

Response to Canterbury City Council's *Our Future District 2040* Consultation

University of Kent

September 2020

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For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 This Report has been prepared by Avison Young on behalf of the University of Kent (UoK) in response to Canterbury City Council's (CCC) 'Our Future District 2040' (OFD 2040) public consultation exercise. This consultation exercise seeks to inform the Council's ongoing Local Plan review.
- 1.2 As part of the OFD 2020 consultation, CCC has published a questionnaire geared towards helping identify the development-related priorities and issues which are important to relevant local stakeholders and the local community within the Local Planning Authority (LPA) area. As such, within later sections of this Report we have set out UoK's responses to the matters raised within CCC's OFD 2020 questionnaire insofar as they relate to UoK's development interests.
- 1.3 This Report follows a previous representation submitted on behalf of UoK in relation to CCC's earlier 'Canterbury Local Plan Call-for-Sites' consultation in June 2020. This earlier representation sought to promote 6no. of UoK's current landholdings ('the Disposal Sites') as being suitable, available and achievable locations for future redevelopment which should be duly allocated within the emerging Local Plan. This Report should therefore be read alongside the originally submitted representation.

The Disposal Sites Context

- 1.4 As set out within UoK's previously submitted Call-for-Sites representation, the University is seeking to raise funds to ensure its sustainable and successful operation in the future.
- 1.5 The University operates on narrow margins but with high fixed costs in terms of staffing and the operation of its extensive estate. Its income is principally 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. Furthermore, Government funding is becoming increasingly insecure, domestic tuition fees are being capped (and have only been subject to one inflationary increase since 2012), there is increasing national and international competition for students and the competition for research funding is significant. These threats to income are compounded by the need to continually invest in its teaching and research quality in order to compete effectively for students, staff and research funding. There is a need to drive innovation in a changing social and technological world and this will require one off expenditures in facilities and infrastructure.
- 1.6 These threats are affecting the UK Higher Education sector as whole, however, the effects on the UoK have been particularly severe. UoK has therefore put in place a strategy to respond to these circumstances which comprises the following components:
- Operational restructuring;
 - Academic portfolio review (reduction in range and number of courses);
 - Optimising new sources of academic income (online, apprenticeships, etc);
 - Increased income from commercial services; and

- Land sales/property rationalisation (capital receipts for repayment of loans and investment in academic activity).
- 1.7 The potential to generate value from its estate is the most significant of the above components in terms of the scale of 'bullet' funds that can be generated and the overall impact on the University's medium term operating position. The University is obliged to achieve 'best value' for the sale of any land and all receipts will be 'ring-fenced' to be reinvested back into the University to resolve its debt position and help fund its further growth and the provision of world class facilities, helping to improve its student offer, position in the market and ultimately ensuring a long term sustainable future for the University and its employees.
- 1.8 UoK is seeking to dispose of approximately 125ha of its landholdings within Canterbury for non-university related development (i.e. the Disposal Sites). The remaining 105ha of land within UoK ownership will, however, be retained and will continue as the University's main campus and used for Higher Education purposes (teaching, research, student housing and associated functions).
- 1.9 For reference, the Disposal Sites comprise 6 separate land parcels (referred to as Sites A-F within the previously submitted representation) which are adjacent to the retained 'Main Campus', as illustrated in **Figure 1** below.

