

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



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From: [Redacted] <[\[Redacted\]@stantec.com](mailto:[Redacted]@stantec.com)>
Sent: 18 March 2024 10:25
To: [Redacted] <[\[Redacted\]@DOVER.GOV.UK](mailto:[Redacted]@DOVER.GOV.UK)>
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]

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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Cambridge CB1 2JH



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[REDACTED]

From: [REDACTED]@stantec.com>
Sent: 18 March 2024 15:21
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Little South Solar Farm

Thanks [REDACTED] – very glad to hear you can both attend.

The client has got the KCC response and is not averse to carrying out trial trenching etc – however, we would like to bottom out the objection from Historic England at the meeting on Thursday before we respond fully to KCC's consultation response.

I will let you know about highways as soon as I hear back from the consultant.

Kind regards

[REDACTED]
[REDACTED]
Planning Associate
Direct: [REDACTED]
Mobile: [REDACTED]
[REDACTED]

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Monday, March 18, 2024 10:45 AM
To: [REDACTED]@stantec.com>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Re: Little South Solar Farm

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,



Senior Planning Officer

Dover District Council

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

Email: [redacted]

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Phone: [redacted]



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[REDACTED]

From: [REDACTED]@stantec.com>
Sent: 19 March 2024 12:21
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Little South Solar Farm

Dear [REDACTED]

Looking forward to seeing you on Thursday.

I wonder if we could ask you to stay on the call for a few minutes at the end so we can have a quick catch up on everything more broadly?

Also, the scheme is due for determination in the next few days. Can we agree an extension of time?

Kind regards

[REDACTED]

[REDACTED]
Planning Associate

Direct: [REDACTED]

Mobile: + [REDACTED]
[REDACTED]

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[REDACTED]

From: [REDACTED]
Sent: 20 March 2024 10:22
To: [REDACTED]; [REDACTED]
Subject: 23/01363 - heritage consultee reps attached
Attachments: 23_01363-HISTORIC_ENGLAND-2506886.doc; 23_01363-ARCHAEOLOGICAL_OFFICER-2497337.pdf; 23_01363-ENGLISH_HERITAGE-2499228.pdf; Goshall Valley East Street Ash 23.01363.docx

Hi Both,

Heritage reps from consultees attached for ease.

Many thanks,

[REDACTED]



[REDACTED]
Senior Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ
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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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Telephone 020 7973 3700
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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



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

Telephone 020 7973 3700
HistoricEngland.org.uk





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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



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

Telephone 020 7973 3700
HistoricEngland.org.uk



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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 *RVTVPIAE*) 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.



[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
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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



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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CONSULTATION MEMO

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

Assessment

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

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

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

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



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

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

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

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

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



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

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

Recommendation

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

[REDACTED]

From: [REDACTED]@kent.gov.uk
Sent: 03 April 2024 12:33
To: [REDACTED]
Subject: DOV/23/01363 - Little South Solar Farm, Goshall Valley

Hi [REDACTED]

I hope this finds you well. I've been contacted by archaeologists working for the applicant of the Little South (Goshall Valley) Solar Farm proposal. They are looking to agree a programme of pre-determination archaeological evaluation works for the site. I'm happy to liaise with them and will keep you updated on discussions. I expect that any pre-determination field evaluation will need to be phased, comprising geoarchaeological works in the first instance (probably a combination of boreholes and geophysical (electrical sectioning) survey), with the results of this used to target trial trenches.

Before going back to the applicant's archaeologists, I wanted to check a couple of things with you. Firstly, do you have any indication as to what direction this application is heading – the scale of the proposal any pre-determination evaluation wouldn't be a small task. Secondly, do you know what the current timescale for determination is? Carrying out evaluation (trenching) works at this time of year is likely to be problematic at this time of year due to groundwater. Ideally, any evaluation would be best carried out during drier weather (summertime) but I appreciate this may be problematic in terms of timescales.

Many thanks,

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

Telephone: [REDACTED] | www.kent.gov.uk |

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From: [REDACTED]
Sent: 15 April 2024 16:24
To: [REDACTED]
Subject: Fw: Little South Solar Farm

Hi All,

The agents for the Goshall Valley solar farm (23/01363) are keen to arrange a site visit, provisionally on 7th May. Please let me know if you are able to attend and if so, if there is any time which would be most/least convenient?

