



Historic England

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Date 16 January 2023

Dear Sir or Madam

Draft Canterbury Local Plan to 2045 Regulation 19 Consultation

Thank you for your email of 24 October 2022 inviting comments on the above consultation document.

General Comments

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.

There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. Historic England is focused on the objective of the National Planning Policy Framework to set out a positive strategy for the conservation, enjoyment and enhancement of the historic environment (Paragraph 190, NPPF); and contain policies to deliver the conservation and enhancement of the historic environment (Paragraph 190 a, NPPF). Additionally, we comment on those policies, such as site allocations for development, that may impact on the significance of heritage assets such that the level of harm is likely to undermine the sustainability of the local plan.

Our comments on each of these matters are set out below. In summary, in our view, there are policies in relation to the promotion of development of a scale and form that is likely to cause harm to the historic environment, contrary to the objectives of the NPPF, and that consequently may affect the soundness of the Local Plan.



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Specific Policy Comments

1. Spatial strategy for the district Vision/strategic objectives

Other than mentioning Canterbury in relation to 'Improved connectivity', the vision fails to draw on the heritage of the district as a whole, its value to this and future generations and the opportunities it presents to play a fundamental role in achieving a resilient economy, improved connectivity, healthy communities and a thriving environment. This seems to be a major shortcoming in the vision, particularly in view of the high significance of the historic environment of the city and district, not least the World Heritage Site (WHS), one of only 19 in England.

The role of heritage is set out more in the strategic objectives, but these should flow from a vision which acknowledges and celebrates the heritage of the district.

Policy SS2 – Sustainable design strategy for the district

We welcome this policy and acknowledge its references to the Canterbury World Heritage Site and heritage assets in general.

Policy SS3 – Development strategy for the district

We raise serious concerns about the strategic development areas (bullet 2) and the new garden community (bullet 3) allocations (see below).

Policy SS4 – Movement and transportation strategy for the district

Notwithstanding the primary aim of this policy to facilitate a modal shift in movement across the district, the inclusion of a new movement corridor to connect the A28 at Sturry with the A2 at Bridge (bullet (g) iii) is likely to result in significant impacts of the historic environment that will need to be justified (see also comments below).

Policy SS5 – Infrastructure strategy for the district

The need for a new water reservoir at Broad Oak is justified both within the draft Local Plan and elsewhere (Water Resources South East draft Regional Plan) but will result in the total loss of significance of a heritage asset; mitigation of this is suggested but may be insufficient (see further comments below).

2. Canterbury

Policy C1 - Canterbury city centre strategy

The identified regeneration sites focus on a strategy of redeveloping existing surface car parks combined with redevelopment of the two former department stores, Debenhams and Nasons. All of the proposed sites are within conservation areas and in many cases the setting of listed buildings and/or scheduled monuments or the wider setting of the WHS. The site at Quinengate Car Park, which lies in the immediate setting of the scheduled Canterbury City Wall (no 8 on the proposals map), the North Lane Car Park, which lies adjacent to the river and close to the scheduled West Gate and development on Burgate/Canterbury Lane are likely to be particularly sensitive in heritage terms.



There is one overarching policy covering the redevelopment of City centre sites and no individual master plans with the exception of the former Cinema site which is dealt with under its own policy (C2). Given the variety of sites, and the potential for complex heritage considerations on each many of the site are sensitive enough to warrant development briefs which set clear parameters, based on a more detailed analysis of the site about quantum, form, scale etc. We strongly recommend a requirement to produce one is included in Policy C1.

Policy C1 makes it clear that development on all of these sites must accord with the plan's development plan policies. Bullet point 8 focusses on heritage and includes reference to protecting, enhancing and capitalising on the WHS and permeability between key heritage assets. However, with the exception of the following there is no detail about how heritage more widely would be assessed within an application: "Proposals which seek to enhance heritage assets will be supported provided there is no substantial harm to any heritage assets or their settings."

We would suggest that this could be strengthened by adding reference to avoiding or minimising harm to heritage assets through redevelopment (it is very unlikely that redevelopment would cause no harm to surrounding assets and archaeology).

Policy C2 – 43-45 St George's Place

The detailed policy focusses on mitigation to designated heritage assets (including the Conservation Area it is within and those it is within the setting of). However, it does not reflect the emphasis on sustaining or enhancing the significance of conservation areas as advocated by the NPPF. It also refers to responding to local context (e.g. the City Walls, etc.) but sets no framework for what might represent an appropriate response which sustains or enhances the significance of the heritage assets.

