

From: [REDACTED]@headlandarchaeology.com>
Sent: 24 September 2024 17:54
To: [REDACTED]@kent.gov.uk; [REDACTED]@HistoricEngland.org.uk
Cc: [REDACTED]@statkraft.com;
Subject: RE: Little South Solar Evaluation Trial Trenching: start date and site visit?

Dear [REDACTED]

Many thanks for attending site last Friday to view the evaluation trenches. It was great to be able to meet you in person and get your advice on the progress of the work and the opening up of trenches 1-8 of 10.

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Kind regards,

[REDACTED]



[REDACTED] Archaeology and Built Heritage Consultant

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From: [REDACTED]@kent.gov.uk [REDACTED]@kent.gov.uk
Sent: Wednesday, September 11, 2024 4:31 PM
To: [REDACTED]@headlandarchaeology.com>; [REDACTED]@HistoricEngland.org.uk
Cc: [REDACTED]@statkraft.com; [REDACTED]@headlandarchaeology.com>; [REDACTED]
[REDACTED]@headlandarchaeology.com>; [REDACTED]@DOVER.GOV.UK
Subject: RE: Little South Solar Evaluation Trial Trenching: start date and site visit?

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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]@headlandarchaeology.com>
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[REDACTED]@HistoricEngland.org.uk>
Cc: [REDACTED]@statkraft.com>; [REDACTED]@headlandarchaeology.com>;

██████████@headlandarchaeology.com>

Subject: Little South Solar Evaluation Trial Trenching: start date and site visit?

Hi ██████ and ██████

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If you have any queries, feel free to get in touch.

Many thanks for your help navigating the archaeological requirements,

Best wishes,

██████████



part of the **RSK** Group



██████████ Director of Consultancy
BA MA PhD MCIFA

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From: [redacted]@headlandarchaeology.com>
Sent: 27 September 2024 15:59
To: [redacted]@kent.gov.uk; [redacted]; [redacted]@HistoricEngland.org.uk
Cc: [redacted]@statkraft.com; [redacted]
Subject: RE: Little South Solar Evaluation Trial Trenching

Dear [redacted]

A summary of progress as promised as site works and backfilling have been completed today:

- Key results include
 - No Roman Road
 - At least two cremations, with the possibility of multiple interments in discreet cuts. Romano-British date. Small jet/shale bracelet suggests a child's grave.
 - A single cremation lifted in urn/pot for excavation in lab by human bone specialist.
 - Other exposed remains cleaned, planned, surveyed, and photographed. Covered with geotextile (with landowner's consent) to act as a marker in future, gently back-filled.
 - Peat deposit identified in trench 1 at the end of trench within channel- sampled for processing
- Post ex work will commence next week. Likely to be an interim statement pending any specialist reports being completed- the key information to inform determination will be in the interim report (nature, date, significance of remains).

Kind regards,

[redacted]



[redacted] Archaeology and Built Heritage Consultant

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part of the **RSK** Group



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From: [redacted]@stantec.com>
Sent: 10 October 2024 16:18
To: [redacted]; [redacted]@historicengland.org.uk
Cc: [redacted]; [redacted]@HistoricEngland.org.uk; [redacted]@kent.gov.uk; [redacted];
Subject: Letter in relation to 23/01363 - Little South Solar
Attachments: 333100227 A3 LK 20241010 Letter to HE.pdf

Dear [redacted]

Please find attached a letter in relation to Historic England's comments on the above application.

We look forward to your response.

Kind regards

[redacted]

[redacted]

Planning Associate

Direct: +[redacted]

Mobile: +[redacted]

[redacted]

Please note: I work part time - I do not work Wednesday afternoons or Fridays.

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



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Stantec UK Limited
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UNITED KINGDOM

10 October 2024

Project/File: 333100227/A3/LK

F.A.O. [REDACTED]

Historic England
4th Floor
Cannon Bridge House
25 Dowgate Hill
London
EC4R 2YA

Dear [REDACTED]

Reference: Goshall Valley, East Street, Ash – Application Ref: 23/01363

Following receipt of your comments on the above application, dated 8 March 2024, and subsequent meeting with you on 21 March 2024, we have made substantial progress with gathering information and positively engaging with relevant consultees in order to resolve matters raised during the consultation. This includes comprehensive archaeological field evaluation undertaken in accordance with a programme of works agreed by the County Archaeologist and Historic England.

We are confident that all substantive matters raised during consultation on the planning application are capable of being resolved. Given the overwhelming evidence for the causes and impacts of climate change and the critical need for renewable energy, proposals such as this one should be delivered as soon as possible. We are firmly of the view that planning permission should be granted for the proposed solar farm.

We intend to submit a package of further information to Dover District Council by 31st October which we consider will be sufficient for the application to now be determined. We are therefore writing to ask for some further clarification on the points you have raised to allow us to provide a comprehensive response for the Local Planning Authority on heritage.

We have set out our queries below:

Viewpoints

Paragraph 1, page 4:

- *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”.*

To ensure that we consider the correct representative viewpoints, are you able to provide locations from which you stood to the southern side of the valley to appreciate the landscape topography? It is our understanding that only the mound of the amphitheatre is visible from the south from the public highway (A256), but we are unaware of any PRow, or other publicly accessible viewpoint from the south which would allow views across the former channel (i.e. the site) towards the monument.

Reference: 333100227/A3/LK

Paragraph 2, page 4:

- *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.*

Again, are you able to provide locations where you consider the amphitheatre to be 'very visible' currently in views from the south and west?

Archaeological Records

Paragraph 4, page 5: *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.*

Despite exhaustive checks, no details of any such excavations are available in the public record. The archaeological assessment being undertaken by Headland Archaeology has found no evidence that would corroborate this statement. Initial findings from further intrusive archaeological investigation, undertaken in consultation with Kent Archaeological Advisors and Anne De Vareilles from HE, has also not found any evidence that would support that position. Are you able to provide further details of the excavations upon which this statement is based?

Paragraph 4, page 5:

In relation to the amphitheatre, *"...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 previous query around providing details of the archaeological evidence relating to the presence of the Roman road network would also apply to this observation.

Current excavations have specifically addressed the potential for this conjectured road with 6 trenches excavated across the projected route. No evidence has been found that would support the presence of a Roman road or road network across the valley floor. Given that it was thought this might have been a key route to the Roman fort, one would expect it to be of substantial construction and subject to repair and maintenance, resulting in a heavily compacted agger typically over a meter thick with flanking ditches. Such a structure should have left some archaeological evidence along its alignment. However, there is no evidence within the site for a buried Roman road to the south that would contribute to the landscape grain or delineate a (lost) key landscape feature associated with Roman Richborough.

Furthermore, recent theories suggest that the amphitheatre at Richborough was associated with the early development of the town and as such would have been located outside the limits of the urban area, built on a site that featured existing natural depressions¹. Due to the topography and the way in

¹ Historic England: Roman Amphitheatres, Theatres, and Circuses (2018), p.5

Reference: 333100227/A3/LK

which we understand the monument was accessed, the landscape to the south is therefore considered to make less of a contribution to the appreciation of its strategic importance, centred around the fort, port, and triumphal arch, very little of which would have been appreciated in views from the south.

On this basis it is considered more likely that views from the east would have had a much greater level of importance and relationship with the SM than those from the south, although it is acknowledged that the coastline has changed significantly since that date and is now occupied by permanent industrial development.

We therefore ask for clarification on:

1. Whether the absence of even the most ephemeral evidence to support the conclusion that there was a Roman road crossing the site would change HE's view on the relationship of the SM with the former Wantsum Channel?
2. Whether HE is able to provide any evidence to support the assumptions that the amphitheatre was positioned specifically to be appreciated from the south?

