

**Canterbury City Council – Representations to the
Local Plan Vision and Preferred Options
Consultation**

**Sustainable Development Opportunity – the
University of Kent**

July 2021

Contents

1.	Introduction	3
2.	The Sites	5
3.	A Unique Opportunity to Achieve Sustainable Development.....	8
4.	The Proposed Policy Allocation	12
5.	Suitability.....	13
6.	Achievability and Availability	22
8.	Public Benefits.....	24
9.	Conclusions.....	27

Appendices

Appendix I	Site Location Plan
Appendix II	'A Vision for Development' Document (prepared by PRP)
Appendix III	Environmental Constraints and Opportunities Summary Report (prepared by WSP)
Appendix IV	Transport Statement (prepared by WSP)
Appendix V	Note on Ancient Woodland Policy Matters (prepared by Avison Young)
Appendix VI	Delivery Strategy (prepared by Avison Young)

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 Planning and Regeneration Limited

1. Introduction

- 1.1 The future economic success of the University of Kent (UoK) and the role that its surplus landholdings can play in meeting Canterbury's development needs over the plan period are integral to the delivery of the proposed Local Plan Vision, Strategic Objectives and preferred Growth Option.
- 1.2 The purpose of this document (and associated appendices) is to present further details to the Council on the sustainable development opportunity at the UoK; the need for land here to be allocated for development in the new Local Plan; and the significant unique public benefits that this would realise.
- 1.3 It supplements, and should be read in conjunction with, the UoK's other comments on the draft Vision, Strategic Objectives, and Preferred Options which have been uploaded directly onto the Council's consultation website. It should also be read in conjunction with its representations submitted to the following previous consultations, which together provide an evidence base to justify the allocation of the site in the new Local Plan:

- Call for Sites June 2020;
- Canterbury City Council's Our Future District 2040 Consultation; and
- Call for Sites July 2021.

Structure of this Report:

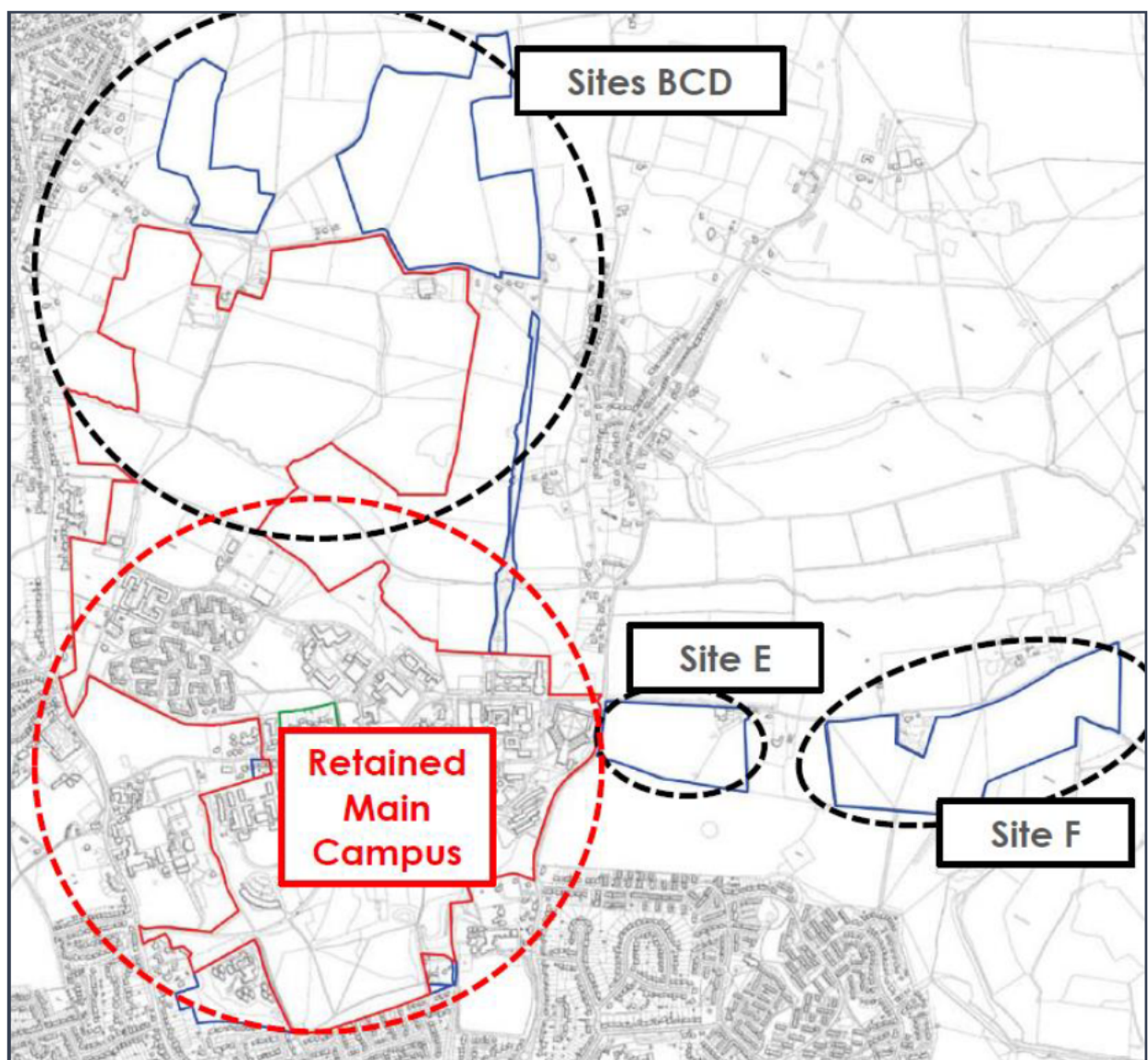
- 1.4 The remainder of this document is set out as follows:
- **Section 2** describes the Disposal Sites;
 - **Section 3** sets out the unique need for the development;
 - **Section 4** sets out the proposed allocations;
 - **Section 5** identifies the suitability of the Disposal Sites;
 - **Section 6** demonstrates the achievability and availability of the Disposal Sites;
 - **Section 7** confirms the public benefits associated with the development of the Disposal Sites; and
 - **Section 8** draws this document to a conclusion.
- 1.5 The above sections are supported by the following appendices, which are signposted, where relevant:
- Appendix I – Site Location Plan
 - Appendix II – A Vision for Development Document (including emerging Concept Masterplan)

- Appendix III – Environmental Constraints and Opportunity Summary Report
- Appendix IV: Transport Statement
- Appendix V – Note on Ancient Woodland Policy Matters
- Appendix VI – Delivery Strategy

2. The Sites

- 2.1 The University's landholdings extend to approximately 230ha of land in and around its campus located on the north western edge of Canterbury. Refer to Site Plan at Appendix I.
- 2.2 This comprises the University's Retained Main Campus (approximately 110ha) plus 5 adjacent sites referred to as Sites B, C, D, E and F which together extend to approximately 120ha, as illustrated in Figure 2.1, below. Sites BCDEF have been identified by the UoK as being surplus to their requirements and their intention is to sell them.

Figure 2.1 Site Plan



Retained Main Campus

- 2.3 The Retained Main Campus extends to approximately 110ha / 271.82 acres and comprises the University's main built estate, which is used for Higher Education purposes including teaching, research, student housing, and associated functions.
- 2.4 It is located approximately 1.8 miles / 2.9km to the north west of Canterbury. It is broadly bound to the north by agricultural fields; east by St Stephen's Hill; south by Chaucer College, the Archbishop School and suburban residential development; and west by Whitstable Road/St Thomas' Hill, St Edmund's School, Blean Primary School, and residential properties.
- 2.5 Giles Lanes runs east-west through the Retained Main Campus connecting Whitstable Road and St Stephen's Hill.