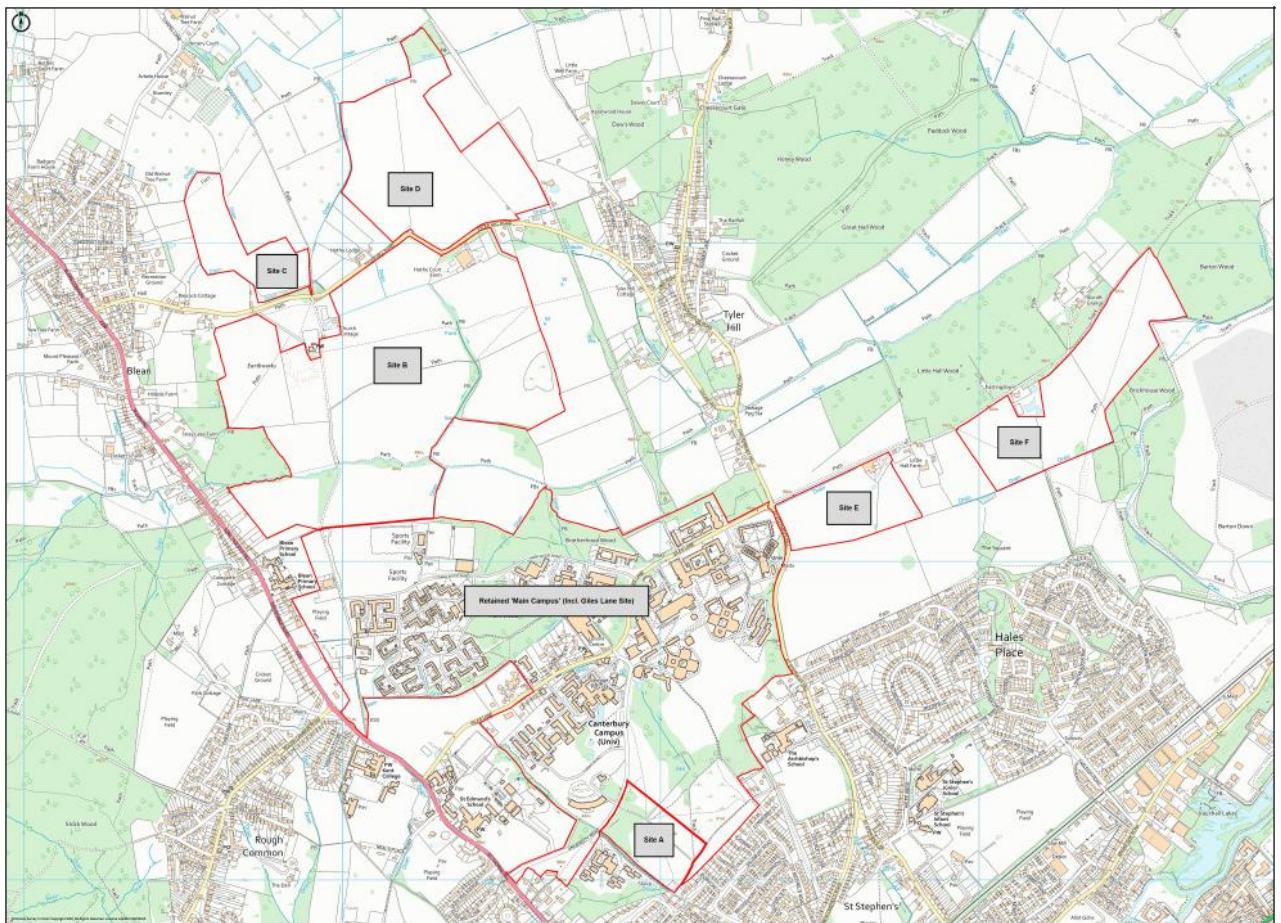


Figure 1 - Disposal Sites - Site Location Plan

- 1.10 Given the above context, UoK is therefore keen to continue engaging with CCC concerning future proposals for the Disposal Sites.

2. Questionnaire Responses

2.1 Within this section, we set out UoK's responses to the questions CCC is posing to key stakeholders a part of the OFD 2020 consultation.

2.2 As previously identified, the below should be read alongside UoK's previously submitted Call-for-Sites representation which outlines the reasons why we consider the Disposal Sites to be suitable, available and achievable locations for redevelopment in further detail.

What are the good things about the local area where you live and what could be improved?

2.3 Canterbury is currently a location where a diverse mix of people choose to live, work, study and socialise. In huge part, this is driven by UoK's ability to attract a variety of students, staff and tourists to the city annually. The University provides an important anchor and economic driver for Canterbury, providing higher value employment and we would like to ensure that this remains the case.

2.4 The emerging Local Plan should therefore seek to ensure that sufficient opportunities are identified to robustly address the housing, educational employment and economic needs of both Canterbury's existing and future population.