Planning Balance and Heritage Mitigation Measures

Paragraph 5, page 7:

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

As mentioned above, it appears that HE's views on the significance of the application Site in relation the Roman Fort and Amphitheatre is largely based on the assumption that there was once a Roman road passing through it and the potential for development to destroy archaeological remains associated with the SM. On this basis HE stated that:

Paragraph 4, Page 1:

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

As previously mentioned, we are close to completing additional archaeological investigation to assist in our understanding of the wider historical setting of the monument. The additional archaeological investigations have confirmed that there is no evidence at all to support the assertion that a Roman road passes through the site approaching Roman Richborough from the south. They have identified evidence in one area of the wider Roman occupation of the landscape around Richborough. However, the finds include several Romano-British cremations within the area of raised land in the centre of the site. This would have been a ridge of high ground projecting into the Wantsum channel during the Romano-British period. Whilst these contribute to our understanding of activities beyond the monument, it is not considered that any significant archaeological features would be lost through the development of a solar farm within the site. Notwithstanding the above, should any localised archaeological remains be found on site, they can be mitigated either by preservation in situ i.e. by avoiding development in archaeologically sensitive areas, or alternatively, they can be fully excavated and any finds recorded. As such, the investigations carried out to date, along with any future excavations required post-determination, will only serve to improve the understanding of the relationship of the former Wantsum

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Channel and adjacent areas with the SM. We are currently undertaking further engagement with Ben Found in relation to possible mitigation measures relating to the archaeological resource. Initial discussions with Ben have established that impacts on the cremations can be satisfactorily mitigated and the findings do not represent an in principle objection to the proposed development.

Mitigation and Public Benefits

It is considered that the removal of modern agricultural land management practices would be of benefit to securing the long-term preservation of any unknown archaeological remains within the site. The remains found during the trial trenching were within close proximity to the surface (200 mm) and are at risk of being ploughed out in the short - medium term should existing agricultural practices continue. By demonstrating conclusively that there was no Roman road network crossing the channel, it is considered that the excavation works have already provided a greater understanding of the landscape surrounding Richborough, better revealing the significance of the monument and how it related to its wider setting.

Additionally, the Applicant would be willing to fund measures to improve the understanding of the site, such as information boards within the Nature Restoration Area and within the SM itself, in collaboration with English Heritage. The provision of information boards showing how the area has changed over time, for example, would provide through interpretation, a direct heritage benefit to be weighed in the planning balance. We believe that these measures would go some way towards enhancing the visitor experience, and help better reveal the significance of the monument, should planning permission be granted.

It has also been suggested that the layout could also potentially be amended to create a viewing corridor through the Site to allow uninterrupted views across the Wantsum Channel from the amphitheatre. We would welcome your views upon such a change.

In relation to the mitigation measures already proposed, the original planning submission included planting of willow carr along the northern edge of the development to soften the interface between the solar farm and the nature restoration area. However, it is understood that both HE and the County Archaeologist consider that the planting itself would be harmful on heritage grounds through its impact on the openness of the landscape in this area.

As you will be aware, one of the challenges for decision makers is to find the appropriate balance between competing interests. Having reviewed the use of willow carr from a heritage, landscape, and ecology perspective, we are content to remove this from the mitigation strategy and provide an alternative planting schedule which will continue to be in keeping with the objectives of the Ash Levels and Richborough Pasture Local Wildlife Site and would therefore make a positive contribution towards enhancing biodiversity in the area. We are currently considering the use of further reed beds to match other areas within the nature restoration area; however, we would welcome HE's view as to what they feel would be appropriate.

Please can you also confirm whether the level of harm identified in the consultation response would be reduced by removing the willow carr and replacing it with another wetland planting regime? We would be grateful for clarification of HE's position on this matter, in light of the latest evidence and information available.

10 October 2024

F.A.O. [REDACTED]

Page 5 of 5

Reference: 333100227/A3/LK

Conclusion

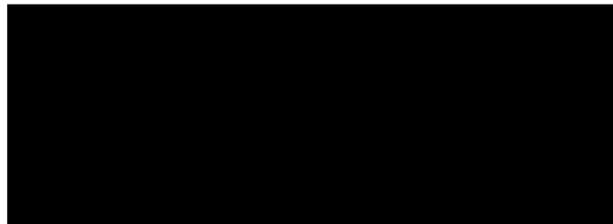
Notwithstanding the current Historic England objection, should a position be reached where the Council is minded to grant planning permission, we would like to seek clarification as to what mitigation HE may consider appropriate, particularly in relation to providing some direct heritage benefits, so that these can be included in our forthcoming submission.

We would be grateful if you are able to respond to the points of clarification before 31st October 2024, so that we can incorporate appropriate mitigation measures in our submission.

For your convenience, a complete list of our questions (numbered) is attached.

Yours sincerely,

STANTEC UK LIMITED



[REDACTED] [REDACTED]
Heritage Planning Director

Phone: + [REDACTED]

Mobile: [REDACTED]

[REDACTED]@stantec.com

Questions:

1. To ensure that we consider the correct representative viewpoints, are you able to provide locations from which you stood to the southern side of the valley to appreciate the landscape topography?
2. Are you able to provide locations where you consider the amphitheatre to be 'very visible' currently in views from the south and west?
3. Are you able to provide further details of the excavations in the valley to which you refer in paragraph 4, page 5 of your comments?
4. We would ask for conformation as to whether the absence of even the most ephemeral evidence to support the conclusion that there was a Roman road crossing the site would change HE's view on the relationship of the SM with the former Wantsum Channel?
5. We would ask whether HE is able to provide any evidence to support the assumptions that the amphitheatre was positioned specifically to be appreciated from the south?
6. We would welcome your views on any amendments that may be made to the layout of the proposals to create a viewing corridor across the site towards the monument.
7. We would welcome your views on any potential changes to the planting strategy within the nature restoration area and what Historic England may consider appropriate.
8. Please can you also confirm whether the level of harm identified in the consultation response would be reduced by removing the willow carr and replacing it with another wetland planting regime?
9. We would like to seek clarification as to what mitigation HE may considered appropriate, particularly in relation to providing some direct heritage benefits, so that these can be included in our forthcoming submission.

From: [REDACTED]@HistoricEngland.org.uk>
Sent: 05 April 2025 00:02
To: [REDACTED]
Cc: South East ePlanning
Subject: IMPORTANT: Goshall Valley solar - extension of time requested

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

Dear [REDACTED]

We have received the consultation for the above case, and request an extension if time. If at all possible we require an extension until Friday 2nd May. This is because the officers involved are on staggered leave over the Easter period returning fully on 28th April.

The case is a significant case for us because of our previous objection, and our response will need to be scrutinised via our Leadership Team, taking further time.

If you could let me know as soon as possible on Monday if this extension would be acceptable I would be most grateful.

Kind Regards

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

Historic England
Floor 4 The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA
Direct dial: [REDACTED] Mob: [REDACTED]
Main office: 020 7973 3700

Annual Leave advance notice: I will be on leave from 12th April, returning 28th

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From: [REDACTED]
Sent: 08 April 2025 10:27
To: [REDACTED]
Cc: e-seast@HistoricEngland.org.uk
Subject: Re: IMPORTANT: Goshall Valley solar - extension of time requested

Dear [REDACTED]

Thank you for your email on Saturday. I have no objection to extending this, however please be aware that the current extension of time for the application to be determined has passed (and although an extension has been requested, a response has not yet been received agreeing/refusing an EOT).

I trust this is of assistance and if there is any update that changes this position then I will contact you as soon as possible.

Kind regards,
[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]@HistoricEngland.org.uk>
Sent: 05 April 2025 00:02
To: [REDACTED]@DOVER.GOV.UK>
Cc: South East ePlanning <e-seast@HistoricEngland.org.uk>
Subject: IMPORTANT: Goshall Valley solar - extension of time requested

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

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Kind Regards

[Redacted]

[Redacted]

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

Historic England

Floor 4 The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

Direct dial: [Redacted] Mob: [Redacted]

Main office: 020 7973 3700

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From: [REDACTED]@HistoricEngland.org.uk>
Sent: 08 April 2025 12:29
To: [REDACTED]
Cc: South East ePlanning; Roberts, Paul
Subject: RE: IMPORTANT: Goshall Valley solar - extension of time requested

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Dear [REDACTED]

Many Thanks for getting back to us on this, and for agreeing to an extension of time for our comments to 2nd May.

We note the EOT situation, however, and if you could keep us updated in any changes or approvals in regard to this, that would be most helpful. To note I will be on leave soon, so if you can ensure any response was copied to our central inbox, copied in here, that would be much appreciated.