Site B

- 2.6 Site B extends to approximately 63.4 ha / 156.69 acres. It comprises several open fields, segregated by hedgerows, small tracts of woodland, and drainage channels.
- 2.7 It is bound to the north by Tyler Hill Road, together with the St Cosmus and St Damian Church, Blean, which is a Grade II* listed building. It should be noted that the church itself is located outside of Site B's boundary, however, surrounding agricultural land and an associated Scheduled Ancient Monument (SAM) are located within the boundary.
- 2.8 It is bound to the east by agricultural land beyond which is the Crab and Winkle Railway and the village of Tyler Hill. To the south is the University's Main Retained Campus, including the sports pitches and coaching areas and a community garden. The western boundary comprises existing woodland areas, beyond which is the village of Blean.
- 2.9 The national cycle route 1 runs through Site B, following the historic path of the Salt Way and leading to Whitstable in the north and Canterbury in the South.

Site C

- 2.10 Site C extends to approximately 7 hectares / 17.28 acres. The site comprises two large arable agricultural fields which are elongated and irregular in shape stretching from north to southeast.
- 2.11 It is encircled by agricultural fields to the north, east and west, with an existing residential property and Tyler Hill Road to the south. Blean village is to the west. The national cycle route identified as

running through Site B is located to the south east of Site C's boundary. A further network of footpaths are located to the east of the site running through the existing agricultural fields.

Site D

- 2.12 Site D extends to approximately 22.9 hectares / 56.58 acres. The village of Tyler Hill is located 500m to the northeast of the site. It comprises agricultural fields bound by Tyler Hill Road to the south and agricultural fields to the north, east and west.
- 2.13 The Crab and Winkle Railway is located to the east of the site and provides a pedestrian and cycle route extending from Canterbury to Whitstable, running along the former railway line which opened in 1830.

Sites E and F

- 2.14 Site E extends to 8.1 hectares / 20.03 acres. It is located directly to the east of the University campus beyond St Stephens Hill. The site comprises greenfield land and includes a grouping of agricultural-related buildings at its north east corner. Site E is bounded by St Stephen's Hill to the west; by further greenfield / agricultural land to the east and south; by a private road to the north, beyond which is a large agricultural plot that extends towards the River Tyler. Little Hall Wood is located to the north / north east of the site and is designated as a Local Wildlife Site.
- 2.15 Site F equates to approximately 18.4 hectares / 45.5 acres. It comprises three greenfield agricultural plots which are separated by hedgerows. The site is bounded by larger tracts of woodland to the north, south and east. It is bounded by an existing private access road / footpath to the north. The curtilage of an existing residential property abuts the northern boundary of the site. Approximately 300m to the south-east lies an area resembling a large quarry which is occupied / part occupied by Viridor, a waste management company.

3. A Unique Opportunity to Achieve Sustainable Development

- 3.1 NPPF para.7 confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. Para.8 clarifies that achieving sustainable development means that the planning system has three overarching objectives – economic, social, and environmental – and that these are interdependent and need to be pursued in mutually supportive ways.
- 3.2 The economic objective focusses on helping to build a strong, responsive and competitive economy. The social objective focusses on supporting strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. The environmental objective focusses on protecting and enhancing our natural, built, and historic environment.
- 3.3 There is a site-specific interdependent economic, social, and environmental need for land at the UoK to be brought forward for development. Meeting this need will deliver the sustainable development objectives of the planning system. This is a unique opportunity for the district which cannot be achieved via development elsewhere. As a consequence, it is our view that this opportunity should be a significant consideration in determining the Vision, Strategic Objectives, and preferred policy options for the new local plan.

Economic Need

- 3.4 Underpinning this opportunity is a significant site-specific economic need for development.
- 3.5 The Higher Education sector delivers significant economic and social value to the UK. Sustaining and growing the sector is a key component of cross-departmental UK Government policy and is accounted for in national planning policy which requires Local Plans to give significant weight to the need to support the sector.
- 3.6 Locally, the University of Kent delivers significant economic and social value to Canterbury and Kent and significant weight should be placed on the need to sustain and grow the University in preparation of the new Local Plan.
- 3.7 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. This requires continual investment in its estate. Compounding this is the continual drive for innovation and sustainability in a changing social and technological world which requires one off investments in facilities and infrastructure.