2.5 As set out a within our previous Call-for-Sites representation, through supporting the University in achieving its short and longer term financial sustainability objectives, the local community within Canterbury (in addition to wider neighbouring areas) will undoubtedly continue to be positively impacted by the direct and indirect benefits which the University delivers, economically and culturally.

2.6 The economic impacts generated by the University's presence are significant and are fully acknowledged/summarised within *The Economic Impact of The University of Kent* document (prepared Viewforth Consulting Ltd, April 2018). A snapshot of these benefits has, however, been provided below in **Table 1**:

Table 1 - Summary of Economic Impacts (University of Kent)

	Canterbury	Kent	South East Region	UK
Output	£342.9m (directly or through secondary effects) Additional £142.9m generated by student expenditure Total: £485.7m	£423.1 (directly or through secondary effects) Additional £211.4 generated by student expenditure Total: £634.5m	£549.7 (directly or through secondary effects) Additional £357.9m generated by student expenditure Total: £907.6m	£594.3m (directly or through secondary effects) Additional £371.8m generated by student expenditure Total: £966.1m
Employment	2,969 FTE (direct) jobs 1,166 FTE (indirect) jobs 1,242 FTE generated by student expenditure	4,988 FTE (direct & indirect) jobs 1,837 FTE generated by student expenditure	6,338 FTE (direct & indirect) jobs 3,110 FTE generated by student expenditure	6,706 FTE (direct & indirect) jobs 3,206 FTE generated by student expenditure

	Total: 5,377 FTE jobs in Canterbury are dependent on the University (10% of Canterbury employment)	Total: 6,825 FTE jobs in Kent are dependent on the University (1.4% of Kent employment)	Total: 9,448 FTE jobs in the South East Region are dependent on the University (0.19% of South East employment)	Total: 9,912 FTE jobs in the UK are dependent on the University
GVA	£208.5m (directly or through knock-on effects) £67.3m generated by student expenditure Total: £275.8m (9% of Canterbury's GVA)	£254.5 (directly or through knock-on effects) £99.5 generated by student expenditure Total: £354m (9% of Kent's GVA)	£320.6m (directly or through knock-on effects) £168.5m generated by student expenditure Total: £489.1m (0.2% of South East GVA)	£342.1m (directly or through knock-on effects) £174.2m generated by student expenditure Total: £516.4m
Export Earnings (2015/16)	Non-EU students: paid £36.4m in fees EU students: paid £13.4m in fees. Research related: The University earned £14.5m for research and other services paid from international sources. International student spending: estimated at £77.4m of off-campus personal spending Total: £141.7m in export earnings.			

2.7 The sheer amount of direct and indirect economic outputs and gross value added to the local and regional economies ensures that local students, employees and families are able to benefit from the presence of the University. Approximately 10% of jobs in Canterbury are directly or indirectly related to the University which continues to ensure that Canterbury and its citizens continue to thrive into the future.

2.8 The University also supports entrepreneurship in the community such as through 'The Hub', which is located in the Canterbury Innovation Centre and is the University's delivery vehicle for student entrepreneurship, start-up support and start-up space, which has contributed to the local business community in the following ways:

- 186 companies have been created and developed at the University of Kent's incubator space since 2010. As a result, 254 jobs have been created in the local community;
- Student Enterprise has run 849 business advice sessions since 2013; and
- 63 companies were established over the last two years.

2.9 Beyond the economic benefits that the community receives from the presence of a large student population within the city, the overall influx of students in the community is also a major benefit to the social fabric of Canterbury as students typically tend to drive demand and support for cultural activities which the broader community also benefits from. The presence of a large student population therefore supports community facilities and events which otherwise may not be able to be present in the community or self-sustaining.

