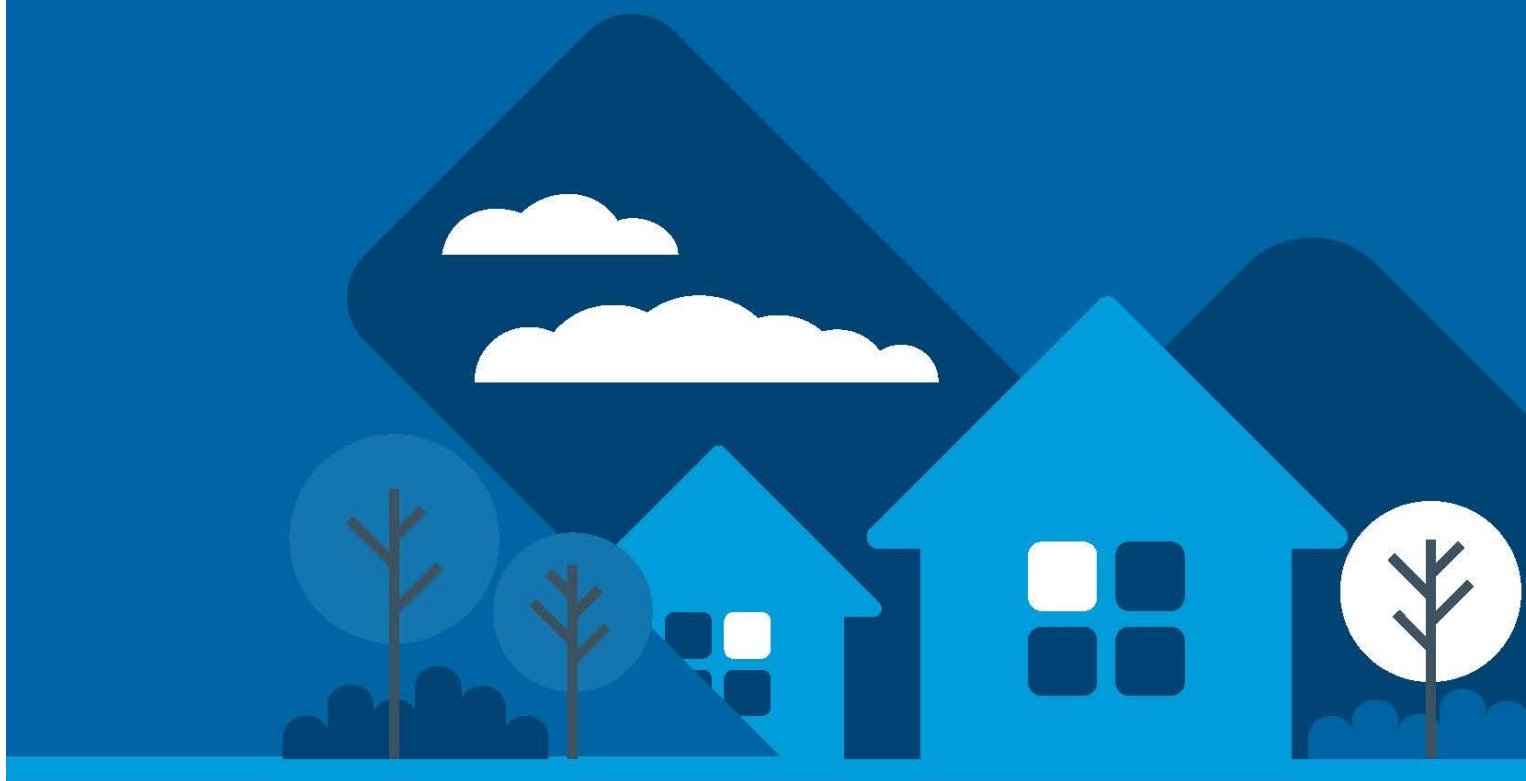


Dover District Council

Draft Archaeology of Dover Supplementary Planning Document

Regulation 12(a) Consultation Statement



September 2025

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1. Introduction

- 1.1 The Draft Archaeology of Dover Supplementary Planning Document (SPD) provides additional guidance on the implementation of the adopted Local Plan policies, including Policy HE3 – Archaeology. This Consultation Statement for the SPD has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, including:
- Regulation 12 (a) - Prior to the adoption of an SPD, a local planning authority must prepare a 'consultation statement', setting out who they consulted when preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the SPD.
 - Regulation 12 (b) - When seeking representations under regulation 13, the local planning authority must make copies of the consultation statement and the SPD available for a period of not less than 4 weeks, with details of the date by which representations must be submitted and the address to which they must be sent.
 - Regulation 35 (1) (a) and (b) – Documents are required to be made available for inspection at the District Council's principal office and such other places within the District as the Council consider appropriate, during normal office hours, and published on the District Council's website.

2. Statement of Community Involvement

- 2.1 The council's Statement of Community Involvement (SCI) 2025 sets out how this Council will consult and involve people in the preparation of Local Plans and other planning documents, including Supplementary Planning Documents. Consultation on the Draft Archaeology of Dover SPD will be carried out in line with the SCI.

3. Data Protection

- 3.1. In undertaking public consultation, the Council must act in accordance with the requirements of the general data protection regulations (GDPR). The data collected will be used to produce this SPD. Contact information will be held securely and confidentially and may be used to contact the respondent regarding their comments. The data may also be shared with Kent County Council for the same purposes. The Corporate and Planning Policy Privacy Notices can be viewed via the following link: www.dover.gov.uk/privacy

4. Consultation Undertaken on the draft SPD

