

From: [REDACTED]@HistoricEngland.org.uk
Sent: 08 March 2024 02:05
To: [REDACTED]
Cc: [REDACTED]@HistoricEngland.org.uk
Subject: Historic England advice on Application no(s) 23/01363
Attachments: 2301363_HERef_P01571894_L445428.doc

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Dear [REDACTED],

Please find attached our advice on the following site -

Goshall Valley East Street Ash
Application No(s):23/01363

Please note that Historic England object to the application.

Yours sincerely,

[REDACTED]
Inspector of Ancient Monuments
E-mail: [REDACTED]@HistoricEngland.org.uk

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[REDACTED]
Dover District Council
White Cliffs Business Park
Dover
Kent
CT16 3PJ

Direct Dial: [REDACTED]

Our ref: P01571894

8 March 2024

Dear [REDACTED]

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**GOSHALL VALLEY EAST STREET ASH
Application No. 23/01363**

Thank you for your letter of 29 January 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The proposed solar farm would harm the significance of Richborough Roman site, which is an exceptionally important site in our national story.

The proposals would erode the ability to appreciate Richborough's significance, which its landscape setting currently supports, and have the potential to destroy archaeology associated with the site. This harm would be greater than that indicated in the environmental statement.

We consider the level of harm to Richborough's significance would be less than substantial, and approaching, but not at, the upper end of the scale.

We think that solar infrastructure anywhere in the proposal area raises concern and mitigation would not help sufficiently overcome those concerns.

Historic England objects to this application because it causes notable heritage harm to assets of the highest order. Harm has not been accurately identified, demonstrably avoided or minimised, and clear and convincing justification for it has not been given.

If the above process has not been undertaken, the application is not consistent with the requirements of the NPPF, and it would not be possible to weigh any residual harm against benefits that might be identified.



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We recommend refusal of this application.

Historic England Advice

Introduction

The development proposals are for a photovoltaic (PV) solar electricity generating facility with associated infrastructure on c.83 ha of flat low-lying land (reclaimed grazing marsh) in Goshall, Dover.

The proposed construction of a solar farm here has significant implications for the historic environment, both within the boundary of the proposal area, and affecting the nationally important heritage asset of Richborough (Saxon Shore Fort, Roman Port and associated remains; National heritage list for England nos 1014642 and 1363256) through development within its setting. We provide advice here on the impacts to this monument including the Grade I listed upstanding Shore Fort remains.

We defer to the local authority Conservation Officer for advice on impacts to Grade II listed buildings, and the County Archaeological Officer for undesignated archaeology, however we acknowledge the potential for archaeological remains on the proposal site to enhance our understanding and appreciation of the significance of Richborough.

Significance

1. The scheduled area

As one of the most important Roman sites in England, Richborough is an exceptionally significant place.

The assumed landing point of the Claudian invasion in AD43, with extensive occupation throughout the Roman period, it was a key gateway to Roman Britain, and is pivotal in understanding of this period of our history.

Its significance is formed from the substantial and imposing standing remains of its Shore Fort, the different phases of military and civilian settlement represented here, its archaeological potential, and its great historical and strategic importance. It is a part of the national heritage collection and since the early part of the 20th century has been, and continues to be today, an important visitor site.

The ability to understand and appreciate these elements is supported by Richborough's setting, and the ability to understand the former landscape within which the remains are set.



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The site has evolved from the Iron Age, through the Roman period with archaeological evidence for the Early Roman military camp and supply base with timber structures later replaced by stone, notably a huge marble faced gilded monumental arch constructed AD85-90. A substantial walled Saxon Shore Fort was added around 277 AD. The scheduled area is part of the larger Roman town that developed around the fort and associated port, so extensive archaeological remains for this also lie outside the scheduled area forming an exceptional evidence base.

In the southern part of the monument on the highest part of the site is an amphitheatre, which survives as a well-defined raised earthwork, and which recent excavations have shown to be Early Roman in date. The amphitheatre was one of the earliest significant structures at Richborough, being a stand-alone, prominent earthwork long before the towering remains of the monumental arch or Shore Fort.

The visitor experience of this part of the site has recently been enhanced, meaning that it is possible to stand in this location to appreciate both the function of the amphitheatre, and how it is positioned in relation to the expansive landscape below. Only a small number of amphitheatres have been identified in Britain, and as such this is a particularly important monument.

2. Setting of Richborough

The setting of Richborough, including the proposal site, is fundamental to understanding how the location of the Roman Fort was deliberately sited on a high point within a formerly watery landscape, for defensive reasons.

It appears that Richborough was purposefully sited next to a large natural Harbour in the Wantsum Channel (a broad stretch of sea water which separated the Isle of Thanet from the Kent mainland until at least the Late Roman period), and near to the mouth of the River Stour. Given its location close to the continent, this meant the town served as a major gateway to Roman Britain and was occupied extensively throughout the Roman period. The major Roman road known as Watling Street, the main Roman road from London and Canterbury, was also first constructed shortly after the invasion and begins/terminates here.

The Roman site is in a unique location on Richborough Bluff, now a highpoint in the surrounding shallow valley landscape, which was effectively an island surrounded by water at the time of the Roman invasion. This translates an important element of its past use. Understanding this context is key to understanding the significance of the site and its strategic location.

In its modern context the former channel is now a distinctive large, flat area of reclaimed marshland, with a network of drainage ditches crossing expansive open



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agricultural land. Although this landscape is different from that during the Roman period, it is possible to stand on either side of the valley and look across the former channel to the rising ground beyond, and understand the topography of the landscape and the strategic position that Richborough held. The lack of vegetation or trees within the former waterway, including the proposal site, also contributes to the legibility of the channel in the landscape today. This is particularly evident from the elevated amphitheatre where views to the south and west are extensive.

The low-lying ground of the adjacent valley, which was formally a water channel, and the raised earthworks of the amphitheatre, means the structure would have been (and still is) very visible on approach to Richborough from the south and west (see verified view D), and from some distance afar on the opposite side of the valley. An alien and perhaps, therefore, simultaneously impressive, intriguing, and intimidating presence to the native population at that time.

The former Wantsum Channel, including the proposal site, therefore makes a very important contribution to the ability to appreciate significance of the scheduled Fort.

The landscape setting of Richborough, including the proposal site, also holds important potential for archaeological remains including palaeoenvironmental features associated with the Wantsum Channel and evidence of a Roman Road. Geophysical survey indicates a principal street within Richborough connects with Watling Street, curves past the amphitheatre, and projects south-west i.e., towards the application site. Excavation in the valley within the former channel has also identified further parts of a Roman road on this alignment, suggesting a road, potentially with a causeway or crossing point, which would have connected with Richborough, passes through the application site.

Archaeological remains could significantly increase understanding of the landscape context of Richborough. As such, the archaeology here may be of an elevated significance because of its relationship with the scheduled monument.

Impact

The proposed solar farm would cause harm to the significance of Richborough Roman site, by reducing the contribution that its setting makes, and by reducing the ability to appreciate the site in its landscape context.

This is most evident in regard to changes in the landscape of the former Wantsum channel, visible from the amphitheatre, and also potentially through destruction of, and setting impacts to, archaeology that may be associated with the monument. This harm would, in our view, be greater than that indicated in the environmental statement.

The installation of the solar farm would result in marked change to the character of the



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landscape to the south of Richborough bluff. The landscape represents the now silted channel of the Wantsum and is recognisable as such because of its extensive and distinctive open flat character, with networks of waterways alluding to its watery past. The addition of the solar panels and infrastructure would compromise an appreciation that this was formally a water channel surrounding the fort, by filling the area with modern infrastructure that covers the features that create its landscape character.

In moving through this flat landscape, with the solar panels in place, it would also be much more difficult to appreciate the character and topography of the former channel, with the panels obscuring views across the former water channel, and also views looking up to Richborough Bluff. This is clearly demonstrated by verified views D fig 11 and 12.

This is harmful to the interpretation and appreciation of Richborough Roman site as a former island built on a high point for strategic reasons, and protected in part by the water of the Wantsum channel, because understanding that it was located on an island surrounded by water at the time of the Roman invasion is key to understanding the significance of the site and its important strategic location.

The amphitheatre appears to have been intentionally placed on the highest available ground in the Early Roman period when there would have been few other constraints for its location. This suggests intentional positioning; it would have been in a position of status, commanding impressive uninterrupted views across the Wantsum for those experiencing it, and being highly visible when being approached from the south and west, presumably along the Roman road network identified in the valley floor.

The solar arrays would make it harder to understand the character and topography of the landscape below. The panels would occupy a large part of the valley floor making the former channel appear narrower, and the proposed planting would not only be uncharacteristic to this open landscape, but would foreshorten the view considerably, making it difficult to appreciate the width of the former channel and the way the land rises beyond. This is demonstrated in the ES verified views A fig 2 and 3, B fig 5 and 6, and C fig 8 and 9.

The amphitheatre is particularly affected, as the ability for a modern visitor to the monument to look across the former channel on either side of the valley, and understand its importance in relation to Richborough, would be harmed by the proposals.

We do not therefore agree with the applicant's assessment that the effect on the setting of Richborough would be minor adverse (ES Table 10.7).

Additionally, the installation of the solar arrays could impact on archaeological deposits that are either related to the Roman occupation of Richborough, or which could



significantly contribute to our understanding of its landscape context. Tree planting for mitigation would increase the impact. We do not agree with the applicant's assessment that the proposed development site is of low archaeological potential (ES chapter 6.83), and that no significant residual effects have been identified in regard to the construction phase (ES chapter 6.104).

In particular we note the Roman road which may continue through the proposal area. Preserving the Roman road in a 'corridor' within the proposed development (as suggested in ES Table 10.1) may help to preserve archaeological deposits but would not address issues in relation to its setting.

Policy

1. National Planning Policy Framework:

Para 201 notes that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Para 205 says that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Para 206 is clear that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

2. Planning Practice Guidance

PPG acknowledges that development of large scale solar farms in rural environments can have a negative impact. It says that great care should be taken to ensure that heritage assets are conserved in a manner appropriate to their significance, including impacts on views important to the heritage assets setting.

Position



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The proposed solar farm would harm the significance of Richborough Roman site, which is an exceptionally important site in our national story.

The proposals would erode the ability to appreciate Richborough's significance, which its landscape setting currently supports, and have the potential to destroy archaeology associated with the site. This harm would be greater than that indicated in the environmental statement.

The impact to the visitor experience at Richborough and the landscape context of the amphitheatre to support that, has also been poorly represented in the application.

We have concerns regarding the applicant's assessment of levels of harm and impact, and the lack of recognition in the ES of the contribution the landscape of the former Wantsum Channel makes to the significance of Richborough Roman site.

We think that solar infrastructure anywhere in the proposal area raises concern and mitigation would not help to sufficiently overcome those concerns. In the case of tree planting as visual screening, it would in fact, increase the level of harm.

Given the remarkable historic significance of Richborough, the harm that these proposals would cause, and the planning policy context, Historic England considers this proposal to be poorly conceived. While we are supportive of the aspiration to provide low carbon energy, we object to these proposals which have not sought to avoid or minimise harm to heritage of the highest significance.

In the language of the NPPF we consider the level of harm to Richborough's significance would be less than substantial, and approaching, but not at, the upper end of the scale. We do not therefore agree with the applicants ES that identifies the harm as minor (adverse) harm, which might translate to a low level of less than substantial harm to the significance of the Roman site.

An accurate level of harm would need to be identified in the ES, that harm demonstrably avoided and minimised, and residual harm clearly and convincingly justified. It would not otherwise be possible to progress to the final step of weighing residual harm against any proposed benefits of the application.

Recommendation

Historic England objects to the application on heritage grounds.

It causes notable heritage harm to assets of the highest order. Harm has not been demonstrably avoided or minimised, and clear and convincing justification for it has not been given.

