

**From:** DDC Conservation  
**Sent:** 15 December 2023 14:44  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Dover District Council- Planning Application consultation on 23/01363  
**Attachments:** ufm7\_Standard\_Consultation\_21\_days.pdf

Hello [REDACTED]

Here is the solar panel application I mentioned yesterday. As I mentioned, there was an application for a solar farm in Guston (if you use GIS mapping you'll find the app number). Hopefully my comments will be on the Idox file if not then they should be on the shared drive. The way to approach this is to look at the guidance on setting by HE and their document on such matters, then to review the application documentation- they should have identified the built heritage that sits within a certain distance and assessed whether there might be any potential for impact, and if there might be then a fuller assessment of what that harm might be. Usually we'd expect a Landscape and Visual Impact Assessment- I haven't checked to see if one has been submitted.

Go through all of those then we can discuss the site visit.

[REDACTED] due to my being on leave and office closure we're going to need a little more time on this one. [REDACTED] will advise further.

Thanks,

[REDACTED]  
Principal Heritage Officer  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Email: [REDACTED]@Dover.gov.uk

Tel: [REDACTED]

Web:

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fdoover.gov.uk%2F&data=05%7C02%7C%40DOVER.GOV.UK%7Cfeb7d9899f774e06cbb408dbfd7c3e22%7C97d0cb53199d4c70a001375e8c953735%7C0%7C0%7C638382482395213124%7CUnknown%7CTWfPbGZsb3d8eyJWljoimc4wLjAwMDAiLCJQljoiv2luMzliLCJBTil6lk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=hKJPFzpm%2Fxn985Mc9ISqlck5R%2B45k2A1fqQmCmR4Tiw%3D&reserved=0>

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-----Original Message-----

From: DevelopmentManagement@DOVER.GOV.UK <DevelopmentManagement@DOVER.GOV.UK>  
Sent: Wednesday, December 13, 2023 9:52 AM  
To: DDC Conservation <Conservation@DOVER.GOV.UK>  
Subject: Dover District Council- Planning Application consultation on 23/01363

CHANGE OF DESCRIPTION

Please find attached correspondence relating to Goshall Valley, East Street, Ash, Regards Development Management Dover District Council

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Dover District Council  
Planning  
Council Offices  
White Cliffs Business Park  
Dover  
Kent CT16 3PJ

Telephone: (01304) 821199  
Website: [www.dover.gov.uk](http://www.dover.gov.uk)

Contact: [REDACTED]

Your Ref: 23/01363

Heritage Team

13th December 2023

Dear Sir/Madam

**Town and Country Planning Act 1990 (As Amended)**

**Proposal:** CHANGE OF DESCRIPTION - Construction of a solar farm with associated access and infrastructure

**Location:** Goshall Valley, East Street, Ash,

The Council has received an application as described above. Please access the details via the Council's website.

I look forward to receiving your comments within the next 21 days. The Council's performance in determining applications is subject to national targets. Accordingly, if you do not meet this deadline, the application may be determined without your observations being considered. If the deadline is likely to cause difficulties, please liaise with the case officer to see if an extension is feasible.

Please note that any representations received may be available for inspection by the public, and may be copied to others, including the Secretary of State and the applicant if there is an appeal against the Council's decision.

**We welcome your comments by email; if emailing, please ensure that they are sent to [DevelopmentManagement@DOVER.GOV.UK](mailto:DevelopmentManagement@DOVER.GOV.UK)**

Yours sincerely

[REDACTED]  
**Support Officer**

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 04 January 2024 09:30  
**To:** [REDACTED]  
**Subject:** RE: Dover District Council- Planning Application consultation on 23/01363  
**Attachments:** RE: DOV/22/00668 - Land North of Guston And The Lane, Guston Court Farm, Guston CT15 5EX

Good morning [REDACTED]

Further to our discussion just now, the reference for the case [REDACTED] mentions in Guston is DOV/22/00668. Whilst all the consultee responses should be on DMS, for ease, I've attached a copy of [REDACTED] response for that case for info.

Myself and [REDACTED] are working on this application and will be visiting the site within the next couple of weeks. For info, due to the number of representations received in both support and objection already, it is highly likely this application will need to be determined by planning committee.

If you have any questions then please email me.

Many thanks,  
[REDACTED]

[REDACTED]  
Senior Planning Officer  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Email: [REDACTED]  
Web: [dover.gov.uk](https://www.dover.gov.uk)  
Phone: [REDACTED]

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-----Original Message-----

From: DDC Conservation <Conservation@DOVER.GOV.UK>  
Sent: Friday, December 15, 2023 2:44 PM  
To: [REDACTED]@DOVER.GOV.UK>  
Cc: [REDACTED]@DOVER.GOV.UK>  
Subject: FW: Dover District Council- Planning Application consultation on 23/01363

Hello [REDACTED]

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file if not then they should be on the shared drive. The way to approach this is to look at the guidance on setting by HE and their document on such matters, then to review the application documentation- they should have identified the built heritage that sits within a certain distance and assessed whether there might be any potential for impact, and if there might be then a fuller assessment of what that harm might be. Usually we'd expect a Landscape and Visual Impact Assessment- I haven't checked to see if one has been submitted.

Go through all of those then we can discuss the site visit.

██████████ due to my being on leave and office closure we're going to need a little more time on this one. ██████████ will advise further.

