



Historic England

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Date

18 May 2026

Dear Sir / Madam

### **Draft Canterbury Local Plan 2042/43 Regulation 19 Consultation**

Thank you for your email of 23 March 2026 inviting comments on the above consultation document. The comments below are provided further to our representations by letters dated 31 May 2024 and 21 October 2025, in relation to the previous Regulation 18 consultations on the draft Local Plan.

In our previous comments, Historic England focused on the objective of the National Planning Policy Framework for Plans to set out a positive strategy for the conservation and enjoyment of the historic environment (Paragraph 203, NPPF); and in particular to contain policies to sustain and enhance the significance of the heritage assets (Paragraph 203 a, NPPF).

The Canterbury district has a truly remarkable and varied historic environment that is much celebrated. The greatest jewel of Canterbury's heritage is the Canterbury Cathedral, St Augustine Abbey and St Martin's Church World Heritage Site, a place of international importance because of its contribution to the story of Christianity in England and its outstanding gothic architecture.

Despite the heritage and archaeology policy (Policy DS30 ) which seeks to protect heritage assets including the World Heritage Site, we are seriously concerned that policies in the Regulation 19 version promote development of a scale and form that may cause harm to the historic environment, notably the Canterbury World Heritage Site and the contribution made to its significance and Outstanding Universal Value by its setting (a description of which is set out in Appendix 2). In our view the policies in the draft Plan compete with one another and risk confusing applicants and decision makers.

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Historic England

While we note the production of a heritage topic paper, we also consider the evidence base underpinning the proposed allocations is not robust. The plan, including the site allocations, should be underpinned by a Heritage Impact Assessment process, which follows the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022).

Undertaking this process would help ensure that policies and site allocations are developed in a way that accounts for the Outstanding Universal Value of the World Heritage Site and avoids harm to it.

Historic England considers that these issues may have implications for the soundness of the draft Local Plan. We are keen to work with you to resolve these concerns.

Were you not to take account of Historic England's advice prior to submission of the draft Plan to the Secretary of State, the Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, may decide to notify the draft plan to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's *Operational Guidelines for the Implementation of the World Heritage Convention*.

Any response that DCMS received from the World Heritage Centre, including any advice from the World Heritage Committee's Advisory Bodies, would be shared with you via Historic England.

Historic England promotes sustainable, plan-led growth supported by a strong evidence base. Working together, we think our concerns, raised in this letter (see Appendix 1 below for detailed comments), could be overcome before you submit your Regulation 19 draft Local Plan to the Planning Inspectorate. However, if they are not resolved in the submission draft of the Plan, we would ask that you treat this letter as an objection to the Plan.

We would like to discuss our concerns and how they can be overcome as soon as is convenient. Please let us know when you are available.

Yours sincerely,

*Alan Byrne,*

Historic Environment Planning Advisor

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## Appendix 1: Historic England detailed comments on draft Local Plan Regulation 19 version