- 3.8 There is a broader local economic need for the University to invest in related developments, such as hotel/conferencing facilities to help optimise the potential for add-on complimentary benefits to the wider local economy that can spin-off from the University.
- 3.9 The University's ability to make these necessary investments is constrained by its high operating costs (including costs of staffing and delivering services across its extensive estate) combined with the way it is funded. The University's income is principally based on funding from the UK Government for domestic students¹ (which is capped and loss making), combined with fees from international students, research income, student accommodation and spin-off commercial activities.
- 3.10 This income stream has been impacted by Covid-19. Whilst the University has weathered the impacts of the pandemic relatively well, there remain significant economic pressures on the University and the sector as a whole as a consequence. 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).
 - 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 These financial pressures are currently reducing the University's ability to invest in its estate and facilities. It follows that there is a need for the University to increase its income in order to meet the economic need to sustain and grow the University.
- 3.12 The University plans to increase its income via the disposal of surplus land (Sites BCDEF) for housing development. Subject to the land being allocated for development in the new Local Plan, this will generate a significant one-off receipt.

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.

3.13 This receipt will help the University release itself from debt obligations, increase the resilience of its balance sheet, and help to overcome the financial pressures it is currently facing. In turn this will open up opportunities for reinvestment back into the University, including the acceleration of essential investment in the development of the institution necessary to support its core business functions (teaching, research and the UoK student experience). This will allow it to not only remain competitive as a thriving UK Higher Education Institution but to also continue to grow its substantial economic, social and cultural impact on the district and wider region.

Housing Need

3.14 The need to allocate extensive land to meet the district's future housing needs is clearly set out in the Local Plan Vision and Preferred Options document.

3.15 As explained in the proceeding sections of this document , surplus land at the University is demonstrably suitable, available and achievable for housing development and therefore is capable of meeting part of the district's future housing need.

3.16 There may be other sites in the district that may also be suitable, available, and achievable for housing development, however no other sites are capable of mutually addressing both housing and the unique economic needs set out above.

Environmental Need

3.17 Achieving the environmental objectives of the NPPF is dependant on meeting the district's development needs in a manner that protects and enhances the district's natural, built and historic environment.

3.18 Much of the theoretical land supply in the district is significantly constrained by landscape, heritage, and other environmental constraints. Land at the UoK is sustainably located, subject to comparatively few substantial environmental constraints, and is capable of being brought forward for development in a manner that will deliver the environmental policy objectives of the NPPF. The alternative to allocating land here would be to direct development to less sustainable locations subject to greater environmental constraints.

Summary

3.19 The sites presented in this submission, are uniquely suitable for development and there is no other land within the District that is capable of mutually satisfying the combined economic, social and

environmental objectives as appropriately. This unique opportunity is a significant material consideration in the case for allocating these sites.

4. The Proposed Policy Allocation

4.1 UoK propose that the sites are allocated in the new Local Plan for the following development:

- **Retained Main Campus:** University and related development. To include educational buildings for teaching, research and administrative functions; student residential accommodation; business accommodation (compatible with the University's role in research and development and business innovation); hotel/conferencing facilities; sports facilities and other facilities directly related to the University's core business. This would effectively be a continuation of Policy EMP7 (of the current Local Plan), with development brought forward in accordance with the University Masterplan (2019), or subsequent update(s) as agreed with the Council.
- **Sites B, C and D:** Residential-led development comprising a minimum 2,000 homes plus a local centre, primary school and associated infrastructure.
- **Sites E and F:** Green infrastructure necessary to support the delivery of development on the Retained Main Campus and Sites BCD (to include University playing fields).

4.2 We would want to work with the Council to formulate appropriate wording for the policy allocation(s) and associated supporting text.

5. Suitability

Retained Main Campus

- 5.1 The University Masterplan (2019) presents how the University intends to deliver the proposed site allocation for the Retained Main Campus.
- 5.2 This has been informed by extensive technical, environmental, and transport survey and assessment work; public/stakeholder consultation; and joint-working with Local Planning Authority Officers, which confirms the suitability of the site for the proposed development. Refer to details provided in the University's representations to the Call-for-sites consultation (July 2020).