Thanks,

██████████  
██████████ officer  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Email: ██████████

Tel: ██████████

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From: DevelopmentManagement@DOVER.GOV.UK <DevelopmentManagement@DOVER.GOV.UK>  
Sent: Wednesday, December 13, 2023 9:52 AM  
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**From:** [REDACTED]  
**Sent:** 05 August 2022 11:25  
**To:** [REDACTED]  
**Subject:** RE: DOV/22/00668 - Land North of Guston And The Lane, Guston Court Farm, Guston CT15 5EX  
**Attachments:** Guston solar farm.22.00668.docx  
**Flag Status:** Flagged

Hello [REDACTED]  
Please find attached.  
Have used 1<sup>st</sup> person so not quite a cut and paste job for you- sorry about that but was easier to write that way! Any questions just ask 😊



[REDACTED]  
**Principal Heritage Officer**  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Email: [REDACTED]  
Tel: [REDACTED]  
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REGISTER NOW [www.dover.gov.uk/keepmeposted](http://www.dover.gov.uk/keepmeposted)

**From:** [REDACTED]@DOVER.GOV.UK>  
**Sent:** 12 July 2022 16:57  
**To:** [REDACTED]@DOVER.GOV.UK>  
**Subject:** DOV/22/00668 - Land North of Guston And The Lane, Guston Court Farm, Guston CT15 5EX

Good afternoon [REDACTED]  
I hope you are keeping well?  
Further to our previous correspondence on this application, we have received a consultation response from Historic England which is available to view in the online planning file. Due to the number of representations received, it is likely the application will need to be determined by the Planning Committee and I would be grateful for your comments on the proposals.  
If you have any queries or require any additional information then please email me.  
I look forward to hearing from you,  
Kind regards,  
[REDACTED]



[REDACTED]  
**Senior Planning Officer**  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Email: [REDACTED]  
Web: [dover.gov.uk](http://dover.gov.uk)  
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## CONSULTATION MEMO

**Proposal:**

**Location:**

**Ref:** 22/00668

**Date:**

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### Assessment

NB: at pre-app stage I recommended that the Heritage Statement takes into account the LVIA, Glint and Glare study and an AONB document which covers appropriate treatment of new structures in a sensitive landscape, as I considered all to be relevant to the issue of impact on the setting of the heritage assets. Unfortunately this advice was not followed.

I comment as follows:

I am content that the Heritage Assessment identifies the relevant assets potentially affected by the proposed development and note that although it states it is a desk-based assessment, in respect of the built heritage site visits were undertaken to facilitate analysis of impact particularly on setting. I have considered only those heritage assets noted in the Heritage Assessment as affected by the proposed development with the addition of three others which in my view deserved greater level of consideration (although I agree with the conclusion in respect of level of harm).

*Swingate Mill*: a grade II listed structure whose character and setting has changed somewhat due to residential conversion and adjacent development. The immediate setting of the windmill is now highly domestic and in my view this has had the impact of disassociating it from the surrounding rural landscape. The Heritage Assessment considers that the mill is best experienced within its immediate setting, however in my opinion views of the mill across the landscape, in particular from the A258 and East Langdon Road, are of most importance as the prominence of the windmill (even without its sails it remains strongly identifiable as a windmill) helps to reinforce its heritage value by demonstrating its strong historic and functional relationship to the land.

The proposed development area has been pulled back from the boundary with the mill. In addition, there will be an increase in the existing vegetation on the boundary. The visual impact on the setting of the windmill will be greatest in the short term but is still considered to be low level, partly due to the manner in which the land undulates and the orientation of the panels which reduces the visual impact of glare where views of the windmill are afforded in particular from the A258.

The LVIA notes that the change to the landscape will be visible from the 1<sup>st</sup> and 2<sup>nd</sup> floors of the windmill; the listing description notes that some of the machinery may still exist however it is likely that the contribution the interior makes to the significance of the windmill is much

reduced due to its conversion to residential. Views out may therefore help to sustain the significance of the heritage asset, although these have been somewhat compromised by the surrounding residential development. The position/extent of the development leaves a fair swathe of land undeveloped and in my view the potential harm in this respect is negligible.

The overall level of harm to Swingate Mill is considered to be at the low end of less than substantial.

*Solton Manor*: the Heritage Assessment has identified that the development will not be 'discerned' from Solton Manor and I confirm that this is the case. As a result, in my view there will be no harm caused to its significance.

*Swingate Masts and the clock tower at Duke of York School*: the masts are grade II and II\* listed; the clock tower is grade II listed. The Heritage Assessment indicates that these listed buildings are unaffected by the proposed development and in particular that the experience of the masts is not affected. In my view this is incorrect. In my view the site does help to contribute to the setting of the individual listed buildings by virtue of its open undeveloped state. The prominence of the listed buildings is a key aspect of their significance and they are the only features projecting above land level that can be seen from the site and from surrounding footpaths and roads. Naturally this means that they draw the eye as a point of interest. As the development will be to the foreground it is likely in my view that it will interrupt the view of the masts and tower and will therefore have an impact on the experience of the listed buildings, albeit minor. In my view, due to the undulation of the land, proposed increase of vegetation and the orientation of the panels, any harm to the significance of the listed buildings will be the very low end of less than substantial in the short term and none to negligible in the mid-longer term.

### **Recommendation**

I am content that the submission adequately considered the impact of the development on the historic built environment. The overall level of harm is likely to be at the low end of less than substantial, and with time may be further reduced once the proposed vegetation grows.

██████████

Principal Heritage Officer

**From:** [REDACTED]  
**Sent:** 25 January 2024 16:04  
**To:** [REDACTED]  
**Subject:** FW: Historic England and Richborough Roman fort

Hello

I had thought that HE had been consulted- but can you respond to this lady please.

Thanks,



[REDACTED]  
**Principal Heritage Officer**  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Email: [REDACTED]@Dover.gov.uk  
Tel: [REDACTED]  
Web: <http://dover.gov.uk>

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**From:** [REDACTED]  
**Sent:** Thursday, January 25, 2024 1:12 PM  
**To:** [REDACTED]@DOVER.GOV.UK>  
**Subject:** Historic England and Richborough Roman fort

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear [REDACTED],

Please excuse me using your personal email address but with most systems still being 'down' at Dover I was anxious to contact you before too much time passes.