2.10 The University itself also helps provide significant institutional and cultural facilities that the broader community enjoys and benefits from. The University and its students and staff also helpfully contribute elsewhere in the community, such as:

- The UoK offers workshops and activities with regional schools and colleges and a Student Ambassador Scheme which has operated for more than 10 years;

- The Gulbenkian Arts Centre welcomes over 10,000 young people a year to participate in engagement programmes helping develop creative and cultural arts in the region;
- Kent Law Clinic received 1,430 enquiries during the year; legal advice was provided in 360 of these matters and 178 other clients were formally represented during the year;
- The newly established Kent and Medway Medical School will take a leading role in the education of a new generation of medical professionals and the development of medical research in the region and retention of future medical professionals to serve the community;
- Students volunteered over 90,000 hours both on campus and in the local community helping more than 130 local organisations; and
- There is a high community usage of university sports facilities

2.11 Overall, UoK provides numerous existing economic, educational and community social benefits to the wider city which should be acknowledged, promoted and protected through emerging planning policies within the new Local Plan.

What main changes would you like to see in the district over the next 20 years?

2.12 Overall, we would like to see Canterbury further established as a positive, supportive, pro-development location. This is the key to attracting the right, most appropriate type of investment into the city and to securing the correct form/nature of new development within Canterbury which ultimately maximises public benefits. We would like to see the entire community involved in driving this change for the better.

2.13 We would like the Council to further promote a strategic agenda and flexible planning policies that assist the University in improving the educational and student experience in Canterbury which in turn will help to support innovation and research. We would also like to see a significant boost in new housing, which is needed to meet current and future social needs and to support wider economic growth. A 'joined up' approach to drafting and implementing housing, economic and historic environment-related planning policies will be required in order to ensure that public benefits can be realised through new development (which is much needed in Canterbury). This approach will ultimately ensure that public benefits for the community are genuinely optimised.

2.14 More specifically, to support the improvement of the educational and student experience in Canterbury, new facilities and housing will be required to accommodate expected growth in staff and student numbers, in addition to addressing the LPA's needs more widely.

2.15 As set out within UoK's previous Call-for-Sites representation, the Disposal Sites offer an excellent opportunity to promote sustainable urban extensions on the edge of the Canterbury campus which will provide sustainably located homes and complimentary commercial uses for future residents and students. Furthermore, any receipts generated from disposal of these sites will be reinvested into the University to further strengthen and modernise its facilities, its overall offer and its ability to continue attracting investment into the City to generate better economic and social outcomes for local residents and the community as a whole.

- 2.16 To support further innovation and research at the University, extensive capital investment is required to support the University's future growth. This investment and growth is planned for the University's core campus and will require flexibility in emerging or updated planning policies, particularly adopted site allocation policy EMP7 (University of Kent), to enable the University to deliver on its envisioned future capital works programmes. As an example of the scale of recent and future capital investments that the University contributes to the local economy, the University has invested £191m in facilities and resources over the last five years and plans further significant investments in facilities and resources in the next decade..
- 2.17 Beyond these undertaken and planned investments, the Council should support the allocation of the Disposal Sites (which are all considered suitable, available and deliverable vacant sites within UoK's landholdings) being realised, to help deliver genuine regeneration and sustainable benefits. This approach could help deliver the following benefits to the local community:
- Creation of improved student facilities, helping to ensure that UoK remains a strong and successful anchor in the local economy. This also reduces demand for typical student market housing within the community thereby ensuring access for housing to all members of the community;
 - Delivery of significant new and sustainable housing on surplus UoK land, including significant affordable homes. The additional delivery of affordable housing in particular will have substantial benefits to members of the community in greatest need;
 - The release of the Disposal Sites for alternative uses would help deliver new local green spaces and provide new, high-quality pedestrian connections across the community through the delivery of a new comprehensively master planned approach;
 - New and improved local transport improvements would be delivered through new development, which would help boost the overall ridership and viability of the local public transport system (albeit, we would recommend that the Council support bids made by applicants for centrally funded transport improvements, where relevant and possible);
 - Better interface/relationship between UoK's landholdings and surrounding residential villages to the north (i.e. Blean and Tyler Hill) which promotes greater connectivity between settlements and helps deliver sustainable and inclusive communities; and
 - Through the delivery of an integrated designed approach, which seeks to involve the local communities in emerging development proposals; local communities will be able to positively engage with the planning process and help guide development that is needed in the community.
- 2.18 All of these benefits that the University assists in delivering are what we believe help make Canterbury such a wonderful place to live, work, socialise and learn in. By helping the University continue to deliver its world-class teaching and learning programmes, the entire Canterbury community will benefit.
- 2.19 As such, **we are seeking to ensure that the emerging Local Plan sufficiently recognises the significant opportunity which the Disposal Sites represent**, and that they are allocated for redevelopment accordingly.