| Reference                                            | Comment                                                                                                                                                                                                     | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.2.1                                                | Factual correction <a href="https://whc.unesco.org/en/statesparties/gb">https://whc.unesco.org/en/statesparties/gb</a>                                                                                      | 35 properties are inscribed across the UK <a href="https://whc.unesco.org/en/statesparties/gb">https://whc.unesco.org/en/statesparties/gb</a>                                                                                                                                                                                                                                                                                                                                                                        |
| Policy SS1 - Environmental Strategy                  | <i>"The council will continue to work with partners to ensure the UNESCO Canterbury World Heritage Site is protected and its accessibility and connectivity are improved."</i>                              | This statement is positive, but it may be helpful to clarify what accessibility and connectivity means and why this is important to the WHS. Perhaps with reference to or picked up in e.g. 6.175?                                                                                                                                                                                                                                                                                                                   |
| 2. Vision                                            | We welcome inclusion of the WHS Management Plan in the list of documents recognised as having potential to complement the Local Plan.                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2.9 South West Canterbury Strategic Development Area | We welcome recognition that open space can enable key views to the WHS to be preserved and incorporated into the green infrastructure network.                                                              | HIA informed by a views analysis would assist in identifying which are the key views and how this could, most effectively, be achieved.                                                                                                                                                                                                                                                                                                                                                                              |
| Policy C10 - Land at Merton Park                     | In Historic England's view, insufficient consideration has been given to the potential for this proposed site allocation to impact on the OUV of the WHS.                                                   | In order to ensure the draft policy and allocation is sound a proportionate level of HIA of this and other proposed allocations is needed. A screening exercise, at this stage, would provide an initial understanding of how delivery of development on these sites might affect the WHS and how any harm caused might be avoided or minimised. If the HIA process is left until a proposal is brought forward at application stage there is a much greater risk that it will result in harm to the OUV of the WHS. |
|                                                      | The Heritage Topic paper identifies views included in the CAA but more detailed understanding is required to identify how long distance views to the City and World Heritage Site can best be incorporated. | More detailed views analysis is required to inform HIA and to ensure that this proposed site allocation would not result in harm to OUV.<br><br>See detailed comment below.                                                                                                                                                                                                                                                                                                                                          |
|                                                      | We would recommend that edits are made to the relevant text in this policy to clarify references to views and the setting of the WHS in line with the NPPF and guidance such as GPA3.                       | <i>2 c. Provide a high-quality built environment, in line with Policy DS13 with an average net density of around 45 dph outside of the community hub. A higher average net density will be encouraged where evidence shows it is appropriate in relation to context,</i>                                                                                                                                                                                                                                             |



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|                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <i>sustainable travel options and impact on views and setting <b>which contribute to the significance and OUV</b> of the World Heritage Site <b>and the ability to appreciate it</b>. Higher densities will be expected within and around the community hub;</i>                                                                                                                                                                                                                                                                                    |
|                                               | <p>We would recommend that edits are made to the relevant text in this policy to clarify references to views and the setting of the WHS in line with the NPPF and guidance such as GPA3.</p> <p>It is noted that in policy DS30 the heritage impact assessment is required to be <i>within</i> the heritage statement.</p>                                                                                                                                                                                                  | <p><i>2 f. Be informed by a Heritage Statement and Heritage Impact Assessment, including an assessment of Areas of Archaeological Potential, and where appropriate sustain and enhance the significance of nearby heritage assets <b>and the contribution made by their settings to that significance</b>, including the <del>setting of the</del> World Heritage <b>and its OUV</b>, in line with Policy DS30. The development layout should be structured and orientated to provide viewing opportunities to the World Heritage Site; and</i></p> |
|                                               | We would recommend that edits are made to the relevant text in this policy to clarify references to views and the setting of the WHS in line with the NPPF and guidance such as GPA3.                                                                                                                                                                                                                                                                                                                                       | <p><i>2 g. Be informed by a views analysis to determine the location of viewing corridors which preserve and enhance views towards the City <b>including those which contribute to the significance and OUV</b> of the World Heritage Site <b>and the ability to appreciate it</b>.</i></p>                                                                                                                                                                                                                                                         |
| Policy C13 - Land to North of Cockerling Road | We welcome the directive for the green and blue infrastructure strategy for the site to incorporate views towards the City and World Heritage Site with provision of viewing corridors from open space (3b) but again note that no key views are included on the policy plan. It is unclear what evidence base the understanding of the importance of the views will flow from as there is no specific requirement in the policy for heritage impact assessment relating to the WHS; this would have to be covered by DS30. | <p>Undertake HIA as part of the evidence base.</p> <p>See detailed comment below.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Policy C14 - Milton Manor House               | We are concerned that there is no reference to the WHS in the draft policy despite the very high-level assessment in heritage topic paper.                                                                                                                                                                                                                                                                                                                                                                                  | Make reference to the WHS within the policy and undertake HIA as part of the evidence base.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Policy C15 - Land south of Littlebourne Road  | We would recommend that edits are made to the relevant text in this policy to clarify references to views and the setting of the WHS in line with the NPPF and guidance such as GPA3.                                                                                                                                                                                                                                                                                                                                       | <p><i>2 c. Provide a high-quality built environment, in line with Policy DS13 with an average net density of around 35 dph outside of the community hub. A higher average net density will be encouraged where evidence shows this is appropriate in relation to context, sustainable travel options and impact on views and setting <b>which contribute to the significance and OUV</b> of the World Heritage Site <b>and the ability to</b></i></p>                                                                                               |