Re: EIA/22/00245 Scoping report re Solar farm at Goshall Valley, East Street  
DOV/23/01363 Full Application re Solar Farm

I have been asked to contact you by several people in the village who query why Historic England has not been included on the list of Consultees for the Full Application. [REDACTED] (Inspector of Ancient Monuments) wrote in her response to the EIA that " Given the importance of the heritage

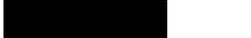
assets within the area, we would expect to provide further advice in due course on this application"

Many of us consider this Grade 1 Listed site is a priceless heritage asset in our district and is afforded the highest level of protection.

We would therefore appreciate if a further response could be obtained from HE given there are now six chapters dealing with archaeology submitted by the applicant in 23/01363.

Thank you

Yours sincerely

  
T. 

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**From:** [REDACTED]  
**Sent:** 31 January 2024 07:53  
**To:** [REDACTED]  
**Subject:** FW: Dover District Council- Planning Application consultation on 23/01363

Hi [REDACTED]

Historic England have requested an EOT until 29<sup>th</sup> which is past the advert date but before the determination date is this ok with you? (please see below)

Thanks

[REDACTED]



[REDACTED]  
**Support Officer**  
**Development Management**  
Dover District Council

Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ  
Email: [REDACTED]@dover.gov.uk  
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**From:** South East ePlanning <e-seast@HistoricEngland.org.uk>  
**Sent:** Tuesday, January 30, 2024 3:50 PM  
**To:** [REDACTED]@DOVER.GOV.UK>  
**Subject:** RE: Dover District Council- Planning Application consultation on 23/01363

Dear [REDACTED]

Many thanks for sending across this consultation for 23/01363.

The Inspector of Ancient Monuments has confirmed that they will respond to the consultation, but due to significant issues affecting capacity they will be unable to provide comments by the 21 deadline. Would it be possible to grant an extension until the 29<sup>th</sup> February? This would be an extension of 11 days.

Please advise whether this would be agreeable to you.

Kind Regards,

[REDACTED]  
Business Officer (Kent) | London & South East Region  
Historic England, 4<sup>th</sup> Floor The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
[REDACTED]

*Please note that Wednesday is my non-working day*



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**From:** [REDACTED] <[@DOVER.GOV.UK](mailto:@DOVER.GOV.UK)>  
**Sent:** 29 January 2024 10:43  
**To:** South East ePlanning <[e-seast@HistoricEngland.org.uk](mailto:e-seast@HistoricEngland.org.uk)>  
**Subject:** Dover District Council- Planning Application consultation on 23/01363

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Please find attached correspondence relating to Goshall Valley, East Street, Ash,  
Regards  
Development Management  
Dover District Council



**Support Officer**  
**Development Management**  
Dover District Council

Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ  
Email: [\[REDACTED\]@dover.gov.uk](mailto: [REDACTED]@dover.gov.uk)  
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**From:** [REDACTED]  
**Sent:** 02 February 2024 15:47  
**To:** [REDACTED]  
**Subject:** Goshall - Heritage Consultation response  
**Attachments:** Goshall Valley East Street Ash – 23.01363.docx

Hi [REDACTED]

Heritage comments attached . Please mark sensitive on the file.

Many thanks

[REDACTED]



[REDACTED]  
**Senior Heritage Officer**  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ  
Tel: [REDACTED]  
Email: [REDACTED]@Dover.gov.uk  
Web: <http://dover.gov.uk>

**Please note my working days are Wednesday, Thursday and Friday.**



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## CONSULTATION MEMO

**Proposal:** Goshall Valley East Street Ash – 23/01363 – Construction of a solar farm

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### Assessment

The Built Heritage Technical Assessment (Appendix 10.1) and Heritage Chapter 10, identifies relevant heritage assets potentially affected by the proposed development within a 1 km study area. I have reviewed this on site and have considered only those heritage assets noted in the assessment that are likely to experience an impact as a result of the development. At the time of the site visit an additional heritage asset was identified which has not been included and, in my view, requires consideration. I comment as follows:

Viewed from within the Scheduled Monument Roman Amphitheatre at Richborough, looking southwest towards the development site, the church of the Grade I listed Church of St Nicholas in the Village of Ash is clearly visible on the horizon. The church is of high significance and designated as being of national importance.

It has also been identified with other churches within the Dover District Heritage Strategy as:

- Contributing to the aesthetic appeal of the historic landscape and the rural environment.
- The spires of rural churches can often be seen over long-distances and are recognised and valued local landmarks.
- A highly visible focal point in this countryside, landscape.



The prominence of this listed building is a key aspect of its significance, and it is the only feature projecting on the horizon that can be seen from this important site. Naturally this means that it draws the eye as a point of interest. As the development will be to the foreground it is likely in my view that it will interrupt the view of the church tower and will therefore have an impact on the experience of the listed building.

In my view, due to the long distances, undulation of the land and proposed mitigation for the development site which includes increased vegetation with a landscape buffer, any harm to the significance of the listed building will be the low end of less than substantial.

Goss Hall and associated barns are grade II listed and form a historic farmstead on an ancient manorial site. The historic farmyard appears to survive intact with walls and outbuildings which give a sense of enclosure. Goss Halls wider landscape setting is rural and agricultural, and this adds to its significance as a historic farmstead. The assessment considered the proposed development would have a 'negligible' impact, with the proposed access road located 80m to the northeast of these listed buildings.

In my view it is unclear if this is correct based on the information submitted. The Landscape Strategy Plan does not show any boundary treatment such as fencing and access gates for the temporary access road; if this is correct then there will be no impact on the setting of Goss Hall as a result of the access route.

The Goss Hall site and its agricultural setting is widely visible from the junction between Copper Street Drove and East Street looking northwest (just off the A257) .



As part of the proposed development the submitted transport statement states the site requires a temporary access route for construction and decommissioning to alleviate possible traffic congestion around the tight bends within the vicinity of Goss Hall.