What are the climate change challenges for our district and how might these be addressed?

- 2.20 Overall, there will be a requirement to ensure that the emerging Local Plan, and planning decision-making within Canterbury, results in the creation of resilient and sustainable communities that are able to mitigate and protect against the impacts generated by global climate change.
- 2.21 Where possible, **the emerging Local Plan should seek to ensure that housing and other land uses which typically generate higher numbers of trips by unsustainable private vehicles (i.e. employment, education, tourism, recreation etc.) are accessible and well-located in proximity to public transport services, cycle routes and/or town centre uses and amenities.** Doing so will help to reduce reliance on fossil fuels and unsustainable transport modes within new development schemes.
- 2.22 There will also be a requirement to ensure that newly created communities are **genuinely mixed-use, with relevant amenities and services also delivered and located within easy walking distance from new homes** to help minimise reliance on the use of private car. Planning policies within the emerging Local Plan should seek to ensure a coordinated and master planned approach is taken within new development to help achieve this, whilst also ensuring that new development also delivers relevant pedestrian and cycle infrastructure and routes to further reduce reliance on car use.
- 2.23 Planning policies should also seek to ensure that new development minimises car parking provision, where relevant, to encourage the use of more sustainable transport modes where appropriate. Policies could also seek to ensure that other measures, such as provision of electrical car charging points in new development, are also delivered.
- 2.24 The emerging Local Plan should also outline the requirement for, and locations of, new strategic sustainable transport improvements (i.e. public transport enhancements and/or delivery of new cycle ways of pedestrian routes throughout Canterbury). A robust strategic highways and movement strategy will therefore be required to be prepared which should underpin the emerging Local Plan, likely devised in collaboration with other nearby LPAs within the wider Kent area.
- 2.25 The emerging Local Plan should include policies geared towards ensuring that new development helps to contribute, where relevant, to the delivery of such strategic transport improvements. Where feasible and appropriate, monies pooled from Community infrastructure Levy and planning obligations should be directed towards delivery of such measures.
- 2.26 In terms of other wider sustainability principles and requirements, we also consider that the emerging Local Plan should seek to ensure that new development also delivers measures such as the following, where appropriate, as means of helping to address climate change:
- Sustainable design measures such as those which reduce energy demand and/or promote the use of locally sourced building materials;

- Ecological enhancements to existing landscape and biodiversity features such as ancient woodlands, local wildlife sites and nature reserves, priority habitats, special areas of conservation, and general improvements to the local natural ecosystems (such as those which surround the Canterbury campus); and
- Creation of additional/retention of existing green space for recreational purposes. Where appropriate, this could also be utilised to deliver SANG provision to help indirectly deliver sustainability benefits elsewhere in the county (notably through relieving the requirement for residents to travel to Kent's coastal Special Protection Areas (SPAs) which are already oftentimes extremely busy and congested).

2.27 **We believe that the above measures could be secured in relation to the Disposal Sites through allocating them for redevelopment within the new Local Plan.** Such allocations should seek to ensure delivery of new sustainably and comprehensively masterplanned communities.

2.28 We consider that the Disposal Sites could be suitable for a range of land uses. We have set out this position in more detail within our previously submitted Call-for-Sites representation.

What are the issues for housing and creating new communities over the next 20 years?