Your authority should take these representations into account in determining the



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Historic England

application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

[REDACTED]

Inspector of Ancient Monuments

E-mail: [REDACTED]@HistoricEngland.org.uk



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[REDACTED]

From: [REDACTED]
Sent: 11 March 2024 14:49
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Historic England advice on Application no(s) 23/01363

Thanks [REDACTED] An objection from HE is a rare object.

Can you let me know how you're going to deal with this case- will it be officer or committee? If the latter then I'd be happy to attend albeit I'm not an archaeologist, if you feel that would be helpful.

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]@DOVER.GOV.UK>
Sent: Friday, March 8, 2024 9:59 AM
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: FW: Historic England advice on Application no(s) 23/01363

Morning both,

Just forwarding for info the comments from HE on the solar farm north of Ash.

Thanks,
[REDACTED]

From: [REDACTED]@HistoricEngland.org.uk <[REDACTED]@HistoricEngland.org.uk>
Sent: Friday, March 8, 2024 2:05 AM

To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@HistoricEngland.org.uk
Subject: Historic England advice on Application no(s) 23/01363

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Dear [REDACTED],

Please find attached our advice on the following site -

Goshall Valley East Street Ash
Application No(s):23/01363

Please note that Historic England object to the application.

Yours sincerely,

[REDACTED]
Inspector of Ancient Monuments
E-mail: [REDACTED]@HistoricEngland.org.uk

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From: [REDACTED]
Sent: 11 March 2024 14:58
To: [REDACTED]
Subject: FW: DOV/23/01363 - Little South Solar Farm, Goshall Valley
Attachments: DO 23 01363 LE01 further info inc pre-det eval.pdf



[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]@kent.gov.uk <[REDACTED]@kent.gov.uk>
Sent: Thursday, February 8, 2024 7:59 PM
To: DDC Development Management <DevelopmentManagement@DOVER.GOV.UK>
Cc: [REDACTED]@english-heritage.org.uk; [REDACTED]@DOVER.GOV.UK>; [REDACTED]@HistoricEngland.org.uk; [REDACTED]@archaeologyuk.org; [REDACTED]@kent.gov.uk
Subject: DOV/23/01363 - Little South Solar Farm, Goshall Valley

RE: DOV/23/01363 | Construction of a solar farm with associated access and infrastructure | Goshall Valley East Street Ash

Hi [REDACTED]

I trust this finds you well. Please find our comments attached for the above planning application. Happy to discuss any of the matters raised further if that would be helpful.

All the best,

██████████
██████████ | Senior Archaeological Officer | Heritage Conservation | Kent County Council | Invicta House,
County Hall, Maidstone ME14 1XX |

Telephone: ██████████ | www.kent.gov.uk |

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Environment, Planning & Enforcement

Invicta House
County Hall
MAIDSTONE
ME14 1XX

Phone: [REDACTED]
Ask for: [REDACTED]
Email: [REDACTED]@kent.gov.uk

08 February 2024

Your Ref: DOV/23/01363

[REDACTED]
Planning Section
Dover District Council
White Cliffs Business Park
DOVER
CT16 3PJ

SENT BY EMAIL

Re: DOV/23/01363

Location: Goshall Valley, East Street, Ash, Canterbury, Kent

Proposal: Construction of a solar farm with associated access and infrastructure

Dear [REDACTED],

Thank you for consulting KCC Heritage Conservation on the above planning application. Our advice is principally concerned with two aspects of the scheme, namely 1) its impact on the setting of nearby heritage assets, most notably the important Roman site at Richborough; and 2) the direct impacts of the proposals on buried archaeological remains.

Attached to this letter are detailed comments on the site's archaeological background; on the impact of the proposed development on the setting of heritage assets; and on the direct impacts on buried archaeological remains. These detailed comments support and should be read in conjunction with our advice below.

Summary

The proposed solar farm lies close to the scheduled Roman site of Richborough, which includes the grade I listed 'Richborough Castle'. Richborough is a site that is of exceptional importance in understanding the complete story of Roman Britain. It is here that the emperor Claudian is believed to have landed his troops during his invasion of Britain in AD 43, and it is at sites such as Richborough that the

withdrawal of the last vestiges of Roman administration in *circa* AD 410 can be observed.

We do not agree with the applicant's conclusions about the degree of harm that the proposed solar farm would cause to the heritage significance of Richborough. The applicant suggests that the proposals will result in a minor-adverse impact to the scheduled Roman. In reaching such a conclusion the applicant has not adequately taken into account the contribution that the landscape of the former Wantsum Channel makes to our understanding and appreciation of Roman Richborough.

Furthermore, we also do not agree with the applicant's assessment of the effects of the development on buried archaeology. Nor do we agree with their recommendations for how this might be addressed and mitigated. We suggest that there is a clear need for further information on buried archaeology to inform decision-taking. We therefore recommend that further intrusive evaluation works are required before the application is determined.

Advice

The proposed solar farm is located in an area that is archaeologically complex and sensitive. It lies within the former Wantsum Channel and to the south of the important Roman site of Richborough. The proposed development will be harmful to the setting of this nationally important Roman site, and we advise that this harm will be significantly greater than is suggested in the Environmental Statement (ES) that accompanies the application.

The landscape context of Richborough is highly important as it enables us to understand why the Romans first landed here in AD43 and subsequently why Richborough developed into an important town and port of entry to the province. The proposed development will affect the ability to understand and appreciate Richborough's landscape context and therefore will cause harm to its significance.

We also advise that the site's archaeological potential is greater than is stated in the ES. The proposed development has the potential to impact a range of buried archaeology, including waterlogged organic remains and other palaeoenvironmental features associated with the former Wantsum Channel. The archaeology of the site has the potential to significantly further our understanding of the landscape context of Richborough island and the nationally important Roman site that developed there.

Recommendations

1) The impact of the scheme on the setting of the Roman site of Richborough is a major consideration. We recommend that the views of Historic England are sought on the impact of the proposals on the setting of the scheduled monument. We think the harm to the monument is serious.

2) Richborough is managed as a visitor site by English Heritage. The managed site includes the Roman amphitheatre which lies on high ground overlooking the

proposed solar farm. We think the proposals will harm the experience of visitors to the amphitheatre. We therefore recommend that English Heritage is consulted on the scheme.

3) The proposed development may also affect the setting of nearby listed buildings and we recommend that the views of your council's conservation officer are sought on this aspect.

4) Three possible *tumuli* (burial mounds) have been identified a short distance north of the proposed development site. The identification and date of these potential barrows is uncertain and insufficient information is currently provided to understand how the proposed scheme will impact their setting. In a worst-case scenario we advise the proposed development could result in harm to the setting of archaeological remains of equivalent significance to a scheduled monument.

5) Further information in the form of a field evaluation is required **prior to the determination of the planning application** so that the significance of buried archaeological remains can be properly understood and taken into account. The evaluation should make use of a range of investigative techniques, potentially including ERT survey, borehole/augur survey, trial trenching and deposit modelling.

6) Because of the potential for waterlogged organic archaeological remains and palaeoenvironmental features further information on the potential impacts of the development on the site's water-environment is needed to ensure the ongoing-preservation of any such deposits.

7) Further information on the detailed design measures proposed at the decommissioning phase is needed so that archaeological impacts can be understood and measures to minimise and avoid harm can be agreed.

I trust that the above comments are helpful and would be pleased to discuss further as required.

Yours sincerely

██████████
Senior Archaeological Officer
Heritage Conservation

Cc

██████████, *Properties Curator (South), English Heritage*
██████████, *Principal Heritage Officer, Dover District Council*
██████████, *Inspector of Ancient Monuments, Historic England*
██████████, *Casework Officer, Council for British Archaeology*

KCC Heritage Conservation – detailed comments on application:

DOV/23/01363 | Goshall Valley, East Street, Ash, Canterbury, Kent |
Construction of a solar farm with associated access and infrastructure

Archaeological Background

The proposed development lies on reclaimed land within the former Wantsum Channel. Historically this was a major waterway which separated the Isle of Thanet from 'mainland' Kent. The history and development of the Wantsum Channel is complex; it was an open, navigable waterway in the later Prehistoric and early Roman period but subsequently silted up before being reclaimed for agriculture. The present landscape is a product of millennia of coastal change and landscape evolution.

Within the channel are various 'islands' which acted as foci for past human activity. Richborough is perhaps the most well-known of these islands, but others include Boxlees Hill and Weatherlees Hill, both of which lie on the Thanet side of Richborough island. Within the proposed development site, a raised 'spit' of land extends northwards from Little East Street Farm towards the Goshall Stream and may have similarly acted as a focus for human activity.

Analysis of archaeological sites and findspots recorded in the Kent HER show how the channel edge and islands and promontories acted as foci for human activity in the later Prehistoric and Romano-British periods, with the channel being a valuable resource in its open, marshland and reclaimed states. Drier conditions and lower sea-levels in the late Neolithic and Early Bronze Age led to increased human activity within the Wantsum Channel and the adjoining Lydden Valley. This is evidenced by the identification of buried land surfaces and artefacts of these periods recorded within and sealed by alluvium to the southeast and west of Sandwich. By the Late Bronze Age, the sea-level had risen which resulted in the flooding of the earlier land surfaces. As such the proposed development site might contain former prehistoric land surfaces and occupation activity lying buried in organic-rich deposits within the alluvium of the Wantsum Channel.

Richborough (known to the Romans as *RVTVP(A)E*) was located on an island at the eastern mouth of the channel, and it is here, within the sheltered anchorage of the Wantsum Channel, that the emperor Claudius is believed to have landed his troops during his invasion of Britain in AD 43. The southern edge of Richborough island lies about 90m north of the application site at its nearest point.

Following the invasion, Richborough would develop into a major port of entry to the new province. A great monumental arch (one of the biggest in the Roman empire) was erected here by Domitian around AD 85 to celebrate the conquest of Britain. Early structures at the wider Richborough site include a pair of temples, erected in the first or perhaps second century AD. Also constructed early in the town's

development, perhaps by military authorities, was an amphitheatre, built to provide entertainment for those living in or passing through the port town.

The amphitheatre is located on the southern edge of Richborough island, on one of its highest points, atop a bluff and overlooking the Wantsum Channel. It survives as a notable and distinctive earthwork and was one of the first Roman amphitheatres to be identified in the country. The top of the amphitheatre's earthworks are at about 19.5m aOD and it is notably elevated above the area of the former Wantsum Channel which generally lies at about 2.0 to 2.5m aOD. As such the amphitheatre site had – and still has – extensive views across the area of the proposed solar farm.

Recent archaeological investigation of the amphitheatre suggests that it was an early structure, built before the town of Richborough had significantly developed. Thus, the amphitheatre's position on a high point at the southern edge of Richborough island wasn't dictated by the presence of existing settlement but instead seems to have been deliberately chosen.

In the second century AD Roman Richborough flourished as stone buildings were constructed, roads re-laid and the port and its associated settlement (*vicus*) expanded, eventually covering a substantial part of Richborough island. The scheduled monument therefore covers only part of this extraordinary Roman site.

Recent excavations at the amphitheatre site suggest that activity occurred across the full extent of the town into the late fourth and early fifth centuries, i.e. until the very end of the Roman period.

In the third century AD the Roman military increased their presence at the site, initially by fortifying the monumental arch, and latterly through the construction of a major stone-built fort (now known as Richborough Castle and grade I listed). This fort was one of a series built in southern and eastern England that are collectively known as the Forts of the Saxon Shore. The fort's massive stone walls and defensive ditches are the most visible element of Roman occupation at Richborough.