The drawings within the transport statement show the preliminary layout only. With no detailed design illustrated to fully assess the potential impact on the setting of Goss Hall Farm. As a temporary access the expectation would be for the landscape to be return to its existing appearance as agricultural land, as it helps to maintain the strong historic and functional relationship the farm has with the surrounding landscape. This would then hopefully result in the development works forming limited harm to this setting for only a temporary period of time.

## **Recommendation**

Notwithstanding the comments above relating to the Church of St Nicholas, the overall level of harm to listed heritage assets, that are expected to experience an impact, is likely to be at the low end of less than substantial within the study area. This may further reduce over time with the proposed mitigation for the development site, which includes increased vegetation with a landscape buffer.

**From:** [REDACTED]  
**Sent:** 06 February 2024 11:50  
**To:** [REDACTED]  
**Subject:** FW: Richborough Roman Fort/Goshall Valley (App Ref 23/01363)  
**Attachments:** [REDACTED] report.docx; LIDAR photo of Richborough.JPG

Hello

I was sent the above- it's archaeology info so have advised I've sent it on to you and if they want to make comment to contact you.

Thanks,



[REDACTED]  
**Principal Heritage Officer**  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Email: [REDACTED]@Dover.gov.uk  
Tel: [REDACTED]  
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**From:** [REDACTED]  
**Sent:** Monday, February 5, 2024 1:49 PM  
**To:** [REDACTED]@DOVER.GOV.UK>  
**Cc:** [REDACTED]  
**Subject:** Richborough Roman Fort/Goshall Valley (App Ref 23/01363)

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[REDACTED]  
Principal Heritage Officer  
Dover District Council

Dear [REDACTED]

I have attached some additional information put together by [REDACTED] re: the solar farm proposal close to Richborough Roman Fort (DDC App. ref: 23/01363). It may be of help to you.

With best regards

[REDACTED]  
SaveAshLevel Campaign  
[REDACTED]

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# The archaeology of Goshall Valley – A baseline report

The Goshall Valley constitutes a broad tract of marshland over 100 hectares in extent, which lies between the present-day village of Ash and Richborough, once a key Roman settlement (*Rutupiae*) and the main port of entry into the province of *Britannia*. Today, the marshes are drained by a network of man-made field ditches and the historic Goshall Stream which flows into the modern River Stour north-west of Sandwich at Goshall Sluice (Fordham and Green 1973, 5, 102). The Goshall marshes form a southern portion of a more extensive tract of marshland that exists in the north-eastern part of Kent associated with the present-day River Stour drainage system (see below).

## 1. Background to coastal topography

**1.1** The coastline of Kent is long, totalling about 160km (100 miles), and lying adjacent to it are some substantial tracts of marshland. Along the northern coast of the County are extensive areas of marsh associated with the outer Thames estuary. These northern marshlands fall into two discrete areas; those on the north coast proper, around the Swale estuary and at the mouth of the River Medway (c.19,000 hectares) and a smaller area of around 7,100 hectares in the north-east, associated with the present-day River Stour drainage system. Prior to their reclamation, these north-east Kent marshlands were occupied by open water, in the form of the Wantsum channel, a broad seaway which originally separated the Isle of Thanet from the Kentish mainland. This channel was formed when the low-lying ground occupying a depression in the chalk (the Richborough Syncline) became flooded during the sea-level rise that followed the last Ice Age. It effectively constituted a southerly extension of the outer Thames estuary at the southern end of the North Sea basin.

**1.2** During prehistoric and Roman times the Wantsum Channel formed a highly important water-way, providing a sheltered (and shorter) alternative to rounding the North Foreland for vessels travelling between the English Channel and the Thames estuary/southern North Sea. During the Anglo-Saxon period, as Bede records, the Wantsum was still 'about three furlongs over, and fordable only in two places...' (*Ecclesiastical History*, Chapter XXV).

**1.3** At its greatest extent the Wantsum seems to have been just over 20km in length, running in a great arc from the eastern-most coast of Kent a little to the north of present-day Deal, broadly north-westward to connect with the outer Thames estuary at Reculver. Further inlets were formed off the Wantsum where local rivers joined with the main Channel, most notably the Great Stour and Little Stour; together with the main Wantsum Channel, the lower reaches of these inlets were probably also once navigable.

**1.4** The archaeological importance of the early Wantsum Channel as an artery for trade and as a focus for settlement in north-east Kent has long been recognized (see Clarke *et al.* 2010, 16). Archaeological distribution maps confirm that the region around the Channel was densely occupied throughout the ancient past and there can be no doubt that it was the presence of the Wantsum itself that was the main reason for this. The Wantsum sea-channel, in fact, occupied a very special and important place in the historical geography of north-western Europe. Not only did it lie in that part of Britain closest to the Continent, but it also once lay at the crossing point of two of Europe's greatest ancient sea trading routes; one running down the River Rhine, across the southern North Sea and up the River Thames; the other running along the English Channel coasts then either following the British coastline as far north as the Shetlands, or hugging the coast of mainland Europe up to Jutland and beyond (Clark in Bennett *et al* 2008, xv).

**1.5** History, tradition and legend are inextricably interleaved with the very silts of the Channel itself. Accounts of the Roman Emperor Claudius and his conquest of Britain; of the landing of the early Anglo-Saxon semi-legendary warriors Hengest and Horsa; of the arrival of Augustine and his Christian monks; of St Mildred and her abbey at Minster; of the rise of medieval Sandwich and Stonar as international trading ports; of the monks of Canterbury's labours to create good grazing land from the emerging saltmarshes of the ever shrinking Wantsum Channel, and much more besides, are all represented here.

**1.6** The Wantsum finally became blocked during the later medieval period, although the silting process must have been going on for many centuries before its final closure to shipping. This is particularly likely to have been the case around the margins of the wetland and around the eastern entrance to the Channel where natural forces had created two long spits of sand and shingle running out across the mouth of the channel. Extending up to the southern shore of the Isle of Thanet was the Stonar Bank, whilst long-shore drift had caused a second sand spit to grow towards Thanet from North Deal – the Deal Spit (Robinson and Cloet 1953; Shephard-Thorn 1988; LVRG 2006; Clarke *et al.* 2010, 15).

