

[REDACTED]

From: [REDACTED]
Sent: 09 June 2025 10:18
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Historic England advice on Application no(s) 23/01363

Dear [REDACTED]

I hope you're well. We have a number of queries following the latest consultation on the above, and as the case will be sent to planning committee in August we would appreciate it if you could provide further comments to clarify.

The position statement notes:

"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."

We have therefore taken it that if the further changes that HE outline are not made to the scheme that the harm is likely to be greater than stated. The applicant does not intend to make any further changes to the proposal. **Could you please advise on the level of harm that the scheme as it stands would have.**

Secondly, on page 19 of the Response document the applicants have noted that the access to the nature restoration area would provide a better view of the monument, and you note that this would have some benefit but would also create a concern with understanding the Roman route, causeway and cremations but we are slightly unclear on whether this aspect of the proposal causes harm (and at what level) to the SM and what the benefit is that HE consider it provides, and would appreciate it if you could provide further clarification. In addition, **could you please advise whether the benefit that this provides is sufficient to mitigate the new/additional harm (if it is considered that harm is caused).**

We also understand that the applications intend to speak to English Heritage regarding potential heritage benefits that they can offer but we are unaware if this has happened yet. as I understand it, the basics might be a couple of interpretation panels, but if on the amphitheatre this would of course be on scheduled land and require SMC. We would be interested to hear if the applicant has entered into pre-app discussions with yourselves at HE.

The applicant has also suggested conditions which we would appreciate receiving your further advice on, in particular the 2nd condition. Please see below: (we have also sought advice from KCC, in particular with reference to further archaeological evaluation/details of piles for 'specified areas')

"Careful consideration has been given to the views expressed by Historic England (correspondence dated 2nd May 2025) and to Kent County Council Heritage Conservation (correspondence dated 17th April). Whilst the Applicant does not believe the following additional planning conditions are also necessary elsewhere on the Site, if the Local Planning Authority were of the opinion that the following were suitable matters for planning conditions to control, the Applicant would be willing to accept the following:

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driven piles. The Proposed Development could then only be constructed in accordance with this approved Scheme.

2. A condition which required that, prior to the commencement of development, a Scheme should be submitted and approved which detailed measures to mark out in an agreed manner the route of the postulated Roman Road through the application site. For example, this could involve the use of marked poles, flags, different coloured panel frames or an equivalent visual feature, so as to denote the postulated route.

Further, the Applicant would be willing to commit to pay a sum of money by way of a S106 Undertaking in order to fund enhanced interpretation facilities available at the amphitheatre site to explain the postulated route to visitors to the site.”

At present, the application will be going to planning committee in August, with reports needing to be completed 1 month before. We would therefore greatly appreciate hearing from you as soon as possible.

NB. the most up to date archaeological report following trial trenching is now available online (KCC have also been consulted for further comment).

We look forward to hearing from you.

Kind regards,



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

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



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From: [Redacted]@DOVER.GOV.UK>
Sent: 13 May 2025 10:00
To: [Redacted]@DOVER.GOV.UK>
Subject: Fw: Historic England advice on Application no(s) 23/01363

From: [Redacted]@HistoricEngland.org.uk <[Redacted]@HistoricEngland.org.uk>
Sent: 02 May 2025 19:51
To: [Redacted]@DOVER.GOV.UK>

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

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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From: [REDACTED]@english-heritage.org.uk>
Sent: 09 June 2025 16:51
To: [REDACTED]
Subject: RE: Goshall solar array application
Attachments: RE: Little South Solar Farm - PA23/01363

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Hello [REDACTED]

I'm well thanks, and hope you are too.

I agree with you entirely. Attached is my email exchange with the applicant regarding mitigation measures, specifically interpretation panels, which I think wouldn't be a mitigatory factor at all. The signs would illustrate how harmful the scheme is!

All best,

[REDACTED]

[REDACTED] | Senior Curator of Properties (South East, London and East) | Curatorial Department

English Heritage
[REDACTED]

www.english-heritage.org.uk



Heritage is for everybody, and we are here for heritage. That's why, as a charity, we care for over a million objects and hundreds of historic sites in every part of England. And it's why we open them up, share their stories and find new ways for everybody to enjoy, learn, play and create.

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From: Alison Cummings <Alison.Cummings@DOVER.GOV.UK>
Sent: 09 June 2025 09:44
To: Porter, Roy <Roy.Porter@english-heritage.org.uk>
Subject: Goshall solar array application

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Dear [REDACTED]

Hope you're doing well.

Am just picking up on this case as the agent advised that they were seeking to engage with EH regarding potential heritage benefits from the proposal. I think at a basic level there was the suggestion of interpretation panels (to my mind this seems pretty poor considering how much money the scheme would generate, and I wonder if they couldn't provide the visitor centre with free electricity for life....!)

Are you involved or know anything about this? We are looking at taking the case to planning committee in August I believe and at present there are no significant heritage benefits to the scheme that we can report on.

Many thanks,



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

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

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[REDACTED]

From: [REDACTED]@english-heritage.org.uk>
Sent: 03 June 2025 15:57
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Little South Solar Farm - PA23/01363

Dear [REDACTED]

Thanks for your email. While interpretation panels at the amphitheatre may enhance public understanding of the historic landform of the area to the south, I think they are unlikely to mitigate the harm of the proposed development; rather they would focus attention on it. Also, we have purposefully restricted the number of panels at the amphitheatre to avoid introducing visual clutter to that part of the scheduled monument, so the notion of additional ones is not enticing.

Best wishes,

[REDACTED]

[REDACTED] FSA | Senior Curator of Properties (South East, London and East) | Curatorial Department

English Heritage
[REDACTED]

www.english-heritage.org.uk

From: [REDACTED]@statkraft.com>
Sent: 03 June 2025 15:07
To: [REDACTED]@english-heritage.org.uk>
Cc: [REDACTED]@statkraft.com>
Subject: Little South Solar Farm - PA23/01363

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Dear [REDACTED]

I am a project manager in the Statkraft UK development team responsible for the Little South Solar farm near to Sandwich, Kent. We have been progressing with the planning application **23/01363** which you may be aware is close to receiving a planning decision. I wanted to contact you regarding your previous comments on the application (attached), specifically:

"Easy and instinctive understanding of Richborough's historic setting space depends on being able to 'read' the former waterway, and the further sub-division of the development site will erode this quality, thus harming the significance of the scheduled ancient monument."

In the event that planning permission were to be granted, we are considering what mitigation measures could be attached to that planning permission. In response to the original comment about interpreting the former landscape, we suggest that we could commit via a S106 Undertaking to fund enhanced interpretation boards at the amphitheatre site, explaining the details of the former waterway to visitors. However, before we commit to this mitigation measure it would be useful to hear your thoughts on the matter, or whether there are any alternative reasonable mitigation measures that you would also like our team to consider.

We look forward to hearing from you.