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|                                             |                                                                                                                                                                                                                                                                                                                            | <i>appreciate it. Higher densities will be expected within and around the community hub;</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                             | <p>We would recommend that edits are made to the relevant text in this policy to clarify references to views and the setting of the WHS in line with the NPPF and guidance such as GPA3.</p> <p>It is noted that in policy DS30 the heritage impact assessment is required to be <i>within</i> the heritage statement.</p> | <p>2. e Be informed by a Heritage Statement and Heritage Impact Assessment including assessment of Areas of Archaeological Potential and where appropriate sustain and enhance the significance of nearby heritage assets <i>and the contribution made by their settings to that significance</i>, including the <del>setting of the</del> World Heritage Site <i>and its OUV</i>, in line with Policy DS30. Lower density development should be provided near to St Martin's Hospital (The Oast) Conservation Area and a landscape buffer should be provided adjacent to the Grade II Listed Buildings and Curtilage Listed Buildings at Hoath Farm to the south of the site;</p> |
| Policy C16 - Land south of Bekesbourne Lane | <p>We would recommend that edits are made to the relevant text in this policy to clarify references to views and the setting of the WHS in line with the NPPF and guidance such as GPA3.</p>                                                                                                                               | <p>2 c. Provide a high-quality built environment, in line with Policy DS13 with an average net density of around 35 dph outside of the community hub. A higher average net density will be encouraged where evidence shows it is appropriate in relation to context, sustainable travel options and impact on views and setting <i>that contribute to the significance and OUV</i> of the World Heritage Site <i>and the ability to appreciate it</i>. Higher densities will be expected within and around the community hub;</p>                                                                                                                                                  |
|                                             | <p>We would recommend that edits are made to the relevant text in this policy to clarify references to views and the setting of the WHS in line with the NPPF and guidance such as GPA3.</p> <p>It is noted that in policy DS30 the heritage impact assessment is required to be <i>within</i> the heritage statement.</p> | <p>2 e. Be informed by a Heritage Statement and Heritage Impact Assessment and where appropriate sustain and enhance the significance of nearby heritage assets <i>and the contribution made by their settings to that significance</i>, including the <del>setting of the</del> World Heritage Site <i>and its OUV</i>, in line with Policy - DS30. Lower density development should be provided near to the Little Barton Farm and St Martin's Hospital (The Oast) Conservation Areas and a landscape buffer should be provided adjacent to the Grade II Listed Buildings and Curtilage Listed Buildings at Little Barton Farm and Hoath Farm;</p>                               |