With Kind Regards

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

Historic England
Floor 4 The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA
Direct dial: [REDACTED] Mob: [REDACTED]
Main office: 020 7973 3700

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 08 April 2025 10:27
To: [REDACTED]@HistoricEngland.org.uk>
Cc: South East ePlanning <e-seast@HistoricEngland.org.uk>
Subject: Re: IMPORTANT: Goshall Valley solar - extension of time requested

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

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I trust this is of assistance and if there is any update that changes this position then I will contact you as soon as possible.

Kind regards,
[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] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>
Sent: 05 April 2025 00:02
To: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Cc: South East ePlanning <e-seast@HistoricEngland.org.uk>
Subject: IMPORTANT: Goshall Valley solar - extension of time requested

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

Dear [REDACTED]

We have received the consultation for the above case, and request an extension if time. If at all possible we require an extension until Friday 2nd May. This is because the officers involved are on staggered leave over the Easter period returning fully on 28th April.

The case is a significant case for us because of our previous objection, and our response will need to be scrutinised via our Leadership Team, taking further time.

If you could let me know as soon as possible on Monday if this extension would be acceptable I would be most grateful.

Kind Regards

[REDACTED]

[REDACTED]

Inspector of Ancient Monuments, Kent, East and West Sussex

Regions Group: London and South East

Historic England

Floor 4 The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

Direct dial: [REDACTED] Mob: [REDACTED]

Main office: 020 7973 3700

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[REDACTED]

From: [REDACTED]
Sent: 11 April 2025 13:09
To: [REDACTED]
Subject: Goshall Valley East Street Ash – 23/01363 – Construction of a solar farm - re consult
Attachments: Goshall Valley East Street Ash – 23.01363 – Construction of a solar farm – re consult.pdf

Afternoon,

Comments attached

Kind Regards

[REDACTED]



[REDACTED]
Senior Heritage Officer

Dover District Council

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

Tel: [REDACTED]

Email: [REDACTED]

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

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



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HERITAGE CONSULTATION MEMO

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

02/02/24 & further comments 11/04/25 - (relating to submission of response regarding Church of St Nicholas)

Initial comments: 02/02/24:

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.

Further comments

The applicant has submitted a heritage response (333135394 received 13/03/25).

The document identifies the Church of St Nicholas as a relevant heritage asset that would have a change to its landscape setting as the spire of St Nicholas is visible in views looking southwest from the amphitheatre. We are content the application now identifies relevant heritage assets.

The overall level of harm to listed heritage assets, that are expected to experience an impact, is as previously advised - at the low end of less than substantial.

Heritage Team

[REDACTED]

From: [REDACTED]@kent.gov.uk
Sent: 22 April 2025 17:34
To: Development Management
Cc: [REDACTED]; [REDACTED]@HistoricEngland.org.uk; [REDACTED]@english-heritage.org.uk; [REDACTED]@archaeologyuk.org; [REDACTED]@kent.gov.uk
Subject: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage updated advice
Attachments: DO 23 01363 LE02 additional advice.pdf

Dear [REDACTED]

Please find my updated advice attached for the Little South/Goshall Valley solar farm site.

Happy to discuss any of the issues raised further if that would be helpful.

Kind regards,

[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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Environment and Circular Economy

Invicta House
County Hall
MAIDSTONE
ME14 1XX

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

17 April 2025
Your Ref: DOV/23/01363
Our Ref: DO 23 01363 LE02

[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices
White Cliffs Business Park
Whitfield
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],

I am writing with Kent County Council Heritage Conservation's (KCCHC) updated advice following the submission of updates to the Environmental Statement (ES) for the above application, including additional technical documentation in the form of a field evaluation report. The applicant has also submitted a Heritage Response which provides their additional commentary on the setting of Roman Richborough.

The advice set out below supplements and supports – but does not replace – our previous advice. The advice provided here should be read in conjunction with our earlier correspondence (letter dated 8, Feb 2024).

In our previous correspondence KCCHC raised concerns about:

- the impact of the scheme on the setting of the exceptionally important Roman site at Richborough
- the impact of the scheme on buried archaeological remains

The applicant has subsequently revised the landscaping treatment and has carried out an archaeological field evaluation. This letter sets out KCCHC's response to the additional information.

A) Summary of updated advice

The archaeological field evaluation has provided additional information, but not all aspects have been fully assessed.

In respect of the postulated Roman road crossing there are issues with the applicant's interpretation which fails to consider the clear, pre-existing evidence for a Roman routeway through the site.

KCCHC remains **very** concerned about the impact of the scheme on the setting of Roman Richborough. We do not think the applicant has adequately understood how the landscape around Richborough contributes to the significance of the place. We remain of the view that **the harm to the monument is serious and significant**. The harm caused to the setting of Roman Richborough is greater than the applicant indicates and should be a major consideration in determining the planning application.

B) The impact of the scheme on buried archaeology

In our consultation response of 8, Feb 2024 KCCHC recommended that field evaluation works were necessary to better understand the archaeological interest of the proposed development site. The applicant has subsequently carried out a programme of archaeological field evaluation works. The field evaluation was undertaken as a staged exercise, involving additional geophysical survey (Electro Magnetic (EM) survey and then Electro Resistivity Tomography (ERT) transects) followed by targeted trial trenching. The scope of the field evaluation works was agreed with Historic England and KCCHC prior to the commencement of work and the archaeological trial trenching was monitored by KCCHC.

It is noted that the newly submitted evaluation report is only an interim report. It does not include assessment of the finds or environmental samples taken during the evaluation. KCCHC would welcome clarification from the applicant as to when the final report on the evaluation works will be made available.

The interim nature of the report means that some information, such as the assessment of the palaeoenvironmental information is still awaited. Peat was identified in one of the trenches, but the significance of this deposit is not yet established, nor is its palaeoenvironmental potential or date determined. The spatial extent of the peat deposit is also unknown. Without this information it is not possible to reach a judgement on the significance of the organic rich deposits or adequately understand how the development will harm significance.

Objectives of the field evaluation

The trial trenching carried out was a limited and targeted exercise. It investigated only a small part of the proposed development site, being focussed on those areas that were modelled as being of highest archaeological potential. The trial trenching comprised the machine cutting of ten evaluation trenches within the proposed development area.

As set out in our previous advice the site of Roman Richborough is of exceptional significance. Previous archaeological investigations and survey at Richborough and in its surrounding landscape have provided good evidence to suggest a Roman route headed south from Richborough island. This evidence remains unchanged. A principal target of the evaluation therefore was to examine what physical remains were present of this road, routeway or crossing within the proposed development area. Five of the ten trial trenches were aligned across a raised spur of ground which was identified as the most likely route for any Roman road or routeway through the site. A sixth was included at the northern end of the raised spur.

The remaining trenches were placed to examine the sedimentary sequences of the Wantsum Channel, with particular attention given to examining channel-edge locations where significant palaeoenvironmental sequences might be closer to the modern ground surface and/or evidence for buried past land-surfaces might be accessible. Peat was found in one trench in a channel edge location at a depth of about 1.7m bgl. This would potentially be impacted by the driven foundations for the solar arrays. Anoxic clays were also identified. These indicate waterlogged conditions where the potential for organic archaeological artefacts is increased.

Peat deposits are of archaeological interest because the waterlogged, oxygen free burial environment provides conditions for the excellent preservation of environmental evidence (and potentially also organic artefacts and structures) which might not otherwise survive. As such they provide a unique record that can make a significant contribution to our understanding of past landscapes, environmental history, and landscape change. No palaeoenvironmental assessment of the samples from the peat deposit is provided in the interim report, nor is its date or spatial extent established. As such it is not yet possible to advise on the significance of the peat deposit identified.

In our previous advice we identified that the palaeoenvironmental potential of the site needed to be better understood. We also advised that further information to understand the impacts of the development on the site's water-environment was needed to ensure the ongoing preservation of any important organic deposits. The interim evaluation report has not addressed this objective.

