

[REDACTED]

From: [REDACTED]@kent.gov.uk
Sent: 09 July 2025 18:11
To: [REDACTED]; Development Management
Cc: [REDACTED]@historicengland.org.uk; [REDACTED]@historicengland.org.uk;
Subject: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice
Attachments: KCC Heritage addendum advice on palaeoenvironmental interest.docx

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Dear [REDACTED]

Thank you for consulting KCC Heritage Conservation on the amended details submitted for the above planning application.

The amended details include an updated (finalised) version of the archaeological evaluation report. We welcome the submission of this updated report, which replaces the previous interim issue.

The updated report provides some additional information, including an initial environmental assessment of the peats identified within the site. I have attached a brief addendum note on this aspect.

Whilst the updated report provides useful additional information and clarification it does not fundamentally change our views on the harm caused by the scheme. We have previously advised that the scheme will cause harm to the monument of Roman Richborough and its environs and that this harm is serious and significant. This remains the case.

We previously noted that requirement (b) of Local Plan Policy CC3 identifies that renewable energy development will be supported, if it will not result in significant harm to heritage assets and we have previously advised that the harm caused to Roman Richborough should be considered as “significant” in terms of Policy CC3.

Our advice remains that the harm caused to the internationally important Roman site of Richborough is sufficiently great that it would be reason to refuse the application and this remains out position. If however your council is minded to approve the application we would welcome further opportunity to discuss options for conditions to secure archaeological mitigation works and safeguarding measures.

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

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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KCC Heritage Conservation

Additional Comments on known peat deposits and palaeoenvironmental significance following the submission of the updated archaeological evaluation report.

The updated archaeological evaluation report confirms the presence of peat deposits within the site which are of high palaeoenvironmental potential. This is because they could make a significant contribution to our understanding of the context and evolution of the landscape around Richborough island.

However, the date and extent of the peat deposit has yet to be established and therefore its significance remains to be determined. If the deposits are historical (post-Roman in date) then they will likely be of local significance, but if they are of earlier date, then their archaeological interest may be significantly greater. Peats of high palaeoenvironmental interest have been observed elsewhere in the Wantsum/Richborough area.

We have reviewed the additional information in the report in conjunction with the Historic England Regional Science Advisor.

We suggest that there is a need for further palaeoenvironmental investigation and assessment to establish the full depth, thickness and lateral extent of the peat, and better understand the direct and indirect (such as changes to hydrology) impacts of the scheme. Such assessment, along with scientific dating, would be best achieved from a borehole core where stratigraphy and chronological sequencing can be controlled.

The recovery of continuous cores would also provide suitable samples for full analysis and dating, not only to understand the historical significance of the peat but to characterise the landscape history of the area. The assessment suggests that changes to vegetation through time should be detectable within the peat.

In terms of the peat deposits, we suggest that any further investigation could be carried out post-consent, provided that any forthcoming planning permission includes conditions to secure:

1. Further geoarchaeological field investigation to recover continuous cores for palaeoenvironmental assessment, scientific dating of the peat and to provide suitable samples for full analysis
2. The ability to control the method for constructing the solar arrays where peat deposits are present which avoids the need for ground impacts (for example through the use of ground-mounted panels).
3. The ability to control the method for constructing the solar farm to ensure that waterlogged deposits with high archaeological / palaeoenvironmental potential are not detrimentally affected by changes to preservation conditions

Additionally, it is suggested that the potential impact on the peat's "carbon sink" should be considered in the scheme's environmental and climatic impacts.

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Additionally, it is suggested that the potential impact on the peat's "carbon sink" should be considered in the scheme's environmental and climatic impacts.

[REDACTED]

From: [REDACTED]
Sent: 06 August 2025 09:36
To: [REDACTED]@kent.gov.uk
Subject: FW: Goshall

Hello [REDACTED]

For our chat later today- some info on the fixings of the panels.

See you later.