|                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| Policy C18 - Wincheap Commercial Area       | We welcome the directive that the design and layout of the site should incorporate long distance views to the city and World Heritage Site (2c).                                                                                                                                                                                                                                                                               | HIA informed by a views analysis would assist in identifying how this could, most effectively, be achieved.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                             | <p>We recommend that edits to this section would help it align more closely with wording elsewhere e.g. C10, C15, C16 which refer to the setting of the WHS and to help clarify the way in which the WHS' setting should be addressed in line with the NPPF and guidance such as GPA3, e.g.:</p> <p>It is noted that in policy DS30 the heritage impact assessment is required to be <i>within</i> the heritage statement.</p> | <p><i>2 d. Be informed by a Heritage Statement and Heritage Impact Assessment, including an assessment of Areas of Archaeological Potential and where appropriate sustain and enhance the significance of nearby heritage assets <b>and the contribution made by their settings to that significance</b>, including the World Heritage Site <b>and its OUV</b>, Listed Buildings on Wincheap and the Canterbury Conservation Area, in line with Policy DS30.</i></p> <p>See detailed comment below.</p>                                                                                                                                                                                                    |
| Policy C32 – Land at Wincheap Park and Ride | We are concerned that there is no reference to the WHS in the draft policy despite the very high-level assessment in heritage topic paper.                                                                                                                                                                                                                                                                                     | Make reference to the WHS within the policy and undertake HIA as part of the evidence base.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Policy DS26 - Landscape Character           | We recommend edits to the draft policy to align more closely with the requirements under the NPPF to avoid or minimise conflict between designated heritage assets and their conservation since mitigating harm only reduces the severity of the effect it does not minimise the harm itself.                                                                                                                                  | <p><i>2. Proposals for development will be permitted if the following criteria are satisfied:</i></p> <p>...</p> <p><i>e. The development avoids or <del>mitigates</del> <b>minimises</b> any impacts on the character and landscape context of the historic City of Canterbury including the World Heritage Site; and</i></p>                                                                                                                                                                                                                                                                                                                                                                             |
| 6.174                                       | We welcome reference to HIA but recommend that additional clarification would assist in implementing this in line with guidance from UNESCO.                                                                                                                                                                                                                                                                                   | <p><i>6.174 National policies establish a clear framework to protect the significance of heritage assets, and to ensure that this plan requires proposals that could impact a heritage asset to submit a Heritage Statement proportionate to the scale of development and potential adverse effects. Within its Heritage Statement, proposals impacting on the <b>significance or OUV of the World Heritage Site, including the contribution made by its Buffer Zone or its setting must also include a Heritage Impact Statement Assessment.</b></i></p> <p><i><b>Heritage Impact Assessment (HIA) can most effectively be implemented as an iterative process so that its results inform the</b></i></p> |



|       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <i>development of a proposal from its earliest stages. This approach is in accordance with guidance from UNESCO. When used in this way HIA can function as a valuable tool in identifying how harm to the significance and OUV of the Canterbury WHS might be avoided or minimised. It can also support the achievement of multiple objectives under the planning system, including for the historic environment, in mutually supportive ways.</i>                                                                                                                                                                                                                                                                                                                                 |
| 6.175 | We welcome the references here, and offer some minor clarifications.:                                                                                                                                                                                                                                                                                                                                                                                             | 6.175 <i>The designation of the Cathedral, St Augustine's Abbey and St Martin's Church as a World Heritage Site demonstrates the significance and Outstanding Universal Value (OUV) of these sites. The Buffer Zone for the Canterbury World Heritage Site (which includes the streets and spaces surrounding, and forming the immediate vicinity of, the three separate parts of the designated WHS) makes an important contribution to <del>the</del> its significance and to maintaining its OUV as it links the three separate parts of the WHS together. Developments within the designated World Heritage Site and its Buffer Zone (as shown on the Policies Map) must preserve, and where possible enhance, the Outstanding Universal Value of the World Heritage Site.</i> |
| 6.176 | The Buffer Zone is a part of the WHS' setting. A minor boundary modification was submitted to the UNESCO World Heritage Centre in January 2026 requesting that the UNESCO World Heritage Committee formally adopt the same buffer zone around the World Heritage Site that has been operating successfully within the Local Plan, providing protection to Canterbury's OUV for some time.<br>We welcome the references here, and offer some minor clarifications. | 6.176 <i>The setting of the World Heritage Site, including its Buffer Zone, includes <del>ing</del> views into, out of and across the three parts of the World Heritage Site <del>from the setting</del>. The WHS' setting is important because of its role in protecting and enhancing the significance and OUV of the World Heritage Site. Any proposal that does impact on the contribution made by the WHS' setting, including its Buffer Zone, should respect, and where possible enhance the Outstanding Universal Value of the World Heritage Site.</i>                                                                                                                                                                                                                     |
| 6.177 | To avoid confusion with the Brief Synthesis in the UNESCO adopted Statement of Outstanding Universal Value (SOUV) from which this text is derived we would recommend a minor edit as follows:                                                                                                                                                                                                                                                                     | 6.177 <i>A summary of the brief synthesis of Canterbury's OUV from the Statement of Outstanding Universal Value (OUV), is as follows:</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |



