

# Dover District Council

## Draft Archaeology of Dover Supplementary Planning Document

### Regulation 12(a) Consultation Statement



**December 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.
- 1.2 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 on SPDs the local planning authority must make copies of the consultation statement and the SPD available for a period of not less than 4 weeks, together with details of the date by which representations must be received (Regulation 13) 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.
  - Regulation 35 (3) (a) - The council may cease to make the document available once the 3 months period after the day on which the SPD is adopted has expired.

## Statement of Community Involvement

- 1.3 The Statement of Community Involvement (SCI 2025) sets out how the council will consult and involve people in the preparation of Local Plans and other planning documents, including SPDs.
- 1.4 The SCI states that the initial stage in preparing an SPD comprises the gathering of evidence and ideas and the consideration of alternative approaches. At this stage, the council will consult with those individuals and bodies who are relevant to the successful implementation of the SPD and may consult more widely if it is considered relevant and appropriate to do so. The method of engagement will depend on the type of SPD, but the Council will

consider using correspondence by letter or email, workshops or focus groups, meetings or drop in events.

- 1.5 Consultation on the Draft Archaeology of Dover SPD has been carried out in line with the Statement of Community Involvement 2025.

## **Data Protection**

- 1.6 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](http://www.dover.gov.uk/privacy)

## **2. Initial Stakeholder Engagement**

- 1.7 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 \(Adopted October 2024\)](#).
- 1.8 During the initial preparation stage, the district council undertook a 5-week initial stakeholder engagement between 10 July to 14 August. This was to ensure the proposed scope, structure and content 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)

- 1.9 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? The features were as follows:*

*a) Structuring the document around the development process, starting at the pre-application stage and ending with the submission of findings in the public domain, was practical and intuitive.*

*b) A simple flowchart, setting out how archaeology should be considered at the different stages of the development process.*

*c) Inclusion of an Archaeological Character Zone Map and supporting text to help potential applicants reach a rapid and concise view of the archaeological character of the area in which their proposals are located and form a clear understanding of the archaeological issues they may face. The SPD will include full details of the Character Zones within an appendix to provide a level of detail likely to be useful to professionals in drafting Impact Assessments and Written Schemes of Investigation.*

*d) Using summaries within the main text, linked to further information in appendices, reducing the length of the main document.*

*e) The style of language style needed to suit the likely audiences, in this instance ranging between homeowners, developers and specialist consultants.*

*f) Using hyperlinks aided useability, e.g. links from the contents page to chapters and from the main text to relevant appendices, so that interested parties could select topics of most relevance to their project.*

*g) Illustrations and photos used for information and add further interest to the document.*

*h) A glossary and list of sources for additional guidance.*

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

- 2.4 Five responses were received to the focussed stakeholder consultation, comprising 1 response from each of the 5 stakeholder groups consulted. Respondents supported the features associated with Question 2, except for 1 respondent that did not support features d) and h). 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*

<b>Respondent</b>	<b>Summary of comments and main issues</b>	<b>How have the issues raised in the consultation informed the SPD?</b>
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

<b>Respondent</b>	<b>Summary of comments and main issues</b>	<b>How have the issues raised in the consultation informed the SPD?</b>
		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	Chapter 2 Section 2.3 of the SPD – Delivering Public Benefit, highlights the benefits of engaging people with local heritage.  The use of conditions in relation to public

Respondent	Summary of comments and main issues	How have the issues raised in the consultation informed the SPD?
	archaeology can be achieved through development-led archaeology and the SPD could advise how public engagement and participation can be conditioned as part of a planning permission.	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 <a href="#">Home - Historic Environment Record</a> . 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	Agree. The SPD refers to both documents.



Respondent	Summary of comments and main issues	How have the issues raised in the consultation informed the SPD?
	England/ KCC/ DCC publication titled 'An Archaeological Characterisation of Dover'.	
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 4.3 of this statement.
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.