Many thanks,

[REDACTED]



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

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From: [REDACTED]@stantec.com>
Sent: 15 April 2024 16:17
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Hi again [REDACTED] – sorry for the bombardment – could we aim for 7th May? What time works best for you?

[REDACTED]
Planning Associate

Direct: +[REDACTED]

Mobile: [REDACTED]

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.

Stantec
3rd Floor, 50-60 Station Road
Cambridge CB1 2JH



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From: [REDACTED]
Sent: Monday, April 15, 2024 3:49 PM
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Ps currently [REDACTED] diary suggests the best options are May 7th, 9th or 10th.

[REDACTED]
Planning Associate

Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]

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: Monday, April 15, 2024 3:48 PM
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Hi [REDACTED]

I am trying to find a good time for the site visit. In terms of attendees, obviously the client, Statkraft, are keen to attend, and one of us from Stantec planning will attend – but in terms of specialisms – could you let me know who would be the best to have – I am hoping to find a time that [REDACTED] (heritage) and [REDACTED] (landscape) can make it but can you confirm that would be ok from your point of view?

Kind regards

[REDACTED]
[REDACTED]
Planning Associate
Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]

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] <[REDACTED]@DOVER.GOV.UK>
Sent: Tuesday, April 9, 2024 2:08 PM
To: [REDACTED] <[REDACTED]@stantec.com>
Subject: Re: Little South

Good afternoon [REDACTED]

Thank you for the extension of time until the end of June, which has been accepted. Yes, I am available to meet on site to review the scheme, please let me know which dates you had in mind and I will confirm my availability over the next few weeks.

Kind regards,

[REDACTED]



[REDACTED]
Senior Planning Officer

Dover District Council

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

Email: [REDACTED]

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

Phone: [REDACTED]



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From: [REDACTED] <[REDACTED]@stantec.com>
Sent: 09 April 2024 14:01
To: [REDACTED] <[REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED] <[REDACTED]@stantec.com>
Subject: Little South

Hi [REDACTED]

Please could we formally agree the extension of time, for now until the end of June 2024?

Also, we discussed potentially meeting on site to review the scheme. Are you available to make that over the next few weeks?

Kind regards

[REDACTED]

[REDACTED]
Planning Associate

Direct: + [REDACTED]

Mobile: + [REDACTED]
[REDACTED]

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: 15 April 2024 16:43
To: [REDACTED]
Subject: RE: Little South Solar Farm

Hello [REDACTED]

I'm not sure what they might want to review, in light of HE comments! For built heritage there's nothing really further to add as there isn't an issue as such, except that they didn't actually identify the church in Ash at all but we've done that and assessed level of harm. Can chat tomorrow when in the office if needed.

Thanks,



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

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



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From: [REDACTED]@DOVER.GOV.UK>
Sent: Monday, April 15, 2024 4:24 PM
To: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>
Subject: Fw: Little South Solar Farm

Hi All,

The agents for the Goshall Valley solar farm (23/01363) are keen to arrange a site visit, provisionally on 7th May. Please let me know if you are able to attend and if so, if there is any time which would be most/least convenient?

Many thanks,
[REDACTED]



[Redacted]

Principal Planning Officer

Dover District Council

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

Email: [Redacted]

Web: dover.gov.uk

Phone: [Redacted]



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From: [Redacted] <[\[Redacted\]@stantec.com](mailto:[Redacted]@stantec.com)>
Sent: 15 April 2024 16:17
To: [Redacted] <[\[Redacted\]@DOVER.GOV.UK](mailto:[Redacted]@DOVER.GOV.UK)>
Subject: RE: Little South

Hi again [Redacted] – sorry for the bombardment – could we aim for 7th May? What time works best for you?

[Redacted]

Planning Associate

Direct: + [Redacted]

Mobile: + [Redacted]

[Redacted]

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.