[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: 06 August 2025 09:16
To: [REDACTED]@DOVER.GOV.UK>
Subject: Goshall

From: [REDACTED]@statkraft.com>
Sent: 15 July 2025 16:06
To: [REDACTED]@DOVER.GOV.UK>; [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@statkraft.com>; [REDACTED]@pegasusgroup.co.uk>; [REDACTED]@pegasusgroup.co.uk>
Subject: Little South Construction Details

[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]

Hi [REDACTED]

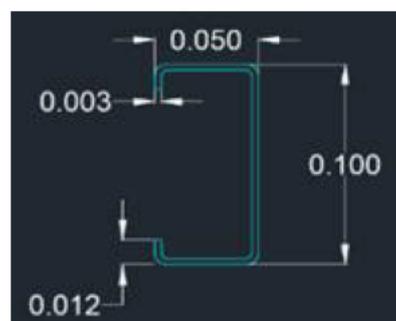
It was good to discuss the Little South application on Friday. We felt that the meeting was very constructive.

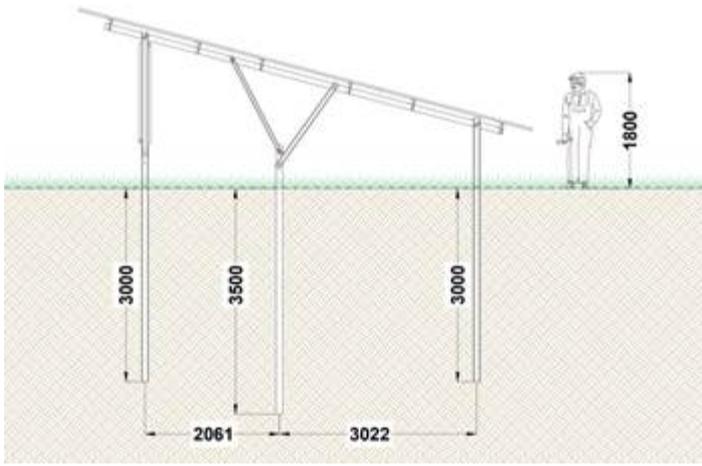
As promised, please find below a summary of the parts of the application that provide details of the construction method for the project.

Document Ref	Dated	Document Name/Description	Comments
SCUKX-LISOU-000-MCS-201	01.12.2022	Internal Track Section Detail	Showing profile and materials used for construction of surface laid internal trackways.
SCUKX-LISOU-000-MCS-201 (A)	24.11.2023	Internal Track Section Detail	Showing profile and materials used for construction of sub- surface laid internal trackways (where ground condition dictate).
SCUKX-LISOU-000-MCS-203	01.12.2022	Fence Elevation	Showing depth of fence posts that are driven into the ground (no concrete).
SCUKX-LISOU-000-MCS-204	01.12.2022	Gate Elevation	Showing gate posts fixed in ground with concrete.
SCUKX-LISOU-000-MCS-206 (A)	07.04.2023	CCTV Elevation	Showing CCTV posts fixed in ground using concrete.
SCUKX-LISOU-000-MCS-217	01.12.2022	Transformer Station	Showing structure supported on surface laid blocks.
ES Chapter 5	November 2023	Construction Methodology & Phasing	Provides an overview of the construction process including, for example, solar array installation (paras 5.9 – 5.12), and buried cables (para 5.14).
333135394	Jan 2025	Response to Historic Environment Consultee responses	Provides some additional details about the construction process, in particular the framework legs for the solar arrays (paragraphs 1.5 – 1.12)

I have found a video clip of framework legs being installed but it is c100MB in size. We are not able to use Dropbox or WeTransfer but I have created a Sharepoint folder for you to access the file [here](#).

Please also find below, some additional indicative illustrative details, as described in the application docs:





I hope this is helpful, but please don't hesitate to ask if you think anything further that you think might help inform committee.

Apologies – I don't have [REDACTED] email address but please feel free to forward this information to her.