|                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| Policy DS30 - Historic environment and archaeology | <p>In line with comments and suggestions elsewhere we recommend that it would be helpful to clarify some elements to the policy wording picking up on points raised elsewhere – relationship between setting and buffer zone, contribution of setting to significance and OUV.</p> <p>We welcome inclusion of the WHS Management Plan in the draft policy as well as in the documents recognised as having potential to complement the Local Plan (section 2, Canterbury Vision), given its role as a material consideration in the planning process.</p> | <p>3. <i>Proposals for development within, <del>or affecting the setting of,</del> the <b>Canterbury</b> UNESCO <del>Canterbury</del> World Heritage Site and/or its <b>setting including its</b> Buffer Zone must provide a Heritage Impact Assessment (HIA) within the Heritage Statement. This must be in line with UNESCO guidance and informed by the Canterbury World Heritage Site Management Plan with a particular regard to the identified attributes of <b>OUV, authenticity and integrity</b>, and should also <del>have</del> <b>provide an understanding assessment</b> of the cumulative impact of development upon the World Heritage Site's Outstanding Universal Value.</i></p> |
|                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>7. <i>Proposals for development within the <b>Canterbury</b> UNESCO <del>Canterbury</del> World Heritage Site <b>and/</b> or its <b>setting including its</b> Buffer Zone will only be permitted when the Outstanding Universal Value of the World Heritage Site is preserved or enhanced, reflecting the findings of the Heritage Impact Assessment. This includes <b>the impact on</b> views into, out of and across the three parts of the World Heritage Site.</i></p>                                                                                                                                                                                                                     |
|                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>8. <i>Proposals for development affecting <del>the setting of</del> the Canterbury World Heritage Site <b>from within its setting</b> or views into, out of and across the three parts of the World Heritage Site <del>from the setting</del>, will be required to demonstrate how they will respect or enhance the landscape, townscape and topographical features which contribute to the Outstanding Universal Value of the World Heritage Site.</i></p>                                                                                                                                                                                                                                    |

## Strategic Allocations

### Policy C18 Wincheap

As it stands, this industrial estate sandwiched between Wincheap, a historic route into the city and the river Stour, does not, in our view, contribute to OUV.

However, the proposed allocation of 1000 units suggests development of a scale that **could** impact views which contribute to attributes of the WHS' OUV specifically attributes 5 and 6.



For example, there are kinetic views of the cathedral's tower, which acts as a wayfinder as it is approached on the footpath beside the river Stour (e.g. viewpoint 15 in the Conservation Area Appraisal). This is also a pilgrimage route into the city from Wye.

If development from the proposed allocation was visible in these kinetic views, it could harm the OUV conveyed in the attributes to which these views contribute.

Depending on the scale of development, it could also potentially be visible in view 1 from Reims Way which is dominated by the cathedral towers as a key wayfinder, and where the Pilgrims Way and North Downs Way converge on the edge of the city in the final approach to the cathedral.

It is also possible that taller development, if needed to deliver the proposed allocation, could impact other views, e.g. view 16 from St Stephen's, which beautifully conveys the Cathedral's prominence in the city and contributes to its picturesque skyline.

All of the above means, depending on the scale of development needed, there is potential for this proposed allocation to harm the WHS' OUV. As it stands, there is not a sufficient evidence base to form a view on whether the proposed allocation has actively avoided or minimised harm to OUV.

## **C13 Land to North of Cockering Road**

This proposed allocation of 36 residential units is nestled within other major allocations to the southwest of Canterbury. However, the site is on the crest of a rise and it is believed there are numerous views of the cathedral from within the site.

Viewpoint 13 in the Canterbury City Conservation Area Appraisal lies just to the south of the proposed allocation, and is a particularly good view of the cathedral roofline in which the rich and lively profile of its towers are visible. Like other views (e.g. view 14) it therefore contributes to the attributes of OUV which convey the prominence of the Cathedral.

Land around this proposed allocation has been consented for residential development. However, without a comprehensive views analysis as part of a setting study of the WHS and a detailed HIA in line with UNESCO guidance, it is not possible to be clear on whether development as proposed, has avoided or minimised harm to the WHS' OUV.

