"> • The loss of BMV agricultural land will be an adverse impact associated with the redevelopment of the site. Nonetheless this should be weighed in the planning balance (having regard to the availability of alternative suitable achievable land and the benefits of developing this land). The site is considered suitable on this basis. 	
<p>Flood risk</p>	<ul style="list-style-type: none"> • Sites B, C and D are located within Flood Zone 1 (low risk of flooding) and are therefore not at risk of flooding (as per the Environment Agency's on-line flood maps). • The Sarre Penn watercourse flows east to west through Site B, which includes adjacent land that forms part of its natural flood plain. In principle this land is not suitable for development. • The development of the site would be expected to accord with sustainable surface water drainage national planning policy requirements (i.e. maintaining the existing greenfield run-off rates taking into account climate change) to ensure that development does not pose an increased risk of flooding elsewhere. This is being developed in conjunction with the emerging Concept Masterplan. Further detail of which will be provided in the forthcoming Local Plan Representations. • A Flood Risk Assessment and Surface Water Drainage Strategy will be prepared at the planning application stage. • The site is suitable for development in flood risk terms. 	
<p>Transport</p>	<p><u>Highways</u></p> <ul style="list-style-type: none"> • Traffic Surveys of both the University campus and surrounding major road network were undertaken in 2018 for both term and vacation periods. This has informed the preparation of a transport strategy for the main University campus. This is to be updated to account for the proposals for the promoted sites and was provided as part of the Original Submission. • Further analysis of the access strategy associated Sites B, C and D has been undertaken to inform the Concept Masterplan. This demonstrates an access to be taken from Whitstable road through the development site focussing on a north / south alignment leading to Site D. This would also include the re-routing of Tyler Hill Road to within the boundary of Site B and so enhance connectivity along this route. • Further work in relation to the access proposals to Site C is currently being undertaken, in conjunction with work associated with identifying connection routes between the three sites. A draft Transport Strategy will be submitted in support of the forthcoming Local Plan Options Representation in due course. <p><u>Bus</u></p> <ul style="list-style-type: none"> • The University's main campus is served by 3 bus lines which provide frequent services to/from Canterbury City Centre. There is opportunity to extend these routes into Sites B, C and D, together with the implementation of a transport hub within the northern portion of Site B, which we note may improve public transport accessibility for Blean and Tyler Hill. Further work in terms of its broad location and potential operating will, where possible, be included within the emerging Representations being prepared in support of the Local Plan consultation. <p><u>Cyclists/Pedestrians</u></p> <ul style="list-style-type: none"> • Sites B, C and D are criss-crossed by existing Public Right of Ways, including public footpaths, cycle paths and a public byway (along the south eastern edge of Site C and western edge of Site D) which provide good pedestrian/cycle accessibility across the sites. Development of the land offers the opportunity to improve these connections further and support the ongoing use of the national cycle route leading through Site B from Whitstable to Canterbury. Whilst outside of the proposed development sites, opportunities to support the Crab and Winkle Way by additional connections will be enhanced. • Significant work, supported by ongoing discussions with CCC and Kent County Council, has been undertaken in support of the emerging Concept Masterplan. A new vehicle access will be provided from Whitstable road along a north south alignment which runs centrally through Site B to Site D and includes the re-alignment of Tyler Hill Road to within Site B's boundary. Further transport feasibility work is being undertaken to ensure the heritage assets and ancient woodland are not adversely affected. It is felt that the quantum of proposed development can be supported in transport 	