2.29 We consider that there is a pressing need to:

- Deliver increased numbers of housing within the LPA area to meet its housing needs;
- Ensure appropriate delivery of affordable and family-sized homes within Canterbury;
- Ensure sufficient delivery of appropriately located student housing and facilities (PBSA), which in turn, will take pressure of the Council's existing privately rented housing stock within central Canterbury; and
- Deliver this growth in locations which avoid the LPA's Areas of Natural Beauty, or in locations which would impact the setting of the world heritage site or other key attributes of the City. We highlight that a vast majority of land adjacent to the built-up part of the city is protected by such designations, however, this notably largely excludes the Disposal Sites; and
- Deliver high value and physically accessible jobs for current and future residents of Canterbury.

2.30 The above position has been informed by the following:

- The Council's latest Strategic Market Housing Assessment (SHMA) (dated March 2018) identifies that there is an Objectively Assessed Need (OAN) for 1,140 dwellings to be delivered per annum throughout the LPA area (i.e. equating to approximately 22,000 new homes over the next 20 years).
- The SHMA also indicates that between 401-751 units of affordable housing will be needed per annum. These figures have been based on ONS demographic projections and has been updated to reflect the mid-year population estimates plus an uplift to address market signals, improved household formation and affordable housing.
- In terms of housing mix needs, we note that the 2018 SHMA outlines the following needs as per **Table 2**:

Table 2 - 2018 SHMA Housing Needs

	1-bed	2-bed	3-bed	4+ bed
Estimated market housing need/ demand	11%	33%	35%	21%
Recommended range	5-20%	25-40%	25-35%	10-30%
Estimated affordable housing need/demand	49%	30%	15%	6%

- 2.31 We note that overall a greater proportion of family housing will be needed for market housing, whereas there is a more pressing need for affordable housing for smaller sized households.
- 2.32 The expectation would be that the Council will seek to allocate new housing sites in sustainable and accessible locations and seek to deliver housing mix based on the identified housing need. **The Disposal Sites are well positioned to deliver a broad range of housing types and tenures, alongside other forms of development, in locations that would support sustainable modes of transportation in areas where residents would want to live.**
- 2.33 There is also additional capacity within the main Canterbury campus to deliver additional student housing, which further provides housing in locations that are suitable for promoting sustainable travel habits and inclusive communities. **The creation of additional on-campus housing for students also beneficially reduces market housing demand within the city, thereby freeing up housing for other local residents and enables a greater range of housing choices** so that residents can choose to live in areas that meet their needs and requirements. It also reduces travel up from the city centre onto Campus by students, reducing the University' carbon footprint.
- 2.34 The expectation is that Canterbury will continue to require new development to deliver the highest quality housing stock in terms of sustainability credentials, which beyond the actual operational qualities of a home also extend to the location, layouts, mixture of types and tenures to help ensure the vision of sustainable development is delivered in future.

What issues need to be addressed for our local economy and employment over the next 20 years?

- 2.35 As set out above and within our previous Call-for-Sites representation:
- Canterbury's economy is significantly supported and bolstered by UoK's strong educational offer and its ability to routinely attract significant numbers of new students to the City on an annual basis;
 - UoK also attracts highly skilled staff to the City in addition to a variety of educational-related visitors and tourism trips;
 - The University also often provides an opportunity for existing Canterbury residents to 'upskill' and it therefore can perform an important local function;