- 4.1 The intention to prepare an SPD dedicated to the archaeology of Dover is set out in the Dover District Local Plan (paragraph 12.32) which was subject to extensive public and other stakeholder engagement prior to its adoption. [Dover District Local Plan to 2040 \(Adopted October 2024\)](#).
- 4.2 The draft SPD has been prepared by District Council's planning policy and heritage team and Kent County Council's heritage conservation team. During the initial preparation stage, the District Council undertook a 5-week initial stakeholder engagement between 10 July to 14 August.
- 4.3 This was to ensure the proposed scope, structure and contents of the SPD were appropriate to inform the drafting of the SPD for the second stage of engagement. A brief engagement document, setting out relevant local planning policy and 8 positive features identified from a review of planning and archaeology guidance produced by other Councils, was emailed to the following stakeholders:
- a) Historic England
 - b) Companies on the Planning Department's Developers Forum contact list
 - c) Companies on the Planning Department's Agents Forum contact list
 - d) Archaeology Organisations - Chartered Institute for Archaeologists (CIfA) and Council for British Archaeology (CBA)
 - e) Archaeology Consultants – CIfA registered organisations in Kent/Sussex (x3)
- 4.4 The engagement document was accompanied by a link to an online questionnaire which posed 3 main questions:
- Question 1: Are there specific difficulties that you or your organisation, clients or members currently experience regarding archaeology and the planning and development process that an SPD could help resolve?*
- Question 2: Would guidance incorporating the features set out in the Engagement document make the archaeology and the planning and development process more straightforward, leading to better and more successful applications?*

Question 3: Are there any other forms of best practice and guidance, or suggestions, that you think the SPD should be informed by?

5. Summary of Comments/Main Issues and how these have been Addressed in the SPD

5.1 Five responses were received, comprising 1 response from each of the 5 stakeholders consulted. Summaries of the main issues identified and how these have been addressed and informed the content of the SPD are set out in the following table. Please refer to [Appendix 1](#) for the full comments from each respondent:

Table 1 – Stakeholder comments and how these were taken into account in the Draft SPD