Stantec
3rd Floor, 50-60 Station Road
Cambridge CB1 2JH



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From: [Redacted]
Sent: Monday, April 15, 2024 3:49 PM
To: [Redacted] <[\[Redacted\]@DOVER.GOV.UK](mailto:[Redacted]@DOVER.GOV.UK)>
Subject: RE: Little South

Ps currently [Redacted] diary suggests the best options are May 7th, 9th or 10th.

[Redacted]

Planning Associate

Direct: + [Redacted]

Mobile: + [Redacted]

[Redacted]

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From: [REDACTED]
Sent: Monday, April 15, 2024 3:48 PM
To: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: RE: Little South

Hi [REDACTED]

I am trying to find a good time for the site visit. In terms of attendees, obviously the client, Statkraft, are keen to attend, and one of us from Stantec planning will attend – but in terms of specialisms – could you let me know who would be the best to have – I am hoping to find a time that [REDACTED] (heritage) and [REDACTED] (landscape) can make it but can you confirm that would be ok from your point of view?

Kind regards

[REDACTED]

[REDACTED]
Planning Associate

Direct: [REDACTED]
Mobile: + [REDACTED]

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From: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Sent: Tuesday, April 9, 2024 2:08 PM
To: [REDACTED] [@stantec.com](mailto:[REDACTED]@stantec.com)>
Subject: Re: Little South

Good afternoon [REDACTED]

Thank you for the extension of time until the end of June, which has been accepted. Yes, I am available to meet on site to review the scheme, please let me know which dates you had in mind and I will confirm my availability over the next few weeks.

Kind regards,

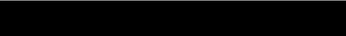
[REDACTED]




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

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From:  [@stantec.com](mailto: @stantec.com)>
Sent: 09 April 2024 14:01
To:  [@DOVER.GOV.UK](mailto: @DOVER.GOV.UK)>
Cc:  [@stantec.com](mailto: @stantec.com)>
Subject: Little South

Hi 

Please could we formally agree the extension of time, for now until the end of June 2024?

Also, we discussed potentially meeting on site to review the scheme. Are you available to make that over the next few weeks?

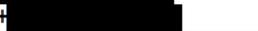
Kind regards





Planning Associate

Direct: +

Mobile: +

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From: [REDACTED]
Sent: 16 April 2024 10:59
To: [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Little South Solar Farm

Hi [REDACTED]

I can make it the morning of the 7th May – I would need to finish on site by 12.

Thanks,

[REDACTED]


Senior Natural Environment Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ
Email: [REDACTED]
Phone: [REDACTED]
Web: dover.gov.uk

My working days are Tuesdays, Wednesdays, Thursdays and Fridays.

From: [REDACTED]@DOVER.GOV.UK>
Sent: Monday, April 15, 2024 4:24 PM
To: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>
Subject: Fw: Little South Solar Farm

Hi All,

The agents for the Goshall Valley solar farm (23/01363) are keen to arrange a site visit, provisionally on 7th May. Please let me know if you are able to attend and if so, if there is any time which would be most/least convenient?

Many thanks,

[REDACTED]


Principal Planning Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield, Dover CT16 3PJ
Email: [REDACTED]
Web: dover.gov.uk
Phone: [REDACTED]

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From: [REDACTED]@stantec.com>

Sent: 15 April 2024 16:17

To: [REDACTED]@DOVER.GOV.UK>

Subject: RE: Little South

Hi again [REDACTED] – sorry for the bombardment – could we aim for 7th May? What time works best for you?

[REDACTED]
Planning Associate

Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]

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Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]

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Planning Associate

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From: [REDACTED]@DOVER.GOV.UK>

Sent: Tuesday, April 9, 2024 2:08 PM

To: [REDACTED]@stantec.com>

Subject: Re: Little South

Good afternoon [REDACTED]

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Kind regards,

[REDACTED]



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



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From: [REDACTED]@stantec.com>
Sent: 09 April 2024 14:01
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@stantec.com>
Subject: Little South

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[REDACTED]

[REDACTED]

Planning Associate

Direct: + [REDACTED]

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[REDACTED]

From: [REDACTED]@kent.gov.uk
Sent: 23 April 2024 11:15
To: [REDACTED]@headlandarchaeology.com
Cc: [REDACTED]@HistoricEngland.org.uk;
[REDACTED]@HistoricEngland.org.uk
Subject: RE: DOV/23/01363 - Solar Farm - Goshall Valley, East Street, Ash, Canterbury, Kent
Attachments: DO 23 01363 LE01 further info inc pre-det eval.pdf

Dear [REDACTED]

Sorry for the delay in getting back to you.

