



Historic England

Consultations Team
Canterbury City Council
14 Rose Lane
Canterbury CT1 2UR

Our ref: PL00791548

Your ref:

Telephone
Email



[By email only to consultations@canterbury.gov.uk](mailto:consultations@canterbury.gov.uk)

Date

21 October 2025

Dear Sir or Madam

Draft Canterbury Local Plan to 2040 Regulation 18 Focused Consultation

Thank you for your email of 9 September 2025 inviting comments on the above consultation document. The comments below are provided in addition to our representations by letter dated 3 June 2024 in relation to the previous Regulation 18 consultation draft Local Plan.

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 that fall within its purview. 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 203, 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.

Summary

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. The lack of a demonstrable evidence base may have an implication for the soundness of the Local Plan.



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Of particular concern is the lack of evidence related to proposed allocations in the setting of the Canterbury Cathedral, St Augustine's Abbey and St Martin's Church World Heritage Site. As a heritage asset of the highest significance, it is essential that proposed allocations which may affect the Outstanding Universal Value (OUV) and significance of the World Heritage Site (WHS) are comprehensively and robustly underpinned by an evidence base. A key recommendation is therefore the need for implementation of a process of Heritage Impact Assessment (HIA) for strategic allocations in the setting of the World Heritage Site. These should follow the methodology set out in UNESCO's Guidance and *Toolkit for Impact Assessments in a World Heritage Context* (2022).

A process of HIA as part of the Local Plan Evidence Base to understand the potential for impact on the OUV of the WHS should be employed as an interactive tool in a positive and proactive way to ensure that any harm to the WHS can be avoided or minimised.

We would be pleased to discuss our concerns around the evidence base and some strategic sites highlighted below and in previous correspondence. We are keen to support the Council as you develop your Local Plan and would welcome the opportunity to discuss this advice and previous advice with Officers.

Specific Policy Comments

Policy N1 – Land at Merton Park

We previously commented on this strategic allocation in our advice of 3 June 2024. While we note the allocation has now been amended our key concerns do not change and are set out below.

Land at Merton Park lies on the south side of Canterbury between the current urban edge and the A2. It is part of the rural setting to the Canterbury Cathedral, St Augustine's Abbey and St Martin's Church World Heritage Site (WHS) and is a site from where important views of Canterbury's attributes of OUV can be appreciated, in particular of the Cathedral and its Bell Harry Tower. These views also help us understand the relationship between the World Heritage Site and the city's rural hinterland.

The importance of Canterbury's rural hinterland for an appreciation of the City Conservation Area is also acknowledged in the Canterbury Conservation Area appraisal, and a number of views within this document highlight this point. This includes a view from within the site (view 14, Fields North of Stuppington Lane). The accompanying text notes that "the foreground shows an open, agricultural landscape to the south-east of the city, which forms an important part of the setting of the conservation area and should be retained as farmland." The text goes on to note that Bell Harry Tower is particularly prominent in this view and that new development should not compete with the prominence.

The WHS Statement of Outstanding Universal Value also provides an explanation about why the views are important in the context of the WHS: *'The vast Cathedral, and particularly its Bell Harry Tower, still dominates the city as it has done for five hundred years. The tower is the*





highest building in the city and its location in the valley floor means that it can be seen from surrounding higher land and extensively along the valley. Maintaining views to and from the Cathedral is crucial to sustain this visual dominance’.

We note the inclusion in the revised policy of a requirement for a heritage assessment and for a requirement to submit a Heritage Impact Assessment in line with the UNESCO Guidance and *Toolkit for Impact Assessments in a World Heritage Context*. Nevertheless, we continue to have concerns that the quantum of development shown on the concept masterplan could cause harm to the OUV of the WHS and to the significance of Canterbury City Conservation Area as the development would substantially alter the character of the site from one which is rural to one which is heavily urbanised.

We are also concerned that the proposed concept masterplan is not clearly founded on a clear evidence base to ensure that decisions about scale and location of development avoid or minimise harm to significance and look for opportunities to enhance significance where possible. Without an evidence base it is not possible to conclude that these objectives would be met in the concept masterplan.

Our concerns extend to the detail of the proposed strategic allocation. For example, although narrow indicative viewing corridors are shown on the illustrative masterplan, we consider that the location of viewing corridors as shown on the concept masterplan should be based on a thorough views analysis. We suggest that the bullet point k, “*preserve and enhance views towards the City and World Heritage Site with provision of viewing corridors from open space and PRoWs crossing the site*” should be amended to include reference to a requirement for a views analysis to inform the location of viewing corridors which preserve and enhance key views into and from the City, with particular reference to the WHS.

There is also no information about the need for a heritage-led scheme based on an understanding of the site’s contribution to the significance of heritage assets. We would expect a starting point to be a thorough heritage assessment to guide detailed proposals which actively seek to avoid and minimise harm and to enhance heritage significance, ensuring that heritage plays a central role in place making within the scheme (rather than an impact assessment which starts from the point of a draft scheme).

All of this is important because the site is a reasonably steep sided valley, meaning that the topography will play a role when considering where taller, bulkier development could be located to ensure that the impacts to heritage are minimised.

Policy N3 – Thanington Recreation Ground

The site is currently public open space comprising parts of the setting of two nearby listed buildings: St Nicholas Church (grade II*), and Thanington Court Farmhouse (grade II). The site may also form part of the setting of the WHS.





The site is proposed as a Park and Ride. We are concerned that this is a significant change which is likely to have a negative impact on the setting of the listed buildings, in particular the parish church that currently benefits from a semi-rural setting, from the both operation of the site itself (e.g. lighting) and from the increased traffic on surrounding roads.

The change from an open green site to a form of intensive urban development with associated lighting, etc may affect views to and from the WHS that have not been weighed in the site allocation assessment process, and the intensification of use, therefore, may impact on the OUV.

We note that the proposed allocation for this use is not underpinned by a process of Heritage Impact Assessment (HIA) and we recommend this is a key next step if you choose to take forward this proposed allocation. The HIA should be undertaken in line with UNESCO's Guidance and *Toolkit for Impact Assessments in a World Heritage Context*.

Conclusion

In the view of Historic England, the draft Canterbury Local Plan to 2040 does not fully meet the objective in NPPF paragraph 8 to achieve sustainable development, because of the risk of significant harm to the historic environment arising from a number of policies relating to the allocation of sites as noted above.

In the absence of a process of HIA the policy also may not fully meet the objective in NPPF, paragraph 2 in relation to the 1972 World Heritage Convention: *'Planning policies and decisions must also reflect relevant international obligations and statutory requirements.'*

While the policy (DS26) for the protection and enhancement of the historic environment may be 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. This is even more of a concern because none of the strategic allocations are underpinned by a historic environment evidence base, including those in the setting of the Canterbury Cathedral, St Augustine's Abbey and St Martin's Church WHS. A key recommendation is therefore to undertake a process of HIA for all strategic allocations and for those in the setting of the WHS, to follow the methodology set out in the UNESCO Guidance and *Toolkit for Impact Assessments in a World Heritage Context, 2022*.

The draft Local Plan needs to seek a 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 and to meet the key test of sustainable development set out in NPPF paragraph 8.

We would also be pleased to provide further advice on the historic environment evidence base including any HIA's which are produced for sites in the setting of the WHS. The necessary process of heritage impact assessment will inform any decision by the Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, about whether there is a need to notify the draft Local Plan to UNESCO, via the





Historic England

World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention.

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

Historic Environment Planning Adviser



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