Evidence for a Roman route across the proposed development site

Evidence for a Roman road or routeway comes from locations directly to the north and to the south of the proposed development site. To the north, within the scheduled monument at Richborough a substantive road has been clearly seen as a crop-mark on aerial imagery and has also been positively identified through geophysical survey. This road curves south from Roman Watling Street, passing the Roman amphitheatre and heads towards the southern edge of Richborough island (in Roman times Richborough island was separated from the 'mainland' by an open navigable channel known as the Wantsum).

Archaeological investigations (excavation) carried out in association with the Thanet Supply Main scheme investigated a narrow corridor along the southern edge of

Richborough island. The works for the Thanet Supply Main fall between the scheduled monument and the proposed development site. Here physical evidence for a Roman road was found during archaeological excavations. The road as observed took the form of a metalled surface (made up from compacted, rounded flint pebbles), with flanking ditches. The metalled road was around 12m wide and up to 200mm thick. The road surface had a definite camber and was flanked by parallel roadside ditches (250 – 350mm deep). This section of excavated road lay about 325m north of the proposed development site. The road was aligned towards the proposed solar farm site.

A second section of Roman road has also been excavated at Each End, Ash to the south of the proposed solar farm site. The road as excavated at Each End, Ash was 15m in width, again comprising a cambered, metalled surface and flanked with roadside ditches. The metalled surface at Each End, Ash was 140mm thick, but the roadside ditches were more substantial, being up to 1.5m deep.

The sections of Roman road discussed above are illustrated in the image below. This shows the known (certain – bright green and probable – darker green) sections of Roman road in relation to the proposed solar farm site (red site outline). The excavated sections for the Thanet Supply Main and at Each End, Ash are highlighted.



In addition to the road, a cremation burial was also identified to the north, close to the excavated section of road, at the Thanet Supply Main site. Cremations and inhumations were also excavated in association with the road to the south at Each End, Ash. It is common practice for Roman period burials to be found alongside roads and route-ways.

The sections of known and probable Roman road to the north and south of the proposed development site clearly appear to align with each other. This strongly suggests that a connection of some form would have existed between the two and would have crossed the proposed development site.

The results of the evaluation

As described above, five of the ten evaluation trenches were targeted across a raised spur of land, which the known sections of Roman road appear to be aligned on. This raised spur would represent a natural point for any crossing. Another trench was positioned on the northern edge of the spur. The trial trenches demonstrated that the spur comprised a naturally derived area of high, dry ground raised above the level of the former Wantsum Channel.

No physical evidence for the projected Roman road was found in the trenches excavated across the spur – i.e. no metalled surface and no roadside ditches were found. The evaluation did however identify at least six cremation burials of Romano-British date. Such burials were often placed along route-ways. The cremations at the proposed development site comprised both urned (i.e. buried within a ceramic container) and un-urned examples and were accompanied by various ceramic vessels and grave goods (including a Samian plate and a small jet or shale bracelet). The excavated assemblage is typical of Roman period burials.

The evaluation report notes that “*all the cremations had been truncated by ploughing*”. It was observed that the burials were found at shallow depth being “*only 200mm below the current surface*” and that the level of truncation was such that “*they would soon have been lost to modern agricultural practice*”. A conservative estimate would suggest that the land-surface here has been truncated by at least 200 to 300mm since Roman times and likely considerably more. By comparison, the base of the cremation burial at the Thanet Supply Main excavation was found at around 1.25m below the present ground surface.

The applicant suggests that any Roman road might be “*expected to have been a substantial construction*” but the evidence from the Thanet Supply Main site and from Each End, Ash suggests a surface in the region of 140 to 200mm in thickness. This is not untypical for rural Roman roads. This being the case we do not agree with the applicant’s conclusion that “*fragmentary evidence for a Roman road would have survived at the site if it were ever there*”. The thickness of the road known to the north and south and the level of truncation indicated by the cremation burials suggests this need not be the case. In this context, the observation of “*frequent sub-rounded pebbles*” within the topsoil and on the exposed surface of the underlying geology in the trench containing the cremations is worth noting, as such pebbles would be typically used in the construction of a Roman metalled road.

The presence of three groups of animal bones found “*at the interface between topsoil and drift geology*” is noted. The evaluation report suggests that these were “*likely to be multiple individual sheep placed in a shallow cut*” (although it seems no visible cut was observed). The evaluation report suggests that these animal groups “*were relatively modern*”. It is unclear from the report why these remains were

thought to be obviously modern and further information is needed to understand the conclusion reached.

The applicant has updated the ES to take account of the newly discovered cremation burials. The ES suggest that the cremation burials could either be preserved in situ (although further work would be needed to understand the full extent of any remains to be preserved) or that they could be fully investigated and recorded prior to development by means of archaeological open area excavation. Given the shallow and fragile nature of the burials the ES suggests that full archaeological excavation ahead of construction would be preferred. KCCHC agrees that the burials will either need to be meaningfully preserved in situ or subject to full excavation ahead of development. The necessary preservation measures or excavation works could be secured by means of an appropriately worded planning condition attached to any forthcoming consent.

In summary:

KCCHC agrees that no physical evidence for a Roman road was found in the evaluation trenches but suggest this may not be unexpected given the level of truncation indicated within the site and the character of the road observed nearby.

We note the presence of at least six cremation burials on the raised spur, with such burials often being placed along route-ways. Additionally, there is clear and unequivocal evidence for a Roman road heading towards the site from the north and from the south.

KCCHC therefore does not agree with the applicant's statement that the archaeological work "*has conclusively found that there is no Roman Road crossing the site*", only that no firm physical evidence for the road was found within the excavated trenches. KCCHC suggest that this is an important distinction, particularly when considering the impact of the scheme on the setting of Roman Richborough.

C) The impact of the scheme on the setting of Roman Richborough

The applicant's Heritage Response does not appear to always reflect the totality of the internationally important site fully at Richborough, which comprises much more than just the Shore Fort and amphitheatre. Additionally, we suggest that the applicant's assessment places too great an emphasis on the eastern setting of Richborough whilst similarly downplaying the contribution that the landscape to the south of Richborough island (where the proposed solar farm is located) makes to the significance of the site.

The upstanding walls of the later Roman Shore Fort naturally draw attention because of their scale and preservation, but the walled fort forms only part of the site's significance. The applicant's assessment often considers the Roman site at Richborough largely in terms of two separate monuments – the fort (meaning the upstanding walls of the Shore Fort and seemingly ignoring earlier fortifications) and the amphitheatre, whilst failing to appreciate that Richborough represents an extensive site extending over several hectares, and containing exceptional and

exceedingly significant archaeology that spans some four centuries of Roman occupation.

The submitted Heritage Response regularly overlooks this important distinction, failing to appreciate the time depth of the site and placing too great emphasis on the Shore Fort and amphitheatre as independent assets, rather than thinking of them as components of a wider site.

The Wantsum Channel and the contribution to significance made by the landscape south of Roman Richborough

The Heritage Response includes acknowledgement of the importance of the landscape setting to the significance of the scheduled monument, noting that the monument's setting is "*defined primarily by its relationship to the coast and the strategic importance of the promontory within what was historically a coastal landscape*". KCCHC disagrees however with the applicant's suggestion that there is "*little evidence remaining of the historic waterways that once defined the setting of Richborough*".

The Heritage Response identifies that "*the current setting of the Monument is defined by a large expanse of flat, agricultural land, comprising reclaimed marshland crossed by a network of drainage channels to the south*". By its very nature, this large expanse of flat land illustrates and clearly evidences the extent of the former open waterway that once surrounded Richborough island. The landscape setting therefore visually and demonstrably contributes to an understanding of the strategic significance of Richborough. The proposed solar farm would occupy a significant part of this landscape on the southern side of Richborough island. That the historic waterway of the Wantsum Channel is no longer open does not equate to there being "*little evidence*" for its former extent.