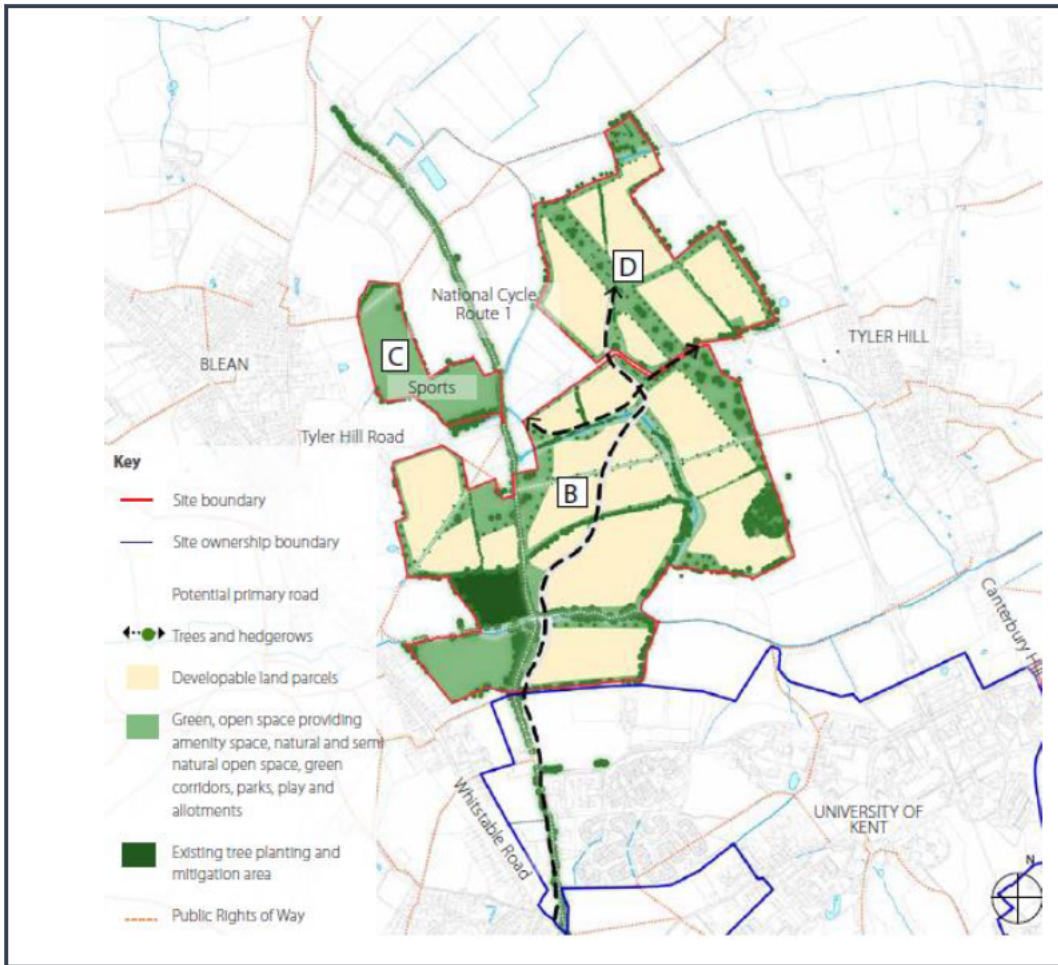
Sites BCD

Illustrative Concept Masterplan

- 5.3 An illustrative Concept Masterplan has been prepared to present one way in which the proposed allocation for Sites BCD could be delivered. This is enclosed at Appendix II (within the 'A Vision Development' document prepared by PRP). It is intended to be delivered alongside the plans for the Retained Main Campus set out in the existing University Masterplan (2019). As an overview, the Illustrative Concept Masterplan comprises:
- The comprehensive masterplanned development of Sites BCD to provide a new residential neighbourhood for Canterbury;
 - Provision of 2,000 new homes alongside a new primary school, local centre a transport hub;
 - Development to be accommodated within a series of development zones (collectively extending to approx. 50ha) set within a framework of greenspaces extending to approx. 43ha (46% of the site);
 - Vehicular access is to be provided via a new primary spine road extending north from Whitstable Road through the University's Main Retained Campus. Tyler Hill Road is to be diverted into the site (but is not to be used as a primary vehicular access route). Existing public rights of way and national cycle routes including the historic Salt Path and the Crab and Winkle Way are retained;
 - New homes will comprise a range of unit sizes, types and tenures in order to create a well-balanced resident community. Average residential densities of around 40DPH are anticipated within a range of 30-50DPH, with typical building heights of mainly 2-4 storeys;