Hopefully, you have seen a copy of our consultation response to the planning application. This sets out what we think are the principal issues in terms of the site's archaeological interest and I attach a copy for reference.

I suggest that a staged programme of pre-determination evaluation works will be necessary to more fully understand the character and significance of archaeology at the solar farm site. As per the requirements of the NPPF a proper understanding the significance of heritage assets must be the starting point for any decision taking.

Given the nature of the site's landscape history and size, I recommend that any evaluation works should be deposit led in the first instance. I think a combination of geophysical and geoarchaeological techniques will be required initially. Electrical Resistivity Tomography (ERT) might be useful as a first stage to provide us with a series of virtual sections through the site to understand its subsurface architecture. This might then be followed by borehole/auger survey to ground-truth the geophysical survey and to inform our understanding of the palaeoenvironmental potential of deposit sequences and identify any areas of heightened potential.

The results from these, alongside existing Lidar, topographic information, and predictive modelling techniques could then be used to target areas for purposive trial trenching. As a starting point I would suggest channel edge areas, and any associated inlets, areas where preserved organic remains might be predicted, any gravel highs or gravel ridges and the corridor where the predicted Roman route crosses the site would seem appropriate to target. Given the low-lying nature of the site any evaluation trenching might be best timed for the drier summer months. There may also be ecological and other constraints that will affect the timing of the works.

Do you know if the applicant is looking to undertake any geotechnical site investigation works at the pre-determination stage, if so then there may be opportunity to integrate archaeological works with these?

I'd be happy to discuss the precise scope further as required. I've copied Anne de Vareilles the Historic England science advisor for the south east region into my response as she may have further advice in terms of evaluation techniques. Because of the close links between the application site and the nationally important site of Richborough I've also cc'd Rebecca Lambert, Inspector of Ancient Monuments.

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

Kind regards,
[REDACTED]

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

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

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From: ██████████@headlandarchaeology.com>
Sent: Thursday, April 18, 2024 11:14 AM
To: ██████████@kent.gov.uk>
Subject: RE: DOV/23/01363 - Solar Farm - Goshall Valley, East Street, Ash, Canterbury, Kent

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

Dear ██████████

I am just following up on my email below regarding the requirement for archaeological investigation at the above site in East Street, Ash, south of Richborough Roman fort, which is proposed for a solar farm. I was hoping you may have some time to discuss the potential fieldwork requirements with me?

I'm keen to get a WSI drawn up and submitted as soon as possible as the client is keen to fully understand any potential archaeological constraints there may be.

I realise you are busy and am very grateful for your time on this matter.

Kind regards,

██████████
██████████



██████████ Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
Copper offices: Third Floor, South 49 Unit 1 | Clearview Court | Twyford | Hereford | HR2 6JR
www.headlandarchaeology.com

Headland Archaeology South & East Building 68C Wrest Park Silsoe Bedfordshire MK45 4HS t 01525 861 578	Headland Archaeology Midlands & West Unit 1 Clearview Court Twyford Rd Hereford HR2 6JR t 01432 364 901	Headland Archaeology Yorkshire & North Units 23-25 Acorn Business Centre Balme Road Cleckheaton BD19 4EZ t 0127 493 8019	Headland Archaeology North West RSK Fourways House 57 Hilton St Manchester M1 2EJ t 0161 236 2757	Headland Archaeology North East 13 Janes Edinbu t 0131
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Registered office: 65 Sussex Street, Glasgow, G41 1DX.