The fort at Richborough continued to be used as a base for the *Legio II Augusta* until their withdrawal to Gaul in AD 406. Evidence shows that Richborough was one of the last places in Britain to be supplied with Roman coinage. There is evidence for some occupation following the army's withdrawal continuing into the later fifth and sixth centuries AD, but unlike other major Roman settlements in Kent only limited occupation continues into the post-Roman periods. Amongst the later features at the site is a small Christian Chapel that was constructed at Richborough in the later Anglo-Saxon period. The Chapel is dedicated to St Augustine who landed in East Kent in 597 AD.

In its later history the Wantsum Channel suffered from the formation of shingle spits within its southern mouth. The development of these spits and shingle banks affected the flow of water such that by the end of the fourth century AD the channel had begun to silt, and marshland develop. This process was exacerbated by reclamation works carried out by the Monks of St Augustine's Abbey in the twelfth

and thirteenth centuries. By the later medieval period, the landscape of the former channel had evolved yet further, with marshland having largely been reclaimed and developed to form an extensive tract of drained grazing pasture. This reclaimed marshland can be seen in the low-lying, open landscape of the proposed development site.

Impact of the proposed development on the setting of heritage assets

The application is accompanied by an Environmental Statement (ES) which in turn is informed by several technical studies. Chapter 7 of the ES addresses the impact of the scheme on Landscape and Views and names (ES para 7.53) various designated heritage assets whose setting might be affected by the proposed development. Further consideration of the impact of the scheme on built heritage assets is provided in Chapter 10, whilst Chapter 6 (Archaeology) considers the impact of the scheme on non-designated heritage assets of archaeological interest.

In our advice below we focus on the impact of the development on the setting of Roman Richborough and other archaeological remains. The ES also identifies a selection of grade II listed buildings whose setting might potentially be affected. We recommend that advice is sought from your council's conservation officer on the effect of the scheme on these assets.

Roman Richborough and its setting

The Roman site of Richborough is of very high significance and includes elements designated at the highest level. The Saxon Shore fort, Roman port and associated remains at Richborough are designated together as a scheduled monument (NHLE entry 1014642) which extends over an area of some 40 hectares and includes the site of the Roman amphitheatre. The scheduled monument lies about 160m north of the proposed development site at its closest point. Richborough Castle is also a grade I listed building (NHLE entry 1363256).

The Roman site of Richborough is situated on an area of raised ground that was once an island within the Wantsum Channel. The Wantsum Channel is now silted up but is still discernible today as an extensive and distinctive low-lying landscape. Because of its elevated position Richborough commands views across the former Wantsum Channel. This is especially the case from the site of the Roman amphitheatre which sits at the highest point on the southern edge of the island.

Verified viewpoint C is taken from within the scheduled monument on the south side of the amphitheatre, looking across the former Wantsum Channel. Verified viewpoint D supplies a counterview, looking north from the far bank of the former channel. From this southerly direction the raised bluff of Richborough island can be clearly and readily identified. The proposed development site falls between these two viewpoints within the Goshall Valley, part of the Ash Levels landscape character area (LCA), which is described in the Dover District Landscape Character Assessment as "*a distinctive large scale, flat and low-lying area of arable and*

pasture grazing. The landscape is reclaimed grazing marsh and retains marshland qualities including drainage ditches and an open expansive character".

This character is clearly discernible in the baseline (as existing) image at verified viewpoint C where the extensive, cohesive and distinctive nature of this low-lying flat landscape can be clearly seen, and the extent of the former Wantsum Channel can be appreciated and understood. As such we do not agree with the applicant's description of the landscape here as "*little more than a post-medieval agricultural valley landscape*" (ES para 6.80).

Views across the former channel are important in understanding the landscape context of Roman Richborough and its strategic topographical position on an island in what was once an extensive sea channel. This appreciation of Richborough's position on a raised island is crucial to understanding why the Roman invasion of AD 43 landed here, and why Richborough subsequently developed into an important port of entry and gateway to the newly conquered province. As such we judge that the landscape setting of Richborough makes a considerable contribution to the significance of the place.

The verified views provide accurate visual representations of how the proposed development will look at year 1 and again at year 15 when landscape planting has become established. The year 1 image from viewpoint C demonstrates how the proposed solar farm will sit as an alien and visually intrusive element in the landscape. It will take in a large part of the visible open, low-lying landscape and will diminish the ability to appreciate the extent of the former sea channel.

The year 15 image shows how the proposed landscape planting will largely mask the panels of the solar farm. However, the planting also has the effect of foreshortening the view, such that the former channel is no longer appreciable as "*a distinctive large scale, flat and low-lying area of arable and pasture grazing*" but is instead reduced to a narrow strip of land between the planting and the bluff edge, where the scale of the former channel can no longer be properly appreciated. In the corresponding view looking north towards Richborough island the raised bluff is entirely obscured by the arrays.

We suggest that the applicant's setting assessment has not adequately considered the contribution that the distinctive and expansive low-lying reclaimed marshes of the Wantsum Channel makes to the significance of Richborough. The applicant's assessment has largely separated consideration of the impact of the scheme on landscape character (in ES Chapter 7) from the impact on views from Richborough scheduled monument (in ES Chapter 10) but has not properly taken into account the contribution that the landscape setting makes to the significance of the monument. The two cannot be separated because it is the very character of the surrounding landscape which helps visitors to Richborough understand and appreciate the strategic position of Richborough on a raised island within the former channel.

The significance of the Wantsum to Roman Richborough is acknowledged elsewhere in the ES which notes that "*the Wantsum Channel itself is of key importance within*

the Roman landscape" (ES 6.52). Therefore, the ability to understand the extent of the former channel (as reflected in the extensive low-lying reclaimed marshland) must contribute to the significance of the site. The marked difference between Richborough 'island' and the low-lying reclaimed marshland of the former sea channel forms part of the experience of Richborough. This is clear at the amphitheatre site where views over the former channel are extensive.

We therefore suggest that **the construction of the proposed solar farm would be harmful to the significance of the scheduled monument of Richborough** and advise that this harm is greater than the minor (adverse) harm indicated in the ES.

Additionally, we note that the Roman amphitheatre which overlooks the application site is located at one of the highest points on Richborough island. Archaeological evidence indicates the construction of the amphitheatre here was intentional and not dictated by existing settlement constraints. Elsewhere, such as at London and other urban centres, amphitheatres were constructed to take advantage of existing natural depressions or dry valleys which could be shaped to form the arena. This does not apply to Richborough, and further consideration might be given to whether the landscape setting influenced the location of the amphitheatre.

The setting of other heritage assets

The ES identifies in Chapter 6 Archaeology the presence of three possible *tumuli* (burial mounds) which are located some 135m from the application site. The ES considers that these mounds must be of Anglo-Saxon date or later as the Wantsum was an open channel in the Prehistoric period. We suggest that this over-simplifies the situation and that the potential barrows lie within an area where conditions may have fluctuated between tidal and marshland up to about the second millennium BC, from when the Wantsum would have been an open navigable body of water. There are several known examples of low-lying barrows in alluvial/channel edge locations of Late Neolithic/Early Bronze Age date and seemingly associated with watercourses or inlets. We do not agree therefore with the assertion in the applicant's Archaeological Impact Assessment (AIA) that such a location would be "uncharacteristic" for barrows of Neolithic or Bronze Age date (AIA 9.6.9).

Archaeological works carried out in advance of the Thanet Supply Main scheme some 250m from the possible barrows has demonstrated the presence of archaeological horizons buried at depth beneath alluvial and marsh reclamation deposits. The possibility that these mounds are the tops of barrows of Late/Neolithic or Bronze Age date, otherwise largely buried by alluvium, cannot yet be discounted.

The ES acknowledges that these receptors are potentially of high significance (ES para 6.72), but their precise character and significance is not currently understood. This is agreed. Because they are not properly understood it is not sound to assume that setting does not contribute to their significance, and therefore we do not agree with the conclusion of the ES that the proposed development would at worst result in a negligible impact (ES 6.101). Because these barrows are not adequately understood, it remains possible that the proposed development could result in a moderate or even major impact on setting of archaeological assets that are

potentially of high importance (equivalent to a scheduled monument). We therefore advise that **in any worst-case scenario the environmental effect of the proposed development on the setting of the possible barrows would be major or major-moderate.**

Policy

The NPPF notes the environmental benefits associated with the production of energy from renewable sources. It highlights (NPPF 157) how the planning system should support the transition to a low carbon future and should support renewable and low carbon energy and associated infrastructure. The NPPF explains that applications should be approved where impacts are acceptable for the proposed location (and by inference that applications in unacceptable locations – or in locations that cannot be made acceptable – should be refused).

The Planning Practice Guidance (PPG) provides further advice on judging whether a location is acceptable or not. The PPG acknowledges that development of large-scale solar farms in rural environments can have a negative impact. It highlights that when considering large-scale solar farms great care should be taken to ensure that heritage assets are conserved in a manner appropriate to their significance, including impacts on views important to a heritage asset's setting. It notes that – depending on the scale, design and prominence of a scheme – the impact of large-scale solar farms on the setting of heritage assets can be considerable and may result in substantial harm (Paragraph 013 Reference ID: 5-013-20150327).

Paragraph 195 of the NPPF explains that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. NPPF 205 states that “*great weight*” should be given to the conservation of designated heritage assets and that the more important the asset the greater the weight should be. Richborough is undoubtedly a heritage asset of the greatest importance. The possible barrows might also be assets whose importance is equivalent to a scheduled monument whereby footnote 72 of the NPPF would apply (albeit this is as yet uncertain). NPPF 206 goes on to explain that any harm to the significance of a designated heritage asset (including harm from development within an asset's setting) should require clear and convincing justification.

Using the assessment criteria detailed in the ES we judge that the impact of the proposed development on the setting of Roman Richborough will as a minimum lead to “*the alteration to a key element of the baseline conditions and that post development the setting of the baseline will be materially changed*”. This would be a moderate magnitude adverse effect. Roman Richborough is a site of high importance and therefore, following the matrix for assessing the significance of an environmental effect the impact on Roman Richborough must be **major-moderate adverse**. We think in a worst-case scenario a major-moderate or even major adverse effect could apply to the ‘barrows’ also.

In considering the level of harm the NPPF refers to substantial harm, less than substantial harm and no harm. There is no direct translation from the significance of an environmental effect in EIA terminology to substantial or less than substantial

harm as described in the NPPF. As a minimum we suggest that a major-moderate adverse effect must fall at the very upper end of the less than substantial harm spectrum and that this harm should be given great weight in any planning judgement. We strongly recommend that the views of Historic England are sought on the impact of the proposals on the setting of the scheduled monument at Richborough and whether this amounts to substantial or less than substantial harm.

Direct impacts on buried archaeological remains

Nature of the direct impacts

As well as impacting the setting of nearby heritage assets the construction (and decommissioning) of the proposed solar farm will directly affect any buried archaeological remains present within the footprint of the proposed development. These direct impacts will result from construction activities for the installation of the arrays; construction of access tracks, substation, transformer stations and monitoring cabin; installation of cabling (including grid-connection), fencing and CCTV cameras. Impacts may also arise from construction enabling works such as the installation of compound and lay-down areas, the formation of construction access tracks and through any temporary drainage infrastructure. Additionally, the creation of drainage ditches, scrapes, swales and reed beds as well as landscape planting will also have a direct impact during their formation. Landscape planting might also impact archaeology during the operational phase through root growth which could damage buried archaeology directly and through water uptake which could result in the localised drying-out of waterlogged deposits.

Chapter 6 of the ES considers how the proposed development might affect the site's archaeological interest and this chapter is supported by the AIA (which forms ES Appendix 6.2). The application is also accompanied by a report detailing the results of a geophysical survey (magnetometry). The ES suggests that the proposed development site is "*of low archaeological potential*". We think that this is incorrect. The proposed development covers a large area, and the archaeological potential of the site will vary, but parts of the site clearly have a significantly greater potential than the ES suggests.