Kind regards

[REDACTED]

[REDACTED]

Senior Project Manager, ENU Solar

— [REDACTED] [@statkraft.com](mailto:[REDACTED]@statkraft.com)

— Mobile + [REDACTED]

Statkraft UK LTD (Reg. No. 05742795)

22 Bishopsgate, London, EC2N 4BQ (Reg. Address)

The Garment Factory, 10 Montrose Street, Glasgow G1 1RE

www.statkraft.co.uk



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From: [REDACTED]@kent.gov.uk
Sent: 07 August 2025 12:45
To: [REDACTED]
Subject: Re: Solar decision

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Hi [REDACTED]

Thanks for sending over this appeal decision. I have only skim read, but it is interesting to note that the inspector concluded that the less than substantial harm (given as "between the lower end of the scale and its mid-point") are not outweighed by the public benefits of the scheme (which in terms of energy generation are broadly comparable to the Goshall scheme).

It was really helpful to explore the issues of harm yesterday and where the Goshall application might fall on the scale of less than substantial harm.

As discussed yesterday, my view is that the harm caused to the setting of Roman Richborough in NPPF terms is "less than substantial" but at least in the middle to upper middle part of the range.

As discussed, the NPPF requires that great weight should be given to an asset's conservation (and the more important the asset, the greater the weight should be). English Heritage describe Richborough as "*the most symbolically important of all Roman sites in Britain*" and in describing their recent archaeological investigations at the amphitheatre Historic England describe Richborough as "*a site of great national and international importance*". As such, and given the site's exceptional importance, the greatest of great weights should be applied in any decision taking to the conservation of Roman Richborough and its setting.

As this is an EIA application it was helpful to also talk through with you how the harm to Richborough might be classified in EIA terminology. The applicant's ES provides the criteria to define the sensitivity (importance) of heritage assets and to assess the magnitude of an impact - see tables 6.3 and 6.4. Table 6.5 sets out how the magnitude of impact and importance of an asset are used to define the significance of an effect.

As noted above Roman Richborough is a site of exceptional importance. In EIA terms I suggest it must be classed as meeting the criteria (Table 6.3) for being an asset of very high sensitivity (as it is demonstrably an asset of international importance).

Turning to the magnitude of effect - I suggest the solar farm will result in substantial alteration to the setting of Richborough, particularly in views south from Richborough island and the Roman amphitheatre and we discussed why this view is important. As discussed, I judge that the post-development character of the southern setting of Richborough will be fundamentally changed. Using the criteria set out in Table 6.4 this would be classed as a major (adverse) impact.

A major (adverse) impact on an asset of very high significance would in EIA terms be a major effect which is considered to be significant.

Even if we were to take a more conservative view, e.g. that Richborough is only of national (high) importance and that the impact is only moderate, then this would still result in a moderate/major effect, which would still be considered significant in EIA terms.

Using the applicant's own decision matrix (given that the significance of Roman Richborough must as a minimum be high), the only way in which the effect of the development could be considered not to be significant in EIA terms would be if the impact of the scheme was judged to be negligible. In no terms can the impact of the development ever meet the criteria set out in Table 6.4 for being negligible.

As discussed, local plan policy CC3 notes that renewable development will only be supported if it does not result in significant harm to heritage assets. It would be useful to understand from your planning policy colleagues whether an impact that is significant in EIA terms would also be significant in terms of this policy wording.

Additionally, I would also suggest that a (EIA) significant effect would not meet the requirement in HE3 to protect (or enhance) the archaeological and historic integrity of the scheduled monument's setting.

Finally, I said I would check what the applicant's assessment of the level of harm to Roman Richborough was in the EIA. Oddly, the applicant has not assessed the impact to Roman Richborough using the Heritage criteria set out in Chapter 6... why? (perhaps they did not like the result!?). Instead Roman Richborough is considered in Chapter 7 which deals with landscape and views. Here they have suggested a moderate (adverse) effect during the later stages of the construction phase; a moderate (adverse) effect on the amphitheatre at operation (year 1) - both would be significant in EIA terms - and a minor (adverse) effect at year 10 - the reason for this reduction is not adequately explained or justified.

Happy to discuss further as needed.