Further analysis, which also draws on the likely impacts of consented schemes, would help us reach a view on this.

## **C10 Land at Merton Park**



Land at Merton Park is a large parcel of undeveloped land, currently in agricultural use to the south of Canterbury. There are many vantage points from within site, including viewpoint 14 from the Canterbury City Conservation Area appraisal, that contribute to an appreciation of attribute 6 and the picturesque skyline of the city.

This is because the site's undeveloped nature which provides wide and open views, are accentuated by its dramatic valley topography and height, in relation to the cathedral, which sits below it in some of the views.

A mixed use of development with up to 1950 residential units is proposed. The indicative concept masterplan shows key view corridors to conserve views of the WHS cathedral towers from within the proposed allocation.

The proposed policy wording also includes a requirement for development to be “informed by a Heritage Statement and Heritage Impact Assessment, including an assessment of Areas of Archaeological Potential, and where appropriate sustain and enhance the significance of nearby heritage assets, including the setting of the World Heritage Site, in line with Policy DS30.”

We welcome acknowledgement of the WHS within the proposed policy wording. However, in our view, the lack of any structured assessment, following the UNESCO toolkit section, means we are not persuaded that the proposed allocation is based on a strong evidence base that demonstrates the proposal would either avoid or minimise harm to the OUV of the WHS.

## Evidence Base

We note the publication of a Heritage Topic Paper since the last version of the draft Local Plan was consulted upon. While we welcome this as an important addition to the evidence supporting the Plan, we are concerned that the assessment of impacts on key heritage assets, not least the World Heritage Site, is cursory.

In the absence of a proportionate process of Heritage Impact Assessment, that considers how the potential site allocations might affect the Canterbury World Heritage Site's draft attributes of OUV, its integrity and its authenticity, it may not fully meet the obligations under the 1972 World Heritage Convention as required under Paragraph 2 of the NPPF: viz. *Planning policies and decisions must also reflect relevant international obligations and statutory requirements.*

Individually these allocations may have an impact on OUV and the ability to appreciate it. However, in addition, the heritage impact assessment process should consider the potential cumulative impact of all the proposed allocations which have potential to affect the OUV of the WHS.



Cumulatively, several of the proposed site allocations could result in the intrusion of modern development in multiple views of the cathedral. Where these views contribute to the attributes of OUV discussed above, this could gradually erode the experience and appreciation of the prominence of the cathedral and its important Bell Harry Tower, and so erode this aspect of its internationally recognised OUV.

At present the evidence base does not consider cumulative impacts to the WHS which adds to our concern.

In our Regulation 18 responses, we suggested that such an assessment is required and should be carried out in accordance with the UNESCO's *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (2022).

This has not been done and as a result the draft Local Plan may require notification to UNESCO under Paragraph 172 of the [Operational Guidelines for the Implementation of the World Heritage Convention](#), bringing additional scrutiny from UNESCO and its Advisory Body ICOMOS International.

## Regeneration opportunity areas

Historic England very much welcomes the principle of regeneration opportunity areas because of the positive benefits these could provide for the historic environment.

However, we note that some of the regeneration areas lie within the setting of the WHS and that some are specifically within its buffer zone e.g. 1 (Debenhams), 2 (Former Nasons Department Store), 6, 8 (against boundary of WHS) and 10.

There is, as far as we can see, no detail on how regeneration opportunity areas would be delivered. Proposals brought forward for these sites would need to avoid or minimise harm to the WHS' OUV and where possible enhance it, and help deliver objectives in the WHS Management Plan in order to ensure regeneration delivers sustainable development



## APPENDIX 2: Values and setting of the Canterbury World Heritage Site

### *The Outstanding Universal Value of the Canterbury Cathedral, St Augustine's Abbey and St Martin's Church World Heritage Site (WHS)*

The Canterbury Cathedral, St Augustine Abbey and St Martin's Church WHS is of Outstanding Universal Value (OUV) as a crowning artistic achievement of gothic architecture in the medieval period, for its importance as the seat of Christianity in England following St Augustine's arrival in 597 and for its association with pilgrimage following the death of Archbishop Becket in 1170.