- UoK can also generate spin-off companies which create local employment alongside offering opportunities for increased 'partnership' working between UoK and local business, resulting in mutual benefits for both parties;
 - The University can be an attraction for businesses and their staff seeking to relocate; and
 - The University has the ability to create a city wide academic community which has the potential to attract international, scientific companies/investment that will support the development of a knowledge economy (one of CCCs key goals) leading to higher paid jobs that further support the local economy.
- 2.36 However, as mentioned previously, the University faces considerable long-term funding challenges to help ensure it remains on a sound financial footing into the future and to continue to provide an anchor institution for Canterbury and high value employment opportunities for residents.
- 2.37 It is therefore **crucial that the Local Plan seeks to support UoK and its business case, to help ensure that the University remains an important and successful economic driver locally**. CCC can do this through working collaboratively with UoK throughout the preparation of its emerging Local Plan and, in turn, through allocating the Disposal Sites for redevelopment in due course. Doing so will help to ensure that sales receipts are maximised and can be re-invested into UoK's educational facilities to help ensure it remains an attractive and successful cornerstone of Canterbury's economy over the next 20 years,
- 2.38 The Covid-19 pandemic also creates additional challenges for all communities in the UK in terms of how they will respond to the upheaval of our modern economic and social systems. How Canterbury responds to these times of uncertainty (and potential period of accompanying economic recession) will be of the utmost importance to ensure the community remains resilient and remains competitive in such unprecedented times. In particular the UK office/commercial sector could be severely challenged through the impacts of Covid-19, given existing and ongoing social distancing restrictions in addition to many companies now having to adopt a 'work from home' style model which could have longer-reaching impacts. The University is an economic anchor that will support the recovery of the local economy post Covid.
- 2.39 Given that it is not possible to predict the longer-term impacts of Covid-19, there will be a requirement for CCC to plan robustly for Canterbury's future. **Relevant planning policies within the new Local Plan should be worded as flexibly as possible to allow businesses and local economic stakeholders to respond to the ongoing Covid-19 scenario quickly, including to potential changes in market demand and/or to evolving business and operational requirements.**
- 2.40 We believe that it will be crucial more so than ever for knowledge-based companies to continue to innovate to maintain a competitive advantage in the post Covid-19 economy. As such, it will be just as crucial for education institutions to continue to provide the necessary skills and training necessary to support knowledge-based industries that rely on innovation and talent to drive their companies forward in an increasingly competitive and restricted marketplace.
- 2.41 Additionally, with the many lifestyle benefits that Canterbury and surrounding areas provide it is likely that more graduates of the University will look to remain in Canterbury post-graduation (especially in the event that UoK is

able to re-invest receipts from the sale of the Disposal Sites into delivery of complementary researched based commercial enterprises and hubs on campus). CCC's new Local Plan should help to plan for this outcome, through ensuring sufficient land is identified for the delivery of business/commercial floorspace, recreational and leisure facilities (alongside significant new high quality homes) to help support potential future knowledge-led/graduate centred strands of the local economy.

What issues need to be addressed for movement and transportation over the next 20 years?

- 2.42 As set out above, the emerging Local Plan should seek to secure and deliver appropriate strategic transport network and highways improvements in tandem with new development. This approach will help to ensure that new development is **truly sustainable through measures such as providing access to enhanced public transport facilities and through new pedestrian and cycle routes** (i.e. such as specifically, an integrated outer ring road with public transport nodes will reduce the pressure on central Canterbury but promote easy access from feeder towns for employment purposes. An East /West link on the outskirts to discourage through traffic from Margate/Ashford could be developed alongside an outer ring road. Improved public transport options for coastal towns into Canterbury will be required given the growth in population planned for those areas).
- 2.43 This principle should be inherent within new strategic site and land use allocations within the emerging Local Plan in addition to within development management orientated policies.
- 2.44 The emerging Local Plan should also **seek to direct new development to locations that are sustainable, or which can be made sustainable, in transport terms as a means of offering future residents genuinely attractive alternatives to using private cars/vehicles**. Importantly, UoK's main campus is already on a high frequency bus route owing to the critical mass of students either learning, visiting and/or residing there. As such, the University campus and the Disposal Sites comprise one of the most accessible locations for new development in the City outside of the city centre in public transport terms and are therefore considered to be a robustly sustainable location for growth and new development.
- 2.45 Over coming years, there will be increasing emphasis within national planning policies for Local Plans and decision-making to promote use of sustainable modes of transport modes within new redevelopment.
- 2.46 **Planning policies should also seek to reduce reliance, where appropriate, on the use of the private car and other more unsustainable modes of transport**. Policies which restrict car parking numbers in new development, and which encourage inclusion of electric vehicle charging points and/or car club provision (to encourage less private car ownership) should also be included within the emerging Local Plan.

What issues need to be addressed for our town centres and local facilities over the next 20 years?

- 2.47 As set out above, the longer-term impacts of the ongoing Covid-19 situation on the vitality and viability of town centres and local facilities is currently unclear. As such, there **is a requirement for planning policies within CCC's**

emerging Local Plan to be worded flexibly to allow local businesses and economic stakeholders to respond to forthcoming changes in the market and to evolving operator requirements.