Respondent	Summary of comments and main issues	How have the issues raised in the consultation informed the SPD?
Finn's	Large parts of the district are covered by 'Areas of Archaeological Potential' on the Local Plan Policies Map. Such a wide area is unhelpful, and it would be better if the areas could be focussed on where it is believed that remains, or remains of higher importance, may be present.	The Areas of Archaeological Potential (AAPs) on the Local Plan Policies Map have been replaced by Archaeological Notification Areas (ANAs), created by KCC. The ANAs advise applicants and DDC planning teams on the type of applications that require archaeological input and when to consult KCC's Heritage Conservation team. This will help streamline the planning process by focusing consultation

		efforts where archaeological interest is most likely. The draft SPD includes guidance on the ANAs in Section 2.1 Legislative and Planning Policy Background.
Finn's	'Areas of Archaeological Potential' included both developed and undeveloped land.	Archaeological deposits can be found at a wide range of depths and can survive within and beneath existing development. The draft SPD sets this out in Section 1.1 Introduction to the Archaeology of Dover Town.
Finn's	Clarity about what areas require a watching brief and those that require field evaluation would be useful.	The Desk-Based Assessment submitted in support of planning applications, together with the potential significance of the archaeology and consultee advice from KCC will determine whether a watching brief during the works or field evaluation will be the appropriate approach. The draft SPD sets this out in Section 4.1 Archaeological Desk-Based Assessments.
Council for British Archaeology	Engaging people with local heritage and archaeology can enhance a sense of local identity, pride of place and community cohesion but there was a lack of opportunities. Participation with archaeology can be	Chapter 2 Section 2.3 of the SPD – Delivering Public Benefit, highlights the benefits of engaging people with local heritage.

	achieved through development-led archaeology and the SPD could advise how public engagement and participation can be conditioned as part of a planning permission.	The use of conditions in relation to public engagement has not been incorporated in the draft for consultation however we will consider this further for the final version of the SPD.
Council for British Archaeology	The published results of developer-led archaeology are not always accessible due to delays in publication or inaccessible language. A requirement for an accessibly written, non-technical summary will improve the impact of deposited findings. Time limits on the submission of the findings from developer-led archaeology to the HER, would ensure that learning is not delayed and that post-excavation work is allocated adequate resources to process and publish the results.	KCC have advised that the HER seeks to provide the accessible account of the work and the discoveries. Their recording manual requires the HER officer to compile the summary field of each HER record in accessible, non-specialist language. This is then made available at Home - Historic Environment Record. Most archaeological reports also include a summary section that would meet this need. KCC specifications for the submission of information to the HER require this to take place within certain time limits but these are often exceeded.
Historic England	The SPD should refer to the Dover Urban Archaeological Database Final Report (July 2020) and the joint Historic England/ KCC/ DCC publication titled 'An Archaeological Characterisation of Dover'.	Agree. The SPD refers to both documents.

Archaeology South-East Council for British Archaeology Citycourt Developments Finn's Historic England	Respondents were able to vote yes/no to each item on a list of 8 positive features identified in planning and archaeology guidance produced by other Councils. Four of the 5 respondents were fully supportive of incorporating the 8 features, with 1 respondent supporting 6 of the features (Finn's did not support features d) and h)).	Following the positive response from stakeholders, the SPD has been drafted to incorporate all 8 of the features set out above in paragraph 3.3 of this report.
Citycourt Developments Ltd.	Clear direction and reference to the excellent 2021 Archaeology of Dover report is very useful. Linking advice, providing continuity and background knowledge from DDC, KCC and local archaeology trusts will be very valuable and allow a clear and reliable route for applicants to follow. This has not always been the case with projects which take many years to come to fruition and can be subject to changing advice from numerous parties over a long period of time.	Support for an SPD and the proposed approach is noted.

6. Conclusion

- 6.1 In response to the focussed stakeholder consultation undertaken during preparation stages of the SPD, the Council revised the structure and scope of the SPD and made a number of refinements ahead of the SPD going out to formal consultation. These revisions and refinements were to ensure the SPD is effective in addressing issues raised by respective stakeholders and to ensure the document is presented in a clear, concise and transparent manner.