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From: ██████████@headlandarchaeology.com>
Sent: Wednesday, April 3, 2024 9:49 AM
To: ██████████@kent.gov.uk
Subject: Re: DOV/23/01363 - Solar Farm - Goshall Valley, East Street, Ash, Canterbury, Kent

Dear ██████████

I am writing to you about the above project and in response to your letter dated 8th February 2024 (attached) in reference to a proposed Solar Farm near Sandwich (NGR: TR 3111 5933). As a response to the direct impacts of the scheme you request a field evaluation should be provided before the planning application is determined, I am hoping to discuss the scope of such a field evaluation with you.

Despite the limited results of the geophysical survey, the archaeological desk-based assessment (attached) and ES chapter have highlighted the potential of archaeological deposits of interest within the site. As noted in the letter its position within the Wantsum Channel means that there is potential for important palaeoenvironmental and organic archaeological remains, particularly around the raised spur/peninsula of higher ground within the centre of the site and 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 not visible on the geophysical survey.

I believe a geo-archaeological investigation would be beneficial given the site location. This could lead on to targeted trial trenching in the locations above if anything of interest is found. It would also help define the extent of the channel and may provide important data on changes to this environment during past periods.

If you are in agreement I will progress with producing a WSI for the geoarchaeological fieldwork. Is there anything else that may be useful to note in the preparation of the methodology?

I'm obviously also more than happy to talk this through with you on the phone or virtual meeting.

I am very grateful for your time on this matter.

Kind regards,



 Archaeology and Built Heritage Consultant

Headland Archaeology Midlands & West
Copper offices: Third Floor, South 49 Unit 1 | Clearview Court | Twyford | Hereford | HR2 6JR
www.headlandarchaeology.com

Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire I MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

Headland Archaeology Yorkshire & North
Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

Headland Archaeology North West
RSK Fourways House | 57 Hilton St
Manchester | M1 2EJ
t 0161 236 2757

Headland Archaeology Edinburgh
13 Jane St
Edinburgh
t 0131 225 1234

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Registered office: 65 Sussex Street, Glasgow, G41 1DX.

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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/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.

From: [redacted]@headlandarchaeology.com>
Sent: 16 August 2024 09:16
To: [redacted]; [redacted]
Cc: [redacted]
Subject: RE: Geophysics report and next phases - Little South Solar scheme (DOV/23/01363).

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

Hi [redacted]

Thanks for letting me know. I have forwarded the invite to [redacted]

@ [redacted]@dover.gov.uk hopefully received ok?

Kind regards,

[redacted]



[redacted] Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com

Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire | MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

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Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

Headland Archaeology North West
RSK Fourways House | 57 Hilton St
Manchester | M1 2EJ
t 0161 236 2757

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13 Jane
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From: [redacted]@DOVER.GOV.UK>
Sent: Thursday, August 15, 2024 1:48 PM
To: [redacted]@headlandarchaeology.com>
Cc: [redacted]@stantec.com>
Subject: Re: Geophysics report and next phases - Little South Solar scheme (DOV/23/01363).

Dear [redacted]

Thank you for the meeting invite, however unfortunately I am unable to attend on Monday as I am at another meeting. I have asked the Team Leader to attend in my absence. Please could you invite [redacted]@dover.gov.uk

Kind regards,

[redacted]



Principal Planning Officer

Dover District Council

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

Email: [REDACTED]

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

Phone: [REDACTED]



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Sent: 14 August 2024 10:48

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

[REDACTED] <[\[REDACTED\]@kent.gov.uk](mailto:[REDACTED]@kent.gov.uk)>; [REDACTED] <[\[REDACTED\]@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>;

[REDACTED] <[\[REDACTED\]@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>

Cc: [REDACTED] <[\[REDACTED\]@statkraft.com](mailto:[REDACTED]@statkraft.com)>; [REDACTED] <[\[REDACTED\]@statkraft.com](mailto:[REDACTED]@statkraft.com)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>; [REDACTED] <[\[REDACTED\]@stantec.com](mailto:[REDACTED]@stantec.com)>; [REDACTED] <[\[REDACTED\]@stantec.com](mailto:[REDACTED]@stantec.com)>;

[REDACTED] <[\[REDACTED\]@statkraft.com](mailto:[REDACTED]@statkraft.com)>

Subject: Geophysics report and next phases - Little South Solar scheme (DOV/23/01363).

When: 19 August 2024 11:00-12:00.

