

[REDACTED]

From: [REDACTED]
Sent: 26 September 2025 12:12
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Goshall Solar Farm application, Ash (DOV/23/01363)

Dear [REDACTED]

Thank you for your email on Wednesday. Noting the last line of your reply, are you able to advise please if it is an unsatisfactory amount in relation to the impacts of the scheme or if it is unsatisfactory in that the amount suggested would not be sufficient to fund/contribute to any potential interpretation provision project that may be envisaged?

Kind regards and thanks,
[REDACTED]



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



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From: [REDACTED]@english-heritage.org.uk
Sent: Wednesday, September 24, 2025 14:18
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Goshall Solar Farm application, Ash (DOV/23/01363)

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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,

█

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

English Heritage
█

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

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Good morning █

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,



Principal Planning Officer

Dover District Council

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

Email: [REDACTED]

Web: dover.gov.uk

Phone: [REDACTED]



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From: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Sent: Friday, September 12, 2025 12:02
To: [REDACTED] <[\[REDACTED\]@english-heritage.org.uk](mailto:[REDACTED]@english-heritage.org.uk)> [REDACTED] <[\[REDACTED\]@english-heritage.org.uk](mailto:[REDACTED]@english-heritage.org.uk)>
Cc: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[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]



Principal Planning Officer

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From: [REDACTED]@english-heritage.org.uk>
Sent: 26 September 2025 12:16
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Goshall Solar Farm application, Ash (DOV/23/01363)

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Dear [REDACTED]

Sorry for the ambiguity. I meant that the amount of heritage benefit is unsatisfactory in relation to the impacts of the scheme.

Best wishes,

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

English Heritage
[REDACTED]

www.english-heritage.org.uk



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Cc: [REDACTED]@DOVER.GOV.UK>
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Kind regards and thanks,
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[REDACTED]
Principal Planning Officer
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Dear [REDACTED]

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Best wishes,

Roy

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

English Heritage

[Redacted]

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To: [REDACTED] <[\[REDACTED\]@english-heritage.org.uk](mailto:[REDACTED]@english-heritage.org.uk)>
Cc: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[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
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,

Rachel



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

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From: [REDACTED]@HistoricEngland.org.uk>
Sent: 29 September 2025 11:02
To: [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: RE: 23/01363 Goshall Valley, East Street, Ash

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Dear [REDACTED]

Many Thanks for sending through these proposals for heritage interpretation, which we broadly referred to in our previous response.

We think there would be scope to make the proposals more meaningful, and better address any objectives from English Heritage given their responsibility for the site, including the visitor experience.

We would be pleased to have further discussion with the applicant and English Heritage, and advise on the requirement of scheduled monument consent, which would be required for any new such proposals in the scheduled area.

Kind Regards

[REDACTED]

[REDACTED]
[REDACTED] and West Sussex
Regions Group: London and South East

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

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 26 August 2025 16:34
To: [REDACTED]@HistoricEngland.org.uk>; [REDACTED]
[REDACTED]@DOVER.GOV.UK>; [REDACTED]@kent.gov.uk>
Cc: [REDACTED]@DOVER.GOV.UK>; [REDACTED]

[REDACTED]@HistoricEngland.org.uk>
Subject: 23/01363 Goshall Valley, East Street, Ash

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Good afternoon [REDACTED] [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 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

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From: [Redacted]

Sent: 18 June 2025 13:19

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)>;

[Redacted] [@HistoricEngland.org.uk](mailto:[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

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

Sent: 12 June 2025 10:59

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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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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From: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>
Sent: 12 June 2025 00:06
To: [REDACTED] <[\[REDACTED\]@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.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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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]

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Regions Group: London and South East

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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

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

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.

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From: [REDACTED]
Sent: 03 October 2025 12:14
To: [REDACTED]@kent.gov.uk
Cc: [REDACTED]
Subject: RE: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice

Importance: High

Hello [REDACTED]

An update- we've received the 10 day notification for appeal of non-determination of the application (6 day inquiry) and will be aiming to get that put off by getting the application to the October planning committee.

We need some assistance from you on conditions. The addendum to your earlier comments you advised the following:

1. Further ge archaeological 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

But I note in your email there might be other conditions you would wish us to impose should permission be granted, am I correct or does the above cover everything? Would you be able to urgently advise what these would be if more are required.

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

Sent: 09 July 2025 18:11

To: [REDACTED]@DOVER.GOV.UK>; Development Management

<DevelopmentManagement@DOVER.GOV.UK>

Cc: [REDACTED]@historicengland.org.uk; [REDACTED]@historicengland.org.uk; [REDACTED]

[REDACTED]@DOVER.GOV.UK>

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

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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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[REDACTED]

From: [REDACTED]@kent.gov.uk
Sent: 03 October 2025 17:18
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice
Attachments: Conditions first draft.docx

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Hi [REDACTED]

In addition to the items detailed in your email below we would also recommend that there should be:

1. provision for a more general site-wide programme of archaeological works in accordance with an agreed Archaeological Mitigation Strategy.
2. control measures for the decommissioning stage so that the removal of the solar farm and restoration of the site does not result in further archaeological impacts.