All the best,

█

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

Telephone: █ | www.kent.gov.uk |

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From: █@DOVER.GOV.UK>

Sent: 06 August 2025 16:00

To: █@kent.gov.uk>

Subject: FW: Solar decision

For info



[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]
Sent: 07 August 2025 13:01
To: [REDACTED]
Subject: FW: Solar decision

For discussion.



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

Email: [REDACTED]
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Sent: 06 August 2025 16:00
To: **[Redacted]** [@kent.gov.uk](mailto:[Redacted]@kent.gov.uk)>
Subject: FW: Solar decision

For info



[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]
Sent: 07 August 2025 17:14
To: [REDACTED]
Subject: Re: Solar decision
Attachments: 23_01363-KCC_ARCHAEOLOGICAL_OFFICER-2637363 (1).docx; 23_01363-KCC_ARCHAEOLOGICAL_OFFICER-2637362.pdf

Dear [REDACTED]

[REDACTED] has passed on your email following your discussion with her yesterday, which I understand are informal comments. Please let me know if you will be submitting this as a formal representation as this seems like a stronger stance than your previous response (attached)?

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]@DOVER.GOV.UK>
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Subject: FW: Solar decision

For discussion.



[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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As noted above Roman Richborough is a site of exceptional importance. In EIA terms I suggest it must be classed as meeting the criteria (Table 6.3) for being an asset of very high sensitivity (as it is demonstrably an asset of international importance).

Turning to the magnitude of effect - I suggest the solar farm will result in substantial alteration to the setting of Richborough, particularly in views south from Richborough island and the Roman amphitheatre and we discussed why this view is important. As discussed, I judge that the post-development character of the southern setting of Richborough will be fundamentally changed. Using the criteria set out in Table 6.4 this would be classed as a major (adverse) impact.

A major (adverse) impact on an asset of very high significance would in EIA terms be a major effect which is considered to be significant.

Even if we were to take a more conservative view, e.g. that Richborough is only of national (high) importance and that the impact is only moderate, then this would still result in a moderate/major effect, which would still be considered significant in EIA terms.

Using the applicant's own decision matrix (given that the significance of Roman Richborough must as a minimum be high), the only way in which the effect of the development could be considered not to be significant in EIA terms would be if the impact of the scheme was judged to be negligible. In no terms can the impact of the development ever meet the criteria set out in Table 6.4 for being negligible.

As discussed, local plan policy CC3 notes that renewable development will only be supported if it does not result in significant harm to heritage assets. It would be useful to understand from your planning policy colleagues whether an impact that is significant in EIA terms would also be significant in terms of this policy wording.

Additionally, I would also suggest that a (EIA) significant effect would not meet the requirement in HE3 to protect (or enhance) the archaeological and historic integrity of the scheduled monument's setting.

Finally, I said I would check what the applicant's assessment of the level of harm to Roman Richborough was in the EIA. Oddly, the applicant has not assessed the impact to Roman Richborough using the Heritage criteria set out in Chapter 6... why? (perhaps they did not like the result!?). Instead Roman Richborough is considered in Chapter 7 which deals with landscape and views. Here they have suggested a moderate (adverse) effect during the later stages of the construction phase; a moderate (adverse) effect on the amphitheatre at operation (year 1) - both would be significant in EIA terms - and a minor (adverse) effect at year 10 - the reason for this reduction is not adequately explained or justified.

Happy to discuss further as needed.

All the best,

█

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

Telephone: █ | www.kent.gov.uk |

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

Sent: 06 August 2025 16:00

To: █ [@kent.gov.uk](mailto:█@kent.gov.uk)>

Subject: FW: Solar decision

For info



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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KCC Heritage Conservation

Additional Comments on known peat deposits and palaeoenvironmental significance following the submission of the updated archaeological evaluation report.

The updated archaeological evaluation report confirms the presence of peat deposits within the site which are of high palaeoenvironmental potential. This is because they could make a significant contribution to our understanding of the context and evolution of the landscape around Richborough island.

However, the date and extent of the peat deposit has yet to be established and therefore its significance remains to be determined. If the deposits are historical (post-Roman in date) then they will likely be of local significance, but if they are of earlier date, then their archaeological interest may be significantly greater. Peats of high palaeoenvironmental interest have been observed elsewhere in the Wantsum/Richborough area.