	<p>terms (together with the strategy for doing so). On this basis, we consider the Disposal Sites to be suitable in transport terms, albeit acknowledge Site C's access issues need to be resolved. As part of the ongoing work referenced above, we are currently exploring the potential options available.</p>	
<p>Heritage</p>	<ul style="list-style-type: none"> • Designated Heritage assets affect parts of Sites B, C and D. • There is a Scheduled Ancient Monument (SAM) in the northern part of Site B (Dispersed medieval settlement remains and a Roman building immediately SW of St. Cosmus and St. Damian's Church'). There are 2 identified 'Prehistoric Sites' located in close proximity to the SAM. • Adjacent to the SAM, but outside of the site boundary, lies the Grade II* listed 'Church Of St Cosmus And St Damian' and the Grade II listed 'Church Cottage'. Sites B, C and D are likely to form part of the setting of these buildings. • 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 adjoin the Amery Court Conservation Area. Site D abuts the Canterbury and Whitstable Railway (Hackington & Blean) Conservation Area along its eastern boundary. • An initial heritage appraisal has been prepared to assess the significance of these assets and has informed the preparation of the emerging Concept Masterplan for Sites B, C and D. Whilst there is potential for impacts to occur on the setting / character of nearby heritage assets, it is considered that these 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 likely to be maximised through the iterative design process. • Further advice in relation to the impact of development in the north western portion of Site B, sitting adjacent to the Church and Scheduled Ancient Monument is currently being prepared in consultation with CCC. This will inform the location of the development parcel in this area of the site. • It is anticipated that Sites B, C and D can be developed without harming the significance of these heritage assets through careful design informed by heritage advice therefore the sites are considered suitable for development in heritage terms. 	
<p>Landscape</p>	<ul style="list-style-type: none"> • Sites B, C and D (and the area to the north) comprise 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. The sites are also not subject to any other landscape-based policy designations in the current Local Plan. • A Landscape Setting and Views Appraisal was undertaken to inform the current University masterplan and was included in the previous Call for Sites submission. • The land is also considered more broadly in the Canterbury Landscape Character and Biodiversity Appraisal (which we understand is being updated by the Council). It forms part of Landscape Character Area 36 (Blean Parklands) • This evidence confirms the following for Sites BCD: <ul style="list-style-type: none"> - The sites are 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. Development on the site should not be visible from Canterbury City Centre (World Heritage Site, Conservation Area, Listed Buildings), and longer distant views to the north/east/west will be blocked by woodland. - Short distant views to/from Blean, Tyler Hill, and public roads/rights of way will be affected by development. This can be accounted for as part of masterplanning to minimise adverse impacts. - The landscape quality of the sites themselves is not of significant value. • The emerging Concept Masterplan will be informed by further landscape/visual impact assessment work which will form part of Representations to the next round of local plan consultation. • The sites are considered suitable for development in landscape terms. 	
<p>Minerals</p>	<ul style="list-style-type: none"> • The southern part of Site B and the entirety of Sites C and D are designated as Minerals Safeguarding Areas (as defined on the current Local Plan Policies Map). This could constrain the development potential of parts of the site, having regard to Paragraph 206 of the NPPF. Any loss of minerals potential should be balanced 	

	<p>with the social and economic benefits of allowing development. The areas designated as part of the Minerals Safeguarding Area are underlain by Head Brickearth and River Terrace Deposits</p> <ul style="list-style-type: none"> • An initial Minerals Assessment and technical note have been prepared in support of the emerging Concept Masterplan. This identifies deposits of Head (Brickearth) with the majority of Site B and small areas of E and F included Head Deposits (Gravel). • The Minerals Assessment has concluded that whilst potentially possible to extract Brickearth from Sites B, C and D prior to development, there is little requirement currently for this mineral within the Kent area. The future requirement is also likely to be limited. The Assessment concludes that the sterilisation of the mineral resource without prior extraction is acceptable at the site. • As a result of the above assessment, the proposed development sites (B, C and D) are suitable for residential development with the overriding need for residential development, the difficulties associated with extraction and the lack of demand for Brickearth within Kent being sufficient justification to support the sterilisation of the mineral resource. 	
<p>Ecology/Biodiversity</p>	<ul style="list-style-type: none"> • A Preliminary Ecological Appraisal (Phase 1 Habitat Survey) has been undertaken to inform the preparation of these Representations and the emerging Concept Masterplan. This has been updated since the previous submission, however, the baseline conditions remain largely as they were before. • The appraisal concludes that Sites B, C and D are of limited botanical interest (as the majority comprises species poor improved grassland - arable agricultural use) although they may have some value for fauna. While improved grassland is the principal habitat, the site does accommodate localised areas of habitats that have potential to support protected species, including ancient woodland, hedgerows, ponds, and the Sarre Penn river channel. As these potentially valuable habitats comprise a small proportion of the site only, it is anticipated that they can be retained (or satisfactorily re-provided) as part of redevelopment. This should not significantly constrain development potential. • Species specific surveys will be required at the planning application stage and appropriate mitigation strategies identified and secured. Desk-based surveys have however been undertaken and can be summarised as follows: <ul style="list-style-type: none"> - Bats – the Desk-based survey identified the site as supporting habitats suitable for foraging and commuting bats. Site B is identified as having suitable trees located within its boundary that would support bat roosts. It is likely that further work in relation to this will be required to establish suitable mitigation measures. - Dormice – suitable habitats have been identified within Site B, C and D, offering opportunities to forage, commute, breed and hibernate. Site B in particular offers the mix of habitats most suitable for this species with the northern edge of Brotherhood Wood noted as being of particular importance. - Badgers – the survey area provides suitable badger foraging and commuting habitat. Setts were identified within Site B and C, with the sett in Site B comprising over 15 entrances indicating it may constitute a main sett used as the principal breeding site for a badger clan. In addition, badger dung pits which are used as territorial markers were identified in Site C. - Water Vole – a stream runs along the northern edge of Site D which could support this species. Site B offers limited suitability for foraging and breeding habitat for water voles. - Hedgehog – the survey area supports extensive areas of suitable habitat. - Breeding birds – the trees and habitat present within the Survey Area have the potential to support common and widespread species of breeding birds. Records of three species were identified by KMBRC and further survey work will be undertaken to support the preparation of any future planning applications for the site. - Invertebrates – there is likely to be some suitable habitat or protected and notable invertebrates such as the woodland and good quality semi-improved grassland. Remaining lower value habitats are likely to support common and widespread invertebrates only. 	