Where the applicant is offering up heritage benefits (for example through interpretation works), these should be properly secured by condition or legal agreement.

I've had a stab at drafting some suggested condition wording to cover the various archaeological requirements and would be happy to discuss further.

I'd note again though, that whilst we have suggested condition wording in relation to buried archaeology, KCC Heritage's position remains that the impact of the proposals on the setting of the scheduled and internationally important Roman site of Richborough would be sufficient reason for the application to be refused.

Happy to chat though further as needed and to review any final condition wording or committee report if that would be helpful.

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: Friday, October 03, 2025 12:14
To: [REDACTED]@kent.gov.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: RE: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice

Hello [REDACTED]

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But I note in your email there might be other conditions you would wish us to impose should permission be granted, am I correct or does the above cover everything? Would you be able to urgently advise what these would be if more are required.

Many thanks,



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

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From: [REDACTED]@kent.gov.uk <[REDACTED]@kent.gov.uk>
Sent: 09 July 2025 18:11
To: [REDACTED]@DOVER.GOV.UK>; Development Management <DevelopmentManagement@DOVER.GOV.UK>
Cc: [REDACTED]@historicengland.org.uk; a [REDACTED]@historicengland.org.uk; [REDACTED]@DOVER.GOV.UK>
Subject: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice

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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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No development (including any preliminary groundworks) shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological and geoarchaeological work in accordance with a written Archaeological Mitigation Strategy and timetable which has been submitted to and approved by the Local Planning Authority. The Archaeological Mitigation Strategy once approved shall be implemented in full.

REASON: To ensure that features of archaeological interest are properly examined and recorded in accordance with Policy HE3 of the Dover District Local Plan to 2040 (2024) and the aims of the National Planning Policy Framework.

No development (including any preliminary groundworks) shall commence on areas containing archaeological deposits until the fieldwork, as detailed in the agreed Archaeological Mitigation Strategy, has been completed to the satisfaction of the Local Planning Authority.

REASON: To ensure the appropriate investigation of archaeological remains, in accordance with Policy HE3 of the Dover District Local Plan to 2040 (2024) and the aims of the National Planning Policy Framework.

No development shall take place until details of foundations designs and any other proposals involving below ground excavation have been submitted to and approved by the Local Planning Authority. The submitted details shall include for the use of ground mounted (non-penetrative) installation solutions to avoid ground impacts where sensitive archaeology may be present. The submitted foundation proposals will also include any necessary measures to ensure that waterlogged deposits with high archaeological / paleoenvironmental potential are not detrimentally affected by changes to their preservation conditions. Development shall be carried out in accordance with the approved details.

REASON: To ensure that due regard is had to the preservation in situ of important archaeological remains in accordance with Policy HE3 of the Dover District Local Plan to 2040 (2024) and the aims of the National Planning Policy Framework.

Prior to the decommissioning of the solar farm hereby permitted, a Decommissioning Scheme shall have been submitted to and approved in writing by the Local Planning Authority. The scheme will include specific measures to address the impacts of decommissioning on archaeological remains.

REASON: To ensure the restoration of the site includes appropriate measures to protect buried archaeology during decommissioning works.

[REDACTED]

From: [REDACTED]
Sent: 20 October 2025 09:07
To: [REDACTED]
Cc: [REDACTED]
Subject: Fw: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice
Attachments: Conditions first draft.docx

Good morning [REDACTED]

Thank you for the suggested condition wording sent earlier this month. The agents are keen to narrow down the scope of the information required by these conditions given the investigations that have already taken place. I've sought suggested wording from them on how they envisage that but please could you let me know if you have any availability this week for a teams call to discuss this?

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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Sent: 03 October 2025 17:18
To: [REDACTED]@DOVER.GOV.UK
Cc: [REDACTED]@DOVER.GOV.UK
Subject: Re: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice

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Hi [REDACTED]

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Many thanks,

██████████
██████████ | 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: Friday, October 03, 2025 12:14

To: ██████████@kent.gov.uk>

Cc: ██████████@DOVER.GOV.UK>

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

Hello ██████████

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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: 09 July 2025 18:11
To: [redacted]@DOVER.GOV.UK>; Development Management <DevelopmentManagement@DOVER.GOV.UK>
Cc: [redacted]@historicengland.org.uk; [redacted]@historicengland.org.uk; A [redacted] [redacted]@DOVER.GOV.UK>
Subject: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice

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

Kind regards,

█

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

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REASON: To ensure that features of archaeological interest are properly examined and recorded in accordance with Policy HE3 of the Dover District Local Plan to 2040 (2024) and the aims of the National Planning Policy Framework.

No development (including any preliminary groundworks) shall commence on areas containing archaeological deposits until the fieldwork, as detailed in the agreed Archaeological Mitigation Strategy, has been completed to the satisfaction of the Local Planning Authority.

REASON: To ensure the appropriate investigation of archaeological remains, in accordance with Policy HE3 of the Dover District Local Plan to 2040 (2024) and the aims of the National Planning Policy Framework.