Kind regards

[Redacted]

[Redacted]

Assistant Project Manager, UK Solar Development

__ [Redacted] [@statkraft.com](mailto:[Redacted]@statkraft.com)

__ Mobile + [Redacted]

Statkraft UK LTD (reg no. 05742795)
19th Floor, 22 Bishopsgate, London, EC2N 4BQ
www.statkraft.co.uk



[REDACTED]

From: [REDACTED]@HistoricEngland.org.uk>
Sent: 12 June 2025 00:06
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: RE: Historic England advice on Application no(s) 23/01363

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Many thanks for your email on this [REDACTED]

I will need to consult with our Regional Leadership Team before responding; I am now not back at desk until Tues/Wedsnext week.

I may be able to respond late next week, subject to Leadership review, but am then on leave from 23rd for one week, returning 30th June. Would a response the first week of July otherwise be possible when I am back from leave?

If you could let me know that would be most helpful.

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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Sent: 09 June 2025 10:18
To: [REDACTED]@HistoricEngland.org.uk>
Cc: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>
Subject: RE: Historic England advice on Application no(s) 23/01363

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Kind regards,



[Redacted]
Principal Heritage Officer
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Subject: Fw: Historic England advice on Application no(s) 23/01363

From: [Redacted] <[\[Redacted\]@HistoricEngland.org.uk](mailto:[Redacted]@HistoricEngland.org.uk)> <[\[Redacted\]@HistoricEngland.org.uk](mailto:[Redacted]@HistoricEngland.org.uk)>
Sent: 02 May 2025 19:51
To: [Redacted] <[\[Redacted\]@DOVER.GOV.UK](mailto:[Redacted]@DOVER.GOV.UK)>
Cc: [Redacted] <[\[Redacted\]@HistoricEngland.org.uk](mailto:[Redacted]@HistoricEngland.org.uk)> <[\[Redacted\]@HistoricEngland.org.uk](mailto:[Redacted]@HistoricEngland.org.uk)>
Subject: Historic England advice on Application no(s) 23/01363

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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From: [REDACTED]
Sent: 12 June 2025 10:59
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Historic England advice on Application no(s) 23/01363

Hello [REDACTED]

Thanks for your email.

To ensure that we can meet our deadline for committee and allow time to review your comments we will need to receive them by noon on Wednesday 3rd at the very latest. Would you be able to confirm this is possible please.

Many thanks,



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

Email: [REDACTED]
Tel: [REDACTED]
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Sent: 12 June 2025 00:06
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Cc: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>
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Historic England

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NB. the most up to date archaeological report following trial trenching is now available online (KCC have also been consulted for further comment).

We look forward to hearing from you.

Kind regards,



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

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

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From: [redacted] [@DOVER.GOV.UK](mailto:[redacted]@DOVER.GOV.UK)>
Sent: 13 May 2025 10:00
To: [redacted] [@DOVER.GOV.UK](mailto:[redacted]@DOVER.GOV.UK)>
Subject: Fw: Historic England advice on Application no(s) 23/01363

From: [redacted] [@HistoricEngland.org.uk](mailto:[redacted]@HistoricEngland.org.uk) <[redacted]@HistoricEngland.org.uk>
Sent: 02 May 2025 19:51
To: [redacted] [@DOVER.GOV.UK](mailto:[redacted]@DOVER.GOV.UK)>
Cc: [redacted] [@HistoricEngland.org.uk](mailto:[redacted]@HistoricEngland.org.uk) [redacted] [@HistoricEngland.org.uk](mailto:[redacted]@HistoricEngland.org.uk)>
Subject: Historic England advice on Application no(s) 23/01363

Dear [redacted],

Please find attached our advice on the following site -

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

Yours sincerely,


Inspector of Ancient Monuments

E-mail: @HistoricEngland.org.uk

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[REDACTED]

From: [REDACTED]@HistoricEngland.org.uk>
Sent: 18 June 2025 13:19
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Historic England advice on Application no(s) 23/01363

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Hello [REDACTED]

Thank you, yes I confirm we will be able to respond by Wednesday 3rd July noon.

All the Best

[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

Advance notice of annual leave: Monday 23rd June for one week, returning Monday 30th June

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 12 June 2025 10:59
To: [REDACTED]@HistoricEngland.org.uk>
Cc: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>
Subject: RE: Historic England advice on Application no(s) 23/01363

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Hello [REDACTED]

Thanks for your email.

To ensure that we can meet our deadline for committee and allow time to review your comments we will need to receive them by noon on Wednesday 3rd at the very latest. Would you be able to confirm this is possible please.

Many thanks,



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

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

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Sent: 12 June 2025 00:06
To: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Cc: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>; [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: RE: Historic England advice on Application no(s) 23/01363

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Many thanks for your email on this [REDACTED]

I will need to consult with our Regional Leadership Team before responding; I am now not back at desk until Tues/Wedsnext week.

I may be able to respond late next week, subject to Leadership review, but am then on leave from 23rd for one week, returning 30th June. Would a response the first week of July otherwise be possible when I am back from leave?

If you could let me know that would be most helpful.

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

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From: [Redacted] <[\[Redacted\]@DOVER.GOV.UK](mailto:[Redacted]@DOVER.GOV.UK)>

Sent: 09 June 2025 10:18

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

Cc: [Redacted] <[\[Redacted\]@DOVER.GOV.UK](mailto:[Redacted]@DOVER.GOV.UK)>; [Redacted] <[\[Redacted\]@DOVER.GOV.UK](mailto:[Redacted]@DOVER.GOV.UK)>

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

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Dear [Redacted]

I hope you're well. We have a number of queries following the latest consultation on the above, and as the case will be sent to planning committee in August we would appreciate it if you could provide further comments to clarify.

The position statement notes:

“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.”

We have therefore taken it that if the further changes that HE outline are not made to the scheme that the harm is likely to be greater than stated. The applicant does not intend to make any further changes to the proposal. **Could you please advise on the level of harm that the scheme as it stands would have.**

Secondly, on page 19 of the Response document the applicants have noted that the access to the nature restoration area would provide a better view of the monument, and you note that this would have some benefit but would also create a concern with understanding the Roman route, causeway and cremations but we are slightly unclear on whether this aspect of the proposal causes harm (and at what level) to the SM and what the benefit is that HE consider it provides, and would appreciate it if you could provide further clarification. In addition, **could you please advise whether the benefit that this provides is sufficient to mitigate the new/additional harm (if it is considered that harm is caused).**

We also understand that the applications intend to speak to English Heritage regarding potential heritage benefits that they can offer but we are unaware if this has happened yet. as I understand it, the basics might be a couple of interpretation panels, but if on the amphitheatre this would of course be on scheduled land and require SMC. We would be interested to hear if the applicant has entered into pre-app discussions with yourselves at HE.