The character of the archaeology

The ES suggests that the site would have lain in open water in the Prehistoric period. The development of the Wantsum Channel in the Prehistoric period is more complex and there will be times (because of climatic differences and changes in relative sea-levels) when the channel would have been dryer and accessible and buried ancient land-surfaces and archaeological remains might be preserved within the alluvial sequence. This has been demonstrated by archaeological works carried out for the Thanet Main Supply scheme which passed to the north of the application site. Here archaeological remains were preserved beneath later alluvium at a depth of about 1m. Because of the depth that they are buried it is unlikely that such features would be revealed through magnetometry and therefore the geophysical survey carried out

across the proposed development site is unlikely to be useful in identifying archaeological features of land-surfaces buried under later alluvium.

Elsewhere in the Wantsum Channel the presence of islands and peninsulas have been proven to act as a focus for Prehistoric and later activity. LiDAR and topographical data indicate that there is a raised projecting spur of land within the centre of the proposed development site. This is an area where activity might be expected. On and around the margins of this higher ground, as well as along the channel edge, we suggest the archaeological potential is significantly raised. In these areas evidence for the exploitation of the marshland and open channel might be expected. Here, because of the waterlogged ground conditions, organic remains that might not otherwise survive could be preserved. The ES identifies the potential for *“evidence for wetland exploitation such as fish traps, boats, wooden jetties, and hides and traps for wild fowling may survive as buried finds/features”* (ES para 6.66).

Additionally, the waterlogged soils, are favourable for the preservation of organic material of palaeoenvironmental interest. These have the potential to provide information that a) sets an environmental framework to provide a landscape and ecological context for recorded human activities, b) illustrates the impact of human activity on the vegetational environment of the Wantsum Channel and c) demonstrates locally how plants and animals were responding to environmental change (including fluctuations between marine and freshwater dominated environments). This preserved paleoenvironmental record, including evidence for marine transgression and regression, could contribute to our understanding of regional effects on historic climate and relative sea level changes.

The sedimentary sequences that evidence the development of the Wantsum Channel and the palaeoenvironmental indicators that they contain are of at least regional importance and their significance might be higher where they can advance understanding of the landscape development and context of the nationally important Roman site of Richborough. The ES states that for both palaeoenvironmental and organic archaeological receptors the development could result in a **major adverse effect** (ES para 6.68).

The ES also notes that the extent and character of palaeoenvironmental and organic archaeological remains is unknown. This is because of the lack of intrusive archaeological/geoarchaeological or geotechnical investigation (ES para 6.75). This is not a satisfactory position, given the potential for a major adverse effect. We think **this issue needs to be addressed through further intrusive investigation before the application is determined.**

Similarly, we judge the archaeological potential for remains of Romano-British date to be greater than the application suggests. To the north of the application site geophysical survey within the scheduled monument at Richborough has revealed part of the layout of the Roman town. A notable feature is a principal street that heads south from Watling Street before curving around the northern side of the amphitheatre. The projected line of this road then heads south-westwards towards the application site. Excavations for the Thanet Supply Main (some 330m to the

north of the proposed solar farm site) revealed a section of road on the projected alignment.

About 750m to the south of the proposed development site archaeological excavations at Each End, Ash revealed further evidence for Roman occupation, including a section of Roman road projecting towards the solar farm site. The projected line of this Roman road heads towards the abovementioned spur/peninsula of raised land located within the application site and projecting into the former Wantsum Channel. The presence of a Roman road heading towards the site from the south-west and again from the north-east strongly indicates that this route continues through the application site. The nature of this route remains uncertain and could have taken the form of a ferry crossing or causeway across the Wantsum.

The ES suggests that the route must have taken the form of a ferry crossing because the Wantsum Channel was open during the Roman period. If this is the case, then some form of landing-stage or wharf might be expected. English Heritage's 'Richborough Environs Project' identified two rectangular enclosures or inlets about 300m to the north of the application site and suggests these "*may have been the location of a beaching or crossing point*" in the Roman period. The topography of the channel indicates that any corresponding southern landing point would likely lie within the proposed development site. Notably, archaeological investigation of the road to the north indicated that it remained in use into the late fourth century AD. The ES identifies that the channel south of Richborough island may have already silted-up and substantially narrowed by this date (ES para 6.53) and this may have affected the nature of the crossing here, meaning that a causeway or trackway might be more viable in the later-Roman period. Such a feature may not be visible on geophysical survey depending on its construction and the depth of overlying later alluvium.

The mitigation suggested in the Environmental Statement

The ES states that the proposed development site is of low archaeological potential (ES para 6.83). This is not agreed. As demonstrated above the archaeological potential of the site varies but we suggest the site has a good potential for buried archaeology on the raised spur/peninsula of higher ground within the centre of the site. That no archaeological features were shown on the geophysical survey here might be a result of masking by later alluvium.

We also suggest that the archaeological potential is significantly raised in channel edge areas, for example about the margins of the raised spur/peninsula and in the southern part of the site both east and west of Little East Street Farm. In these locations archaeology buried beneath the alluvium could include preserved organic remains, potentially including structures of Prehistoric and Romano-British date. Applying a blanket level of potential across a site as the ES attempts to do is not reasonable or realistic.

The ES acknowledges that the potential for palaeoenvironmental and organic archaeological remains to exist locally across the proposed development site (ES para 6.65). It explains that the extent, character and significance of such remains is

currently undefined because no intrusive investigation has taken place (ES para 6.75). It also recognises that where present such remains could be of high significance (ES para 6.46).

Because their survival is dependent on their waterlogged state the on-going preservation of such organic archaeological remains and palaeoenvironmental indicators is susceptible to changes to the water-environment. This is acknowledged in the ES which states that “*organic archaeological remains... are sensitive to change and require a stable and wet environment for preservation*” (ES para 6.66). The ES also notes that such remains “*could suffer total loss in the event that the introduction of the panels results in a change in these levels*”. The ES does not definitively state whether such changes will occur but notes the installation of the panels has the potential to do so. Given the extent of the array it is possible that such an impact could be widespread. The proposed landscape (willow-carr) planting also has the potential to locally impact the water-table through water-uptake.

The ES identifies that preventing changes to the levels of water is an important consideration (ES 6.75) but no mitigation measures to achieve this are put forward.

We recommend that further intrusive investigation is required to adequately understand the potential for important palaeoenvironmental and organic archaeological remains within the development site. Without such intrusive investigation the effect of the development on the site’s archaeological interest cannot be adequately defined and measures to minimise or avoid harm cannot be agreed. We therefore recommend that **further information in the form of a field evaluation is needed prior to determination of the planning application**. This is important because the ES acknowledges that these remains could be of high significance and because the proposed development could lead to their total loss (ES para 6.68).

We note that the ES identifies (para 6.83) that archaeological remains may be present whose significance is such that preservation in situ is needed (i.e. harm or loss to these assets needs to be avoided). The ES suggests that such preservation might be achieved by alternative foundation design (the use of surface mounted concrete shoes) and through the exclusion of development from parts of the site.

Areas where development might need to be excluded are not – and cannot – currently be defined. This is because no intrusive field evaluation works have been carried out. The ES suggests such field evaluation could be carried out following the granting of planning permission and be secured by condition. We cannot see how this would allow for exclusion of areas from development. The application under consideration is for full (detailed) planning permission. Therefore, if exclusion might be required as a mitigation response this needs to be determined before the design is fixed and plans approved.

We also note that the ES identifies that the removal of the arrays at the decommissioning stage might have a greater impact than their original construction. The ES identifies that removal of piles without the implementation of additional

mitigation measures will result in further harm to the archaeological resource (ES para 6.82). The ES subsequently explains that “no additional mitigation measures [during the decommissioning phase] have been identified” (ES para 6.87). Instead, it suggests that detailed design proposals for the careful removal of piles could be used to minimise impacts. However, no details of such detailed design proposals are given. We recommend that they need to be clearly set out and understood at this stage, otherwise how can they be agreed and conditioned?

Policy

The NPPF identifies that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance (NPPF 195).

NPPF 209 explains that the effect of the development on non-designated heritage assets should be taken into account when determining planning applications. In doing so the scope of any harm or loss and the significance of the asset will need to be considered. In our comments above we have advised that the archaeological potential of the site is greater than is suggested in the ES.

Footnote 73 of the NPPF states that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments should be treated as if they were designated. If the three mounds to the north of the application site identified as possible *tumuli* were confirmed as upstanding burial mounds, then these would be of a level of significance that footnote 73 would apply.

The ES has assigned a low potential to the overall site. It does acknowledge that there may be areas within the site that contain archaeological remains of high importance, but the location and extent of such remains (if present) is not fully understood.

NPPF 200 states that applicants should be required to describe the significance of any heritage assets affected by a proposal, including any contribution made by their setting. It goes on to note that the information should be sufficient to understand the impact of a proposal on the significance of affected heritage assets.

The ES itself identifies that archaeological remains may be present whose level of significance is such that they require preservation *in situ*, and this may necessitate excluding parts of the site from development. Because no intrusive field evaluation works have been carried out the location and extent of any such archaeology cannot be defined. As such the present application does not contain sufficient information to understand the significance of heritage assets present or how these might be affected by the proposals.

NPPF 200 acknowledges that for heritage assets with archaeological interest a desk-based assessment should be submitted. It notes that this may not be sufficient on its own to adequately understand the significance of any archaeological remains present or the impact that might arise from the development proposal. The NPPF therefore states that where necessary a field evaluation should be submitted. No

field evaluation has been submitted and we advise that one should be provided before the application is determined. We would be pleased to discuss the scope of such a field evaluation with the applicant.

From: [REDACTED]
Sent: 12 March 2024 09:32
To: [REDACTED]@HistoricEngland.org.uk
Cc: [REDACTED]; [REDACTED]@HistoricEngland.org.uk
Subject: Historic England advice on Application no(s) 23/01363
Attachments: 2301363_HERef_P01571894_L445428.doc

Good morning [REDACTED]

Thank you for your consultation response on the above application for a solar farm. Would it be possible to arrange a brief Teams call with myself and the Principal Heritage Officer [REDACTED] to discuss your comments? If so, please could you let me know your availability next week?

Many thanks and kind regards,
[REDACTED]



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

 Please consider the Environment before printing this email

Dover District Council is a data controller under GDPR, your attention is drawn to our Corporate Privacy Notice at <https://www.dover.gov.uk/privacy>. This explains how we will use and share your personal information and protect your privacy and rights.

From: [REDACTED]@HistoricEngland.org.uk <[REDACTED]@HistoricEngland.org.uk>
Sent: Friday, March 8, 2024 2:05 AM
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@HistoricEngland.org.uk
Subject: Historic England advice on Application no(s) 23/01363

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

Dear [REDACTED],

Please find attached our advice on the following site -

Goshall Valley East Street Ash
Application No(s):23/01363

Please note that Historic England object to the application.

Yours sincerely,

Inspector of Ancient Monuments

E-mail: [REDACTED]@HistoricEngland.org.uk

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[REDACTED]
Dover District Council
White Cliffs Business Park
Dover
Kent
CT16 3PJ

Direct Dial: [REDACTED]

Our ref: P01571894

8 March 2024

Dear [REDACTED]

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**GOSHALL VALLEY EAST STREET ASH
Application No. 23/01363**

Thank you for your letter of 29 January 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The proposed solar farm would harm the significance of Richborough Roman site, which is an exceptionally important site in our national story.

The proposals would erode the ability to appreciate Richborough's significance, which its landscape setting currently supports, and have the potential to destroy archaeology associated with the site. This harm would be greater than that indicated in the environmental statement.

We consider the level of harm to Richborough's significance would be less than substantial, and approaching, but not at, the upper end of the scale.

We think that solar infrastructure anywhere in the proposal area raises concern and mitigation would not help sufficiently overcome those concerns.