**1.7** The geological evolution of the Wantsum Channel is still imperfectly understood but it would seem that, in simple terms, an initial expansion phase of marine inundation eventually ceased and gave way to a very long period of silting and infilling. The entire process seems to have been closely tied to the evolution of the local coastal topography. It has been previously established that the south-eastern entrance to the Wantsum Channel had, by the Roman period, been significantly reduced through the somewhat curious formation of the two opposing marine spits, the Stonar Bank and the Deal Spit (Dowker 1897; Hawkes 1968). These, together with a third, lesser sand spit (Sandown) located to the east of Sandwich, indicate that the entrance into the Roman Wantsum must have been quite narrow, suggesting that access for vessels sailing in from the English Channel would have not have been a straightforward operation.

**1.8** The marshes of Goshall Valley formed around the south-western margin of the Wantsum, some distance west (inland) of the Stonar Bank. Reclamation of the marsh in this area could have begun at a relatively early date. Much of what is today drained marshland was very probably already natural salt marsh by the early Roman period. The recent suggestion that in certain areas formal reclamation of these Wantsum salt marshes actually started during the Roman period represents a new and exciting suggestion for the archaeology of east Kent which needs much more detailed investigation and thought.

## **2. Richborough 'island'**

**2.1** Richborough island consists of a hill of Woolwich and Thanet Beds sands, just over one kilometre across, which rises above the general level of the adjacent marshlands that surround it on all sides. The highest part of the island lies along the eastern side and this area is occupied by an extensive Roman site, of international importance. Richborough is the largest of a number of such small islands of higher-ground enclosed by marshland that exist in this region. Weatherlees Hill, further to the north is another example.

**2.2** On present evidence the main area of Roman occupation seems to be located in the south-eastern part of Richborough island and covers around 35 hectares. Nevertheless, the entire island may be regarded as potentially having a high archaeological potential.

### **3. Archaeological potential of the Goshall Valley**

#### **3.1 Potential for a submerged prehistoric land surface in the Goshall valley**

Evidence for the submergence of what was formerly dry land comes from the southern margin of the Wantsum, mainly to the south-east of Sandwich, where a buried Neolithic–early Bronze Age land-surface exists below marshland sediments in certain parts of the Lydden Valley (Halliwell 1981; Halliwell and Parfitt 1985). Finds of prehistoric worked flints at two localities immediately to the west of at Sandwich provide important evidence for the continuation of a submerged ancient land-surface in this direction (Halliwell 1981, 113; Ogilvie 1983). Archaeological investigations near Lowton on the southern side of Richborough island, revealed a shallow pit sealed by marshland clay (Marggats 2008, 9–10), and subsequently another pit and two ditches of late Bronze Age/early Iron Age date (Kent HER ref. TR 35 NW 413) were located below the marsh clay. Together, these features raise the possibility that a submerged landscape might also extend below the marshes of the Goshall Valley.

The shoreline of the Wantsum Channel was constantly changing throughout the centuries. Silting around its shores will have begun at an early stage but a straightforward sequence of progressive sediment deposition cannot be readily accepted. In all probability, there would have been phases of both marine transgression as evidenced by the submerged land-surfaces recorded, and perhaps also phases of regression in response to changing environmental conditions.

#### **3.2 Potential for a Roman Road crossing the Goshall valley**

South-west of the Goshall valley, an archaeological site of some importance has previously been investigated at Each End. Here evidence for a Romano-British settlement was recorded ahead of road works in 1992 (Hicks 1998; Kent HER ref. TR 35 NW 195). The full extent of this settlement was not ascertained but a number of ditched enclosures, perhaps delimiting fields or garden plots, were revealed, together with the remains of a small timber building. A number of second century cremation burials were also found. Of particular interest, however, was evidence for a south-west by north-east aligned Roman road passing through the site, heading in the direction of Richborough.

It seems quite possible that the section of Roman road revealed represents the start of a route initially following a low ridge of ground leading north-east through East Street, across the relatively narrow strip of wetland (either as open water or marsh) now represented by the Goshall valley marshes, to reach Richborough island below the amphitheatre there. Present-day East Street might preserve elements of the approximate line. If correct, this more southerly road could have provided an alternative route to the more generally accepted one through Cooper Street and Fleet Farm (Margary 1967; Route 10). The possibility of a ferry crossing to Richborough island from the area of Little East Street Farm had been previously considered by Margary (1949, 132) and was also hinted at by Winbolt (1925, 155).

#### **3.3 Evolution and dating of the marshland drainage complex**

The hamlet of East Street is first recorded in a document of 1483 (Downes 2000, 26) and East Street Farm, along with neighbouring Little East Street Farm, are both long-established, being clearly marked on nineteenth-century Ordnance Survey maps. The farmhouse at East Street Farm is a brick-built structure of seventeenth- to nineteenth-century date. It is listed Grade II (Kent HER ref. TR 35 NW 437). Both these farms must have been closely connected with working the adjacent marshlands of the Goshall valley.

The evolution, draining and dating of the Goshall Valley marshlands is also likely to be closely bound up with the medieval manor Goss Hall from which the marsh takes their name. According to Hasted (1800, 204) this manor originated in the Norman period and the earliest marshland drainage works may have begun during this period – more research is required.

#### 4. Current threats to the marshland landscape

In addition to plans to build an extensive solar panel farm south of Richborough, across about 205 acres (83 hectares) of the Goshall valley south of the Roman amphitheatre, there are also other plans to build a 6-hectare onshore converter station across part of the Minster Marshes to the north of the Richborough Roman fort - So the old Wantsum Channel is set for at least two major construction programmes, each significantly reducing the extent of undisturbed marshland remaining.