The applicant has also suggested conditions which we would appreciate receiving your further advice on, in particular the 2nd condition. Please see below: (we have also sought advice from KCC, in particular with reference to further archaeological evaluation/details of piles for ‘specified areas’)

"Careful consideration has been given to the views expressed by Historic England (correspondence dated 2nd May 2025) and to Kent County Council Heritage Conservation (correspondence dated 17th April). Whilst the Applicant does not believe the following additional planning conditions are also necessary elsewhere on the Site, if the Local Planning Authority were of the opinion that the following were suitable matters for planning conditions to control, the Applicant would be willing to accept the following:

1. A condition which required that, prior to commencement of development, a Scheme should be submitted and approved which details that, in respect of specified areas of archaeological interest, an appropriate method for constructing the solar arrays is to be agreed which avoids the need for using driven piles. The Proposed Development could then only be constructed in accordance with this approved Scheme.
2. A condition which required that, prior to the commencement of development, a Scheme should be submitted and approved which detailed measures to mark out in an agreed manner the route of the postulated Roman Road through the application site. For example, this could involve the use of marked poles, flags, different coloured panel frames or an equivalent visual feature, so as to denote the postulated route.

Further, the Applicant would be willing to commit to pay a sum of money by way of a S106 Undertaking in order to fund enhanced interpretation facilities available at the amphitheatre site to explain the postulated route to visitors to the site.”

At present, the application will be going to planning committee in August, with reports needing to be completed 1 month before. We would therefore greatly appreciate hearing from you as soon as possible.

NB. the most up to date archaeological report following trial trenching is now available online (KCC have also been consulted for further comment).

We look forward to hearing from you.

Kind regards,



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

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

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Sent: 13 May 2025 10:00
To: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: Fw: Historic England advice on Application no(s) 23/01363

From: [REDACTED] [@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk) <[REDACTED]@HistoricEngland.org.uk>
Sent: 02 May 2025 19:51
To: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Cc: [REDACTED] [@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk) [REDACTED] [@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>
Subject: Historic England advice on Application no(s) 23/01363

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](mailto:[REDACTED]@HistoricEngland.org.uk)

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[REDACTED]

From: [REDACTED]
Sent: 26 August 2025 16:34
To: [REDACTED]
Cc: [REDACTED]
Subject: 23/01363 Goshall Valley, East Street, Ash
Attachments: Little South s.106 UU (TLT updates 08.08.25) (Draft clean version).docx

Good afternoon [REDACTED] and [REDACTED]

Following previous correspondence and a meeting held with the agents, they have provided the attached draft legal agreement which sets out a scheduled monument contribution and a number of options that could be considered for inclusion in a heritage mitigation strategy (Appendix C). I am awaiting comments from our planning solicitors but would be grateful if you could let me know your initial thoughts on the measures suggested.

I look forward to hearing from you.

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: 02 July 2025 09:33
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>; [REDACTED]
[REDACTED]@HistoricEngland.org.uk>
Subject: RE: Historic England advice on Application no(s) 23/01363

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Dear [REDACTED]

Thank you for your email regarding this consultation and our previous advice to you, we would be pleased to clarify the following:

1) We think the level of harm from the scheme as it stands (with the removal of alder carr but proposed solar panels on the area of the postulated Roman road and causeway) would be less than substantial in the middle of the range. If the solar panels were removed from the postulated line of the Roman road, the level of harm would be slightly reduced.

2) With regard to heritage benefit and mitigation; there are two separate proposals for consideration that are not dependant on one another, and a reduction in harm in one area does not mitigate for an increase in harm in another. Achieving both would be preferable:

- a. Opening a better view of the monument from the nature restoration area (thus retaining the visible connection from within the valley floor to the amphitheatre which is currently possible), benefits the ability of people to appreciate the monument by helping to sustain an understanding of its prominence and former relationship to the watery landscape which surrounded it. This is an improvement to the scheme as it would help better reveal significance.
- b. In terms of whether the above could mitigate the harm of building over the line of the postulated Roman Road, we think the Local Authority is best placed to judge this.
- c. As noted in our last letter, solar panels extending over the postulated route of the 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. We think harm could be reduced by removing solar panels from the proposed line of the Roman road.

3) We have not been asked to provide pre-application advice on interpretation panels in the amphitheatre, but should the applicant and English Heritage approach us, we would be very pleased to advise. Enhancement of interpretation facilities sounds positive, and would, in our view, be a heritage benefit

4) With regard to proposed planning conditions;

- a. **A condition which required that, prior to commencement of development, a Scheme should be submitted and approved which details that, in respect of specified areas of archaeological interest, an appropriate method for constructing the solar arrays is to be agreed which avoids the need for using driven piles. The Proposed Development could then only be constructed in accordance with this approved Scheme.**

A key concern with this condition is that it does not preclude the use of other methods of piling that could still be harmful to the archaeological resource.

We note that avoiding harm to buried archaeology from driven piles would be sensible as driven plies are generally the more harmful method of piling (we have specific published guidance on this).

However, this wording does not, however, mean no below ground disturbance, for example screw piles could be proposed instead of driven which would still have a localised impact, or impact across a greater area if they disturbed anaerobic deposits such as preserved peat.

A better approach might be to have clarity on whether piling is needed at all by seeking confirmation on whether ground mounted solar panels are an option.

- b. **A condition which required that, prior to the commencement of development, a Scheme should be submitted and approved which detailed measures to mark out in an agreed manner the route of the postulated Roman Road through the application site. For example, this could involve the use of marked poles, flags, different coloured panel frames or an equivalent visual feature, so as to denote the postulated route.**

This is an unusual suggestion. We think this could draw more attention to the solar panels when viewed from the monument. A better suggestion would be to introduce reference to the postulated Roman Road on interpretation boards within the monument.

- c. **The Applicant would be willing to commit to pay a sum of money by way of a S106 Undertaking in order to fund enhanced interpretation facilities available at the amphitheatre site to explain the postulated route to visitors to the site.**

We would consider interpretation as a heritage benefit.

5) The Historic England Science Advisor has reviewed the latest archaeological evaluation report and provided comments to Ben Found at KCC. We anticipate that any relevant points will therefore be channelled through his advice to you.

I hope these points are helpful in clarifying our position, but if there are any further queries that we can help with then please do not hesitate to get in touch.

With 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
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From: [Redacted]
Sent: 18 June 2025 13:19
To: [Redacted]@DOVER.GOV.UK>
Cc: [Redacted]@DOVER.GOV.UK>; [Redacted]@DOVER.GOV.UK>; [Redacted]@HistoricEngland.org.uk>
Subject: RE: Historic England advice on Application no(s) 23/01363

Hello [Redacted]

Thank you, yes I confirm we will be able to respond by Wednesday 3rd July noon.

All the Best

[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

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

Thanks for your email.

To ensure that we can meet our deadline for committee and allow time to review your comments we will need to receive them by noon on Wednesday 3rd at the very latest. Would you be able to confirm this is possible please.