Historic England objects to this application because it causes notable heritage harm to assets of the highest order. Harm has not been accurately identified, demonstrably avoided or minimised, and clear and convincing justification for it has not been given.

If the above process has not been undertaken, the application is not consistent with the requirements of the NPPF, and it would not be possible to weigh any residual harm against benefits that might be identified.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



We recommend refusal of this application.

Historic England Advice

Introduction

The development proposals are for a photovoltaic (PV) solar electricity generating facility with associated infrastructure on c.83 ha of flat low-lying land (reclaimed grazing marsh) in Goshall, Dover.

The proposed construction of a solar farm here has significant implications for the historic environment, both within the boundary of the proposal area, and affecting the nationally important heritage asset of Richborough (Saxon Shore Fort, Roman Port and associated remains; National heritage list for England nos 1014642 and 1363256) through development within its setting. We provide advice here on the impacts to this monument including the Grade I listed upstanding Shore Fort remains.

We defer to the local authority Conservation Officer for advice on impacts to Grade II listed buildings, and the County Archaeological Officer for undesignated archaeology, however we acknowledge the potential for archaeological remains on the proposal site to enhance our understanding and appreciation of the significance of Richborough.

Significance

1. The scheduled area

As one of the most important Roman sites in England, Richborough is an exceptionally significant place.

The assumed landing point of the Claudian invasion in AD43, with extensive occupation throughout the Roman period, it was a key gateway to Roman Britain, and is pivotal in understanding of this period of our history.

Its significance is formed from the substantial and imposing standing remains of its Shore Fort, the different phases of military and civilian settlement represented here, its archaeological potential, and its great historical and strategic importance. It is a part of the national heritage collection and since the early part of the 20th century has been, and continues to be today, an important visitor site.

The ability to understand and appreciate these elements is supported by Richborough's setting, and the ability to understand the former landscape within which the remains are set.



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The site has evolved from the Iron Age, through the Roman period with archaeological evidence for the Early Roman military camp and supply base with timber structures later replaced by stone, notably a huge marble faced gilded monumental arch constructed AD85-90. A substantial walled Saxon Shore Fort was added around 277 AD. The scheduled area is part of the larger Roman town that developed around the fort and associated port, so extensive archaeological remains for this also lie outside the scheduled area forming an exceptional evidence base.

In the southern part of the monument on the highest part of the site is an amphitheatre, which survives as a well-defined raised earthwork, and which recent excavations have shown to be Early Roman in date. The amphitheatre was one of the earliest significant structures at Richborough, being a stand-alone, prominent earthwork long before the towering remains of the monumental arch or Shore Fort.

The visitor experience of this part of the site has recently been enhanced, meaning that it is possible to stand in this location to appreciate both the function of the amphitheatre, and how it is positioned in relation to the expansive landscape below. Only a small number of amphitheatres have been identified in Britain, and as such this is a particularly important monument.

2. Setting of Richborough

The setting of Richborough, including the proposal site, is fundamental to understanding how the location of the Roman Fort was deliberately sited on a high point within a formerly watery landscape, for defensive reasons.

It appears that Richborough was purposefully sited next to a large natural Harbour in the Wantsum Channel (a broad stretch of sea water which separated the Isle of Thanet from the Kent mainland until at least the Late Roman period), and near to the mouth of the River Stour. Given its location close to the continent, this meant the town served as a major gateway to Roman Britain and was occupied extensively throughout the Roman period. The major Roman road known as Watling Street, the main Roman road from London and Canterbury, was also first constructed shortly after the invasion and begins/terminates here.

The Roman site is in a unique location on Richborough Bluff, now a highpoint in the surrounding shallow valley landscape, which was effectively an island surrounded by water at the time of the Roman invasion. This translates an important element of its past use. Understanding this context is key to understanding the significance of the site and its strategic location.

In its modern context the former channel is now a distinctive large, flat area of reclaimed marshland, with a network of drainage ditches crossing expansive open



agricultural land. Although this landscape is different from that during the Roman period, it is possible to stand on either side of the valley and look across the former channel to the rising ground beyond, and understand the topography of the landscape and the strategic position that Richborough held. The lack of vegetation or trees within the former waterway, including the proposal site, also contributes to the legibility of the channel in the landscape today. This is particularly evident from the elevated amphitheatre where views to the south and west are extensive.

The low-lying ground of the adjacent valley, which was formally a water channel, and the raised earthworks of the amphitheatre, means the structure would have been (and still is) very visible on approach to Richborough from the south and west (see verified view D), and from some distance afar on the opposite side of the valley. An alien and perhaps, therefore, simultaneously impressive, intriguing, and intimidating presence to the native population at that time.

The former Wantsum Channel, including the proposal site, therefore makes a very important contribution to the ability to appreciate significance of the scheduled Fort.

The landscape setting of Richborough, including the proposal site, also holds important potential for archaeological remains including palaeoenvironmental features associated with the Wantsum Channel and evidence of a Roman Road. Geophysical survey indicates a principal street within Richborough connects with Watling Street, curves past the amphitheatre, and projects south-west i.e., towards the application site. Excavation in the valley within the former channel has also identified further parts of a Roman road on this alignment, suggesting a road, potentially with a causeway or crossing point, which would have connected with Richborough, passes through the application site.

Archaeological remains could significantly increase understanding of the landscape context of Richborough. As such, the archaeology here may be of an elevated significance because of its relationship with the scheduled monument.

Impact

The proposed solar farm would cause harm to the significance of Richborough Roman site, by reducing the contribution that its setting makes, and by reducing the ability to appreciate the site in its landscape context.

This is most evident in regard to changes in the landscape of the former Wantsum channel, visible from the amphitheatre, and also potentially through destruction of, and setting impacts to, archaeology that may be associated with the monument. This harm would, in our view, be greater than that indicated in the environmental statement.

The installation of the solar farm would result in marked change to the character of the



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landscape to the south of Richborough bluff. The landscape represents the now silted channel of the Wantsum and is recognisable as such because of its extensive and distinctive open flat character, with networks of waterways alluding to its watery past. The addition of the solar panels and infrastructure would compromise an appreciation that this was formally a water channel surrounding the fort, by filling the area with modern infrastructure that covers the features that create its landscape character.

In moving through this flat landscape, with the solar panels in place, it would also be much more difficult to appreciate the character and topography of the former channel, with the panels obscuring views across the former water channel, and also views looking up to Richborough Bluff. This is clearly demonstrated by verified views D fig 11 and 12.

This is harmful to the interpretation and appreciation of Richborough Roman site as a former island built on a high point for strategic reasons, and protected in part by the water of the Wantsum channel, because understanding that it was located on an island surrounded by water at the time of the Roman invasion is key to understanding the significance of the site and its important strategic location.

The amphitheatre appears to have been intentionally placed on the highest available ground in the Early Roman period when there would have been few other constraints for its location. This suggests intentional positioning; it would have been in a position of status, commanding impressive uninterrupted views across the Wantsum for those experiencing it, and being highly visible when being approached from the south and west, presumably along the Roman road network identified in the valley floor.

The solar arrays would make it harder to understand the character and topography of the landscape below. The panels would occupy a large part of the valley floor making the former channel appear narrower, and the proposed planting would not only be uncharacteristic to this open landscape, but would foreshorten the view considerably, making it difficult to appreciate the width of the former channel and the way the land rises beyond. This is demonstrated in the ES verified views A fig 2 and 3, B fig 5 and 6, and C fig 8 and 9.

The amphitheatre is particularly affected, as the ability for a modern visitor to the monument to look across the former channel on either side of the valley, and understand its importance in relation to Richborough, would be harmed by the proposals.

We do not therefore agree with the applicant's assessment that the effect on the setting of Richborough would be minor adverse (ES Table 10.7).

Additionally, the installation of the solar arrays could impact on archaeological deposits that are either related to the Roman occupation of Richborough, or which could



significantly contribute to our understanding of its landscape context. Tree planting for mitigation would increase the impact. We do not agree with the applicant's assessment that the proposed development site is of low archaeological potential (ES chapter 6.83), and that no significant residual effects have been identified in regard to the construction phase (ES chapter 6.104).

In particular we note the Roman road which may continue through the proposal area. Preserving the Roman road in a 'corridor' within the proposed development (as suggested in ES Table 10.1) may help to preserve archaeological deposits but would not address issues in relation to its setting.

Policy

1. National Planning Policy Framework:

Para 201 notes that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Para 205 says that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Para 206 is clear that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

2. Planning Practice Guidance

PPG acknowledges that development of large scale solar farms in rural environments can have a negative impact. It says that great care should be taken to ensure that heritage assets are conserved in a manner appropriate to their significance, including impacts on views important to the heritage assets setting.

Position



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The proposed solar farm would harm the significance of Richborough Roman site, which is an exceptionally important site in our national story.

The proposals would erode the ability to appreciate Richborough's significance, which its landscape setting currently supports, and have the potential to destroy archaeology associated with the site. This harm would be greater than that indicated in the environmental statement.

The impact to the visitor experience at Richborough and the landscape context of the amphitheatre to support that, has also been poorly represented in the application.

We have concerns regarding the applicant's assessment of levels of harm and impact, and the lack of recognition in the ES of the contribution the landscape of the former Wantsum Channel makes to the significance of Richborough Roman site.

We think that solar infrastructure anywhere in the proposal area raises concern and mitigation would not help to sufficiently overcome those concerns. In the case of tree planting as visual screening, it would in fact, increase the level of harm.

Given the remarkable historic significance of Richborough, the harm that these proposals would cause, and the planning policy context, Historic England considers this proposal to be poorly conceived. While we are supportive of the aspiration to provide low carbon energy, we object to these proposals which have not sought to avoid or minimise harm to heritage of the highest significance.

In the language of the NPPF we consider the level of harm to Richborough's significance would be less than substantial, and approaching, but not at, the upper end of the scale. We do not therefore agree with the applicants ES that identifies the harm as minor (adverse) harm, which might translate to a low level of less than substantial harm to the significance of the Roman site.

An accurate level of harm would need to be identified in the ES, that harm demonstrably avoided and minimised, and residual harm clearly and convincingly justified. It would not otherwise be possible to progress to the final step of weighing residual harm against any proposed benefits of the application.

Recommendation

Historic England objects to the application on heritage grounds.

It causes notable heritage harm to assets of the highest order. Harm has not been demonstrably avoided or minimised, and clear and convincing justification for it has not been given.

Your authority should take these representations into account in determining the



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application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

[REDACTED]

Inspector of Ancient Monuments

E-mail: [REDACTED]@HistoricEngland.org.uk



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Cc: [REDACTED]
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Do send a Teams invite for whichever time works best for you both.

The applicant has also been in touch and I have offered them a discussion to clarify any points in the letter.

Kind Regards

[REDACTED]
Inspector of Ancient Monuments, Kent, East and West Sussex
Regions Group: London and South East

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Thank you for your consultation response on the above application for a solar farm. Would it be possible to arrange a brief Teams call with myself and the Principal Heritage Officer Alison Cummings to discuss your comments? If so, please could you let me know your availability next week?

Many thanks and kind regards,

[REDACTED]



[REDACTED]
Senior Planning Officer

Dover District Council

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

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Goshall Valley East Street Ash

Application No(s):23/01363

Please note that Historic England object to the application.

Yours sincerely,

[REDACTED]

Inspector of Ancient Monuments

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Sent: 12 March 2024 14:22
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Historic England advice on Application no(s) 23/01363

Hello

I can do Wednesday 3-5 or all day Thursday.

Have copied [REDACTED] in- [REDACTED] if you can read the HE response (and preferably the KCC and EH responses) so you can see the arguments that are being made, then would be beneficial if you could attend the meeting just to listen in, but also be prepped in case you need to come back on anything re the built heritage aspect as [REDACTED] won't be considering that.