Policy C11 – East Canterbury (and associated sites, Policies C12-C15); and Policy C16 - Canterbury Eastern Movement Corridor

Historic England has serious concerns about parts of the proposed eastern movement corridor where the safeguarded land is within the Fordwich Conservation Area because of the high potential for the road to cause harm to the significance of this important conservation area and the many listed buildings and archaeologically sensitive areas (e.g. Howe Barracks Training Area) within it. Views across the area, including towards the cathedral tower within the WHS and along the historic pilgrimage route, may be impacted.

Fordwich is England's smallest town and an important medieval settlement on the banks of the river Stour which marked the furthest navigable point on the river Stour until medieval times. It developed as a compact settlement around a narrow road which winds through the town to a bridge over the river Stour. Its medieval plan form is remarkably intact and a number of medieval buildings survive within the town, many of which are very high quality. The town continued to develop in the 18th and 19th centuries and while there is some limited modern development, it remained compact and distinct from other nearby settlements. This





aspect of its historic character and its high quality architecture make an important contribution to its significance.

The conservation area includes fields to the west of the town including land close to the river which is not in productive use and one large agricultural field. They contribute to the significance of the conservation area by illustrating its historic landscape context and by holding aesthetic value as the green backdrop in views out from the urban parts of the conservation area and as a green foreground in views towards the core of the town.

The construction of a road across the landscape setting of Fordwich Town and within the boundary of the conservation area is likely to harm the significance of the conservation area. Without further detail it is difficult to be exact about the level of harm but the nature of the harm could be described as follows:

the introduction of a road, associated noise and lighting would have an urbanising effect on fields which positively contribute to the significance of the conservation area harming significance if derives from the survival of its historic landscape context and an appreciation that it remains distinct from nearby settlements;

the possible need for earthworks where it crosses the river (or a long bridge) would have a significant impact on the aesthetic values of the conservation area and would add to the urbanising effect of the road. This would be amplified by the proposed location of the road south of the conservation area, where it would cross two narrow step sided lanes which form the historic approach to the conservation area as the road would compromise their character as narrow lanes.

The policy, as currently worded, does not include any reference to designated heritage. This raises serious concerns for Historic England as it is likely the land safeguarded for a relief road, would if built, cause impacts to a number of assets including the Fordwich Conservation Area. It is also not clear why the proposed land for safeguarding could not be routed outside the Fordwich Conservation Area to reduce harm to heritage significance.

The Eastern Movement Corridor (C12) will cut across an area of considerable Palaeolithic potential, between Bridge and Sturry Road. This area is underlain by river terraces of the Stour, which contain important evidence about ancestral humans and the changing environment in which their activity took place. Such evidence is extremely scarce. It offers rare glimpses into the ways of life of other human species now extinct, which help us reflect on what it means to be human. The river terraces in this area, between the Great Stour and the Little Stour, are particularly important because they have revealed abundant lithic artefacts, relating to different stages of the Pleistocene (the 'Ice Ages'). Some of these remains are thought to be amongst the earliest evidence for occupation in Britain. However, as yet the date and detailed distribution of the deposits of interest is not well understood..





The Palaeolithic evidence from this area is considered by Palaeolithic specialists to be of national and even international significance. However, stone tools and associated environmental evidence can rarely be scheduled, because such remains represent 'sites without structures' (Sites of early Human Activity: scheduling selection guide: <https://historicengland.org.uk/images-books/publications/dssg-sites-early-human-activity/heag242-sites-of-early-human-activity-ssg/>). Nevertheless, it may be of equivalent importance to that of scheduled sites and, according to the NPPF footnote 68, page 57, should be treated in a similar way.

The Eastern Movement Corridor route is likely to directly impact on deposits of Palaeolithic interest. Even where the depth of the deposits lie beyond direct impacts, the route is likely to render them inaccessible for future research. Therefore, detailed Palaeolithic assessment supported by field evaluation is necessary to inform route options and design. This requirement should be included in Policy C12, paragraph 2f; C13, paragraph 2g; and C14, paragraph 2c). The Palaeolithic assessment should also be a consideration in the Minerals Assessment proposed for these Policies. The scope of Palaeolithic assessment and evaluation is set out in forthcoming Historic England Guidance 'Curating the Palaeolithic' (in press) and also in Kent County Council's advice note: Investigating Palaeolithic archaeology in Kent: advice note for archaeologists and developers (available from KCC Heritage Conservation Team).

Policy C21 - Land at Canterbury Business Park

This is a proposed allocation on land within the Highland Court Conservation Area and within its immediate setting. The Council's own Conservation Area appraisal (2005) notes is this is a conservation area which "essentially contains the original parkland, farmland and orchards to the house and model farm" (p.3). In other words, it provides the historic context to understand how Higham Court (grade II* and within the conservation area) functioned as the focal point for a wider estate which includes parkland and farmland. The conservation area is therefore significant as a good example of a historic estate.