Many thanks,



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

Email: [REDACTED]
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Subject: RE: Historic England advice on Application no(s) 23/01363

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Many thanks for your email on this [REDACTED]

I will need to consult with our Regional Leadership Team before responding; I am now not back at desk until Tues/Wedsnext week.

I may be able to respond late next week, subject to Leadership review, but am then on leave from 23rd for one week, returning 30th June. Would a response the first week of July otherwise be possible when I am back from leave?

If you could let me know that would be most helpful.

Kind Regards

[REDACTED]

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From: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Sent: 09 June 2025 10:18
To: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>
Cc: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>; [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: RE: Historic England advice on Application no(s) 23/01363

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

Dear [REDACTED]

I hope you're well. We have a number of queries following the latest consultation on the above, and as the case will be sent to planning committee in August we would appreciate it if you could provide further comments to clarify.

The position statement notes:

"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."

We have therefore taken it that if the further changes that HE outline are not made to the scheme that the harm is likely to be greater than stated. The applicant does not intend to make any further changes to the proposal. **Could you please advise on the level of harm that the scheme as it stands would have.**

Secondly, on page 19 of the Response document the applicants have noted that the access to the nature restoration area would provide a better view of the monument, and you note that this would have some benefit but would also create a concern with understanding the Roman route, causeway and cremations but we are slightly unclear on whether this aspect of the proposal causes harm (and at what level) to the SM and what the benefit is that HE consider it provides, and would appreciate it if you could provide further clarification. **In addition, could you please advise whether the benefit that this provides is sufficient to mitigate the new/additional harm (if it is considered that harm is caused).**

We also understand that the applications intend to speak to English Heritage regarding potential heritage benefits that they can offer but we are unaware if this has happened yet. as I understand it, the basics might be a couple of interpretation panels, but if on the amphitheatre this would of course be on scheduled land and require SMC. We would be interested to hear if the applicant has entered into pre-app discussions with yourselves at HE.

The applicant has also suggested conditions which we would appreciate receiving your further advice on, in particular the 2nd condition. Please see below: (we have also sought advice from KCC, in particular with reference to further archaeological evaluation/details of piles for 'specified areas')

"Careful consideration has been given to the views expressed by Historic England (correspondence dated 2nd May 2025) and to Kent County Council Heritage Conservation (correspondence dated 17th April). Whilst the Applicant does not believe the following additional planning conditions are also necessary elsewhere on the Site, if the Local Planning Authority were of the opinion that the following were suitable matters for planning conditions to control, the Applicant would be willing to accept the following:

1. A condition which required that, prior to commencement of development, a Scheme should be submitted and approved which details that, in respect of specified areas of archaeological interest, an appropriate method for constructing the solar arrays is to be agreed which avoids the need for using driven piles. The Proposed Development could then only be constructed in accordance with this approved Scheme.
2. A condition which required that, prior to the commencement of development, a Scheme should be submitted and approved which detailed measures to mark out in an agreed manner the route of the postulated Roman Road through the application site. For example, this could involve the use of marked poles, flags, different coloured panel frames or an equivalent visual feature, so as to denote the postulated route.

Further, the Applicant would be willing to commit to pay a sum of money by way of a S106 Undertaking in order to fund enhanced interpretation facilities available at the amphitheatre site to explain the postulated route to visitors to the site."

At present, the application will be going to planning committee in August, with reports needing to be completed 1 month before. We would therefore greatly appreciate hearing from you as soon as possible.

NB. the most up to date archaeological report following trial trenching is now available online (KCC have also been consulted for further comment).

We look forward to hearing from you.

Kind regards,



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

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



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From: [REDACTED] <[REDACTED]@DOVER.GOV.UK>
Sent: 13 May 2025 10:00
To: [REDACTED] <[REDACTED]@DOVER.GOV.UK>
Subject: Fw: Historic England advice on Application no(s) 23/01363

From: [REDACTED] <[REDACTED]@HistoricEngland.org.uk> [REDACTED] <[REDACTED]@HistoricEngland.org.uk>
Sent: 02 May 2025 19:51
To: [REDACTED] <[REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED] <[REDACTED]@HistoricEngland.org.uk> [REDACTED] <[REDACTED]@HistoricEngland.org.uk>
Subject: Historic England advice on Application no(s) 23/01363

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] <[REDACTED]@HistoricEngland.org.uk>

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Unilateral Planning Obligation

under Section 106 of the Town and
Country Planning Act 1990

(1) SOVEX DEVELOPMENTS LIMITED

(2)



to

(3) DOVER DISTRICT COUNCIL

relating to land at Goshall Valley East Street Ash
Kent

Dated 2025

Draft: dated 8 August 2025 (TLT)



Contents

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3 Condition precedent 3

4 Statutory provisions and covenants 3

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D Example of an information board 10

This Unilateral Planning Obligation is made the [●] day of [●] 2025

And given by:

- (1) SOVEX DEVELOPMENTS LIMITED (Company Registration Number 02077395) whose registered office is at The Goods Shed, Jubilee Way, Faversham, Kent, England, ME13 8GD (“**First Owner**”); and
 - (2) [REDACTED] and [REDACTED] of [REDACTED] (“**Second Owner**”);
- to
- (3) DOVER DISTRICT COUNCIL of White Cliffs Business Park, Dover CT16 3PJ (“**Council**”)

1 Definitions and interpretation

- 1.1 In this Unilateral Planning Obligation the following expressions shall where the context so requires or admits have the following meanings:

Act means the Town and Country Planning Act 1990 (as amended) or any re-enactment or modification thereof for the time being in force

Application means the application made by the Developer to the Council for full planning permission to develop the Application Site under reference number 23/01363

Application Site means the land at Goshall Valley, East Street, Ash, Kent, shown edged red on Plan 1 in respect of which the Developer has made the Application

CIL Regulations means the Community Infrastructure Regulations 2010 (as amended)

Developer means Little South Clean Energy Limited (Company Registration Number 13935685) whose registered office is at 19th Floor 22 Bishopsgate, London, United Kingdom, EC2N 4BQ

Development means such development as may be authorised by the Planning Permission

Heritage Mitigation Strategy means the document prepared by the Owners and approved by the Council, setting out the heritage mitigation measures to be provided either at the Application Site or at the relevant alternative location, which may include one or more of the example measures listed in Appendix C

Implementation means in the case of implementation of the Planning Permission the carrying out of any of the material

operations listed in Section 56 of the Act pursuant to the Planning Permission provided that for the purposes of determining whether or not a material operation has been carried out there shall be disregarded site clearance, demolition, site surveys and investigations and **implement** and **implemented** shall be construed accordingly