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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Please let me know when works best for you from the dates/times below and I'll send a Teams invite?

Many thanks,
[REDACTED]

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Sent: Tuesday, March 12, 2024 10:40 AM
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Do send a Teams invite for whichever time works best for you both.

The applicant has also been in touch and I have offered them a discussion to clarify any points in the letter.

Kind Regards

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[REDACTED]
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[REDACTED]



[REDACTED]
Senior Planning Officer

Dover District Council

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Subject: Historic England advice on Application no(s) 23/01363

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Application No(s):23/01363

Please note that Historic England object to the application.

Yours sincerely,

[REDACTED]

Inspector of Ancient Monuments

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Attachments: Times Letter 4.3.24.pdf

Hello

I think you've probably been sent this but just in case. Its not an email that requires a response.

Barry Cunliffe is a huge name in archaeology by the way- I don't know the others [REDACTED]



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

Email: [REDACTED]@Dover.gov.uk
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Fort under siege

Sir, Climate change is placing solar generation at the centre of the UK's future energy strategy. Recognition that this is imperative should not, however, lead us to dismiss concerns about the impact on our heritage. In Kent, for example, there is a proposal to construct a solar farm covering 83 hectares that would extend to within 160 metres of the Richborough Roman fort and amphitheatre. This important site was the landing place for the Roman invasion in AD43 and became a key fort, harbour and town, remaining in occupation into the 5th century. As such it is rightly protected as a scheduled monument and is a popular tourist attraction. However, its environmental setting is endangered by the proposed solar farm. Such sites can only be understood in a landscape context. We need a much clearer and stronger policy that limits the visual impact of solar sites on heritage assets.

Martin Millett, emeritus Laurence professor of classical archaeology, University of Cambridge; **William Bowden**, professor of Roman archaeology, University of Nottingham; **Dr John Carman**, honorary associate professor, University of Birmingham; **Sir Barry Cunliffe**, emeritus professor of European archaeology, University of Oxford; *plus eight further signatories at [thetimes.co.uk/letters](https://www.thetimes.co.uk/letters)*

From: [REDACTED]@stantec.com>
Sent: 18 March 2024 10:25
To: [REDACTED]
Subject: Little South Solar Farm

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Hi [REDACTED]

We have been in touch with [REDACTED] at Historic England regarding her objection as we are keen to discuss it further to clarify various aspects.

We have arranged a meeting at 2.30pm on Thursday (21st), and I suggested to her that I would invite you and your Conservation Officer to attend which she is happy with.

Could you let me know whether you can attend and who the Conservation Officer is so that I can invite them?

Thanks

[REDACTED]

[REDACTED]

Planning Associate

Direct: + [REDACTED]

Mobile: + [REDACTED]

[REDACTED]@stantec.com

Please note: I work part time.

I am available all day Mondays, Tuesdays and Thursdays, and Wednesday mornings.

I am not at work Wednesday afternoons or Fridays.

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From: [REDACTED]
Sent: 18 March 2024 10:35
To: [REDACTED]
Subject: RE: Little South Solar Farm

Hello

Yes that's fine for me- are we meeting HE ourselves beforehand? Might be a good idea or for us to at least have a pre-meet inhouse?



[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]@DOVER.GOV.UK>
Sent: Monday, March 18, 2024 10:27 AM
To: [REDACTED]@DOVER.GOV.UK>
Subject: Fw: Little South Solar Farm
Importance: High

Hi [REDACTED]

Your calenda looks free but please could you confirm if you'd be available at 2:30pm on Thursday 21st to discuss the solar farm with the agent and historic england?

Many thanks,
[REDACTED]

From: [REDACTED]@stantec.com>
Sent: 18 March 2024 10:25
To: [REDACTED]@DOVER.GOV.UK>
Subject: Little South Solar Farm

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Hi [REDACTED]

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Thanks

[REDACTED]

[REDACTED]

Planning Associate

Direct: + [REDACTED]

Mobile: + [REDACTED]

[REDACTED]@stantec.com

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[REDACTED]

From: [REDACTED]
Sent: 18 March 2024 10:45
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Little South Solar Farm
Attachments: 23_01363-ARCHAEOLOGICAL_OFFICER-2497337.pdf

Good morning [REDACTED]

Thank you for your email. Myself and the Principal Heritage Officer [REDACTED] (CC'd) are available to join your meeting with Historic England on Thursday 21st at 2.30pm.

I understand your consultants have met with KCC Highways to discuss their comments and would be grateful if you could advise if there is any update on this please?

KCC County Archaeology have provided a detailed consultation response on the application (a copy is attached and also available on the online planning file). They recommend that further intrusive evaluation works are required before the application is determined. Please let me know if you have any comments on their response?

If you have any questions then please contact me.

Many thanks,

[REDACTED]



[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
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Sent: 18 March 2024 10:25
To: [REDACTED]@DOVER.GOV.UK>
Subject: Little South Solar Farm

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Hi [REDACTED]

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Thanks

[REDACTED]
[REDACTED]
Planning Associate

Direct: [REDACTED]

Mobile: [REDACTED]
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Environment, Planning & Enforcement

Invicta House
County Hall
MAIDSTONE
ME14 1XX

Phone: [REDACTED]
Ask for: [REDACTED]
Email: [REDACTED]

08 February 2024

Your Ref: DOV/23/01363

[REDACTED]
Planning Section
Dover District Council
White Cliffs Business Park
DOVER
CT16 3PJ

SENT BY EMAIL

Re: DOV/23/01363

Location: Goshall Valley, East Street, Ash, Canterbury, Kent

Proposal: Construction of a solar farm with associated access and infrastructure

Dear [REDACTED],

Thank you for consulting KCC Heritage Conservation on the above planning application. Our advice is principally concerned with two aspects of the scheme, namely 1) its impact on the setting of nearby heritage assets, most notably the important Roman site at Richborough; and 2) the direct impacts of the proposals on buried archaeological remains.

Attached to this letter are detailed comments on the site's archaeological background; on the impact of the proposed development on the setting of heritage assets; and on the direct impacts on buried archaeological remains. These detailed comments support and should be read in conjunction with our advice below.

Summary

The proposed solar farm lies close to the scheduled Roman site of Richborough, which includes the grade I listed 'Richborough Castle'. Richborough is a site that is of exceptional importance in understanding the complete story of Roman Britain. It is here that the emperor Claudian is believed to have landed his troops during his invasion of Britain in AD 43, and it is at sites such as Richborough that the

withdrawal of the last vestiges of Roman administration in *circa* AD 410 can be observed.

We do not agree with the applicant's conclusions about the degree of harm that the proposed solar farm would cause to the heritage significance of Richborough. The applicant suggests that the proposals will result in a minor-adverse impact to the scheduled Roman. In reaching such a conclusion the applicant has not adequately taken into account the contribution that the landscape of the former Wantsum Channel makes to our understanding and appreciation of Roman Richborough.

Furthermore, we also do not agree with the applicant's assessment of the effects of the development on buried archaeology. Nor do we agree with their recommendations for how this might be addressed and mitigated. We suggest that there is a clear need for further information on buried archaeology to inform decision-taking. We therefore recommend that further intrusive evaluation works are required before the application is determined.

Advice

The proposed solar farm is located in an area that is archaeologically complex and sensitive. It lies within the former Wantsum Channel and to the south of the important Roman site of Richborough. The proposed development will be harmful to the setting of this nationally important Roman site, and we advise that this harm will be significantly greater than is suggested in the Environmental Statement (ES) that accompanies the application.

The landscape context of Richborough is highly important as it enables us to understand why the Romans first landed here in AD43 and subsequently why Richborough developed into an important town and port of entry to the province. The proposed development will affect the ability to understand and appreciate Richborough's landscape context and therefore will cause harm to its significance.

We also advise that the site's archaeological potential is greater than is stated in the ES. The proposed development has the potential to impact a range of buried archaeology, including waterlogged organic remains and other palaeoenvironmental features associated with the former Wantsum Channel. The archaeology of the site has the potential to significantly further our understanding of the landscape context of Richborough island and the nationally important Roman site that developed there.

Recommendations

1) The impact of the scheme on the setting of the Roman site of Richborough is a major consideration. We recommend that the views of Historic England are sought on the impact of the proposals on the setting of the scheduled monument. We think the harm to the monument is serious.

2) Richborough is managed as a visitor site by English Heritage. The managed site includes the Roman amphitheatre which lies on high ground overlooking the

proposed solar farm. We think the proposals will harm the experience of visitors to the amphitheatre. We therefore recommend that English Heritage is consulted on the scheme.

3) The proposed development may also affect the setting of nearby listed buildings and we recommend that the views of your council's conservation officer are sought on this aspect.

4) Three possible *tumuli* (burial mounds) have been identified a short distance north of the proposed development site. The identification and date of these potential barrows is uncertain and insufficient information is currently provided to understand how the proposed scheme will impact their setting. In a worst-case scenario we advise the proposed development could result in harm to the setting of archaeological remains of equivalent significance to a scheduled monument.

5) Further information in the form of a field evaluation is required **prior to the determination of the planning application** so that the significance of buried archaeological remains can be properly understood and taken into account. The evaluation should make use of a range of investigative techniques, potentially including ERT survey, borehole/auger survey, trial trenching and deposit modelling.

6) Because of the potential for waterlogged organic archaeological remains and palaeoenvironmental features further information on the potential impacts of the development on the site's water-environment is needed to ensure the ongoing-preservation of any such deposits.

7) Further information on the detailed design measures proposed at the decommissioning phase is needed so that archaeological impacts can be understood and measures to minimise and avoid harm can be agreed.

I trust that the above comments are helpful and would be pleased to discuss further as required.

Yours sincerely

██████████
Senior Archaeological Officer
Heritage Conservation

Cc

██████████, *Properties Curator (South), English Heritage*
██████████, *Principal Heritage Officer, Dover District Council*
██████████, *Inspector of Ancient Monuments, Historic England*
██████████, *Casework Officer, Council for British Archaeology*

KCC Heritage Conservation – detailed comments on application:

DOV/23/01363 | Goshall Valley, East Street, Ash, Canterbury, Kent |
Construction of a solar farm with associated access and infrastructure

Archaeological Background

The proposed development lies on reclaimed land within the former Wantsum Channel. Historically this was a major waterway which separated the Isle of Thanet from 'mainland' Kent. The history and development of the Wantsum Channel is complex; it was an open, navigable waterway in the later Prehistoric and early Roman period but subsequently silted up before being reclaimed for agriculture. The present landscape is a product of millennia of coastal change and landscape evolution.

Within the channel are various 'islands' which acted as foci for past human activity. Richborough is perhaps the most well-known of these islands, but others include Boxlees Hill and Weatherlees Hill, both of which lie on the Thanet side of Richborough island. Within the proposed development site, a raised 'spit' of land extends northwards from Little East Street Farm towards the Goshall Stream and may have similarly acted as a focus for human activity.

Analysis of archaeological sites and findspots recorded in the Kent HER show how the channel edge and islands and promontories acted as foci for human activity in the later Prehistoric and Romano-British periods, with the channel being a valuable resource in its open, marshland and reclaimed states. Drier conditions and lower sea-levels in the late Neolithic and Early Bronze Age led to increased human activity within the Wantsum Channel and the adjoining Lydden Valley. This is evidenced by the identification of buried land surfaces and artefacts of these periods recorded within and sealed by alluvium to the southeast and west of Sandwich. By the Late Bronze Age, the sea-level had risen which resulted in the flooding of the earlier land surfaces. As such the proposed development site might contain former prehistoric land surfaces and occupation activity lying buried in organic-rich deposits within the alluvium of the Wantsum Channel.

Richborough (known to the Romans as *RVTVP(A)E*) was located on an island at the eastern mouth of the channel, and it is here, within the sheltered anchorage of the Wantsum Channel, that the emperor Claudius is believed to have landed his troops during his invasion of Britain in AD 43. The southern edge of Richborough island lies about 90m north of the application site at its nearest point.

