

From: Tracey Dessoy [REDACTED]
Sent: 18 May 2026 16:50
To: Consultations
Subject: Regulation 19 Representation on Draft Local Plan

--Email From External Account--

Regulation 19 Representation – Objection on Heritage Grounds

Draft Canterbury District Local Plan (Regulation 19) – Sustainability Appraisal Failures

Submitted by: Dr Tracey Haynes
Address: [REDACTED]
Date: 18 May 2026

1. Introduction

I am submitting this representation as a formal **objection** to the Regulation 19 Draft Canterbury District Local Plan on the grounds that the accompanying **Sustainability Appraisal (SA)** fails to meet the requirements of the **NPPF 2024** in relation to the historic environment.

The SA's treatment of heritage is **generic, incomplete, and insufficiently evidence-based**, and therefore incapable of supporting a legally compliant Local Plan for a district containing one of the most important historic environments in England, including the **Canterbury World Heritage Site (WHS)**, the medieval city, its conservation areas, its archaeological landscape, and the historic rural setting of the Stour Valley and surrounding villages.

2. Evidence from the SA demonstrating the deficiencies

The SA's heritage framework is summarised in **SA Objective 9**, which states:

“9.1 Preserve and enhance designated heritage assets including their setting and contribution to local character and distinctiveness... 9.5 Encourage new developments to contribute to the maintenance and enhancement of the historic character through design, layout and setting.”

The Non-Technical Summary also states that the SA:

“is intended to help further refine the emerging Draft Canterbury District Local Plan.”

These statements demonstrate the **generic and process-driven nature** of the SA's heritage assessment. They do not demonstrate compliance with the **specific, asset-based, significance-led requirements** of the NPPF 2024.

3. Failure 1 – No “positive strategy” for Canterbury’s unique historic environment (NPPF 2024)

NPPF 2024 requires Local Plans to set out a **positive strategy** for the conservation and enjoyment of the historic environment, including:

- sustaining and enhancing significance
- addressing assets most at risk
- recognising the contribution of heritage to character and place
- using the Historic Environment Record (HER) to understand significance

The SA does **none** of this.

Key failures:

- No reference to the **Canterbury World Heritage Site**, its Outstanding Universal Value, buffer zones, or key views.
- No recognition of the **historic city skyline**, dominated by the Cathedral, or the sensitivity of long-distance views from the Downs and Stour Valley.
- No analysis of the **historic rural setting** of Canterbury, including Littlebourne (R 9) Fordwich, Sturry, and the farmed landscapes between Bekesbourne and the A257 (C 15 and c 16) that currently define the city's eastern approaches.
- No identification of **heritage at risk** or assets most vulnerable to change.
- No evidence that the **HER** has been used to inform site selection or spatial strategy.

This is a **fundamental breach** of NPPF 2024's requirement for a positive, place-specific heritage strategy.

4. Failure 2 – No assessment of “significance” or “setting” as required by NPPF 2024

NPPF 2024 is explicit that:

- significance derives from physical fabric, setting, and relationships
- setting must be assessed using evidence

- plans must understand how development affects significance

The SA provides **no asset-specific assessment** of significance or setting.

Instead, it relies on a **single generic objective** (Objective 9) and a high-level scoring system that is incapable of identifying:

- impacts on the WHS
- impacts on the medieval street pattern
- impacts on the city walls and gateways
- impacts on the Cathedral's skyline dominance
- impacts on the historic river crossings and Stour Valley landscape
- impacts on archaeological sensitivity across the district

This is a **systemic methodological failure**.

5. Failure 3 – No distinction between designated and non-designated heritage assets

NPPF 2024 requires:

- **great weight** to be given to designated heritage assets
- different tests for substantial and less-than-substantial harm
- proportionate but clear assessment of non-designated assets

The SA collapses all heritage into a **single objective**, failing to reflect:

- the statutory and policy hierarchy of heritage protection
- the special status of the WHS
- the differing levels of harm and policy tests

This risks **mis-scoring** sites and **misleading** the plan-making process.

6. Failure 4 – Inadequate cumulative and spatial assessment of heritage impacts

The SA includes a chapter on cumulative effects, but it is **not heritage-led** and does not address:

- the combined impact of multiple large allocations around Canterbury on the WHS setting

- the erosion of historic approaches to the city
- the effect of new transport infrastructure (e.g. park & ride, junction upgrades, HGV facilities) on conservation areas and historic landscapes
- the cumulative archaeological impact of large-scale ground disturbance

Given Canterbury's exceptional heritage sensitivity, this omission is **completely unacceptable**.

7. Failure 5 – No identification of enhancement opportunities or public benefits

NPPF 2024 requires plans to:

- identify opportunities for enhancement
- recognise the social, cultural and economic benefits of heritage
- ensure development makes a positive contribution to local character

The SA does not identify:

- opportunities to enhance the WHS
- opportunities to improve access to the city walls
- opportunities to restore historic landscapes or views
- opportunities for heritage-led regeneration in rural villages or coastal towns

The SA treats heritage as a **constraint**, not a **driver of positive place-making**, contrary to NPPF 2024.

8. Consequence – The SA cannot lawfully support the Local Plan

In summary, the SA:

- fails to assess significance
- fails to assess setting
- fails to assess cumulative effects
- fails to reflect the heritage hierarchy
- fails to address Canterbury's unique historic environment
- fails to identify enhancement opportunities

- fails to provide a positive strategy

Thus, the SA **cannot** be said to have informed the Local Plan in a manner compliant with the NPPF 2024 or the SEA Regulations.

The Local Plan is therefore demonstrably **unsound** under the NPPF tests of:

- **Justified** – not based on proportionate evidence
- **Effective** – not deliverable without unacceptable heritage harm
- **Consistent with national policy** – fails to meet NPPF 2024 heritage requirements

Conclusion

Canterbury is not an ordinary district. It contains a **World Heritage Site**, a medieval city of international importance, and a rural landscape whose historic character is integral to the city's identity.

The SA's failure to recognise and assess this heritage properly is arguably a **serious and material defect**.

I therefore object to the Regulation 19 Draft Local Plan on the grounds set out above and request that the Council:

1. **Withdraw and revise the Sustainability Appraisal**, producing a heritage-specific assessment that:
 - identifies significance and setting for key assets
 - assesses cumulative impacts
 - maps heritage sensitivities
 - evaluates alternatives properly
 - reflects the WHS and Canterbury's unique historic environment
2. **Reassess the spatial strategy and site allocations** in light of a compliant heritage assessment.
3. **Reconsult** on the revised SA and any resulting changes to the Local Plan.

Until these steps are taken, the Local Plan cannot proceed to Examination in a legally robust form.

Dr Tracey Haynes