Owners	means the First Owner and the Second Owner, taken together
Plan 1	means the plan contained in Appendix A to this Unilateral Planning Obligation
Plan 2	means the plan contained in Appendix B to this Unilateral Planning Obligation
Planning Permission	means the planning permission granted pursuant to the Application
Scheduled Monument	means Richborough Saxon Shore Fort, Roman Port and associated remains shown shaded red on Plan 2
Scheduled Monument Contribution	means £35,000 (thirty-five thousand pounds), plus VAT, to be used by English Heritage in connection with the costs of delivering and implementing the Heritage Mitigation Strategy
Working Day	means any day from Monday to Friday (inclusive) which is not Christmas Day, Good Friday or a statutory bank holiday and Working Days shall be construed accordingly

- 1.2 In this Unilateral Planning Obligation, unless the context otherwise requires:
- 1.2.1 any reference to a statute or a provision of a statute shall be construed as a reference to that statute or provisions as amended, re-enacted or extended at the relevant time;
 - 1.2.2 any reference to a person shall be construed as a reference to any person, firm, company, corporation, government, state or agency of a state or any association or partnership (whether or not having separate legal personality) or one or more of the foregoing;
 - 1.2.3 any reference to the singular shall include the plural and vice versa;
 - 1.2.4 any reference to the masculine gender shall include the feminine and neuter and vice versa;
 - 1.2.5 the table of contents and headings are inserted for ease of reference only and shall not affect the construction of this Unilateral Planning Obligation;
 - 1.2.6 where any party comprises two or more persons, any obligations of that party in, under or arising from this Unilateral Planning Obligation is

- undertaken by or binding upon such two or more persons jointly and severally;
- 1.2.7 references to any party to this Unilateral Planning Obligation include its successors-in-title and permitted assignees and in the case of any local authority shall also include any successor in function;
- 1.2.8 references to numbered clauses, schedules or paragraphs are references to the relevant clauses or schedules in this Unilateral Planning Obligation or the relevant paragraph of this Unilateral Planning Obligation respectively;
- 1.2.9 where in this Unilateral Planning Obligation any approval or consent or a certificate is required to be given by the Council then such approval or consent shall unless otherwise stated be given by such officer as the Council as appropriate shall from time to time notify in writing to the Owners;
- 1.2.10 all payments in accordance with the terms of this Unilateral Planning Obligation shall be exclusive of any VAT payable in respect thereof.

2 Background

- 2.1 The Council is a Local Planning Authority as defined in the Act and a Local Planning Authority for the purposes of planning obligations imposed pursuant to the provisions of Section 106 of the Act.
- 2.2 The First Owner is the owner in fee simple in possession of the portion of the Application Site with title absolute registered at HM Land Registry under title numbers TT39492, TT24211 and K125774. The Second Owner is the owner in fee simple in possession of the portion of the Application Site with title absolute registered at HM Land Registry under title number K443184 .
- 2.3 The Application has been submitted to the Council by the Developer for Planning Permission for the development of the Application Site as described in the Application.
- 2.4 The Owners are willing to give an undertaking to perform the obligations set out in this Unilateral Planning Obligation in the event of the Planning Permission being granted.

3 Condition precedent

- 3.1 This Unilateral Planning Obligation (with the exception of clauses 1, 2, 3, 4, 6, 7, 8, 9 which shall take effect on the date hereof) is conditional on:
- 3.1.1 the grant of the Planning Permission; and
- 3.1.2 the Implementation of the Planning Permission.

4 Statutory provisions and covenants

- 4.1 This Unilateral Planning Obligation is entered into pursuant to the provisions of sections 106 of the Act and section 111 of Local Government Act 1972 and shall be deemed to be planning obligations in respect of the Application Site for the purposes of that section but without prejudice to all and any other means of enforcing them at law or in equity or by statute.
- 4.2 The covenants and obligations created by this Unilateral Planning Obligation are planning obligations for the purposes of Section 106 of the Act and are enforceable by the Council as Local Planning Authority.

- 4.3 This Unilateral Planning Obligation shall cease to have effect in respect of any then outstanding obligations in the event that the Planning Permission is quashed as a result of legal proceedings is revoked, or is modified without the Owners' consent.
- 4.4 No person will be liable for any breach of this Unilateral Planning Obligation unless they hold an interest in that part of the Application Site in respect of which such breach occurs or hold such an interest at the date of the breach provided that the person shall remain liable for any antecedent.

5 Obligations

The Owners covenant as follows:

- 5.1 to pay the Scheduled Monument Contribution to the Council prior to the Implementation of the Development.
- 5.2 to prepare and submit the Heritage Mitigation Strategy to the Council for approval prior to the Implementation of the Development in accordance with the process set out in Appendix C.

6 Notices

- 6.1 Any notice or consent required or permitted under this Unilateral Planning Obligation shall be in writing and shall be sent by first class registered post, hand delivery or fax. There shall be no right to serve notices or consents by email but if a party chooses to do so and the other party agrees email may be used.
- 6.2 Subject to Clause 6.4 below any such notice, consent or other document shall be deemed to have been duly received:
- 6.2.1 if despatched by first class, registered post – 48 hours from the time of posting to the relevant party; or
- 6.2.2 if despatched by hand delivery – at the time of actual delivery; or
- 6.2.3 if despatched by email – 24 hours after the time of the despatch.
- 6.3 Unless otherwise notified by one party to the other in writing from time to time, for the purposes of this clause the postal addresses of each party are those set out at the beginning of this Unilateral Planning Obligation.
- 6.4 In proving service by post it will be sufficient (unless any relevant part of the postal service is affected by industrial action) to prove that the envelope containing the notice was duly stamped addressed and posted to the addresses specified herein. In proving service by fax or email it shall be sufficient to prove that it was properly addressed and dispatched to the numbers or address specified herein.
- 6.5 A party shall not attempt to prevent or delay the service on it of a notice under this Unilateral Planning Obligation.

7 Waiver

- 7.1 No delay or failure on the part of any party in enforcing any provision in this Unilateral Planning Obligation shall be deemed to be a waiver or create a precedent or in any way prejudice any party's rights under this Unilateral Planning Obligation.
- 7.2 The rights and remedies provided in this Unilateral Planning Obligation are cumulative and are additional to any rights or remedies provided by law.

8 Miscellaneous

- 8.1 If any party defaults in the payment when due of any sum payable under this Unilateral Planning Obligation (whether pursuant to a court order or otherwise) the liability of that party in default shall be increased to include interest on such sum from the date when such payment was due until the date of actual payment at a rate of 4% above the base rate from time to time of Barclays Bank plc such interest shall accrue from day to day and shall be compounded annually.
- 8.2 The Owners shall pay to the Council upon completion of the Unilateral Planning Obligation its proper and reasonable legal costs incurred in connection with this Unilateral Planning Obligation to be limited to £[●]
- 8.3 The Owners hereby consent to the registration of this Deed as a Local Land Charge .
- 8.4 If any provision in this Unilateral Planning Obligation shall be held to be invalid illegal or unenforceable the validity legality and enforceability of the remaining provisions hereof shall not in any way be deemed thereby to be affected or impaired.
- 8.5 Nothing in this Unilateral Planning Obligation shall prohibit or limit the right to develop any part of the Application Site in accordance with any planning permission (other than the Planning Permission) granted after the date of the Planning Permission **save for** if the Council grant a planning permission pursuant to an application to vary or amend the Planning Permission made by the Developer or Owners under section 73 of the Act the covenants and provisions of this Unilateral Planning Obligation shall be deemed to bind the varied permission and to apply in equal terms to the new planning permission unless that application to vary the Planning Permission is itself supported by a completed planning obligation under section 106 of the Act and/or completed deed of variation under section 106A of the Act.
- 8.6 This Unilateral Planning Obligation constitutes a Deed.