	<ul style="list-style-type: none"> - Great Crested Newts – Ponds suitable for breeding were identified during field surveys, including 2 within Site B, 1 within Site C and 1 within Site D. In addition, a rubble pile located within Site B and log piles at the Access Road Site offer hibernacula for great crested newt. Further survey and assessment work will be required in relation to this species. • The site is located in close proximity to the Blean Woodland complex which is designated as a Special Area for Conservation (SAC). It is also located within the Zone of Influence of the Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Thames Medway and Swale Estuary SPA. Habitats Regulation requirements in terms of Screening and potential Appropriate Assessment will need to be satisfied at the planning application stage. Mitigation measures to manage access/recreation pressure on these designated sites are to be identified and worked into the masterplan as part of an Environmental Strategy. • Further investigation will be required regarding the interrelationship between potential air quality impacts associated with development (notably vehicle traffic) and the Blean Woodland SPA to determine if this could constrain development potential and/or whether any site-specific mitigation measures are necessary. A district-wide strategy may be the most appropriate solution. • A number of small areas of land adjacent to the site boundary are designated as Local Wildlife Sites and Local Nature Reserves. Site B and D are within a 'SSSI Impact Risk Zone' requiring consultation with Natural England. Site B and D are both partially located within a National Habitat Network 'Network Enhancement Zone 1'. Sites B, C and D are all wholly located within 'The Blean' Biodiversity Opportunity Area. Consideration will need to be given to any potential impact that development might have on these designated areas and necessary mitigation measures identified. • The site itself has limited ecological value. At this stage it is anticipated that existing valuable habitats can either be retained or re-provided on-site and that there is an opportunity for bio-diversity net gain as part of redevelopment. • The limited loss of Ancient Woodland as a result of the proposed development is currently being discussed with CCC in terms of acceptability and potential mitigation measures. The University are of the view that the limited loss of Ancient Woodland is justified by wholly exceptional circumstances in this instance (associated with securing the future economic health of the University and the ability for sales receipts generated from the Disposal Sites to help fund enhancements to UoK's facilities to ensure it remains an economically competitive local institution which continues to play a vital role in Canterbury's economy). We also consider that impacts of the masterplan on the Ancient Woodland could be mitigated through a robust re-planting strategy including better quality and value trees elsewhere within the University's landholding (on Sites, B, C and D and also on Sites E and F). We also consider that associated air quality, recreational and ecological impacts resulting from the masterplan on the Ancient Woodland can be robustly addressed. Further evidence is being provided to CCC and an update will be provided at within the Local Plan Representations which will be submitted in due course. This is a key consideration for the Concept Masterplan and due care and consideration to ensure the impact on the woodland is minimised as much as possible. • A strategy will be required to inform the preparation of development proposals and to manage future development to ensure that the potential for adverse impacts on off-site ecological assets is managed and mitigated where appropriate. A preliminary strategy will be prepared to inform masterplanning work and will be submitted as part of Representations to the next round of Local Plan consultation. On this basis, the site is suitable for development in ecological terms. 	
Noise	<ul style="list-style-type: none"> • There are no known noise sensitive receptors or significant sources of noise in the local area that would make the site unsuitable for development. Good acoustic design measures including a carefully considered development layout / orientation to screen external amenity areas will be considered throughout the preparation of the emerging Concept Masterplan. • A Noise Impact Assessment would be undertaken at the planning stage. • The sites are suitable for development in noise terms. 	