- 6.2 This consultation statement will be updated following the completion of the next stage of public consultation, which will be undertaken in accordance with the Statement of Community Involvement.

Appendix 1 – Full comments made by Respondents

Question: Are there specific difficulties that you or your organisation, clients or members currently experience regarding archaeology and the planning and development process that an SPD could help resolve?

Citycourt Developments Ltd
No.

Council for British Archaeology

PUBLIC PARTICIPATION

It is widely accepted that engaging people with the heritage and archaeology of their place can enhance a sense of local identity, pride of place and community cohesion. Opportunities to participate with local historic environment projects contribute to community well-being and social capital. They can be a vehicle for engaging diverse groups of people, offering new skills, confidence, the opportunity to become an active citizen and to connect with a shared human past.

The Council for British Archaeology (CBA) champion this type of participation with archaeology as a form of public benefit that development-led archaeology can achieve if it is conditioned as part of planning permission. A lack of opportunities for communities to be involved with and learn from their local heritage can therefore be addressed through a recommendation for conditioned public engagement and participation within the SPD.

PUBLICATION OF FINDINGS

The published results of developer-led archaeology are not always accessible to the wide range of interested people who want to learn more about the historic environment, due to delays in publication or inaccessible language. The CBA welcome the requirement for the results of developer-led archaeological investigations to be deposited with the Historic Environment Record. We advise that a requirement for the inclusion of an accessibly-written non-technical summary will improve the impact of these deposited findings, and allow them to achieve their goal of improving public understanding of the local historic environment.

The CBA also recommend that time limits are imposed on the submission of the findings from developer-led archaeology to the HER, to ensure that wider learning from the findings is not delayed and to ensure that the post-excavation processing is allocated adequate resources to process and publish the results from an archaeological excavation.

Finn's

The Local Plan Policy Map specifies wide 'blanket led' policy areas (HE3) which cover large swathes of the District as a 'General Area of Archaeological Potential'. An example is at Ringwould/Kingsdown where the Area of Archaeological Potential covers some 6.25 square kilometres and includes both developed and undeveloped areas. Such a wide area is unhelpful and it would be better focused if the areas could be better specifies where it is believed remains may be present. Additionally where the Policy Desk Based Assessment identifies a Watching Brief is suitable, we are finding that Officers are applying the Policy as if it requires a full field evaluation dig to be carried out.

It would be helpful if an SPD could perhaps distinguish areas which have higher importance for potential archaeological remains rather than the current blanket approach and also be clearer about what areas require watching brief and what require field evaluations.

Historic England

Dover UAD was updated relatively recently (Final Report, July 2020) and, perhaps could be added as an additional source of information / data (I think, however, it only covers the town and not the wider district). The UAD informed a joint HE/KCC/DCC publication titled 'An

Archaeological Characterisation of Dover' published about the same time as the UAD Final Report, which also could be referenced

Question: Are there any other forms of best practice and guidance, or suggestions, that you think the SPD should be informed by?

Citycourt Developments Ltd

I support additional clear guidance to developers and applicants. Clear direction and reference to the excellent 2021 Archaeology of Dover report is very useful. Linking advise, providing continuity and background knowledge from DDC, KCC and local archaeology trusts will be very valuable and allow a clear and reliable route for applicants to follow. This has not always been the case with projects which take many years to come to fruition and can be subject to changing advice from numerous parties over a long period of time.

Council for British Archaeology

Further information about understanding public benefit from developer-led archaeology is available in this UKRI publication from Harald Fredheim and Sadie Watson:
<https://www.mola.org.uk/sites/default/files/downloads/UKRI%202023.pdf>

Historic England

Dover UAD was updated relatively recently (Final Report, July 2020) and, perhaps could be added as an additional source of information / data (I think, however, it only covers the town and not the wider district). The UAD informed a joint HE/KCC/DCC publication titled 'An Archaeological Characterisation of Dover' published about the same time as the UAD Final Report, which also could be referenced.