#### 5. Summary of archaeological/historical concerns with the Goshall Valley

From an archaeological/historical point of view, there are major concerns about the construction of the Goshall valley solar panel farm. The Dover Archaeological Group has raised the following points of concern:

- 1) The impact on views both *to* and *from* the nearby Richborough Roman site – one of the most important Roman sites in Britain and of Empire-wide significance.
- 2) The significant damage that will be caused to a tract of historic east Kent marshland which is the product of many centuries of wetland development and management.
- 3) The damage that may be caused by excavations and changes in ground-water levels to any archaeological remains preserved on the surface of the marsh or below its surface.
- 4) The damage that may be caused by excavations and changes in ground-water levels to buried deposits of palaeoenvironmental interest that may preserve a record of the evolution of this portion of the formerly open waters of the Wantsum Channel.

The above points are equally valid for the large area of the nearby Minster Marshes, further north, which are also due to be built across. Considered together, rather than singly, these two developments constitute a major threat to the marshlands that exist in north-east Kent.

#### 6. References

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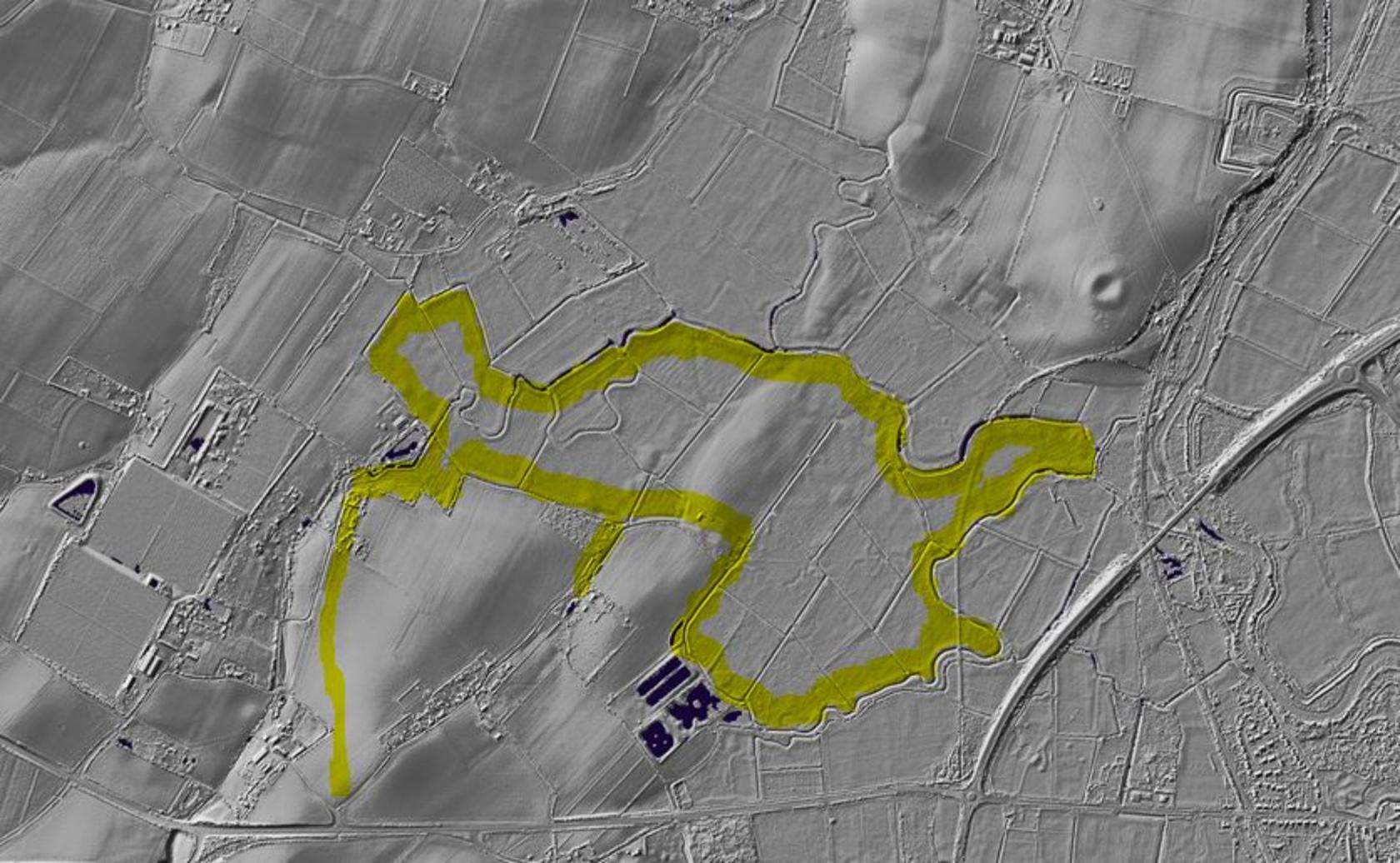
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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 06 February 2024 13:29  
**To:** [REDACTED]  
**Subject:** RE: Richborough Roman Fort/Goshall Valley (App Ref 23/01363)

Thanks [REDACTED] that's great

---

**From:** [REDACTED]@DOVER.GOV.UK>  
**Sent:** Tuesday, February 6, 2024 12:50 PM  
**To:** [REDACTED]@DOVER.GOV.UK>  
**Subject:** RE: Richborough Roman Fort/Goshall Valley (App Ref 23/01363)

I don't know- I have asked them to contact you if they do want it to be a rep and warned them that it currently wouldn't be.



[REDACTED]  
**Principal Heritage Officer**  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Email: [REDACTED]@Dover.gov.uk  
Tel: [REDACTED]  
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**From:** [REDACTED]@DOVER.GOV.UK>  
**Sent:** Tuesday, February 6, 2024 11:58 AM  
**To:** [REDACTED]@DOVER.GOV.UK>  
**Subject:** RE: Richborough Roman Fort/Goshall Valley (App Ref 23/01363)

Hello [REDACTED]

Is this to be uploaded as a representation or have they sent it purely to you for information?