- The extent of development zones have been compiled to ensure that designated heritage assets and their setting are not harmed and to ensure that existing hedges, woodlands, and water courses are retained as core structural components of the green infrastructure framework. Green spaces will provide a range of children's play, outdoor sport, food growing, recreation, and outdoor amenity opportunities within easy reach of all homes.

Figure 5.1 – Illustrative Concept Masterplan



Environmental, Technical, and Transport Evidence

- 5.4 The Illustrative Concept Masterplan has been informed by an extensive up to date evidence base covering a broad range of technical, environmental, and transport matters, which is enclosed at Appendix III. This comprises an Environmental Constraints and Opportunities Summary Report (prepared by WSP) alongside various supporting environmental and technical appendices.
- 5.5 In addition, a Transport Statement (prepared by WSP) is also included at Appendix IV and an Ancient Woodland Policy Matters Note (prepared by Avison Young) is included at Appendix V.

- 5.6 The above reports build upon the evidence previously submitted to the Council's call-for-sites consultations in July 2020 and July 2021.
- 5.7 Table 5.1, below provides an overview of the suitability of Site BCD having regard to key technical and environmental matters (drawing upon the above evidence and relevant policy). It provides a 'RAG Rating' against each matter 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 5.1: Suitability Appraisal (Sites BCD)

Criteria	Appraisal	Rating	Rating (description)
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). 		Suitable for development but with known constraints/ policy issues that can be satisfied
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 175 (with reference to footnote 58) 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 		Suitable for development but with known constraints/ policy issues that can be satisfied

	<p>land. The Inspector accepted that allocating such land was justified by housing need and broader sustainability considerations.</p> <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. • 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>Suitable for development</p>
<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 Retained Main University campus. • 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. • A Transport and Access Strategy is enclosed at Appendix III. <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. <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 Illustrative 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 		<p>Suitable for development but with known constraints/ policy issues that can be satisfied</p>

	<p>woodland are not adversely affected. The quantum of proposed development can be supported in transport 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>		
Heritage	<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 (enclosed at Appendix III). 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. 		Suitable for development but with known constraints/ policy issues that can be satisfied
Landscape	<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. 		Suitable for development

	<ul style="list-style-type: none"> - 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. <ul style="list-style-type: none"> • The sites are considered suitable for development in landscape terms. 		
Minerals	<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 212 of the NPPF. Any loss of minerals potential should be balanced 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 • An initial Minerals Assessment and technical note have been prepared in support of the emerging Concept Masterplan (refer to Appendix III). 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. 		Suitable for development but with known constraints/ policy issues that can be satisfied
Ecology/Biodiversity	<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. Refer to Appendix VI. • 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 development but with known constraints/ policy issues that can be satisfied

	<p>suitable for this species with the northern edge of Brotherhood Wood noted as being of particular importance.</p> <ul style="list-style-type: none"> - 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. - 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. <ul style="list-style-type: none"> • 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. • Further assessment into the potential impacts of the proposed access strategy in relation to existing Ancient Woodland (in the southern part of Site B) has been undertaken. This focuses on an area referred to as Long Thin Wood. The conclusions of this high-level assessment have determined that: <ul style="list-style-type: none"> - There are a variety of species within the woodland including oak and ash trees. The ash trees appear to be infested with ash 		
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	<p>dieback and there are several large trees which have collapsed from root plate failure.</p> <ul style="list-style-type: none"> - The Ancient Woodland Inventory records sites that have the potential of being ancient. Long thin Wood is included, however, the assessment survey conducted in support of these representations advises that it is unlikely that any of the trees within the woodland show signs of being in-situ prior to 1600AD (a key criteria for defining Ancient Woodland). There are some veteran tree characteristics associated with Long Thin Wood and further assessment of those is required. - The site woodland 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 (if any) as a result of the proposed development is currently being discussed with CCC in terms of acceptability and potential mitigation measures. <ul style="list-style-type: none"> • The ancient woodland on-site 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. • In addition, we consider that there is a 'wholly exceptional circumstances' case in this instance which justifies the loss of ancient woodland in this instance, centred on the University-specific needs and financial considerations set out in Section 3 of this Report. • 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. • Given the above, 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. 		Suitable for development
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. 		Suitable for development but with known constraints/ policy issues that can be satisfied