No development shall take place until details of foundations designs and any other proposals involving below ground excavation have been submitted to and approved by the Local Planning Authority. The submitted details shall include for the use of ground mounted (non-penetrative) installation solutions to avoid ground impacts where sensitive archaeology may be present. The submitted foundation proposals will also include any necessary measures to ensure that waterlogged deposits with high archaeological / paleoenvironmental potential are not detrimentally affected by changes to their preservation conditions. Development shall be carried out in accordance with the approved details.

REASON: To ensure that due regard is had to the preservation in situ of important archaeological remains in accordance with Policy HE3 of the Dover District Local Plan to 2040 (2024) and the aims of the National Planning Policy Framework.

Prior to the decommissioning of the solar farm hereby permitted, a Decommissioning Scheme shall have been submitted to and approved in writing by the Local Planning Authority. The scheme will include specific measures to address the impacts of decommissioning on archaeological remains.

REASON: To ensure the restoration of the site includes appropriate measures to protect buried archaeology during decommissioning works.

[REDACTED]

From: [REDACTED]
Sent: 23 October 2025 09:36
To: [REDACTED]
Cc: [REDACTED]
Subject: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice
Attachments: KCC Draft Archaeology Conditions Wording (SK comment, Applicant's comments).docx

Good morning [REDACTED]

Further to my email, the agents have suggested amended wording (attached) for the archaeology conditions. Appreciate you're on leave but if you could let me know your thoughts on this when you're back I'd be very grateful.

Many thanks,
[REDACTED]



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



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From: [REDACTED]@DOVER.GOV.UK>
Sent: Monday, October 20, 2025 09:07
To: [REDACTED]@kent.gov.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Fw: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice

Good morning [REDACTED]

Thank you for the suggested condition wording sent earlier this month. The agents are keen to narrow down the scope of the information required by these conditions given the investigations that have already taken place.

I've sought suggested wording from them on how they envisage that but please could you let me know if you have any availability this week for a teams call to discuss this?

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]@kent.gov.uk <[REDACTED]@kent.gov.uk>

Sent: 03 October 2025 17:18

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

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

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

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Hi [REDACTED]

In addition to the items detailed in your email below we would also recommend that there should be:

1. provision for a more general site-wide programme of archaeological works in accordance with an agreed Archaeological Mitigation Strategy.
2. control measures for the decommissioning stage so that the removal of the solar farm and restoration of the site does not result in further archaeological impacts.

Where the applicant is offering up heritage benefits (for example through interpretation works), these should be properly secured by condition or legal agreement.

I've had a stab at drafting some suggested condition wording to cover the various archaeological requirements and would be happy to discuss further.

I'd note again though, that whilst we have suggested condition wording in relation to buried archaeology, KCC Heritage's position remains that the impact of the proposals on the setting of the scheduled and internationally important Roman site of Richborough would be sufficient reason for the application to be refused.

Happy to chat though further as needed and to review any final condition wording or committee report if that would be helpful.

Many thanks,

[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: Friday, October 03, 2025 12:14
To: [REDACTED]@kent.gov.uk>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: RE: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice

Hello [REDACTED]

An update- we've received the 10 day notification for appeal of non-determination of the application (6 day inquiry) and will be aiming to get that put off by getting the application to the October planning committee.

We need some assistance from you on conditions. The addendum to your earlier comments you advised the following:

1. Further geoaerchaeological 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

But I note in your email there might be other conditions you would wish us to impose should permission be granted, am I correct or does the above cover everything? Would you be able to urgently advise what these would be if more are required.

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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From: [REDACTED]@kent.gov.uk <[REDACTED]@kent.gov.uk>
Sent: 09 July 2025 18:11
To: [REDACTED]@DOVER.GOV.UK>; Development Management <DevelopmentManagement@DOVER.GOV.UK>
Cc: [REDACTED]@historicengland.org.uk; [REDACTED]@historicengland.org.uk; [REDACTED]@DOVER.GOV.UK>
Subject: DOV/23/01363 - Goshall Valley (Little South) Solar Farm - KCC Heritage additional updated advice

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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]

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

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

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REASON: To ensure that features of archaeological interest are properly examined and recorded in accordance with Policy HE3 of the Dover District Local Plan to 2040 (2024) and the aims of the National Planning Policy Framework.

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REASON: To ensure the appropriate investigation of archaeological remains, in accordance with Policy HE3 of the Dover District Local Plan to 2040 (2024) and the aims of the National Planning Policy Framework.

No development shall take place until details of foundations designs and any other proposals involving below ground excavation have been submitted to and approved by the Local Planning Authority. The submitted details shall include for the use of ground mounted (non-penetrative) installation solutions to avoid ground impacts where sensitive archaeology may be present. The submitted foundation proposals shall will also include any necessary measures to ensure that waterlogged deposits with high archaeological / paleoenvironmental potential are not detrimentally affected by changes to their preservation conditions. Development shall be carried out in accordance with the approved details.

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Prior to the decommissioning of the solar farm hereby permitted, a Decommissioning Scheme shall have been submitted to and approved in writing by the Local Planning

Authority. The Decommissioning Scheme shall ~~will~~ include specific measures to address the impacts of decommissioning on archaeological remains.

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