9 Third Parties

The Owners declare and confirm that with the exception of any person who becomes an Owner, Lessee or Mortgagee] of the Application Site no term of this Unilateral Planning Obligation is enforceable under the Contract (Rights of Third Parties) Act 1999 by a person who is not a party to this Unilateral Planning Obligation.

In witness whereof this deed has been duly executed by the parties the day and year first before written.

Signed as a Deed by)
SOVEX DEVELOPMENTS LIMITED)
)
) Director
acting by [●Name of Director])
in the presence of)

Witness signature:

Name:

Address:

Occupation:

Signed as a Deed by)
[REDACTED])
in the presence of)
)

Witness signature:)

Name:)

Address:)

Occupation:)

Signed as a Deed by)
[REDACTED])
in the presence of)
)

Witness signature:)

Name:)

Address:)

Occupation:)

Appendix A

Plan 1

[Plan to be added]

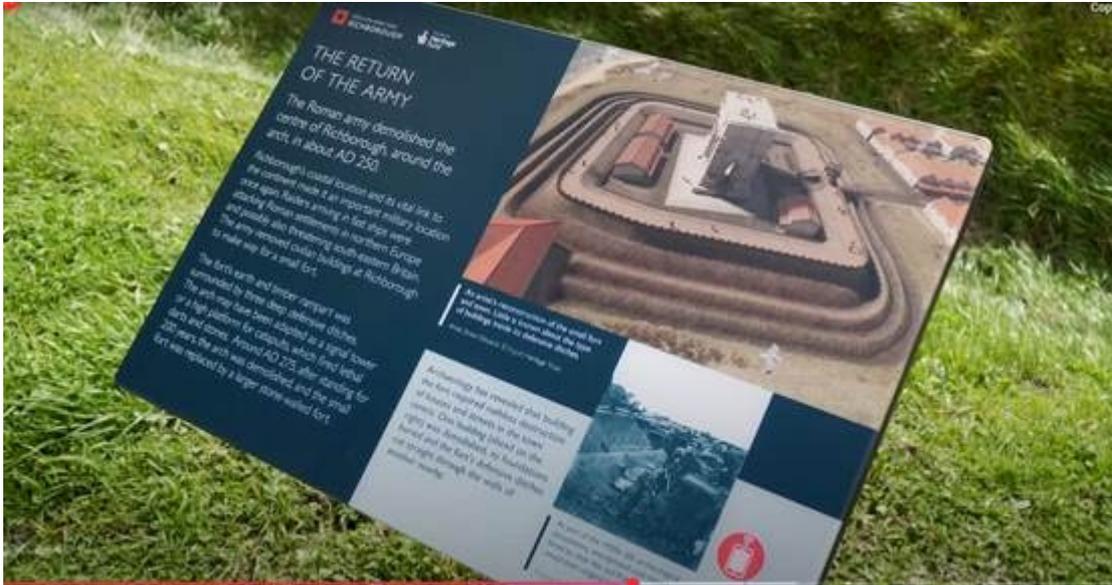
Appendix C

Examples of options to be considered for inclusion in a Heritage Mitigation Strategy

- 1 The heritage mitigation measures to be provided by the Owners may include one or more of the following:
 - 1.1 An information board or boards located within the Application Site with heritage educational text providing information about the area during the Roman period and a 2D representation of how the Wantsum Channel and surrounds would have appeared during the Roman Period from that location ("Option 1").
 - 1.2 An information board or boards located within the Scheduled Monument with educational explanatory text and a 2D representation of how the Wantsum Channel and surrounds would have appeared during the Roman Period from that location ("Option 2").
 - 1.3 A virtual 3D representation of how the Wantsum Channel and surrounds would have appeared during the Roman Period that can be accessed and viewed either remotely via a computer, or similar personal digital device that can view website-hosted material, or on site through a QR code (or other means of directing visitors to the virtual viewing experience) to be accessed by a smartphone (or similar device). It is suggested that the QR code could be located:
 - 1.3.1 on timber posts or information boards at either end of the proposed heritage viewing corridor within the Application Site ("Option 3.1"), and/or
 - 1.3.2 on an existing or a new information board within the Scheduled Monument, close to the amphitheatre ("Option 3.2").
- 2 Examples of an information board and web-based materials are contained in Appendix D.
- 3 The options to be taken forward, their format and details will be designed with input from English Heritage, Historic England and the Council, and, where possible, input on the format and content will also be invited from interested parties within the local community.
- 4 In the event that English Heritage decide that none of the information referred to above should be provided within the footprint of the Scheduled Monument, Options 1 and 3.1 listed above will be the default options to be provided by the Owners.
 - 4.1 In such circumstances the style, format and presentation of materials will be determined through advice from independently appointed heritage experts and agreed in writing by the Council.

Appendix D

Example of an information board



(Source: English Heritage <https://youtu.be/EVoOHwtNJQ8>)

English Heritage examples of web-based materials

1. Online tour

<https://www.english-heritage.org.uk/visit/places/cliffords-tower-york/history-and-stories/virtual-tour/>

<https://www.english-heritage.org.uk/visit/places/warkworth-castle-and-hermitage/history/virtual-tour/>

2. 360 tours

<https://www.english-heritage.org.uk/members-area/members-magazine/360-videos/>

3. VR tour

<https://www.english-heritage.org.uk/visit/places/warkworth-castle-and-hermitage/history/virtual-tour/>

[REDACTED]

From: [REDACTED]@HistoricEngland.org.uk>
Sent: 02 July 2025 09:33
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Historic England advice on Application no(s) 23/01363

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Dear [REDACTED]

Thank you for your email regarding this consultation and our previous advice to you, we would be pleased to clarify the following:

1) We think the level of harm from the scheme as it stands (with the removal of alder carr but proposed solar panels on the area of the postulated Romand road and causeway) would be less than substantial in the middle of the range. If the solar panels were removed from the postulated line of the Roman road, the level of harm would be slightly reduced.