The proposed allocation of land as an extension to the existing industrial area on the site (much of the industrial site is outwith the conservation area boundary), has the potential to cause harm to the significance of the conservation area by eroding more of the landscape setting to the grade II* listed Higham Court.

Historic England has recently written in response to a planning application on the proposed allocation, raising concerns and noting that development within the proposed allocation could "entirely remove a large area of productive landscape which makes a positive contribution to the significance of the Highland Court Conservation Area as it represents the productive landscape associated with the Higham Court estate. The erosion of the productive landscape would harm an understanding of its historic extent and character and thus also the significance of the conservation area." Our advice also noted that industrial buildings within the site of the proposed allocation had the potential to harm the significance of the grade II* listed Higham Court.





Historic England's recent advice on a live application within the proposed allocation suggested that less harmful ways to extend the industrial site were feasible by extending in outside the conservation area boundary so as to avoid eroding parts of the conservation area which make a positive contribution to its significance.

Notwithstanding the above, the proposed policy wording only refers to mitigating impacts on the significance of the conservation area and the grade II* listed Higham Court. We do not think this goes far enough as it fails to look for opportunities to sustain and enhance the significance of the conservation area.

5. Rural areas

Policy R1 – Land at Cooting Farm

This is a proposed new garden settlement on farmland at Cooting Farm. Cooting Farm lies in a shallow but long valley on a rough north/south alignment. Modest hamlets and settlements have developed over time along the bottom and sides of the valley and these are in many cases medieval in origin. The relatively open character of the valley means that there are long views between heritage assets, and it is therefore possible to appreciate the relationship between heritage assets and their settings.

This is the case for three settlements in the immediate setting of the proposed allocation all of which are designated as conservation areas and some include listed buildings. These are Adisham Conservation Area, Cooting (Adisham) Conservation Area and Blodden (Adisham) Conservation Area.

Adisham, is a linear settlement at the base of the valley (and directly west of the proposed allocation), which is terminated at its northern end by a particularly fine grade I listed church and is designated as a conservation area. The conservation area boundary is tightly drawn around the settlement and could be characterised as a very good example of a linear historic settlement whose architecture illustrates its origins in the medieval period and its continued growth up and including the 20th century.

The Cooting (Adisham) Conservation Area lies to the east of Adisham and comprises the twin focus of Cooting Farm (including the grade II listed farmhouse) and Little Cooting Farm. This conservation area is chiefly significant as a good example of a pair of farmsteads which remain in use as farms. They derive significance from the surrounding landscape as it helps explain the historic function and origins of the conservation area. This is appreciable from numerous views from the surrounding fields, all of which are within the proposed allocation. To the north of the Cooting Conservation Area is the Blodden (Adisham) Conservation Area. This conservation is a modest hamlet of buildings, of mainly 18th and 19th century date. Their original function is not clear but they may have been accommodation associated with farming on nearby land. Although all unlisted, the hamlet is nevertheless comprised of a very handsome group of buildings which illustrate the areas development from the 18th century onwards. The conservation area derives significance from the surrounding fields, all of which





are within the proposed garden settlement, because they help explain its origins as a rural hamlet.

More broadly, the site of the proposed settlement at Cooting Farm and the fields within it are essential to explain the settlement patterns which characterise the valley as a whole and may be summarised as a larger linear settlement with other modest hamlets along the valley's length often focussed on farmsteads. Without the physical separation, in the form of fields, between Adisham and surrounding hamlets, the essence of the areas historic character would be difficult to interpret.

Historic England has serious concerns about the proposed garden settlement because of the potential for development at Cooting Farm to cause high levels of harm to the significance of designated heritage.

Our concerns are greatest for the Cooting (Adisham) Conservation Area which would lose a large part of its immediate rural setting. This impact would be compounded by building on a large part of its wider rural setting altering its character to one which is heavily urban. This would harm an understanding of the farmstead's functional relationship to the surrounding fields and the origins of this conservation area.

Our concerns are also great for the impacts the proposed settlement would have on the grade I listed Church of the Holy Innocents. The church is located on rising ground on the west side of the valley and is highly visible, as a prominent landmark, in a number of views from within the proposed allocation. The ability to appreciate the church's origins as a rural parish, in some of the best views of the church from within the proposed allocation, would be quite seriously impacted by the development, despite proposals to create green buffer between the settlement of Adisham and the proposed settlement and acknowledgement of some long views across the site towards the church and Adisham.

Our concerns are also high for the Blodden (Adisham) and Adisham Conservation Areas for similar reasons. In both cases, the wider rural setting, which forms an important component of the setting of both conservation areas as it helps explain their rural origins and provides the foreground in views towards both, would be seriously comprised by the highly urbanising effect of the proposed development. This is despite the proposed green buffer between Adisham and Cooting Lane and to the north-east of Blodden.