Many thanks,



**Senior Planning Officer**

Dover District Council

Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Email: @DOVER.gov.uk

Web: [dover.gov.uk](http://dover.gov.uk)

Phone:



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---

**From:** @DOVER.GOV.UK>  
**Sent:** Tuesday, February 6, 2024 11:50 AM  
**To:** @DOVER.GOV.UK>  
**Subject:** FW: Richborough Roman Fort/Goshall Valley (App Ref 23/01363)

Hello

I was sent the above- it's archaeology info so have advised I've sent it on to you and if they want to make comment to contact you.

Thanks,



**Principal Heritage Officer**

Dover District Council

Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Email: @Dover.gov.uk

Tel:

Web: <http://dover.gov.uk>



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NEWS AND ALERTS BY EMAIL FROM YOUR COUNCIL  
REGISTER NOW [www.dover.gov.uk/keepmeposted](http://www.dover.gov.uk/keepmeposted)

**From:** [REDACTED]  
**Sent:** Monday, February 5, 2024 1:49 PM  
**To:** [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>  
**Cc:** [REDACTED]

**Subject:** Richborough Roman Fort/Goshall Valley (App Ref 23/01363)

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[REDACTED]  
Principal Heritage Officer  
Dover District Council

Dear [REDACTED]

I have attached some additional information put together by [REDACTED] re: the solar farm proposal close to Richborough Roman Fort (DDC App. ref: 23/01363). It may be of help to you.

With best regards

[REDACTED]  
SaveAshLevel Campaign  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** 14 February 2024 09:27  
**To:** DDC Development Management  
**Subject:** RE: Dover District Council- Planning Application consultation on 23/01363

Hi [REDACTED]

I agree the extension of time for Historic England as I need their comments.

Many thanks,  
[REDACTED]



**Senior Planning Officer**  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ  
Email: [REDACTED]@DOVER.gov.uk  
Web: [dover.gov.uk](http://dover.gov.uk)  
Phone: [REDACTED]

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**From:** DDC Development Management <DevelopmentManagement@DOVER.GOV.UK>  
**Sent:** Tuesday, February 13, 2024 5:06 PM  
**To:** [REDACTED]@DOVER.GOV.UK>  
**Subject:** FW: Dover District Council- Planning Application consultation on 23/01363

Hi [REDACTED]

Is the below extension request ok?

Many thanks,  
[REDACTED]



**Support Officer**  
**Development Management**  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ  
Email: [developmentmanagement@dover.gov.uk](mailto:developmentmanagement@dover.gov.uk)  
Web: <http://dover.gov.uk>  
Tel: [REDACTED]

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**From:** [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>  
**Sent:** Tuesday, February 13, 2024 4:43 PM  
**To:** DDC Development Management <[DevelopmentManagement@DOVER.GOV.UK](mailto:DevelopmentManagement@DOVER.GOV.UK)>  
**Subject:** RE: Dover District Council- Planning Application consultation on 23/01363

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Hi [REDACTED]

Many thanks for your reply.

If possible, we would like to extend until the 29<sup>th</sup> February?

Best wishes,

[REDACTED]

[REDACTED]  
Business Officer (Kent) | London & South East Region  
Historic England, 4<sup>th</sup> Floor The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
[REDACTED]

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**From:** DDC Development Management <[DevelopmentManagement@DOVER.GOV.UK](mailto:DevelopmentManagement@DOVER.GOV.UK)>  
**Sent:** 13 February 2024 16:30  
**To:** [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>  
**Subject:** RE: Dover District Council- Planning Application consultation on 23/01363

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Hi [REDACTED]

Can I confirm what date you would like to extend until?

Many thanks,



[Redacted]  
**Support Officer**  
**Development Management**  
Dover District Council  
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16  
3PJ  
Email: [developmentmanagement@dover.gov.uk](mailto:developmentmanagement@dover.gov.uk)  
Web: <http://dover.gov.uk>  
Tel: [Redacted]

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**From:** [Redacted] <[\[Redacted\]@HistoricEngland.org.uk](mailto:[Redacted]@HistoricEngland.org.uk)>  
**Sent:** Tuesday, February 13, 2024 3:09 PM  
**To:** DDC Development Management <[DevelopmentManagement@DOVER.GOV.UK](mailto:DevelopmentManagement@DOVER.GOV.UK)>  
**Subject:** FW: Dover District Council- Planning Application consultation on 23/01363

You don't often get email from [Redacted]. [Learn why this is important](#)

Hello Team,

As outlined in the email below, would it be possible to confirm whether an extension of 11 days on application 23/01363 would be possible please?

Kind Regards,

[Redacted]  
Business Officer (Kent) | London & South East Region  
Historic England, 4<sup>th</sup> Floor The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
[Redacted]

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**From:** South East ePlanning  
**Sent:** 30 January 2024 15:50  
**To:** [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>  
**Subject:** RE: Dover District Council- Planning Application consultation on 23/01363

Dear [REDACTED]

Many thanks for sending across this consultation for 23/01363.

The Inspector of Ancient Monuments has confirmed that they will respond to the consultation, but due to significant issues affecting capacity they will be unable to provide comments by the 21 deadline. Would it be possible to grant an extension until the 29<sup>th</sup> February? This would be an extension of 11 days.

Please advise whether this would be agreeable to you.

Kind Regards,

[REDACTED]

[REDACTED]  
Business Officer (Kent) | London & South East Region  
Historic England, 4<sup>th</sup> Floor The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
[REDACTED]

*Please note that Wednesday is my non-working day*

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**From:** [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>  
**Sent:** 29 January 2024 10:43  
**To:** South East ePlanning <[e-seast@HistoricEngland.org.uk](mailto:e-seast@HistoricEngland.org.uk)>  
**Subject:** Dover District Council- Planning Application consultation on 23/01363

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Please find attached correspondence relating to Goshall Valley, East Street, Ash,  
Regards  
Development Management  
Dover District Council



[REDACTED]  
**Support Officer**  
**Development Management**  
Dover District Council

Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ

Email: [REDACTED]@dover.gov.uk  
Web: <http://dover.gov.uk>



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[REDACTED]

---

**From:** DDC Development Management  
**Sent:** 15 February 2024 16:32  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Dover District Council- Planning Application consultation on 23/01363

Hi [REDACTED]

That will be fine.