2) With regard to heritage benefit and mitigation; there are two separate proposals for consideration that are not dependant on one another, and a reduction in harm in one area does not mitigate for an increase in harm in another. Achieving both would be preferable:

- a) Opening a better view of the monument from the nature restoration area (thus retaining the visible connection from within the valley floor to the amphitheatre which is currently possible), benefits the ability of people to appreciate the monument by helping to sustain an understanding of its prominence and former relationship to the watery landscape which surrounded it. This is an improvement to the scheme as it would help better reveal significance.
- b) In terms of whether the above could mitigate the harm of building over the line of the postulated Roman Road, we think the Local Authority is best placed to judge this.
- c) As noted in our last letter, solar panels extending over the postulated route of the 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. We think harm could be reduced by removing solar panels from the proposed line of the Roman road.

3) We have not been asked to provide pre-application advice on interpretation panels in the amphitheatre, but should the applicant and English Heritage approach us, we would be very pleased to advise. Enhancement of interpretation facilities sounds positive, and would, in our view, be a heritage benefit

4) With regard to proposed planning conditions;

- a) **A condition which required that, prior to commencement of development, a Scheme should be submitted and approved which details that, in respect of specified areas of archaeological interest, an appropriate method for constructing the solar arrays is to be agreed which avoids the need for using driven piles. The Proposed Development could then only be constructed in accordance with this approved Scheme.**

A key concern with this condition is that it does not preclude the use of other methods of piling that could still be harmful to the archaeological resource.

We note that avoiding harm to buried archaeology from driven piles would be sensible as driven plies are generally the more harmful method of piling (we have specific published guidance on this).

However, this wording does not, however, mean no below ground disturbance, for example screw piles could be proposed instead of driven which would still have a localised impact, or impact across a greater area if they disturbed anaerobic deposits such as preserved peat.

A better approach might be to have clarity on whether piling is needed at all by seeking confirmation on whether ground mounted solar panels are an option.

- b) A condition which required that, prior to the commencement of development, a Scheme should be submitted and approved which detailed measures to mark out in an agreed manner the route of the postulated Roman Road through the application site. For example, this could involve the use of marked poles, flags, different coloured panel frames or an equivalent visual feature, so as to denote the postulated route.**

This is an unusual suggestion. We think this could draw more attention to the solar panels when viewed from the monument. A better suggestion would be to introduce reference to the postulated Roman Road on interpretation boards within the monument.

- c) The Applicant would be willing to commit to pay a sum of money by way of a S106 Undertaking in order to fund enhanced interpretation facilities available at the amphitheatre site to explain the postulated route to visitors to the site.**

We would consider interpretation as a heritage benefit.

5) The Historic England Science Advisor has reviewed the latest archaeological evaluation report and provided comments to Ben Found at KCC. We anticipate that any relevant points will therefore be channelled through his advice to you.

I hope these points are helpful in clarifying our position, but if there are any further queries that we can help with then please do not hesitate to get in touch.

With 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

For new case submissions and enquiries you can email the south east inbox: [e-seast@historicengland.org.uk](mailto:seast@historicengland.org.uk)



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From: [REDACTED]
Sent: 18 June 2025 13:19
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>; [REDACTED]@HistoricEngland.org.uk>
Subject: RE: Historic England advice on Application no(s) 23/01363

Hello [REDACTED]

Thank you, yes I confirm we will be able to respond by Wednesday 3rd July noon.

All the Best

[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

Advance notice of annual leave: Monday 23rd June for one week, returning Monday 30th June

For new case submissions and enquiries you can email the south east inbox: e-seast@historicengland.org.uk

From: [REDACTED]@DOVER.GOV.UK>
Sent: 12 June 2025 10:59
To: [REDACTED]@HistoricEngland.org.uk>
Cc: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>
Subject: RE: Historic England advice on Application no(s) 23/01363

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Hello [REDACTED]

Thanks for your email.

To ensure that we can meet our deadline for committee and allow time to review your comments we will need to receive them by noon on Wednesday 3rd at the very latest. Would you be able to confirm this is possible please.

Many thanks,



Principal Heritage Officer

Dover District Council

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

Email: [REDACTED]

Tel: [REDACTED]

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



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

Sent: 12 June 2025 00:06

To: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>

Cc: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>; [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>

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

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Many thanks for your email on this [REDACTED]

I will need to consult with our Regional Leadership Team before responding; I am now not back at desk until Tues/Wedsnext week.

I may be able to respond late next week, subject to Leadership review, but am then on leave from 23rd for one week, returning 30th June. Would a response the first week of July otherwise be possible when I am back from leave?

If you could let me know that would be most helpful.

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

Sent: 09 June 2025 10:18

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

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

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

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

Dear [REDACTED]

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The position statement notes:

"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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The applicant has also suggested conditions which we would appreciate receiving your further advice on, in particular the 2nd condition. Please see below: (we have also sought advice from KCC, in particular with reference to further archaeological evaluation/details of piles for ‘specified areas’)

"Careful consideration has been given to the views expressed by Historic England (correspondence dated 2nd May 2025) and to Kent County Council Heritage Conservation (correspondence dated 17th April). Whilst the Applicant does not believe the following additional planning conditions are also necessary elsewhere on the Site, if the Local Planning Authority were of the opinion that the following were suitable matters for planning conditions to control, the Applicant would be willing to accept the following:

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At present, the application will be going to planning committee in August, with reports needing to be completed 1 month before. We would therefore greatly appreciate hearing from you as soon as possible.

NB. the most up to date archaeological report following trial trenching is now available online (KCC have also been consulted for further comment).

We look forward to hearing from you.

Kind regards,



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

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





From: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Sent: 13 May 2025 10:00
To: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: Fw: Historic England advice on Application no(s) 23/01363

From: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)> [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>
Sent: 02 May 2025 19:51
To: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Cc: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)> [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>
Subject: Historic England advice on Application no(s) 23/01363

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](mailto:[REDACTED]@HistoricEngland.org.uk)

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[REDACTED]

From: [REDACTED]@HistoricEngland.org.uk>
Sent: 02 July 2025 09:33
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Historic England advice on Application no(s) 23/01363

[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe]

Dear [REDACTED]

Thank you for your email regarding this consultation and our previous advice to you, we would be pleased to clarify the following:

1) We think the level of harm from the scheme as it stands (with the removal of alder carr but proposed solar panels on the area of the postulated Romand road and causeway) would be less than substantial in the middle of the range. If the solar panels were removed from the postulated line of the Roman road, the level of harm would be slightly reduced.

2) With regard to heritage benefit and mitigation; there are two separate proposals for consideration that are not dependant on one another, and a reduction in harm in one area does not mitigate for an increase in harm in another. Achieving both would be preferable:

- a) Opening a better view of the monument from the nature restoration area (thus retaining the visible connection from within the valley floor to the amphitheatre which is currently possible), benefits the ability of people to appreciate the monument by helping to sustain an understanding of its prominence and former relationship to the watery landscape which surrounded it. This is an improvement to the scheme as it would help better reveal significance.
- b) In terms of whether the above could mitigate the harm of building over the line of the postulated Roman Road, we think the Local Authority is best placed to judge this.
- c) As noted in our last letter, solar panels extending over the postulated route of the 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. We think harm could be reduced by removing solar panels from the proposed line of the Roman road.