Following the invasion, Richborough would develop into a major port of entry to the new province. A great monumental arch (one of the biggest in the Roman empire) was erected here by Domitian around AD 85 to celebrate the conquest of Britain. Early structures at the wider Richborough site include a pair of temples, erected in the first or perhaps second century AD. Also constructed early in the town's

development, perhaps by military authorities, was an amphitheatre, built to provide entertainment for those living in or passing through the port town.

The amphitheatre is located on the southern edge of Richborough island, on one of its highest points, atop a bluff and overlooking the Wantsum Channel. It survives as a notable and distinctive earthwork and was one of the first Roman amphitheatres to be identified in the country. The top of the amphitheatre's earthworks are at about 19.5m aOD and it is notably elevated above the area of the former Wantsum Channel which generally lies at about 2.0 to 2.5m aOD. As such the amphitheatre site had – and still has – extensive views across the area of the proposed solar farm.

Recent archaeological investigation of the amphitheatre suggests that it was an early structure, built before the town of Richborough had significantly developed. Thus, the amphitheatre's position on a high point at the southern edge of Richborough island wasn't dictated by the presence of existing settlement but instead seems to have been deliberately chosen.

In the second century AD Roman Richborough flourished as stone buildings were constructed, roads re-laid and the port and its associated settlement (*vicus*) expanded, eventually covering a substantial part of Richborough island. The scheduled monument therefore covers only part of this extraordinary Roman site.

Recent excavations at the amphitheatre site suggest that activity occurred across the full extent of the town into the late fourth and early fifth centuries, i.e. until the very end of the Roman period.

In the third century AD the Roman military increased their presence at the site, initially by fortifying the monumental arch, and latterly through the construction of a major stone-built fort (now known as Richborough Castle and grade I listed). This fort was one of a series built in southern and eastern England that are collectively known as the Forts of the Saxon Shore. The fort's massive stone walls and defensive ditches are the most visible element of Roman occupation at Richborough.

The fort at Richborough continued to be used as a base for the *Legio II Augusta* until their withdrawal to Gaul in AD 406. Evidence shows that Richborough was one of the last places in Britain to be supplied with Roman coinage. There is evidence for some occupation following the army's withdrawal continuing into the later fifth and sixth centuries AD, but unlike other major Roman settlements in Kent only limited occupation continues into the post-Roman periods. Amongst the later features at the site is a small Christian Chapel that was constructed at Richborough in the later Anglo-Saxon period. The Chapel is dedicated to St Augustine who landed in East Kent in 597 AD.

In its later history the Wantsum Channel suffered from the formation of shingle spits within its southern mouth. The development of these spits and shingle banks affected the flow of water such that by the end of the fourth century AD the channel had begun to silt, and marshland develop. This process was exacerbated by reclamation works carried out by the Monks of St Augustine's Abbey in the twelfth

and thirteenth centuries. By the later medieval period, the landscape of the former channel had evolved yet further, with marshland having largely been reclaimed and developed to form an extensive tract of drained grazing pasture. This reclaimed marshland can be seen in the low-lying, open landscape of the proposed development site.

Impact of the proposed development on the setting of heritage assets

The application is accompanied by an Environmental Statement (ES) which in turn is informed by several technical studies. Chapter 7 of the ES addresses the impact of the scheme on Landscape and Views and names (ES para 7.53) various designated heritage assets whose setting might be affected by the proposed development. Further consideration of the impact of the scheme on built heritage assets is provided in Chapter 10, whilst Chapter 6 (Archaeology) considers the impact of the scheme on non-designated heritage assets of archaeological interest.

In our advice below we focus on the impact of the development on the setting of Roman Richborough and other archaeological remains. The ES also identifies a selection of grade II listed buildings whose setting might potentially be affected. We recommend that advice is sought from your council's conservation officer on the effect of the scheme on these assets.

Roman Richborough and its setting

The Roman site of Richborough is of very high significance and includes elements designated at the highest level. The Saxon Shore fort, Roman port and associated remains at Richborough are designated together as a scheduled monument (NHLE entry 1014642) which extends over an area of some 40 hectares and includes the site of the Roman amphitheatre. The scheduled monument lies about 160m north of the proposed development site at its closest point. Richborough Castle is also a grade I listed building (NHLE entry 1363256).

The Roman site of Richborough is situated on an area of raised ground that was once an island within the Wantsum Channel. The Wantsum Channel is now silted up but is still discernible today as an extensive and distinctive low-lying landscape. Because of its elevated position Richborough commands views across the former Wantsum Channel. This is especially the case from the site of the Roman amphitheatre which sits at the highest point on the southern edge of the island.

Verified viewpoint C is taken from within the scheduled monument on the south side of the amphitheatre, looking across the former Wantsum Channel. Verified viewpoint D supplies a counterview, looking north from the far bank of the former channel. From this southerly direction the raised bluff of Richborough island can be clearly and readily identified. The proposed development site falls between these two viewpoints within the Goshall Valley, part of the Ash Levels landscape character area (LCA), which is described in the Dover District Landscape Character Assessment as "*a distinctive large scale, flat and low-lying area of arable and*

pasture grazing. The landscape is reclaimed grazing marsh and retains marshland qualities including drainage ditches and an open expansive character".

This character is clearly discernible in the baseline (as existing) image at verified viewpoint C where the extensive, cohesive and distinctive nature of this low-lying flat landscape can be clearly seen, and the extent of the former Wantsum Channel can be appreciated and understood. As such we do not agree with the applicant's description of the landscape here as "*little more than a post-medieval agricultural valley landscape*" (ES para 6.80).

Views across the former channel are important in understanding the landscape context of Roman Richborough and its strategic topographical position on an island in what was once an extensive sea channel. This appreciation of Richborough's position on a raised island is crucial to understanding why the Roman invasion of AD 43 landed here, and why Richborough subsequently developed into an important port of entry and gateway to the newly conquered province. As such we judge that the landscape setting of Richborough makes a considerable contribution to the significance of the place.

The verified views provide accurate visual representations of how the proposed development will look at year 1 and again at year 15 when landscape planting has become established. The year 1 image from viewpoint C demonstrates how the proposed solar farm will sit as an alien and visually intrusive element in the landscape. It will take in a large part of the visible open, low-lying landscape and will diminish the ability to appreciate the extent of the former sea channel.

The year 15 image shows how the proposed landscape planting will largely mask the panels of the solar farm. However, the planting also has the effect of foreshortening the view, such that the former channel is no longer appreciable as "*a distinctive large scale, flat and low-lying area of arable and pasture grazing*" but is instead reduced to a narrow strip of land between the planting and the bluff edge, where the scale of the former channel can no longer be properly appreciated. In the corresponding view looking north towards Richborough island the raised bluff is entirely obscured by the arrays.

We suggest that the applicant's setting assessment has not adequately considered the contribution that the distinctive and expansive low-lying reclaimed marshes of the Wantsum Channel makes to the significance of Richborough. The applicant's assessment has largely separated consideration of the impact of the scheme on landscape character (in ES Chapter 7) from the impact on views from Richborough scheduled monument (in ES Chapter 10) but has not properly taken into account the contribution that the landscape setting makes to the significance of the monument. The two cannot be separated because it is the very character of the surrounding landscape which helps visitors to Richborough understand and appreciate the strategic position of Richborough on a raised island within the former channel.

The significance of the Wantsum to Roman Richborough is acknowledged elsewhere in the ES which notes that "*the Wantsum Channel itself is of key importance within*

the Roman landscape" (ES 6.52). Therefore, the ability to understand the extent of the former channel (as reflected in the extensive low-lying reclaimed marshland) must contribute to the significance of the site. The marked difference between Richborough 'island' and the low-lying reclaimed marshland of the former sea channel forms part of the experience of Richborough. This is clear at the amphitheatre site where views over the former channel are extensive.

We therefore suggest that **the construction of the proposed solar farm would be harmful to the significance of the scheduled monument of Richborough** and advise that this harm is greater than the minor (adverse) harm indicated in the ES.

Additionally, we note that the Roman amphitheatre which overlooks the application site is located at one of the highest points on Richborough island. Archaeological evidence indicates the construction of the amphitheatre here was intentional and not dictated by existing settlement constraints. Elsewhere, such as at London and other urban centres, amphitheatres were constructed to take advantage of existing natural depressions or dry valleys which could be shaped to form the arena. This does not apply to Richborough, and further consideration might be given to whether the landscape setting influenced the location of the amphitheatre.

The setting of other heritage assets

The ES identifies in Chapter 6 Archaeology the presence of three possible *tumuli* (burial mounds) which are located some 135m from the application site. The ES considers that these mounds must be of Anglo-Saxon date or later as the Wantsum was an open channel in the Prehistoric period. We suggest that this over-simplifies the situation and that the potential barrows lie within an area where conditions may have fluctuated between tidal and marshland up to about the second millennium BC, from when the Wantsum would have been an open navigable body of water. There are several known examples of low-lying barrows in alluvial/channel edge locations of Late Neolithic/Early Bronze Age date and seemingly associated with watercourses or inlets. We do not agree therefore with the assertion in the applicant's Archaeological Impact Assessment (AIA) that such a location would be "uncharacteristic" for barrows of Neolithic or Bronze Age date (AIA 9.6.9).

Archaeological works carried out in advance of the Thanet Supply Main scheme some 250m from the possible barrows has demonstrated the presence of archaeological horizons buried at depth beneath alluvial and marsh reclamation deposits. The possibility that these mounds are the tops of barrows of Late/Neolithic or Bronze Age date, otherwise largely buried by alluvium, cannot yet be discounted.

The ES acknowledges that these receptors are potentially of high significance (ES para 6.72), but their precise character and significance is not currently understood. This is agreed. Because they are not properly understood it is not sound to assume that setting does not contribute to their significance, and therefore we do not agree with the conclusion of the ES that the proposed development would at worst result in a negligible impact (ES 6.101). Because these barrows are not adequately understood, it remains possible that the proposed development could result in a moderate or even major impact on setting of archaeological assets that are

potentially of high importance (equivalent to a scheduled monument). We therefore advise that **in any worst-case scenario the environmental effect of the proposed development on the setting of the possible barrows would be major or major-moderate.**

Policy

The NPPF notes the environmental benefits associated with the production of energy from renewable sources. It highlights (NPPF 157) how the planning system should support the transition to a low carbon future and should support renewable and low carbon energy and associated infrastructure. The NPPF explains that applications should be approved where impacts are acceptable for the proposed location (and by inference that applications in unacceptable locations – or in locations that cannot be made acceptable – should be refused).

The Planning Practice Guidance (PPG) provides further advice on judging whether a location is acceptable or not. The PPG acknowledges that development of large-scale solar farms in rural environments can have a negative impact. It highlights that when considering large-scale solar farms great care should be taken to ensure that heritage assets are conserved in a manner appropriate to their significance, including impacts on views important to a heritage asset's setting. It notes that – depending on the scale, design and prominence of a scheme – the impact of large-scale solar farms on the setting of heritage assets can be considerable and may result in substantial harm (Paragraph 013 Reference ID: 5-013-20150327).

Paragraph 195 of the NPPF explains that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. NPPF 205 states that “*great weight*” should be given to the conservation of designated heritage assets and that the more important the asset the greater the weight should be. Richborough is undoubtedly a heritage asset of the greatest importance. The possible barrows might also be assets whose importance is equivalent to a scheduled monument whereby footnote 72 of the NPPF would apply (albeit this is as yet uncertain). NPPF 206 goes on to explain that any harm to the significance of a designated heritage asset (including harm from development within an asset's setting) should require clear and convincing justification.