We have reviewed the additional information in the report in conjunction with the Historic England Regional Science Advisor.

We suggest that there is a need for further palaeoenvironmental investigation and assessment to establish the full depth, thickness and lateral extent of the peat, and better understand the direct and indirect (such as changes to hydrology) impacts of the scheme. Such assessment, along with scientific dating, would be best achieved from a borehole core where stratigraphy and chronological sequencing can be controlled.

The recovery of continuous cores would also provide suitable samples for full analysis and dating, not only to understand the historical significance of the peat but to characterise the landscape history of the area. The assessment suggests that changes to vegetation through time should be detectable within the peat.

In terms of the peat deposits, we suggest that any further investigation could be carried out post-consent, provided that any forthcoming planning permission includes conditions to secure:

1. Further geoarchaeological field investigation to recover continuous cores for palaeoenvironmental assessment, scientific dating of the peat and to provide suitable samples for full analysis
2. The ability to control the method for constructing the solar arrays where peat deposits are present which avoids the need for ground impacts (for example through the use of ground-mounted panels).
3. The ability to control the method for constructing the solar farm to ensure that waterlogged deposits with high archaeological / palaeoenvironmental potential are not detrimentally affected by changes to preservation conditions

Additionally, it is suggested that the potential impact on the peat's "carbon sink" should be considered in the scheme's environmental and climatic impacts.

From: PlanningComments <PlanningComments@DOVER.GOV.UK>

Sent: 10 Jul 2025 09:20:52

To:

Cc:

Subject: FW: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice

Attachments: KCC Heritage addendum advice on palaeoenvironmental interest.docx

From: [REDACTED]@kent.gov.uk [REDACTED]@kent.gov.uk>

Sent: 09 July 2025 18:11

Dear [REDACTED]

Thank you for consulting KCC Heritage Conservation on the amended details submitted for the above planning application.

The amended details include an updated (finalised) version of the archaeological evaluation report. We welcome the submission of this updated report, which replaces the previous interim issue.

The updated report provides some additional information, including an initial environmental assessment of the peats identified within the site. I have attached a brief addendum note on this aspect.

Whilst the updated report provides useful additional information and clarification it does not fundamentally change our views on the harm caused by the scheme. We have previously advised that the scheme will cause harm to the monument of Roman Richborough and its environs and that this harm is serious and significant. This remains the case.

We previously noted that requirement (b) of Local Plan Policy CC3 identifies that renewable energy development will be supported, if it will not result in significant harm to heritage assets and we have previously advised that the harm caused to Roman Richborough should be considered as "significant" in terms of Policy CC3.

Our advice remains that the harm caused to the internationally important Roman site of Richborough is sufficiently great that it would be reason to refuse the application and this remains out position. If however your council is minded to approve the application we would welcome further opportunity to discuss options for conditions to secure archaeological mitigation works and safeguarding measures.

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

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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[KCC Heritage addendum advice on palaeoenvironmental interest.docx](#)

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From: [REDACTED]@kent.gov.uk
Sent: 08 August 2025 14:13
To: [REDACTED]
Subject: Re: Solar decision

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Hi [REDACTED]

I wasn't planning on submitting a further representation on this one... but as always I'm happy to provide further advice or assistance if needed. We are your archaeological advisors, so if you need any clarification, then please let me know.

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]@DOVER.GOV.UK>
Sent: 07 August 2025 17:14
To: [REDACTED]@kent.gov.uk>
Subject: Re: Solar decision

Dear [REDACTED]

[REDACTED] has passed on your email following your discussion with her yesterday, which I understand are informal comments. Please let me know if you will be submitting this as a formal representation as this seems like a stronger stance than your previous response (attached)?

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]@DOVER.GOV.UK>
Sent: 07 August 2025 13:01
To: [REDACTED]@DOVER.GOV.UK>
Subject: FW: Solar decision

For discussion.