Where: Microsoft Teams Meeting

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Meeting to share the results of the EM/ERT survey and discuss programme for the following phases of work.

To include.

Stantec: [REDACTED]

LPA case officer: [REDACTED]

Statkraft engineer: [REDACTED]

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting [REDACTED]

Passcode: [REDACTED]

For organizers: [Meeting options](#)

From: [REDACTED] [@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>
Sent: Tuesday, August 13, 2024 10:56 AM
To: [REDACTED] [@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>; [REDACTED] [@kent.gov.uk](mailto:[REDACTED]@kent.gov.uk)
Subject: RE: Geophysics report and next phases - Little South Solar scheme (DOV/23/01363).

Hi [REDACTED]

I'm free on the 19th from 10:30-14:30.

Thank,

[REDACTED]



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Sent: Monday, August 12, 2024 4:38 PM
To: [REDACTED] [@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>; [REDACTED] [@kent.gov.uk](mailto:[REDACTED]@kent.gov.uk)
Subject: Geophysics report and next phases - Little South Solar scheme (DOV/23/01363).

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Dear both

We have had the EM/ERT survey results back for this site and would like to discuss the findings and share with you our plan for the boreholes and trenching.

Are you possibly available for a catch-up meeting next **Monday 19th August**?

Kind regards,



 Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com

Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire | MK45 4HS
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Unit 1 | Clearview Court | Twyford Rd
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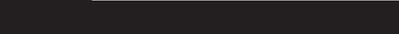
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Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

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Manchester | M1 2EJ
t 0161 236 2757

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Sent: Friday, June 28, 2024 4:07 PM
To:  <[@kent.gov.uk](mailto:kent.gov.uk)>
Cc:  <[@HistoricEngland.org.uk](mailto:HistoricEngland.org.uk)>
Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

Hi [redacted] and [redacted]

I was hoping to arrange a meeting with you to discuss the results of the EM survey and the placement of ERT transects.

Currently we have the following schedule:

- w/c Mon 24th June – EM surveys (5-10 days)
- w/c 8th July – EM reporting and agreement of ERT transects
- w/c 15th July – ERT survey (5 days)

[redacted] who is conducting the survey has suggested a meeting on the **12th July** to go through the EM data and ERT proposals, if this day would work at all for you both?

If so I will send a teams invite out.

Many thanks,

[redacted]



[redacted] Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com



Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire I MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

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Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

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RSK Fourways House | 57 Hilton St
Manchester | M1 2EJ
t 0161 236 2757

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Cc: [REDACTED] <[\[REDACTED\]@statkraft.com](mailto:[REDACTED]@statkraft.com)>
Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

Many thanks [REDACTED]

I'd be happy to be involved in placing the ERT transects once the EM data has been interpreted.

[REDACTED]



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Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

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Dear [REDACTED]

Many thanks for your review and input.

The landowner has confirmed that the site has been planted with field beans which could be 60cm-80cm by this time of year, depending on the weather. As the EM equipment is held about 1m above the ground this should be ok.

I believe a field visit was taking place yesterday to examine access and site conditions. I will liaise with Mark and the surveyors to ensure that field conditions were suitable and that the surveys will be going ahead as scheduled, and feedback as appropriate.

Kind regards,



██████████ Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com



Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire | MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

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Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

Headland Archaeology North West
RSK Fourways House | 57 Hilton St
Manchester | M1 2EJ
t 0161 236 2757

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13 Jane St
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██████████ [@kent.gov.uk](mailto:██████████@kent.gov.uk)
Cc: ██████████ [@statkraft.com](mailto:██████████@statkraft.com)>
Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

Dear ██████████

Thank you for sharing the methodology, which seems fine to me.

My only concern is that vegetation should not be above knee-height for EM surveys. Crops are reaching their maximum height at this time of year. Can you reassure us that you have the required permissions for the outlined area (Fig.1) and that field conditions are appropriate?