We think the harm to all these designated heritage assets would be amplified by increased noise and activity (despite the proximity of the B4046 all of the conservation areas and the listed buildings within them have a tranquil setting which is characteristic of their rural location). Lighting and the visual presence of a large number of houses, even if partially screened, would add to the overall level of harm (the site is on rising ground and it is therefore unlikely that screening would ever entirely remove views of the development).





We also have some concerns about the proposed wording of the policy. Firstly, as far as we can tell, reference to preserving and enhancing views towards Canterbury City and the World Heritage Site is not relevant because these views are not visible from within the site due to rising land west of the proposed allocation.

Secondly, where the policy refers to designated heritage, including surrounding buildings, it only refers to mitigation and fails to pick up on opportunities to sustain or enhance the significance of designated heritage, which is required by NPPF paragraph 190. The policy also does not refer to the grade I listed Church of the Holy Innocents. As an asset of great importance, which would be impacted by this proposed allocation we think this is a serious omission.

R26 - Broad Oak Reservoir and Country Park

This proposal for a new reservoir includes the demolition and reconstruction of a grade II listed building, Vale Farm (ID 1336586). This raises serious concerns for Historic England as it involves the total demolition of a listed building, which even if reconstructed (as suggested in the policy wording) would still likely be very harmed by its demolition and reconstruction because evidence of craftsmanship (i.e. how it was constructed and the patina it has acquired over the years, which both contribute to its significance), its historic landscape setting and relationship to surrounding farmstead buildings would all be entirely lost or very seriously compromised.

We therefore suggest the policy should include reference to a need for a detailed farmstead and wider landscape survey, the requirement for a level 4 recording exercise to inform proposals for reconstruction (as per Historic England guidance, A Guide to Good Recording), a detailed measured survey, and for a concurrent proposal to reconstruct the listed building, should all be included in the policy in order to demonstrate the harm to heritage significance has been minimised as far as possible.

General comment on Allocations within the draft Local Plan

Many of the strategic allocations place an emphasis on mitigating harm rather than on minimising harm and seeking enhancements to significance of heritage assets (e.g. Policy C6 – Land at Merton Park; Policy C8 - Milton Manor House), and this is a real concern given the large number allocations which could have an impact individually and cumulatively on the historic environment, including archaeology of potential high significance (e.g. Policy C5 – South West Canterbury (Cocking and Thanington); Policy C6 – Land at Merton Park; Policy R20 – Aylesham south).

The NPPF notes (paragraph 189) that “(heritage) assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”. It is far from certain that these policies achieve this objective of the NPPF.





Open space, natural and historic environment

Policy DS26 – Historic environment and archaeology

We welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. The key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment (paragraph 190), in our view, have been met.

We suggest the following amendments to improve the scope of the policy to make it more reflective of national guidance.

First, it would be appropriate for the Policy DS26 in bullet one and two to make reference to Canterbury World Heritage Site Management (presently being reviewed and revised) as a key material matter when considering development affecting the outstanding universal value of the Site, its buffer zone and within its setting. Enhanced public access to the WHS, and enhanced interpretation if this is not possible (for management or proprietary reason) should be added as an objective of the policy.

Secondly, Policy DS26 refers to the historic environment and archaeology, and Paragraph 13 refers to developments on sites where there is potential for an archaeological heritage asset. Given the great potential for Palaeolithic archaeology within the Local Plan area and its likely importance, especially along the Eastern Movement Corridor, provision should be made at the Desk Based Assessment and subsequent stages for input by a Palaeolithic archaeologist and Pleistocene geologist. It would be helpful if the policy was amended to include this requirement for specialist expertise.

Evidence Base

It is not clear what evidence was prepared or drawn upon in relation to the historic environment in preparing the draft Local Plan. We are aware that the Council has prepared a Heritage Strategy, for instance, and recent work has been undertaken on review of the WHS Management Plan and on Conservation Area appraisals, but there is to these no reference to these either within the draft plan itself or in the supporting evidence pages of the website. It should be clear that all policies in the local plan, including those for the historic environment, are appropriately evidenced.

Summary

In the view of Historic England, the draft Canterbury Local Plan to 2045 fails to meet the objective in NPPF paragraph 7 to achieve sustainable development because of the risk of significant harm to the historic arising from a number of policies relating to the allocation of sites, as noted above. While the policy (DS26) for the protection and enhancement of the historic environment maybe found to be sound, this is undermined by the force given by other policies to forms of development and in locations that are likely to cause harm to numerous heritage assets if implemented as currently proposed. The draft Local Plan needs to seek a





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better balance, in our view, between the needs of the historic environment and that of development to achieve the goal of sustainability required of it.

We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that these comments are useful.

Yours sincerely

Alan Byrne

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