[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]@kent.gov.uk>
Sent: 07 August 2025 12:45
To: [REDACTED]@DOVER.GOV.UK>
Subject: Re: Solar decision

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Hi [REDACTED]

Thanks for sending over this appeal decision. I have only skim read, but it is interesting to note that the inspector concluded that the less than substantial harm (given as "between the lower end of the scale and its mid-point") are not outweighed by the public benefits of the scheme (which in terms of energy generation are broadly comparable to the Goshall scheme).

It was really helpful to explore the issues of harm yesterday and where the Goshall application might fall on the scale of less than substantial harm.

As discussed yesterday, my view is that the harm caused to the setting of Roman Richborough in NPPF terms is "less than substantial" but at least in the middle to upper middle part of the range.

As discussed, the NPPF requires that great weight should be given to an asset's conservation (and the more important the asset, the greater the weight should be). English Heritage describe Richborough as "*the most symbolically important of all Roman sites in Britain*" and in describing their recent archaeological investigations at the amphitheatre Historic England describe Richborough as "*a site of great national and international importance*". As such, and given the site's exceptional importance, the greatest of great weights should be applied in any decision taking to the conservation of Roman Richborough and its setting.

As this is an EIA application it was helpful to also talk through with you how the harm to Richborough might be classified in EIA terminology. The applicant's ES provides the criteria to define the sensitivity (importance) of heritage assets and to assess the magnitude of an impact - see tables 6.3 and 6.4. Table 6.5 sets out how the magnitude of impact and importance of an asset are used to define the significance of an effect.

As noted above Roman Richborough is a site of exceptional importance. In EIA terms I suggest it must be classed as meeting the criteria (Table 6.3) for being an asset of very high sensitivity (as it is demonstrably an asset of international importance).

Turning to the magnitude of effect - I suggest the solar farm will result in substantial alteration to the setting of Richborough, particularly in views south from Richborough island and the Roman amphitheatre and we discussed why this view is important. As discussed, I judge that the post-development character of the southern setting of Richborough will be fundamentally changed. Using the criteria set out in Table 6.4 this would be classed as a major (adverse) impact.

A major (adverse) impact on an asset of very high significance would in EIA terms be a major effect which is considered to be significant.

Even if we were to take a more conservative view, e.g. that Richborough is only of national (high) importance and that the impact is only moderate, then this would still result in a moderate/major effect, which would still be considered significant in EIA terms.

Using the applicant's own decision matrix (given that the significance of Roman Richborough must as a minimum be high), the only way in which the effect of the development could be considered not to be significant in EIA terms would be if the impact of the scheme was judged to be negligible. In no terms can the impact of the development ever meet the criteria set out in Table 6.4 for being negligible.

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Finally, I said I would check what the applicant's assessment of the level of harm to Roman Richborough was in the EIA. Oddly, the applicant has not assessed the impact to Roman Richborough using the Heritage criteria set out in Chapter 6... why? (perhaps they did not like the result!). Instead Roman Richborough is considered in Chapter 7 which deals with landscape and views Here they have suggested a moderate (adverse) effect during the later stages of the

construction phase; a moderate (adverse) effect on the amphitheatre at operation (year 1) - both would be significant in EIA terms - and a minor (adverse) effect at year 10 - the reason for this reduction is not adequately explained or justified.

Happy to discuss further as needed.

All the best,

██████████

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

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

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From: ██████████ [@DOVER.GOV.UK](mailto:██████████@DOVER.GOV.UK)>
Sent: 06 August 2025 16:00
To: ██████████ [@kent.gov.uk](mailto:██████████@kent.gov.uk)>
Subject: FW: Solar decision

For info



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

Email: ██████████
Tel: ██████████
Web: <http://dover.gov.uk>



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From: [REDACTED]
Sent: 12 September 2025 12:03
To: [REDACTED]@english-heritage.org.uk
Cc: [REDACTED]
Subject: Goshall Solar Farm application, Ash (DOV/23/01363)
Attachments: appendix c draft legal agreement.docx

Dear [REDACTED]

By way of introduction, I am dealing with the planning application for a solar farm at Goshall Valley, East Street, Ash (DOV/23/01363) which you have previously commented on. I understand the applicants have previously been in contact in relation to heritage mitigation which could be offered (interpretation boards). Since this, the applicants have suggested a number of other mitigation measures for consideration, set out in the attached schedule of options. They have indicated a £35,000 contribution could be secured via legal agreement if permission were to be granted to deliver and implement this.