Furthermore, the Heritage Response suggests that the "*fort and town historically had a strong functional and associative relationship with the coastline to the east where the port was located*". This eastward emphasis is seemingly highlighted to downplay the relationship between Roman Richborough and the land to the south where the solar farm is proposed. We note that the location of the port is not known with certainty. It has long been supposed that the port was located to the east of the town, but this does not appear to be based on firm archaeological evidence. It is equally possible that the port was located on the sheltered leeward side of the island. In this respect we would note the observance of late settlement, occupation and potentially industrial type activity on the southern side of Richborough island as evidenced in archaeological excavations at the amphitheatre and for the Thanet Supply Main.

The application has been revised with changes to the planting scheme along the northern edge of the solar arrays. The previous landscaping proposals included a belt of planting which when developed would screen the solar panels from Richborough but had the harmful effect of foreshortening the view across the former Wantsum Channel so that the channel's extent would no longer be appreciable. The removal of this screening planting in favour of lower level, softer planting undoes this

harmful aspect of the proposals but does mean that the solar arrays will be more visible in the landscape, even at the 15-year mark. We note that the applicant has identified existing harm to the setting of Richborough to the east where they note the effects of the “*introduction of modern industrial development and infrastructure associated with energy production*”. The proposed development would result in the introduction of modern industrial infrastructure on the south side of Richborough island which would be highly visible from the raised position of Richborough island and in an area where such modern industrial infrastructure is currently absent.

The applicant has failed to adequately consider the archaeological and topographical evidence in the landscape around Richborough island. There is clear evidence for a Roman route heading south from Richborough island towards (and highly likely across) the application site. The application site includes a locally raised spur centrally within it which would have been a notable local topographic feature in the Roman period, representing an area of higher, dryer land projecting conspicuously out into the Wantsum Channel. Roman activity was occurring on this spur, with cremations being placed there. The southern side of the island was chosen as the location for a Roman amphitheatre which would originally have been an imposing and substantial structure, and which now survives as a distinct earthwork.

The setting of the Roman amphitheatre

The applicant’s assessment does not appear to fully appreciate the importance of the amphitheatre’s position and incorrectly paints a picture of a monument whose setting is wholly incidental to its function. The applicant’s assessment simplistically describes the amphitheatre as “*inherently inwardly looking*” using an overly functional view of the role of the amphitheatre. Instead, the amphitheatre at Richborough needs to be considered in the context of the settlement’s role as the ‘gateway to the province’ and in terms of the symbolic and military function of the place and the concept of ‘Empire’. The amphitheatre is now understood to date to the early part of Roman occupation at Richborough, potentially built by military engineers. The construction of a large, new and distinctly Roman type of structure in such a prominent position on the southern side of Richborough island would have provided a clear physical manifestation of the fact that ‘the Romans had landed’.

Study of amphitheatres across the Roman world shows a pattern that suggests their placement is not accidental or incidental. The amphitheatre’s position at Richborough towards the edge of a settlement at a Roman military site is common. Analysis suggests that amphitheatres were most often deliberately located at strategic military locations, near important rivers or roads or at important trading sites (Richborough is all of these). It is suggested that they had a role in projecting power and control, not just as an entertainment venue. It has been argued that as substantial monuments they were positioned to be seen over long distances as symbols of the importance and power of the Roman empire.

It is notable that the amphitheatre at Richborough was built at the highest point of the island (contrary to the applicant’s statements), rather than taking advantage of the flank of the hill for its construction as might be expected and is demonstrated

elsewhere. This again suggests that the amphitheatre was purposefully sited for visibility.

In summary:

The applicant places too much weight on the supposed associative relationship to the east, whilst artificially downplaying the significance of the landscape to the south when assessing the setting of Roman Richborough.

There is still good evidence for a Roman route heading south from Richborough island towards and probably across the development site. Roman activity has been identified within the proposed development site in the form of burials, located on a raised spur of land. This context should form the baseline from which the significance of the site is understood.

The applicant has failed to fully consider the setting of Roman Richborough ‘in the round’ and has taken a narrow approach to assessing setting which places too much emphasis on views, rather than how the monument is experienced and how this experience contributes to our understanding of the significance of the place.

The applicant fails to fully take account of the setting of the amphitheatre, which is prominently positioned on the highest point of Richborough island.

D) Updated advice

The Dover District Local Plan to 2040 supports schemes that generate renewable and low-carbon energy but notes that for larger scale renewable energy schemes there is a need to balance the environmental impact against the benefits of the proposal. Environmental impacts include impacts to the historic environment. Local Plan Policy SP15 (echoing NPPF 202) highlights the importance of the district’s heritage assets which are an irreplaceable resource which should be conserved in a manner appropriate to their significance. Requirement (b) of Local Plan Policy CC3 notes that renewable energy development will be supported, if it will not result in significant harm to heritage assets.

Whether the scheme will result in significant harm is a judgement for the decision taker. In our advice above (and previously) we have set out how the development will cause clear harm to the setting of the exceptionally important Roman site of Richborough. KCCHC advises that the harm to the setting of Roman Richborough is greater than the applicant indicates, and we suggest that this harm should be considered as “significant” in terms of Policy CC3.

NPPF 212 sets out that when considering the impact of a proposed development on a designated heritage asset, great weight should be given to the asset’s conservation (and that the more important the asset, the greater that weight should be). The site of Richborough is designated at the highest level and is one of the most important Roman archaeological sites in the country. As such its conservation should be afforded the ‘greatest of great weights’ when considering impacts on its significance.

NPPF 213 explains that any harm or loss of significance of a designated heritage asset (including from development within its setting) should require clear and convincing justification. We do not think the harm that will be caused by the development is clearly and convincingly justified. In terms of the proposed site's selection, it is unclear what reasonable alternatives were considered, and no alternative site assessment has been provided.

In NPPF terms, the harm to Roman Richborough amounts to 'less than substantial harm', and so NPPF paragraph 214 should inform decision making. Historic England have previously advised that the harm to the setting of the scheduled monument to be less than substantial but towards the upper end of that scale. KCCHC agrees with this assessment and suggests that this level of 'less than substantial harm' to a heritage asset of such importance is still serious and significant in planning terms.

In terms of buried archaeology, the applicant has carried out a programme of targeted field evaluation works. These identified Roman period cremation burials within the application site. The applicant has set out suitable mitigation measures for these in the updated ES and it is suggested that these could be secured through an appropriately worded planning condition.

We previously advised that the site could contain important paleoenvironmental remains and organic deposits, which could make a significant contribution to our understanding of the context and evolution of the landscape around Richborough island. The field evaluation identified the presence of a buried peat deposit towards the southern edge of the proposed development site, but the date, extent and significance of this deposit has yet to be established. Further information is required to establish this.

The impact of the scheme on archaeology and palaeoenvironmental remains, either from direct physical impacts or through changes to the site's water-environment has not been adequately described. The updated Environmental Statement includes an accompanying Archaeological Impact Assessment (as Appendix 6.2 of the ES), but this has not been updated to take account of the recent field evaluation works or to take account of the information requests in our previous advice letter.

KCCHC continues to have significance concerns about the proposed development, especially in terms of its relationship with the internationally important site of Roman Richborough.

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

Yours sincerely

[REDACTED]

Senior Archaeological Officer
Heritage Conservation

Cc

[REDACTED], *Properties Curator (South), English Heritage*

[REDACTED], *Inspector of Ancient Monuments, Historic England*

[REDACTED], *Casework Officer, Council for British Archaeology*

From: [REDACTED]
Sent: 22 April 2025 17:43
To: [REDACTED]@kent.gov.uk
Subject: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage updated advice
Attachments: DO 23 01363 LE02 additional advice.pdf

Dear [REDACTED]

Thank you for your comments. So that I can register these correctly, please could you confirm if this should be registered as an objection?

Kind regards,
[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]



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

From: [REDACTED]@kent.gov.uk
Sent: Tuesday, April 22, 2025 17:34
To: Development Management
Cc: [REDACTED]; [REDACTED]@HistoricEngland.org.uk; [REDACTED]@english-heritage.org.uk; [REDACTED]@archaeologyuk.org; [REDACTED]@kent.gov.uk
Subject: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage updated advice

Dear [REDACTED]

Please find my updated advice attached for the Little South/Goshall Valley solar farm site.

Happy to discuss any of the issues raised further if that would be helpful.

Kind regards,

█

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

Telephone: █ | www.kent.gov.uk |

Please help save paper by NOT printing this email unless absolutely necessary.