It is comprised of three elements, the Cathedral, the ruins of St Augustine's Abbey and the parish church of St Martin's. These are within and partly without the medieval city walls and are linked by a buffer zone that helps protect functional, ceremonial and visual links between the three.

Draft attributes, capturing the tangible and intangible elements that convey Canterbury's OUV, are described in the 2026 draft World Heritage Site Management Plan. Though not yet subject to public consultation, these are in the public domain via planning applications and the City Council has advised on the development of the management plan. They are referred to in this advice for those reasons.

### *Contribution of the World Heritage Site's setting to its OUV*

The draft attributes that are of greatest relevance to the OUV of Canterbury's WHS for the purposes of proposed allocations, because of the contribution made by the WHS' setting, are:

*(5) the site's historic and present role as a centre of pilgrimage and*

*(6) the prominence of the cathedral in views creating a picturesque skyline and a landmark for wayfinding.*

It should be noted that the setting of the WHS may also support an appreciation of the WHS' attributes of OUV in other ways and the above is not exhaustive.

The medieval city of Canterbury, much of which (except for the city's southeast corner that was lost due to WWII bomb damage), survives intact and forms part of the setting of the WHS. The city therefore continues to illustrate the historic context to the great medieval cathedral and monastic sites of the WHS and in some ways help convey an appreciation of OUV.

For example, the city's network of streets and principal roads preserves the historic routes to and views towards the cathedral along which it was approached for pilgrimage (e.g. views along Mercery Lane to Christchurch Gate of the Cathedral towers as a terminus for pilgrims is



closely linked to attribute 6 and the tower's prominence for wayfinding). Buildings within the city associated with pilgrimage provide historic functional links to the WHS (e.g. former Chequer Inn, built in the late 14<sup>th</sup> century for pilgrim's attribute 5).

Land outside the city, also contributes to WHS OUV in different ways. From pilgrimage routes into the city, there are views, often kinetic, in which the cathedral and particularly its magnificent 15<sup>th</sup> century Bell Harry tower can be seen as a landmark for pilgrims travelling towards the WHS (attribute 5 and 6). The views, therefore, make a particularly strong contribution to the WHS' OUV and the ability to appreciate it.

The prominence of the cathedral and the contribution it makes to the city's picturesque skyline (attribute 6), can also be appreciated from other land surrounding the city including from proposed site allocations. These incidental views may contribute to the WHS' OUV to a lesser extent than those experienced along identified historic pilgrimage routes, but they still make an important contribution to our understanding and appreciation of the WHS' OUV.

Views from the Conservation Area Appraisal that convey an attribute of OUV, and are in our view relevant to proposed strategic allocations, include:

- Views 2 and 4 illustrate which how the cathedral's tower is the prominent feature in the city skyline. Its landmark status is further accentuated by a backdrop of green undeveloped fields that, without built form, accentuate the prominence of the tower. Some of these fields (although a full views analysis is needed to confirm this), may include sites proposed for allocations.
- View 16, also from the north looking south, provides a particularly clear illustration of the cathedral's prominence and its contribution to the picturesque skyline of the city. Some modern development within the city, including since inscription, does detract from the Cathedral's prominence including modern student accommodation which appears as white blocks in the view. Fields visible in the view may include strategic allocations.
- View 14, from within a strategic allocation, Land at Merton Park, C10 also illustrates the prominence of the cathedral in the city and is particularly powerful because both the Bell Harry and west end towers are visible. This view clearly illustrates the cathedral's visual prominence and the contribution it makes to the city's picturesque skyline.

There is no setting assessment, including views analysis of the WHS, provided as part of the evidence base to support proposed site allocations. This is a serious omission because the test in NPPF paragraph 32 - *The preparation and review of all policies should be underpinned by relevant and up-to-date evidence* - has not been met.



Historic England

We also note that additional viewpoints, would be relevant for any discussion on cumulative impacts (i.e. understanding how the contribution that setting makes to OUV and the ability to appreciate that since the time of inscription, including approved development).