I would be grateful if you could please advise if English Heritage have any comments on these suggested mitigation measures?

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

Phone: [REDACTED]



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Please note that I will be out of the office until Tuesday 16th September when I will respond to any e-mails as soon as possible.

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.

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/>

From: [REDACTED]
Sent: 24 September 2025 09:43
To: [REDACTED]@english-heritage.org.uk
Cc: [REDACTED]
Subject: Goshall Solar Farm application, Ash (DOV/23/01363)
Attachments: appendix c draft legal agreement.docx

Good morning [REDACTED]

I trust you are well. I just wanted to check you received my email earlier this month? If you could please confirm and let me know if you have any comments then I'd be very grateful.

Many thanks and 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]@DOVER.GOV.UK>
Sent: Friday, September 12, 2025 12:02
To: [REDACTED]@english-heritage.org.uk [REDACTED]@english-heritage.org.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Goshall Solar Farm application, Ash (DOV/23/01363)

Dear [REDACTED]

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Kind regards,



[REDACTED]
Principal Planning Officer

Dover District Council

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

Email: [REDACTED]

Web: dover.gov.uk

Phone: [REDACTED]



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2. 360 tours

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3. VR tour

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

[REDACTED]

From: [REDACTED]@english-heritage.org.uk>
Sent: 24 September 2025 14:18
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Goshall Solar Farm application, Ash (DOV/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]

Thanks for chasing, and my apologies for my delayed response but I wanted to consult colleagues in English Heritage before replying to you.

In short, we think the developer's proposals for additional interpretation of the landscape (as outlined in the draft legal agreement attached to your email) do not mitigate the levels of harm associated with the development. In the absence of any reduction to potential levels of harm to the setting of the amphitheatre, we maintain our position regarding the proposals for the reasons set out in our earlier response.

The interpretation proposals will deliver a heritage benefit, but compared to the scale of the potential harm rising from the development these benefits will be very small. Information about the historic landscape is already available on site at Richborough and on English Heritage's website. The proposed measures will add little to the existing provision but, by illustrating the significance of the landscape, may draw attention to the harm caused by the development.

Our position regarding the overall scheme therefore remains unchanged, but should it receive planning permission we would be willing to consider expansion of the interpretation provision at Richborough Roman Fort and Amphitheatre in order to extract the maximum possible heritage benefit for the scheme, despite this being (in our view) an unsatisfactory amount.

Best wishes,

[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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Sent: 24 September 2025 09:43
To: [REDACTED]@english-heritage.org.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Goshall Solar Farm application, Ash (DOV/23/01363)

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Good morning [REDACTED]

I trust you are well. I just wanted to check you received my email earlier this month? If you could please confirm and let me know if you have any comments then I'd be very grateful.

Many thanks and 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](https://www.dover.gov.uk)
Phone: [REDACTED]

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Friday, September 12, 2025 12:02
To: [REDACTED]@english-heritage.org.uk [REDACTED]@english-heritage.org.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Goshall Solar Farm application, Ash (DOV/23/01363)

Dear [REDACTED]

By way of introduction, I am dealing with the planning application for a solar farm at Goshall Valley, East Street, Ash (DOV/23/01363) which you have previously commented on. I understand the applicants have previously been in contact in relation to heritage mitigation which could be offered (interpretation boards). Since this, the applicants have suggested a number of other mitigation measures for consideration, set out in the attached schedule of options. They have indicated a £35,000 contribution could be secured via legal agreement if permission were to be granted to deliver and implement this.

I would be grateful if you could please advise if English Heritage have any comments on these suggested mitigation measures?

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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Please note that I will be out of the office until Tuesday 16th September when I will respond to any e-mails as soon as possible.

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