Environment and Circular Economy

Invicta House
County Hall
MAIDSTONE
ME14 1XX

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

17 April 2025
Your Ref: DOV/23/01363
Our Ref: DO 23 01363 LE02

[REDACTED]
Principal Planning Officer
Dover District Council
Council Offices
White Cliffs Business Park
Whitfield
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],

I am writing with Kent County Council Heritage Conservation's (KCCHC) updated advice following the submission of updates to the Environmental Statement (ES) for the above application, including additional technical documentation in the form of a field evaluation report. The applicant has also submitted a Heritage Response which provides their additional commentary on the setting of Roman Richborough.

The advice set out below supplements and supports – but does not replace – our previous advice. The advice provided here should be read in conjunction with our earlier correspondence (letter dated 8, Feb 2024).

In our previous correspondence KCCHC raised concerns about:

- the impact of the scheme on the setting of the exceptionally important Roman site at Richborough
- the impact of the scheme on buried archaeological remains

The applicant has subsequently revised the landscaping treatment and has carried out an archaeological field evaluation. This letter sets out KCCHC's response to the additional information.

A) Summary of updated advice

The archaeological field evaluation has provided additional information, but not all aspects have been fully assessed.

In respect of the postulated Roman road crossing there are issues with the applicant's interpretation which fails to consider the clear, pre-existing evidence for a Roman routeway through the site.

KCCHC remains **very** concerned about the impact of the scheme on the setting of Roman Richborough. We do not think the applicant has adequately understood how the landscape around Richborough contributes to the significance of the place. We remain of the view that **the harm to the monument is serious and significant**. The harm caused to the setting of Roman Richborough is greater than the applicant indicates and should be a major consideration in determining the planning application.

B) The impact of the scheme on buried archaeology

In our consultation response of 8, Feb 2024 KCCHC recommended that field evaluation works were necessary to better understand the archaeological interest of the proposed development site. The applicant has subsequently carried out a programme of archaeological field evaluation works. The field evaluation was undertaken as a staged exercise, involving additional geophysical survey (Electro Magnetic (EM) survey and then Electro Resistivity Tomography (ERT) transects) followed by targeted trial trenching. The scope of the field evaluation works was agreed with Historic England and KCCHC prior to the commencement of work and the archaeological trial trenching was monitored by KCCHC.

It is noted that the newly submitted evaluation report is only an interim report. It does not include assessment of the finds or environmental samples taken during the evaluation. KCCHC would welcome clarification from the applicant as to when the final report on the evaluation works will be made available.

The interim nature of the report means that some information, such as the assessment of the palaeoenvironmental information is still awaited. Peat was identified in one of the trenches, but the significance of this deposit is not yet established, nor is its palaeoenvironmental potential or date determined. The spatial extent of the peat deposit is also unknown. Without this information it is not possible to reach a judgement on the significance of the organic rich deposits or adequately understand how the development will harm significance.

Objectives of the field evaluation

The trial trenching carried out was a limited and targeted exercise. It investigated only a small part of the proposed development site, being focussed on those areas that were modelled as being of highest archaeological potential. The trial trenching comprised the machine cutting of ten evaluation trenches within the proposed development area.

As set out in our previous advice the site of Roman Richborough is of exceptional significance. Previous archaeological investigations and survey at Richborough and in its surrounding landscape have provided good evidence to suggest a Roman route headed south from Richborough island. This evidence remains unchanged. A principal target of the evaluation therefore was to examine what physical remains were present of this road, routeway or crossing within the proposed development area. Five of the ten trial trenches were aligned across a raised spur of ground which was identified as the most likely route for any Roman road or routeway through the site. A sixth was included at the northern end of the raised spur.

The remaining trenches were placed to examine the sedimentary sequences of the Wantsum Channel, with particular attention given to examining channel-edge locations where significant palaeoenvironmental sequences might be closer to the modern ground surface and/or evidence for buried past land-surfaces might be accessible. Peat was found in one trench in a channel edge location at a depth of about 1.7m bgl. This would potentially be impacted by the driven foundations for the solar arrays. Anoxic clays were also identified. These indicate waterlogged conditions where the potential for organic archaeological artefacts is increased.

Peat deposits are of archaeological interest because the waterlogged, oxygen free burial environment provides conditions for the excellent preservation of environmental evidence (and potentially also organic artefacts and structures) which might not otherwise survive. As such they provide a unique record that can make a significant contribution to our understanding of past landscapes, environmental history, and landscape change. No palaeoenvironmental assessment of the samples from the peat deposit is provided in the interim report, nor is its date or spatial extent established. As such it is not yet possible to advise on the significance of the peat deposit identified.

In our previous advice we identified that the palaeoenvironmental potential of the site needed to be better understood. We also advised that further information to understand the impacts of the development on the site's water-environment was needed to ensure the ongoing preservation of any important organic deposits. The interim evaluation report has not addressed this objective.

Evidence for a Roman route across the proposed development site

Evidence for a Roman road or routeway comes from locations directly to the north and to the south of the proposed development site. To the north, within the scheduled monument at Richborough a substantive road has been clearly seen as a crop-mark on aerial imagery and has also been positively identified through geophysical survey. This road curves south from Roman Watling Street, passing the Roman amphitheatre and heads towards the southern edge of Richborough island (in Roman times Richborough island was separated from the 'mainland' by an open navigable channel known as the Wantsum).

Archaeological investigations (excavation) carried out in association with the Thanet Supply Main scheme investigated a narrow corridor along the southern edge of

Richborough island. The works for the Thanet Supply Main fall between the scheduled monument and the proposed development site. Here physical evidence for a Roman road was found during archaeological excavations. The road as observed took the form of a metalled surface (made up from compacted, rounded flint pebbles), with flanking ditches. The metalled road was around 12m wide and up to 200mm thick. The road surface had a definite camber and was flanked by parallel roadside ditches (250 – 350mm deep). This section of excavated road lay about 325m north of the proposed development site. The road was aligned towards the proposed solar farm site.

A second section of Roman road has also been excavated at Each End, Ash to the south of the proposed solar farm site. The road as excavated at Each End, Ash was 15m in width, again comprising a cambered, metalled surface and flanked with roadside ditches. The metalled surface at Each End, Ash was 140mm thick, but the roadside ditches were more substantial, being up to 1.5m deep.

The sections of Roman road discussed above are illustrated in the image below. This shows the known (certain – bright green and probable – darker green) sections of Roman road in relation to the proposed solar farm site (red site outline). The excavated sections for the Thanet Supply Main and at Each End, Ash are highlighted.



In addition to the road, a cremation burial was also identified to the north, close to the excavated section of road, at the Thanet Supply Main site. Cremations and inhumations were also excavated in association with the road to the south at Each End, Ash. It is common practice for Roman period burials to be found alongside roads and route-ways.

The sections of known and probable Roman road to the north and south of the proposed development site clearly appear to align with each other. This strongly suggests that a connection of some form would have existed between the two and would have crossed the proposed development site.

The results of the evaluation

As described above, five of the ten evaluation trenches were targeted across a raised spur of land, which the known sections of Roman road appear to be aligned on. This raised spur would represent a natural point for any crossing. Another trench was positioned on the northern edge of the spur. The trial trenches demonstrated that the spur comprised a naturally derived area of high, dry ground raised above the level of the former Wantsum Channel.

No physical evidence for the projected Roman road was found in the trenches excavated across the spur – i.e. no metalled surface and no roadside ditches were found. The evaluation did however identify at least six cremation burials of Romano-British date. Such burials were often placed along route-ways. The cremations at the proposed development site comprised both urned (i.e. buried within a ceramic container) and un-urned examples and were accompanied by various ceramic vessels and grave goods (including a Samian plate and a small jet or shale bracelet). The excavated assemblage is typical of Roman period burials.