3) We have not been asked to provide pre-application advice on interpretation panels in the amphitheatre, but should the applicant and English Heritage approach us, we would be very pleased to advise. Enhancement of interpretation facilities sounds positive, and would, in our view, be a heritage benefit

4) With regard to proposed planning conditions;

- a) **A condition which required that, prior to commencement of development, a Scheme should be submitted and approved which details that, in respect of specified areas of archaeological interest, an appropriate method for constructing the solar arrays is to be agreed which avoids the need for using driven piles. The Proposed Development could then only be constructed in accordance with this approved Scheme.**

A key concern with this condition is that it does not preclude the use of other methods of piling that could still be harmful to the archaeological resource.

We note that avoiding harm to buried archaeology from driven piles would be sensible as driven plies are generally the more harmful method of piling (we have specific published guidance on this).

From: [REDACTED]
Sent: 18 June 2025 13:19
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>; [REDACTED]@HistoricEngland.org.uk>
Subject: RE: Historic England advice on Application no(s) 23/01363

Hello [REDACTED]

Thank you, yes I confirm we will be able to respond by Wednesday 3rd July noon.

All the Best

[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

Advance notice of annual leave: Monday 23rd June for one week, returning Monday 30th June

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 12 June 2025 10:59
To: [REDACTED]@HistoricEngland.org.uk>
Cc: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>
Subject: RE: Historic England advice on Application no(s) 23/01363

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Hello [REDACTED]

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Many thanks,



Principal Heritage Officer

Dover District Council

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

Email: [REDACTED]

Tel: [REDACTED]

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



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

Sent: 12 June 2025 00:06

To: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>

Cc: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>; [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>

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

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From: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>

Sent: 09 June 2025 10:18

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

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

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

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Kind regards,



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

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





From: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Sent: 13 May 2025 10:00
To: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: Fw: Historic England advice on Application no(s) 23/01363

From: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)> [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>
Sent: 02 May 2025 19:51
To: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Cc: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)> [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>
Subject: Historic England advice on Application no(s) 23/01363

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](mailto:[REDACTED]@HistoricEngland.org.uk)

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From: [REDACTED]
Sent: 03 July 2025 10:21
To: [REDACTED]; [REDACTED]
Subject: FW: Goshall solar array application
Attachments: RE: Little South Solar Farm - PA23/01363



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

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

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From: [REDACTED]@english-heritage.org.uk>
Sent: 09 June 2025 16:51
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Goshall solar array application

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Hello [REDACTED]

I'm well thanks, and hope you are too.

I agree with you entirely. Attached is my email exchange with the applicant regarding mitigation measures, specifically interpretation panels, which I think wouldn't be a mitigatory factor at all. The signs would illustrate how harmful the scheme is!

All best,

█

█ | Senior Curator of Properties (South East, London and East) | Curatorial Department

English Heritage

█

www.english-heritage.org.uk



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From: █ [@DOVER.GOV.UK](mailto:█@DOVER.GOV.UK)>

Sent: 09 June 2025 09:44

To: █ [@english-heritage.org.uk](mailto:█@english-heritage.org.uk)>

Subject: Goshall solar array application

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Dear █

Hope you're doing well.

Am just picking up on this case as the agent advised that they were seeking to engage with EH regarding potential heritage benefits from the proposal. I think at a basic level there was the suggestion of interpretation panels (to my mind this seems pretty poor considering how much money the scheme would generate, and I wonder if they couldn't provide the visitor centre with free electricity for life....!)

Are you involved or know anything about this? We are looking at taking the case to planning committee in August I believe and at present there are no significant heritage benefits to the scheme that we can report on.

Many thanks,



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

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



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[REDACTED]

From: [REDACTED]@english-heritage.org.uk>
Sent: 03 June 2025 15:57
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Little South Solar Farm - PA23/01363

Dear [REDACTED]

Thanks for your email. While interpretation panels at the amphitheatre may enhance public understanding of the historic landform of the area to the south, I think they are unlikely to mitigate the harm of the proposed development; rather they would focus attention on it. Also, we have purposefully restricted the number of panels at the amphitheatre to avoid introducing visual clutter to that part of the scheduled monument, so the notion of additional ones is not enticing.

Best wishes,

[REDACTED]

[REDACTED] | Senior Curator of Properties (South East, London and East) | Curatorial Department

English Heritage
[REDACTED]

www.english-heritage.org.uk

From: [REDACTED]@statkraft.com>
Sent: 03 June 2025 15:07
To: [REDACTED]@english-heritage.org.uk>
Cc: [REDACTED]@statkraft.com>
Subject: Little South Solar Farm - PA23/01363

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Dear [REDACTED]

I am a project manager in the Statkraft UK development team responsible for the Little South Solar farm near to Sandwich, Kent. We have been progressing with the planning application **23/01363** which you may be aware is close to receiving a planning decision. I wanted to contact you regarding your previous comments on the application (attached), specifically:

"Easy and instinctive understanding of Richborough's historic setting space depends on being able to 'read' the former waterway, and the further sub-division of the development site will erode this quality, thus harming the significance of the scheduled ancient monument."

In the event that planning permission were to be granted, we are considering what mitigation measures could be attached to that planning permission. In response to the original comment about interpreting the former landscape, we suggest that we could commit via a S106 Undertaking to fund enhanced interpretation boards at the amphitheatre site, explaining the details of the former waterway to visitors. However, before we commit to this mitigation measure it would be useful to hear your thoughts on the matter, or whether there are any alternative reasonable mitigation measures that you would also like our team to consider.

We look forward to hearing from you.

Kind regards

[Redacted]

[Redacted]

Assistant Project Manager, UK Solar Development

[Redacted]

Mobile + [Redacted]

Statkraft UK LTD (reg no. 05742795)
19th Floor, 22 Bishopsgate, London, EC2N 4BQ
www.statkraft.co.uk



From: [REDACTED]
Sent: 03 July 2025 10:21
To: [REDACTED]; [REDACTED]
Subject: FW: Goshall solar array application
Attachments: RE: Little South Solar Farm - PA23/01363



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

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

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From: [REDACTED]@english-heritage.org.uk>
Sent: 09 June 2025 16:51
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Goshall solar array application

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Hello [REDACTED]

I'm well thanks, and hope you are too.

I agree with you entirely. Attached is my email exchange with the applicant regarding mitigation measures, specifically interpretation panels, which I think wouldn't be a mitigatory factor at all. The signs would illustrate how harmful the scheme is!

All best,

█

█ | Senior Curator of Properties (South East, London and East) | Curatorial Department

English Heritage

█

www.english-heritage.org.uk



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[REDACTED]

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English Heritage
[REDACTED]

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[Redacted]

[Redacted]

Assistant Project Manager, UK Solar Development

[Redacted]

Mobile + [Redacted]

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