- 2.48 In short, **CCC needs to do everything it can to retain and strengthen Canterbury's institutions and key employers**, as this is what drives and underpins catchment area spend (as well as visitor/tourism related spend) within the city. As set out above, CCC also needs to boost housing delivery as a means of bolstering the local residential population, which again will drive catchment expenditure and will result in positive impacts on the vitality and viability of the town centre.
- 2.49 Ensuring the longevity of Canterbury's tourism economy will also be important. The Local Plan should therefore seek to ensure that the University, with its scope to continually generate knowledge-based tourism and visitors to the city, is protected and promoted as a key local economic driver. This includes through ensuring that emerging Local Plan policies align with UoK's business plan as much as possible.
- 2.50 UoK intends to continue regularly engagement with CCC concerning these matters throughout preparation of the emerging Local Plan.
- 2.51 As set out above, the above steps will result in wider economic and tourism benefits for Canterbury over the next 20 years.

What issues need to be addressed for our historic and natural environment over the next 20 years?

- 2.52 The emerging Local Plan should seek to ensure that Canterbury's rich historic and natural environment preserved and enhanced. As such, emerging planning policies should seek to ensure that new development is respectful of the character of the City's heritage and environmental assets. This means directing new development to land which is not subject to protective designations and which, in turn, can be a sustainable location. As set out within UoK's previous Call-for-Sites representation, the Disposal Sites are considered to be strong locations for achieving this.
- 2.53 New development should be required to come forward in a well-designed, comprehensively masterplanned manner. Development proposals should also be underpinned and informed via a suite of relevant technical assessments which seek to assess and address local heritage and landscape contexts appropriately and robustly.
- 2.54 In heritage terms, emerging planning policies should continue to ensure that **new development preserves and enhances the character and setting of nearby and/or relevant heritage assets in terms of its proposed form, scale, design and materiality**. This approach will help to avoid unacceptable levels of 'harm' being caused to such assets.
- 2.55 Similarly, planning policies should require the scale and nature of new development is respectful (and results in no unacceptable adverse impacts) on the character or setting of protected areas of landscape value.

- 2.56 Where appropriate, new residential/mixed use development should also incorporate SANGs. As set out above, this approach will help to mitigate potential harmful impacts from new development on the Thanet Coast and Sandwich Bay and the Thames Medway and Swale Estuary SPAs through the provision of high-quality alternative open space.

3. Summary and Conclusions

- 3.1 In summary, the University is supportive of the Local Plan Review and would like to continue to positively engage with the Council as preparation of its new Local Plan progresses.
- 3.2 We believe that the economic and social fabric of the City is closely related to the continued success and sustainability of the University as it represents the city's largest direct employer, generates many indirect benefits through its large student population and skilled staff and creates significant additional added value to the economy through its capital investments, research, innovation and entrepreneurship and is well placed to help the city navigate through the likely very challenging post-Covid 19 economic crisis. The University provides an economic anchor to support the post Covid economic recovery.
- 3.3 The University is promoting a number of sustainably located Disposal Sites as part of the Council's Call-for-Sites exercise, all of which are considered suitable, achievable and deliverable for development. The Disposal Sites would all help generate new sustainable development alongside a number of broader benefits to the community and would help alleviate a number of challenges the City faces including a shortage of market and affordable housing.
- 3.4 As outlined previously, sales receipts generated from the sale of the Disposal Sites in the future would also be directly re-invested into UoK's facilities and improving its long term financial sustainability, helping to further cement its status as a successful and pioneering institution and key local economic driver.
- 3.5 The University continues to prepare further technical evidence which will be tabled with CCC officers in due course which will help further demonstrate the suitability of the Sites for redevelopment and the benefits that they will be able to deliver the local community.
- 3.6 In the meantime, we trust that CCC officers welcome these representations in support of the Our Future District 2040 consultation, and we look forward to continually engage in the review of the Local Plan as it continues to progress towards adoption.

Contact Details

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