Using the assessment criteria detailed in the ES we judge that the impact of the proposed development on the setting of Roman Richborough will as a minimum lead to “*the alteration to a key element of the baseline conditions and that post development the setting of the baseline will be materially changed*”. This would be a moderate magnitude adverse effect. Roman Richborough is a site of high importance and therefore, following the matrix for assessing the significance of an environmental effect the impact on Roman Richborough must be **major-moderate adverse**. We think in a worst-case scenario a major-moderate or even major adverse effect could apply to the ‘barrows’ also.

In considering the level of harm the NPPF refers to substantial harm, less than substantial harm and no harm. There is no direct translation from the significance of an environmental effect in EIA terminology to substantial or less than substantial

harm as described in the NPPF. As a minimum we suggest that a major-moderate adverse effect must fall at the very upper end of the less than substantial harm spectrum and that this harm should be given great weight in any planning judgement. We strongly recommend that the views of Historic England are sought on the impact of the proposals on the setting of the scheduled monument at Richborough and whether this amounts to substantial or less than substantial harm.

Direct impacts on buried archaeological remains

Nature of the direct impacts

As well as impacting the setting of nearby heritage assets the construction (and decommissioning) of the proposed solar farm will directly affect any buried archaeological remains present within the footprint of the proposed development. These direct impacts will result from construction activities for the installation of the arrays; construction of access tracks, substation, transformer stations and monitoring cabin; installation of cabling (including grid-connection), fencing and CCTV cameras. Impacts may also arise from construction enabling works such as the installation of compound and lay-down areas, the formation of construction access tracks and through any temporary drainage infrastructure. Additionally, the creation of drainage ditches, scrapes, swales and reed beds as well as landscape planting will also have a direct impact during their formation. Landscape planting might also impact archaeology during the operational phase through root growth which could damage buried archaeology directly and through water uptake which could result in the localised drying-out of waterlogged deposits.

Chapter 6 of the ES considers how the proposed development might affect the site's archaeological interest and this chapter is supported by the AIA (which forms ES Appendix 6.2). The application is also accompanied by a report detailing the results of a geophysical survey (magnetometry). The ES suggests that the proposed development site is "*of low archaeological potential*". We think that this is incorrect. The proposed development covers a large area, and the archaeological potential of the site will vary, but parts of the site clearly have a significantly greater potential than the ES suggests.

The character of the archaeology

The ES suggests that the site would have lain in open water in the Prehistoric period. The development of the Wantsum Channel in the Prehistoric period is more complex and there will be times (because of climatic differences and changes in relative sea-levels) when the channel would have been dryer and accessible and buried ancient land-surfaces and archaeological remains might be preserved within the alluvial sequence. This has been demonstrated by archaeological works carried out for the Thanet Main Supply scheme which passed to the north of the application site. Here archaeological remains were preserved beneath later alluvium at a depth of about 1m. Because of the depth that they are buried it is unlikely that such features would be revealed through magnetometry and therefore the geophysical survey carried out

across the proposed development site is unlikely to be useful in identifying archaeological features of land-surfaces buried under later alluvium.

Elsewhere in the Wantsum Channel the presence of islands and peninsulas have been proven to act as a focus for Prehistoric and later activity. LiDAR and topographical data indicate that there is a raised projecting spur of land within the centre of the proposed development site. This is an area where activity might be expected. On and around the margins of this higher ground, as well as along the channel edge, we suggest the archaeological potential is significantly raised. In these areas evidence for the exploitation of the marshland and open channel might be expected. Here, because of the waterlogged ground conditions, organic remains that might not otherwise survive could be preserved. The ES identifies the potential for *“evidence for wetland exploitation such as fish traps, boats, wooden jetties, and hides and traps for wild fowling may survive as buried finds/features”* (ES para 6.66).

Additionally, the waterlogged soils, are favourable for the preservation of organic material of palaeoenvironmental interest. These have the potential to provide information that a) sets an environmental framework to provide a landscape and ecological context for recorded human activities, b) illustrates the impact of human activity on the vegetational environment of the Wantsum Channel and c) demonstrates locally how plants and animals were responding to environmental change (including fluctuations between marine and freshwater dominated environments). This preserved paleoenvironmental record, including evidence for marine transgression and regression, could contribute to our understanding of regional effects on historic climate and relative sea level changes.

The sedimentary sequences that evidence the development of the Wantsum Channel and the palaeoenvironmental indicators that they contain are of at least regional importance and their significance might be higher where they can advance understanding of the landscape development and context of the nationally important Roman site of Richborough. The ES states that for both palaeoenvironmental and organic archaeological receptors the development could result in a **major adverse effect** (ES para 6.68).

The ES also notes that the extent and character of palaeoenvironmental and organic archaeological remains is unknown. This is because of the lack of intrusive archaeological/geoarchaeological or geotechnical investigation (ES para 6.75). This is not a satisfactory position, given the potential for a major adverse effect. We think **this issue needs to be addressed through further intrusive investigation before the application is determined.**

Similarly, we judge the archaeological potential for remains of Romano-British date to be greater than the application suggests. To the north of the application site geophysical survey within the scheduled monument at Richborough has revealed part of the layout of the Roman town. A notable feature is a principal street that heads south from Watling Street before curving around the northern side of the amphitheatre. The projected line of this road then heads south-westwards towards the application site. Excavations for the Thanet Supply Main (some 330m to the

north of the proposed solar farm site) revealed a section of road on the projected alignment.

About 750m to the south of the proposed development site archaeological excavations at Each End, Ash revealed further evidence for Roman occupation, including a section of Roman road projecting towards the solar farm site. The projected line of this Roman road heads towards the abovementioned spur/peninsula of raised land located within the application site and projecting into the former Wantsum Channel. The presence of a Roman road heading towards the site from the south-west and again from the north-east strongly indicates that this route continues through the application site. The nature of this route remains uncertain and could have taken the form of a ferry crossing or causeway across the Wantsum.

The ES suggests that the route must have taken the form of a ferry crossing because the Wantsum Channel was open during the Roman period. If this is the case, then some form of landing-stage or wharf might be expected. English Heritage's 'Richborough Environs Project' identified two rectangular enclosures or inlets about 300m to the north of the application site and suggests these "*may have been the location of a beaching or crossing point*" in the Roman period. The topography of the channel indicates that any corresponding southern landing point would likely lie within the proposed development site. Notably, archaeological investigation of the road to the north indicated that it remained in use into the late fourth century AD. The ES identifies that the channel south of Richborough island may have already silted-up and substantially narrowed by this date (ES para 6.53) and this may have affected the nature of the crossing here, meaning that a causeway or trackway might be more viable in the later-Roman period. Such a feature may not be visible on geophysical survey depending on its construction and the depth of overlying later alluvium.

The mitigation suggested in the Environmental Statement

The ES states that the proposed development site is of low archaeological potential (ES para 6.83). This is not agreed. As demonstrated above the archaeological potential of the site varies but we suggest the site has a good potential for buried archaeology on the raised spur/peninsula of higher ground within the centre of the site. That no archaeological features were shown on the geophysical survey here might be a result of masking by later alluvium.

We also suggest that the archaeological potential is significantly raised in channel edge areas, for example about the margins of the raised spur/peninsula and in the southern part of the site both east and west of Little East Street Farm. In these locations archaeology buried beneath the alluvium could include preserved organic remains, potentially including structures of Prehistoric and Romano-British date. Applying a blanket level of potential across a site as the ES attempts to do is not reasonable or realistic.

The ES acknowledges that the potential for palaeoenvironmental and organic archaeological remains to exist locally across the proposed development site (ES para 6.65). It explains that the extent, character and significance of such remains is

currently undefined because no intrusive investigation has taken place (ES para 6.75). It also recognises that where present such remains could be of high significance (ES para 6.46).

Because their survival is dependent on their waterlogged state the on-going preservation of such organic archaeological remains and palaeoenvironmental indicators is susceptible to changes to the water-environment. This is acknowledged in the ES which states that “*organic archaeological remains... are sensitive to change and require a stable and wet environment for preservation*” (ES para 6.66). The ES also notes that such remains “*could suffer total loss in the event that the introduction of the panels results in a change in these levels*”. The ES does not definitively state whether such changes will occur but notes the installation of the panels has the potential to do so. Given the extent of the array it is possible that such an impact could be widespread. The proposed landscape (willow-carr) planting also has the potential to locally impact the water-table through water-uptake.

The ES identifies that preventing changes to the levels of water is an important consideration (ES 6.75) but no mitigation measures to achieve this are put forward.

We recommend that further intrusive investigation is required to adequately understand the potential for important palaeoenvironmental and organic archaeological remains within the development site. Without such intrusive investigation the effect of the development on the site’s archaeological interest cannot be adequately defined and measures to minimise or avoid harm cannot be agreed. We therefore recommend that **further information in the form of a field evaluation is needed prior to determination of the planning application**. This is important because the ES acknowledges that these remains could be of high significance and because the proposed development could lead to their total loss (ES para 6.68).

We note that the ES identifies (para 6.83) that archaeological remains may be present whose significance is such that preservation in situ is needed (i.e. harm or loss to these assets needs to be avoided). The ES suggests that such preservation might be achieved by alternative foundation design (the use of surface mounted concrete shoes) and through the exclusion of development from parts of the site.

Areas where development might need to be excluded are not – and cannot – currently be defined. This is because no intrusive field evaluation works have been carried out. The ES suggests such field evaluation could be carried out following the granting of planning permission and be secured by condition. We cannot see how this would allow for exclusion of areas from development. The application under consideration is for full (detailed) planning permission. Therefore, if exclusion might be required as a mitigation response this needs to be determined before the design is fixed and plans approved.

We also note that the ES identifies that the removal of the arrays at the decommissioning stage might have a greater impact than their original construction. The ES identifies that removal of piles without the implementation of additional

mitigation measures will result in further harm to the archaeological resource (ES para 6.82). The ES subsequently explains that “no additional mitigation measures [during the decommissioning phase] have been identified” (ES para 6.87). Instead, it suggests that detailed design proposals for the careful removal of piles could be used to minimise impacts. However, no details of such detailed design proposals are given. We recommend that they need to be clearly set out and understood at this stage, otherwise how can they be agreed and conditioned?

Policy

The NPPF identifies that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance (NPPF 195).

NPPF 209 explains that the effect of the development on non-designated heritage assets should be taken into account when determining planning applications. In doing so the scope of any harm or loss and the significance of the asset will need to be considered. In our comments above we have advised that the archaeological potential of the site is greater than is suggested in the ES.

Footnote 73 of the NPPF states that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments should be treated as if they were designated. If the three mounds to the north of the application site identified as possible *tumuli* were confirmed as upstanding burial mounds, then these would be of a level of significance that footnote 73 would apply.

The ES has assigned a low potential to the overall site. It does acknowledge that there may be areas within the site that contain archaeological remains of high importance, but the location and extent of such remains (if present) is not fully understood.

NPPF 200 states that applicants should be required to describe the significance of any heritage assets affected by a proposal, including any contribution made by their setting. It goes on to note that the information should be sufficient to understand the impact of a proposal on the significance of affected heritage assets.

The ES itself identifies that archaeological remains may be present whose level of significance is such that they require preservation *in situ*, and this may necessitate excluding parts of the site from development. Because no intrusive field evaluation works have been carried out the location and extent of any such archaeology cannot be defined. As such the present application does not contain sufficient information to understand the significance of heritage assets present or how these might be affected by the proposals.

NPPF 200 acknowledges that for heritage assets with archaeological interest a desk-based assessment should be submitted. It notes that this may not be sufficient on its own to adequately understand the significance of any archaeological remains present or the impact that might arise from the development proposal. The NPPF therefore states that where necessary a field evaluation should be submitted. No

field evaluation has been submitted and we advise that one should be provided before the application is determined. We would be pleased to discuss the scope of such a field evaluation with the applicant.