Many thanks,

[Redacted]

[Redacted]

Science Advisor

South East Region

Investigative Science Team | National Specialist Services Department

Historic England

[Redacted]



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From: [Redacted] <[\[Redacted\]@headlandarchaeology.com](mailto:[Redacted]@headlandarchaeology.com)>

Sent: Friday, June 14, 2024 11:20 AM

To: [Redacted] <[\[Redacted\]@headlandarchaeology.com](mailto:[Redacted]@headlandarchaeology.com)>; [Redacted]

[Redacted] <[\[Redacted\]@HistoricEngland.org.uk](mailto:[Redacted]@HistoricEngland.org.uk)>; [Redacted] <[\[Redacted\]@kent.gov.uk](mailto:[Redacted]@kent.gov.uk)>

Cc: [Redacted] <[\[Redacted\]@statkraft.com](mailto:[Redacted]@statkraft.com)>

Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

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Dear [Redacted] and [Redacted]

Further to your meeting on 24th May with Andy we have now finalised our approach for the initial stage of the archaeological investigations at Little South Solar, East Steet, Ash (DOV/23/01363). Attached is a methodology for the proposed EM and ERT surveys, with costs removed. The work is currently booked in for w/c 24th June.

We would welcome your input on the placement of the ERT transects once we have the EM data back. If you are happy to be involved in a meeting I can arrange one down the line once we know more.

Kind regards,



██████████ Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com



Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire | MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

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Units 23-25 | Acorn Business Centre | Balme Road
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Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

Hi ██████████ and ██████████

Further to our recent meeting and correspondence, we have just had a catch up with our Statkraft client ([REDACTED], cc'd in here).

[REDACTED] thoroughly understands the need for an iterative approach to establishing the heritage significance of any archaeological remains at the Little South Solar site (and how they might be impacted by the scheme).

To this end would you (and [REDACTED] be available for a brief discussion to select the most appropriate geophysical technique(s) to employ next. We have sought costs from geophysicists for:

- EM followed by ERT transects, and
- TEM alone

The costs are pretty much the same for the respective approaches. TEM is marginally more expensive but has the advantage of being a single survey and won't require the multiple rounds of arranging access, survey (and disruption for landowners) and reporting.

We are assuming that the results of the geophysical survey will be used to inform selection of borehole transect(s) for modelling of the geoarchaeology of the site and establishing paleoenvironmental potential. With this then informing where to place trial trenches (as well as the projected line of the Roman road).

I will send a Teams invite. Please feel free to suggest an alternative date/time if you prefer.

Thanks for your help with the scheme,

Best wishes,

[REDACTED]



[REDACTED] Director of Consultancy
BA MA PhD MCIfA
Headland Archaeology North West
172 Chester Road | Helsby | WA6 0AR
t 01612362757 | m [REDACTED]
www.headlandarchaeology.com

Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire I MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
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t 01432 364 901

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Cc: [REDACTED] <[\[REDACTED\]@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>
Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

Dear [REDACTED]

That summary seems fair to me (without commenting on points specifically relating to [REDACTED] position).

Just a typo: my name is spelt [REDACTED] (not obvious from my email address).

Many Thanks,

[REDACTED]

[REDACTED]

Science Advisor

South East Region

Investigative Science Team | National Specialist Services Department

Historic England

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To: [REDACTED] <[\[REDACTED\]@kent.gov.uk](mailto:[REDACTED]@kent.gov.uk)>; [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>
Cc: [REDACTED] <[\[REDACTED\]@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>
Subject: summary of discussion on archaeological aspects of Little South Solar scheme

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Dear [REDACTED] and [REDACTED]

Many thanks for your time this morning discussing the archaeological aspects of the Little South Solar scheme. It was really helpful to develop a better understanding of your expectations for information required to determine the planning application with respect to buried archaeology at the site.

I thought it helpful to send a brief email outlining the key points covered during our discussion and what the next steps might be. Please feel free to proffer comments or suggest adjustments. I'd like to use this to inform a briefing to our client at Statkraft.

Present: [REDACTED] (Historic England Regional Science Advisor); [REDACTED] (Kent CC archaeological advisor); [REDACTED] and [REDACTED] (Headland Archaeology Ltd consultancy team).