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The applicant has failed to adequately consider the archaeological and topographical evidence in the landscape around Richborough island. There is clear evidence for a Roman route heading south from Richborough island towards (and highly likely across) the application site. The application site includes a locally raised spur centrally within it which would have been a notable local topographic feature in the Roman period, representing an area of higher, dryer land projecting conspicuously out into the Wantsum Channel. Roman activity was occurring on this spur, with cremations being placed there. The southern side of the island was chosen as the location for a Roman amphitheatre which would originally have been an imposing and substantial structure, and which now survives as a distinct earthwork.

The setting of the Roman amphitheatre

The applicant’s assessment does not appear to fully appreciate the importance of the amphitheatre’s position and incorrectly paints a picture of a monument whose setting is wholly incidental to its function. The applicant’s assessment simplistically describes the amphitheatre as “*inherently inwardly looking*” using an overly functional view of the role of the amphitheatre. Instead, the amphitheatre at Richborough needs to be considered in the context of the settlement’s role as the ‘gateway to the province’ and in terms of the symbolic and military function of the place and the concept of ‘Empire’. The amphitheatre is now understood to date to the early part of Roman occupation at Richborough, potentially built by military engineers. The construction of a large, new and distinctly Roman type of structure in such a prominent position on the southern side of Richborough island would have provided a clear physical manifestation of the fact that ‘the Romans had landed’.

Study of amphitheatres across the Roman world shows a pattern that suggests their placement is not accidental or incidental. The amphitheatre’s position at Richborough towards the edge of a settlement at a Roman military site is common. Analysis suggests that amphitheatres were most often deliberately located at strategic military locations, near important rivers or roads or at important trading sites (Richborough is all of these). It is suggested that they had a role in projecting power and control, not just as an entertainment venue. It has been argued that as substantial monuments they were positioned to be seen over long distances as symbols of the importance and power of the Roman empire.

It is notable that the amphitheatre at Richborough was built at the highest point of the island (contrary to the applicant’s statements), rather than taking advantage of the flank of the hill for its construction as might be expected and is demonstrated

elsewhere. This again suggests that the amphitheatre was purposefully sited for visibility.

In summary:

The applicant places too much weight on the supposed associative relationship to the east, whilst artificially downplaying the significance of the landscape to the south when assessing the setting of Roman Richborough.

There is still good evidence for a Roman route heading south from Richborough island towards and probably across the development site. Roman activity has been identified within the proposed development site in the form of burials, located on a raised spur of land. This context should form the baseline from which the significance of the site is understood.

The applicant has failed to fully consider the setting of Roman Richborough ‘in the round’ and has taken a narrow approach to assessing setting which places too much emphasis on views, rather than how the monument is experienced and how this experience contributes to our understanding of the significance of the place.

The applicant fails to fully take account of the setting of the amphitheatre, which is prominently positioned on the highest point of Richborough island.

D) Updated advice

The Dover District Local Plan to 2040 supports schemes that generate renewable and low-carbon energy but notes that for larger scale renewable energy schemes there is a need to balance the environmental impact against the benefits of the proposal. Environmental impacts include impacts to the historic environment. Local Plan Policy SP15 (echoing NPPF 202) highlights the importance of the district’s heritage assets which are an irreplaceable resource which should be conserved in a manner appropriate to their significance. Requirement (b) of Local Plan Policy CC3 notes that renewable energy development will be supported, if it will not result in significant harm to heritage assets.

Whether the scheme will result in significant harm is a judgement for the decision taker. In our advice above (and previously) we have set out how the development will cause clear harm to the setting of the exceptionally important Roman site of Richborough. KCCHC advises that the harm to the setting of Roman Richborough is greater than the applicant indicates, and we suggest that this harm should be considered as “significant” in terms of Policy CC3.

NPPF 212 sets out that when considering the impact of a proposed development on a designated heritage asset, great weight should be given to the asset’s conservation (and that the more important the asset, the greater that weight should be). The site of Richborough is designated at the highest level and is one of the most important Roman archaeological sites in the country. As such its conservation should be afforded the ‘greatest of great weights’ when considering impacts on its significance.

NPPF 213 explains that any harm or loss of significance of a designated heritage asset (including from development within its setting) should require clear and convincing justification. We do not think the harm that will be caused by the development is clearly and convincingly justified. In terms of the proposed site's selection, it is unclear what reasonable alternatives were considered, and no alternative site assessment has been provided.

In NPPF terms, the harm to Roman Richborough amounts to 'less than substantial harm', and so NPPF paragraph 214 should inform decision making. Historic England have previously advised that the harm to the setting of the scheduled monument to be less than substantial but towards the upper end of that scale. KCCHC agrees with this assessment and suggests that this level of 'less than substantial harm' to a heritage asset of such importance is still serious and significant in planning terms.

In terms of buried archaeology, the applicant has carried out a programme of targeted field evaluation works. These identified Roman period cremation burials within the application site. The applicant has set out suitable mitigation measures for these in the updated ES and it is suggested that these could be secured through an appropriately worded planning condition.

We previously advised that the site could contain important paleoenvironmental remains and organic deposits, which could make a significant contribution to our understanding of the context and evolution of the landscape around Richborough island. The field evaluation identified the presence of a buried peat deposit towards the southern edge of the proposed development site, but the date, extent and significance of this deposit has yet to be established. Further information is required to establish this.

The impact of the scheme on archaeology and palaeoenvironmental remains, either from direct physical impacts or through changes to the site's water-environment has not been adequately described. The updated Environmental Statement includes an accompanying Archaeological Impact Assessment (as Appendix 6.2 of the ES), but this has not been updated to take account of the recent field evaluation works or to take account of the information requests in our previous advice letter.

KCCHC continues to have significance concerns about the proposed development, especially in terms of its relationship with the internationally important site of Roman Richborough.

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

Yours sincerely

[REDACTED]

Senior Archaeological Officer
Heritage Conservation

Cc

[REDACTED], *Properties Curator (South), English Heritage*

[REDACTED], *Inspector of Ancient Monuments, Historic England*

[REDACTED], *Casework Officer, Council for British Archaeology*

[REDACTED]

From: [REDACTED]@HistoricEngland.org.uk
Sent: 02 May 2025 19:52
To: [REDACTED]
Cc: [REDACTED]@HistoricEngland.org.uk
Subject: Historic England advice on Application no(s) 23/01363
Attachments: 2301363_HERef_P01571894_L469811.doc

Dear [REDACTED],

Please find attached our advice on the following site -

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

Yours sincerely,

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

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

Direct Dial: [REDACTED]

Our ref: P01571894

2 May 2025

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 20 March 2025 regarding further information on the above application for planning permission. On the basis of this information, 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, an exceptionally important place in our national story. The proposals would erode Richborough's significance by harming the ability to appreciate its relationship with the former Wantsum Channel, a water body that played a major role in its defence which is now an important part of the Roman site's setting.

Since we commented on this scheme previously, proposed tree screening for the solar farm has been replaced with grassland and wetland which would help maintain a clearer understanding of the extent of the former water channel. This is welcomed, albeit that the panels would be more visible in the landscape, potentially impacting visitors' enjoyment and appreciation of the ruinous fort in its broader setting, which to the south has remained unencumbered by modern intrusion.

Solar panels extending over the postulated route of the associated Roman road are likely to cause harm, as it would be more difficult to understand how the route related to Richborough, or to read the landscape location of the causeway and associated archaeology.

It may be possible to reduce harm by removing solar panels from the proposed line of the Roman road and considering whether below ground disturbance could be reduced to lessen the impact on archaeology.



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In reaching a decision on this application your Council will need to weigh the harm against public benefits (NPPF, Para 215). You will need to give great weight to the conservation of the scheduled Richborough Fort (NPPF, Para 212), noting that as an asset of the highest significance, it should be afforded the greatest weight.

Historic England Advice

We previously commented on this application in March 2024, raising deep concerns about impacts to the significance of Richborough Roman Fort (National Heritage List for England no's 1014642 and 1363256).

Our previous letter sets out our position regarding significance and impact, and this letter seeks to clarify our response to new supporting documentation provided by the applicant, and changes made to the layout and landscape scheme.

The applicant has submitted the following new supporting information:

Heritage Response document which provides the applicants further commentary on the setting of Roman Richborough.

Updated relevant Environmental Statement chapters (ES)

An archaeological evaluation report (technical report following archaeological fieldwork).