[REDACTED] – FYI

Kind Regards



[REDACTED]  
**Planning Support and Land Charges Manager**  
**Development Management**  
Dover District Council  
Council Offices, White Cliffs Business Park,  
Whitfield, Dover CT16 3PJ  
Tel: [REDACTED]  
Mobile: [REDACTED]  
Email: [REDACTED]@DOVER.gov.uk  
Web: [dover.gov.uk](http://dover.gov.uk)

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---

**From:** [REDACTED]@HistoricEngland.org.uk>  
**Sent:** Thursday, February 15, 2024 1:18 PM  
**To:** DDC Development Management <DevelopmentManagement@DOVER.GOV.UK>  
**Subject:** RE: Dover District Council- Planning Application consultation on 23/01363

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Hi [REDACTED]

Many thanks for agreeing to the extension of time – it is a great help.

I'm afraid that as the case is now the subject of significant public interest, it will have to go to internal review at our end. Would it be possible to further extend the deadline for Historic England's comments to the 7<sup>th</sup> March please?

Sorry to ask a second time.

Kind Regards,

[REDACTED]

[REDACTED]  
Business Officer (Kent) | London & South East Region

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

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From: DDC Development Management <[DevelopmentManagement@DOVER.GOV.UK](mailto:DevelopmentManagement@DOVER.GOV.UK)>

Sent: 14 February 2024 11:17

To: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>

Subject: RE: Dover District Council- Planning Application consultation on 23/01363

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Hi [REDACTED]

The extension is fine.

Kind Regards



[REDACTED]  
**Planning Support and Land Charges Manager**  
**Development Management**  
Dover District Council  
Council Offices, White Cliffs Business Park,  
Whitfield, Dover CT16 3PJ

Tel: [REDACTED]  
Mobile: [REDACTED]  
Email: [REDACTED] <[\[REDACTED\]@DOVER.gov.uk](mailto:[REDACTED]@DOVER.gov.uk)>  
Web: [dover.gov.uk](https://www.dover.gov.uk)

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From: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>

Sent: Tuesday, February 13, 2024 4:43 PM

To: DDC Development Management <[DevelopmentManagement@DOVER.GOV.UK](mailto:DevelopmentManagement@DOVER.GOV.UK)>

Subject: RE: Dover District Council- Planning Application consultation on 23/01363

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Hi [REDACTED]

Many thanks for your reply.

If possible, we would like to extend until the 29<sup>th</sup> February?

Best wishes,

[REDACTED]

[REDACTED]  
Business Officer (Kent) | London & South East Region  
Historic England, 4<sup>th</sup> Floor The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
[REDACTED]

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**From:** DDC Development Management <[DevelopmentManagement@DOVER.GOV.UK](mailto:DevelopmentManagement@DOVER.GOV.UK)>

**Sent:** 13 February 2024 16:30

**To:** [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>

**Subject:** RE: Dover District Council- Planning Application consultation on 23/01363

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Hi [REDACTED]

Can I confirm what date you would like to extend until?

Many thanks,

[REDACTED]



**Support Officer  
Development Management**

**Dover District Council**

Council Offices, White Cliffs Business Park, Whitfield, Dover CT16  
3PJ

Email: [developmentmanagement@dover.gov.uk](mailto:developmentmanagement@dover.gov.uk)

Web: <http://dover.gov.uk>

Tel: [REDACTED]

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**From:** [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>  
**Sent:** Tuesday, February 13, 2024 3:09 PM  
**To:** DDC Development Management <[DevelopmentManagement@DOVER.GOV.UK](mailto:DevelopmentManagement@DOVER.GOV.UK)>  
**Subject:** FW: Dover District Council- Planning Application consultation on 23/01363

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Hello Team,

As outlined in the email below, would it be possible to confirm whether an extension of 11 days on application 23/01363 would be possible please?

Kind Regards,

[REDACTED]

[REDACTED]  
Business Officer (Kent) | London & South East Region  
Historic England, 4<sup>th</sup> Floor The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
[REDACTED]

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---

**From:** South East ePlanning  
**Sent:** 30 January 2024 15:50  
**To:** [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>  
**Subject:** RE: Dover District Council- Planning Application consultation on 23/01363

Dear [REDACTED]

Many thanks for sending across this consultation for 23/01363.

The Inspector of Ancient Monuments has confirmed that they will respond to the consultation, but due to significant issues affecting capacity they will be unable to provide comments by the 21 deadline. Would it be possible to grant an extension until the 29<sup>th</sup> February? This would be an extension of 11 days.

Please advise whether this would be agreeable to you.

Kind Regards,

[Redacted]

[Redacted]  
Business Officer (Kent) | London & South East Region  
Historic England, 4<sup>th</sup> Floor The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
[Redacted]

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---

**From:** [Redacted] <[\[Redacted\]@DOVER.GOV.UK](mailto:[Redacted]@DOVER.GOV.UK)>  
**Sent:** 29 January 2024 10:43  
**To:** South East ePlanning <[e-seast@HistoricEngland.org.uk](mailto:e-seast@HistoricEngland.org.uk)>  
**Subject:** Dover District Council- Planning Application consultation on 23/01363

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Please find attached correspondence relating to Goshall Valley, East Street, Ash,  
Regards  
Development Management  
Dover District Council



[Redacted]  
**Support Officer**  
**Development Management**  
Dover District Council

Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ  
Email: [Redacted] <[\[Redacted\]@dover.gov.uk](mailto:[Redacted]@dover.gov.uk)>  
Web: <http://dover.gov.uk>

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