- The site is located on reclaimed ground within the former Wantsum Channel close to the Richborough Roman fort and amphitheatre
- There is a possible Roman road passing through the site towards Roman Richborough
- There may have been an earlier ferry crossing during the Roman period (with associated structures/waterfront facilities)
- LiDAR data suggest that there is a ridge of high ground projecting into the channel which may have carried the road (possible a causeway or a natural feature)
- The shape of the channel, its edges and islands within it are currently unknown

- The periphery and islands within the channel are likely to have been the focus of human activity during the prehistoric periods
- The location of areas of greatest archaeological potential within the site are currently unknown (apart from the projected road and ridge)
- The earlier magnetometry survey did not identify anomalies of likely pre-Medieval date since the near surface deposits consist of boundaries and drain of late Medieval /post medieval date associated with reclamation of the land
- Archaeologically sensitive deposits and structures (if present) are likely to be located at unknown and variable depth within the development area
- There are likely to be deposits within the Wantsum Channel which contain palaeoenvironmental information on landuse and reclamation from the prehistoric periods through to the post-medieval period. The location and depth of these deposits is currently unknown
- Geoarchaeological modelling of the site will inform an understanding of the location and archaeological significance of remains
- Solar development is less damaging to archaeology than many forms of development with a potential to minimise impacts through adjustment to layout or design.
- Taking an area of arable land out of agricultural use for solar development for 30+ years will likely have a net benefit to any near-surface archaeological deposits
- Foundations from solar development (i.e. piles) can disrupt the moisture/oxygen levels in buried archaeological deposits leading to irreversible damage

At present:

- [REDACTED] does not feel like he has enough information on the likely and potential archaeological remains at the site to determine the application.
- [REDACTED] previously offered pre-application advice on the need to select the most appropriate geophysical and evaluation techniques for understanding this site- this was not followed up and a magnetometry geophysical survey was undertaken which doesn't give all the information required
- A single ERT and borehole transect across the site will not give [REDACTED] (or [REDACTED] confidence that the archaeological significance of the site will be well-understood
- [REDACTED] would prefer an iterative approach to understanding the archaeology of the site with either:
 - an initial EM survey to map the underground topography, followed by targeted ERT transects, then targeted boreholes for geoarchaeological/palaeoenvironmental investigation and subsequent targeted trial trenching.
 - Use of a combined technique (TEM) then targeted boreholes for geoarchaeological/palaeoenvironmental investigation and subsequent targeted trial trenching
- [REDACTED] is uncomfortable with the use of a mitigation strategy to defer extensive archaeological investigation to a post-determination phase. He isn't convinced that measures such as redesign of the layout to secure preservation in situ of archaeological remains of national importance (for example securing a no-dig, no development of a corridor over a Roman road) can be secured by condition, since it would make the consented scheme unbuildable.

Actions:

- Confirm the substance of the discussions ([REDACTED] and [REDACTED] – this email)
- Brief Statkraft on what is currently required to determine the application with respect to buried archaeology [REDACTED]
- Discuss with Statkraft's planning consultant to see if there might be mechanisms for securing design flexibility into the post-consent phase to give [REDACTED] confidence that a mitigation strategy could work for this

project (and thereby defer some archaeological costs into the stage where the scheme is viable and the expense isn't incurred whilst project is still at risk). (■■/■■ Statkraft)

- Resume discussions with ■■ and ■■ about the scope of the investigations required to determine the application and what mitigation measures might be considered acceptable (■■/■■/Statkraft).

Hope this makes sense. Can you let us know soon if you are happy with the above or would like adjustments? I can then use it to brief Statkraft.

Cheers,

■■■



■■■ Director of Consultancy
BA MA PhD MCIfA

Headland Archaeology North West
172 Chester Road | Helsby | WA6 0AR
t 01612362757 | m ■■■

www.headlandarchaeology.com

Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

Headland Archaeology Yorkshire & North
Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

Headland Archaeology North West
RSK Fourways House | 57 Hilton St
Manchester | M1 2EJ
t 0161 236 2757

Headland Archaeology Edinburgh
13 Jane St
Edinburgh
t 0131 225 1111

Headland Archaeology (UK) Ltd is a company registered in Scotland under number 342945.
Registered office: 65 Sussex Street, Glasgow, G41 1DX.

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