	<ul style="list-style-type: none"> • 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. 		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. 		Suitable for development but with known constraints/ policy issues that can be satisfied

Sites EF

5.8 Sites EF are considered appropriate for the delivery of green infrastructure uses, including open space and other relevant mitigation such as biodiversity improvements associated with the redevelopment of Sites BCD. They also have the potential to support the re-provision / relocation of some of the existing University sports pitches. On the basis of the technical work undertaken to date, there are no known constraints that would preclude the delivery of these uses and so the sites are deemed suitable,

6. Achievability and Availability

Availability

- 6.1 The UoK holds the freehold title to all land promoted in this submission with the exception of a small area of land adjacent to the Main Campus on Giles Lane (which forms part of the Retained Main Campus site). Title plans and reports have been provided in the University's submission to the Call-for-Sites (July 2020).
- 6.2 The Giles Lane land is in full control of Giles Lane Investments who, alongside the University and St Edmunds School, own the land and are working together to bring the site forward for redevelopment.
- 6.3 There are no restrictive covenants (or similar constraints) on the land that prevents it being brought forward for development.
- 6.4 The University (and the 3rd party) confirm that the land is available for development now.

Achievability

Retained Main Campus

- 6.5 The delivery of the proposed development on the Retained Main Campus (as set out in the University Masterplan) is dependant on the University's ability to fund the works. This is dependant on the University securing funds from the disposal of Sites BCD (the receipt from which is to be reinvested into the University) combined with future income streams.

Sites BCD

- 6.6 The illustrative Concept Masterplan has been informed by commercial advice from Avison Young (in their capacity as the University's Development Advisors and Land Agents). Details are set out in the Delivery Strategy enclosed at Appendix VI, which covers market conditions, viability, means of delivery, and timescales for delivery among other matters. It concludes that the proposed allocation for Sites BCD is achievable.
- 6.7 Key points to note are as follows:
- The opportunity at Sites BCD is deliverable under a range of delivery routes, including simple disposal for delivery by the private sector and development partnership options.

- The site is available now and the preparation of a planning application could theoretically commence, however, the University is likely to wait until the Local Plan has reached Regulation 19 stage to ensure sufficient planning certainty.
- Start of site is anticipated for early 2025.
- The initial viability analysis undertaken demonstrates that a sufficient premium for the landowners to be willing to sell the site.

8. Public Benefits

8.1 The allocation of the University's sites for development will provide a policy basis that will enable it to deliver substantive public benefits, as set out below:

Delivery of National Planning Policy

8.2 The University provides the single most unique and significant development opportunity within Canterbury in terms of its ability to deliver NPPF policy requirements associated with the economy, housing, environment, and town centre vitality/viability in a mutually supportive manner.

Delivery of the Draft Vision, Strategic Objectives and Preferred Growth Option

8.3 The proposed allocations deliver the draft vision in terms of:

- A strong resilient economy;
- Growth focussed on Canterbury;
- Healthy Communities; and
- Improved connectivity.

8.4 The proposed allocations would deliver the Strategic Objectives as a whole. They will:

- Deliver the growth and development of the University of Kent as a centre of innovation and learning excellence; continue to create business start-ups and skilled jobs; and increase the range of jobs, including more high paid jobs, for everyone;
- Provide high quality housing, including affordable housing as part of a sustainable, mixed community that is well designed, energy efficient and has access to community facilities and open space; and
- Provide development that is easily accessible to Canterbury supporting the vibrancy of the city centre.