Air quality	<ul style="list-style-type: none"> The sites are not located within an Air Quality Management Area 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. There are no known existing air quality issues that would make the sites unsuitable for residential development. In the short-medium term the development of the site will likely have an adverse impact on air quality through construction stage dust and vehicle based emissions once operational (this will likely fall away in the medium-long term due to the shift to electric vehicles and through the development of a transport hub within the northern portion of Site B which would seek to promote public transport measures). As noted above, there are a number of sensitive sites in the local area that could be adversely impacted by this. A strategy is to be prepared to inform the preparation of development proposals and to manage future development to ensure that the potential for adverse impacts on off-site ecological assets is managed and mitigated where appropriate. An Air Quality Impact Assessment would also be undertaken at the planning application stage. The sites are suitable for development in air quality terms. There may be some constraints to development and/or a requirement for mitigation measures and these will be considered, in combination with the measures considered to mitigate the loss of ancient woodland, in due course. 	
Ground conditions	<ul style="list-style-type: none"> The site's historic uses indicate that it is not likely to be subject to contamination. The majority of the Site B is within an 'unproductive' groundwater vulnerability area, with sections towards the centre of the site having a 'low' and 'medium – low' value. Site B has a designated 'Minor Aquifer Intermediate' Ground Water Vulnerability as per Environment Agency Mapping. Site C and D are classified as having an 'unproductive' groundwater vulnerability area. Site B, C and D soilscape comprises a combination of partly 'Freely Draining Slightly Acid Loamy Soils', partly 'Slowly Permeably Seasonally Wet Acid Loamy and Clayey Soils', and partly 'Loamy Soils with Naturally High Groundwater'. Site B comprises primarily London Clay, Head Gravel, and Brickearth geological conditions. Site C and D comprise predominantly 4th Terrace and small sections of London Clay along their southern boundaries. There are no known Ground Condition constraints that have been identified and the sites are therefore considered suitable for development. 	
Utilities	<ul style="list-style-type: none"> Both Site B (northwestern corner) and Site D (through the middle of site) have an underground gas line running north-south through the sites. Southern Gas Network (as the operator) has been engaged and further work is being undertaken to understand the development potential within the identified easement areas. This will need to be accounted for as part of masterplanning but does not prevent the development of the site. This work is ongoing and further information is likely to be provided as part of the Local Plan Representations. The existing university campus is served by all utilities and at this stage it is anticipated that these can be extended into the site (alongside appropriate capacity upgrades). The sites are suitable for development in utilities terms. 	

4.8 Further constraints and opportunities mapping will be included within the forthcoming Local Plan Representations. This will include the key environmental considerations, as set out above, and underpinning the emerging Concept Masterplan. We are also in the process of discussing these matters with CCC officers, and these discussions will help to inform the nature of our supporting assessments in due course.

5. Availability

- 5.1 The availability of the Disposal Sites remains unchanged from the position stated in the June 2020 Call for Sites submission.

6. Achievability

Retained Campus

- 6.1 The achievability of the Retained Main Campus development proposals remains unchanged from the Original Submission.

Disposal Sites: BCDEF (combined)

- 6.2 The achievability of the residential-led development on Sites BCD remains as per the Original Submission.
- 6.3 The revised masterplan has been informed by ongoing development consultancy advice from Avison Young to ensure its commercial achievability. A commercial delivery strategy is to be submitted as part of the University's forthcoming Representations to the Local Plan.

7. Conclusions

- 7.1 The further evidence that has been prepared by the University over the period since June 2020 confirms that Site BCD is uniquely suitable for residential-led development in that it offers the opportunity to satisfy very significant economic and social needs that otherwise would not be capable of being met. It is also available and achievable and therefore comprises a deliverable sustainable development opportunity.
- 7.2 This is deliverable alongside the long-term plans for the University's Retained Main Campus plus works to Sites E and F for complimentary open space, green infrastructure and environmental mitigation purposes
- 7.3 The Disposal Sites presented in this document represent a unique opportunity to deliver a significant proportion of new housing within the District and as identified through the emerging Local Plan Review. In this context, the Disposal Sites collectively will be able to satisfy a very significant economic and social need that would otherwise not be realised.
- 7.4 We trust this Call for Sites Representation is helpful. Should the Local Planning Authority require any further information, the University would be more than happy to provide this.

Contact Details

Enquiries

Kate Green

07798 690 234

kate.green@avisonyoung.com

Colin Sinclair

07796 233 6079

Colin.sinclair@avisonyoung.com

Visit us online

avisonyoung.co.uk