The changes made to the proposal are:

Repositioning of the access route to the Nature Restoration Area to the east of the Site.

Reinstating solar panels over the area of the causeway (central area).

Changing the landscape buffer to remove the willow trees (willow car) in favour of grass/wetland.

Our advice in relation to the additional information is set out below.

Setting of Richborough

Our letter of 8th March 2024 confirmed that Richborough is of exceptional significance and one of the most important Roman sites in England as a key gateway to Roman Britain.

The Fort was strategically sited on a high point in the watery landscape of the Wantsun Channel, for defensive reasons, but also as a demonstration of social and political power.



The fort's landscape setting to the south (including the site) has changed, but not beyond recognition, and does therefore contribute to the significance of the site. Its character as obviously reclaimed wetland is suggestive of the former water channel, and this is reinforced by the topography of the landscape. The fort sits on high land which drops off to the south onto an open flat network of fields (the former channel) and then noticeably rises again on the southern side of the former channel.

We think there are key points where this is particularly evident, including from the elevated amphitheatre where views to the south and west incorporate the proposal area, and are extensive taking in both the former channel, its southern bank, and the land beyond.

In our view, the valley topography is distinctive enough to allow the history of the landscape to be read, and we remain concerned that the applicant's heritage response does not fully consider how this landscape contributes to Richborough's significance.

The applicant places greater importance on the relationship of Richborough to the landscape to the east, whilst suggesting the landscape to the south does not contribute as much to Richborough's exceptional significance. We do not agree with this approach and note the fort's eastern setting contributes to significance in a different way to the landscape to the south, rather than being of greater or lesser importance.

The applicant places focus on two separate areas of upstanding remains/earthworks at Richborough - the amphitheatre and shore fort; treating them as separate assets whilst not adequately considering the extensive and holistic nature of the site, with significant archaeological deposits demonstrating multiple periods of occupation, and having a setting that is not fully appreciated in the applicants supporting documentation.

We also disagree with the applicant's interpretation of the amphitheatre as a purely inward-looking monument, located incidentally in relation to the fort and town. This is because, in our view, the prominence of its location, on the highest point of Richborough Bluff and highly visible from the south and east, would have been a key aspect of its siting, allowing a display of status and dominance towards the native population. In this regard, we think the amphitheatres setting to the south and west is important when considering its placement and function at Richborough, and the potential contribution of setting to significance.

Archaeology in the valley floor

As advised previously, your primary advisor should be the County Archaeological Officer for undesignated archaeology, however we comment here specifically because of the potential for archaeology in the valley floor to enhance our understanding and



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appreciation of the significance of Richborough.

An archaeological evaluation has taken place, which targeted the postulated Roman road; it is possible that further relevant archaeology could be identified beyond this area. It is disappointing that not all the archaeological reporting information is complete or in finalised format, however our advice here is not contingent on receipt or correction of this information.

The applicant suggests that because a compacted surface and roadside ditches were absent in the trial trenches investigated along the route, a Roman road leading towards Richborough was never present. However, fieldwork nearby identified a road orientated toward this site, aligned with a raised spit of ground that naturally lends itself to continuation. A road here may not be substantial given that nearby surfaces were shallow, and the evidence of ploughing reduction of archaeological features discovered in this evaluation. It therefore seems questionable to interpret an absence of evidence as confirmation a road did not exist.

Additionally, a group of Roman period cremations were discovered on the spit during the evaluation; cremations are commonly found alongside Roman roads, so their presence could be interpreted as further evidence of a significant route.

Given the evidence in the round, we think it possible that a routeway continued through the proposal site and connected with Richborough.

Changes to the proposal and Impact

Because the applicant does not consider that a Roman road existed crossing the valley floor and spit, the layout of the proposed solar array has now been changed to replace open space aligned on the postulated Roman Road with solar panels. This is regrettable.

Instead, the approach track has been re-routed to create a better view of the Richborough bluff where the amphitheatre is located. This delivers some benefit but at the expense of not being able to read the line of the postulated Roman route, respect the former landscape feature of the causeway, or the focused area for the cremation burials.

The landscaping buffer has also been amended, with removal of the willow trees (willow car) in favour of grass/wetland. We recognised previously that planting here would help screen the solar array, but we were concerned that the proposed tree planting would be uncharacteristic in an open landscape and would foreshorten the view considerably, making it difficult to appreciate the width of the former Wantsum channel and the way the land rises beyond.



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Based on the submitted photomontages, the amended proposals for grass/wetland are unlikely, in our opinion, to foreshorten the view to any great effect, although the panels would still obscure views of some of the former southern bank of the former channel, compromising an appreciation of the former watery landscape to a degree.

The benefit of removing the trees is somewhat limited by the resulting increase in the visibility of the panels in views out from the scheduled site. The greater visibility of the panels is likely to distract attention away from the Richborough in an area of its setting largely devoid of modern development. However, we consider that this amendment to the landscaping is to be welcomed overall.

Policy

1. National Planning Policy Framework

National Planning Policy Framework (Dec 2024) para 208 says you should avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Para 212 says that in considering the impact of a proposed development, great weight should be given to heritage asset's conservation, and the more important the asset, the greater the weight should be (scheduled monuments are of the highest level of importance). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Para 213 notes any harm to, or loss of, significance from development (including within the setting of heritage assets) should require clear and convincing justification. Para 210 notes the desirability of new development making a positive contribution to local character and distinctiveness.

Para 215 describes that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

Para 219 says that within the setting of heritage assets, opportunities should be sought to enhance or better reveal the assets significance.

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.



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3. Case law

The applicant provides examples of case law in their heritage response document. We recommend you seek your own legal advice on this matter but think that the focus should be on understanding significance, impact, and for your authority to correctly undertake the balancing exercise required regarding impact and public benefits of the proposal.

Position

Historic England believes in maximising the benefits of renewable energy projects, while minimising their adverse effects on the historic environment. However, in this case, we consider that the proposed solar farm would harm the significance of Richborough Roman site, an exceptionally important site in our national story.

We think the greatest impact of the solar development would be in relation to the amphitheatre and peoples experience of it.

Harm would occur from the height and location of solar panels, which would make it harder to appreciate the depth of the former Wantsum channel which forms an important part of the setting of the Roman site. It would also be difficult to appreciate relevant associated features including the postulated route of the Roman road connecting with Richborough. There would also be an impact to enjoyment of the site, particularly the amphitheatre, through the introduction of modern infrastructure in its rural setting.

We think the new submitted information and proposed changes address some of our previous concerns, but not all. Harm would be reduced by the removal of Alder Carr as a boundary to the proposed development, and introduction of views of the amphitheatre and Richborough Bluff from the re-routed approach track.

However, solar panels extending over the postulated route of the associated Roman road would make it more difficult to understand how the route related to Richborough, and read the landscape location of the causeway and associated archaeology. We think there is an opportunity to minimise harm further by removing infrastructure and solar panels from the proposed line of the Roman road.

Consideration might also be given to whether below ground disturbance could be reduced through design (for example changing from driven piles for solar panels), to lessen potential impact on any buried archaeological deposits.

Even with these changes, we think the proposals would still be harmful to the heritage significance of Richborough. In the language of the NPPF we consider this harm would be less than substantial, in the middle of the range.



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We note there are few heritage benefits and enhancements currently proposed in the application (NPPF, Paras 210 and 219), aside from mitigations; benefits primarily relate to biodiversity and requirements of energy generation and government climate targets.

In reaching a decision on this proposal, your Council will need to weigh the heritage harm against the public benefits (NPPF, Para 215). You will need to give great weight to the conservation of Richborough Fort, noting that the more important the asset, the greater the weight should be (NPPF, para 212). In this case, Richborough Fort is an asset of the highest significance and should be afforded weight accordingly.

Recommendation

Historic England has serious concerns regarding this application because it harms heritage of great importance to the history of England. You should only approve these proposals if you are fully satisfied that the harm would be outweighed by public benefits.

Historic England have published advice on key considerations and to support consistent decision making for solar developments Commercial Renewable Energy Development and the Historic Environment | Historic England.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

[Redacted]

Inspector of Ancient Monuments

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