8.5 The allocation of the site would support the delivery of the Preferred Growth Options by focusing growth on Canterbury as the economic hub of the District and supporting strategic housing growth in a well-connected and sustainable location.

Specific Public Benefits

8.6 The proposed site allocations will enable the following specific public benefits to be realised:

Economic:

- Generate funds to stabilise the University's financial position, enabling it to invest in new facilities necessary to remain competitive as a thriving UK Higher Education teaching and research institution, and to maintain its significant contribution to the local economy on a long term sustainable basis;
- Protect existing and generate opportunities for further high value high skilled jobs both directly at the University itself and indirectly in the wider economy;
- Create the opportunities to spin-off companies from the University's teaching and research activities, alongside the provision of new business space to accommodate new and growing companies within the district (generating future economic opportunity and retaining that value within the district);
- Provision of a conference hotel which will improve the city's conferencing offer and improve the city's visitor accommodation offer for business travellers, providing support to the broader businesses community and increasing expenditure in the city centre; and
- Improve the vitality and viability of Canterbury City Centre through the continuation and potential increase in its catchment area expenditure capacity associated with University staff, students, and visitors.

Social

- Continuation of the provision of higher education and research at the University;
- 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 beautifully designed and well specified homes set within a masterplanned environment with generous amount of green open space that promotes healthy living;
- Provision of new social infrastructure necessary to provide for the needs of future residents, including a new local centre, primary school and other community facilities.

Environmental

- Provision of beautiful design;
- Provides for the development needs of the district in a manner that minimises the contribution that this would make to climate change and which is resilient to the effects of a changing climate, including:
 - Provision of new and refurbished University accommodation specified to minimise carbon impacts associated with energy consumption;

- Provision of 2,000 homes planned, designed, and specified in a manner that will enable their occupants to live sustainable lifestyles, including in respect to carbon impacts associated with household energy consumption and transport.
- Protection of the significance of existing heritage assets including the Grade II* listed Church of St Cosmus and St Damian, Grade II listed Church Cottage, Scheduled Ancient Monuments and Conservation Areas; and
- Minimum 10% biodiversity net gain compared to the existing position.

9. Conclusions

- 9.1 In summary this document has presented the key role in which the University has in meeting the District's development needs over the Plan period and thus its importance in delivering the proposed Local Plan Vision, Strategic Objectives and preferred Growth Option.
- 9.2 Further evidence has been presented which underpins the emerging Concept Masterplan which indicates one way in which a new residential-led community could be delivered on Sites BCD, supported by Sites E and F. This is to be delivered alongside the University's Retained Main Campus and the long-term Higher Education plans associated with this.
- 9.3 The proposed allocations presented in this document represent a unique opportunity to deliver a number of public benefits aligning with both the national and emerging local policy context, specifically outlined in the draft Vision, Objectives and Preferred Growth Options. They would ensure the growth and development of the University thereby securing the economic strength and resilience of Canterbury's economy, whilst also delivering a significant new, sustainable, neighbourhood on the edge of Canterbury, where growth is to be focused. There are no other sites within the District that would be able to deliver these opportunities.
- 9.4 The University looks forward to continuing its work with Canterbury City Council to ensure any further information relating to the Concept Masterplan can be provided, and to also assist with the drafting of the proposed allocation policy wording.

Appendix I

Site Location Plan

Appendix II

'A Vision for Development' Document (prepared by PRP)

Appendix III

Environmental Constraints and Opportunities Summary Report (prepared by WSP)

Appendix IV

Transport Statement (prepared by WSP)

Appendix V

Note on Ancient Woodland Policy Matters (prepared by Avison Young)

Appendix VI

Delivery Strategy (prepared by Avison Young)

Contact Details

Enquiries

Nick Alston

[REDACTED]
[REDACTED]

Colin Sinclair

[REDACTED]
[REDACTED]

Kate Green

[REDACTED]
[REDACTED]

Visit us online

avisonyoung.co.uk