### 3. Draft SPD Public Consultation

- 3.1 A draft SPD was prepared by the council's planning policy and heritage team and Kent County Council's heritage conservation team. Following approval at the Cabinet meeting on 6<sup>th</sup> October 2025, the council undertook a 4-week public engagement on the draft version of the SPD between 5<sup>th</sup> November to and 3<sup>rd</sup> December.
- 3.2 Two background documents were also published with the draft SPD, as required by legislation: a Consultation Statement and Strategic Environmental Assessment and Habitat Regulation Assessment Screening Determination. A Statement of Representations Procedure and Notification of Period of Representations under the Town and Country Planning (Local Planning) (England) Regulations 2012 was provided to assist consultees in making a response (see Appendix 2).
- 3.3 Consultation took place via the council's consultation web pages and the planning department's consultation web page and portal. Direct emails/letters were sent to statutory consultees (see Appendix 3) and the council notified by email all the consultees contacted as part of the initial engagement, listed above in paragraph 2.2. Consultees registered in the council's planning consultation portal to receive notifications of new consultations and registered on the council's 'Keep me posted' notification system to receive news and updates from the council, were also contacted by email. The Keep Me Posted email was sent to 2,760 people on 5<sup>th</sup> November with a reminder sent to 2,761 people on 28<sup>th</sup> November. The consultation was also promoted on Facebook with 6,932 views on 6<sup>th</sup> November and 6,125 views on 27<sup>th</sup> November (see Appendix 4).
- 3.4 Paper copies of the SPD and comment forms were available throughout the consultation period at the council's Whitfield offices and the Deal, Dover and Sandwich libraries and at Dover Museum. Comments were accepted via the online portal, email and by post.
- 3.5 Consultees were invited to respond to 4 questions:
1. *Do you have any comments on Chapter 1 - Introduction for example, is the purpose and status of the SPD clearly set out? (pages 5-12)*
  2. *Does the SPD provide clear and sufficient information regarding what is required to be submitted to support*

*applications, depending on the specific circumstances?  
(pages 13 -56)*

3. *Is there any other information that you think would be useful for us to include in the SPD and/or its Appendices?*
4. *Do you have any comments on the SPD's supporting documents: - Strategic Environmental Assessment (SEA) Screening Determination and Habitat Regulations Assessment (HRA) Screening Determination (August 2025) and the Consultation Statement (September 2025)?*

3.6 Twelve representations were received and reviewed, excluding one duplicate submission. The consultee name and submission number, a summary of the comments and any main issues, together with any action considered appropriate to address the issues raised are set out in Table 2 below. No comments were received in response to Question 4.

*Table 2 – Public consultation representations and how these were taken into account in the final SPD*

<b>Respondent &amp; submission no.</b>	<b>Summary of comments and main issues</b>	<b>How issues have been addressed in the SPD</b>
Environment Agency (S-1)	No Comments	n/a
Natural England (S-2)	No Comments	n/a
Deal Town Council (S-3)	Q1. Welcomes use of the SPD to enhance preservation, conservation, recording and explanation of Dover's heritage and the application of principles to the whole district (SPD paragraph 1.24).	Support noted.
	Q1. Reference to Dover's archaeology being "of great importance" could be strengthened to "of national and international importance" (SPD Paragraph 1.1).	Paragraph 1.1 refers to archaeology in Dover in general terms. To highlight within the Introduction of the SPD the importance of some of the archaeological remains in Dover town the following text has been added into the first sentence of

Respondent & submission no.	Summary of comments and main issues	How issues have been addressed in the SPD
		paragraph 1.6: "some of which are of national and international importance".
	Q2. Level of below ground archaeology detail is suitable for the purposes of the SPD.	Support noted
	Q3. Listed buildings and conservation areas are noted throughout the document but little consideration of above-ground archaeology. The recording and possible preservation of historic features are also part of the historic fabric of the town, especially in Dover which suffered so much destruction of its historic buildings in WW2.	<p>The term 'archaeology' in the SPD refers to below and above ground archaeology, for example paragraph 1.7 on page 7 and the inclusion of 'standing building surveys' as a field evaluation technique on page 37 (second bullet point).</p> <p>The SPD has been amended to emphasise that the document applies to both below and above ground archaeology by removing the phrase "beneath the streets" from paragraph 1.17 and by adding a link on page 37 to <a href="#">Understanding Historic Buildings   Historic England</a>, a guide to good building recording practice, and to Appendix E: Other Sources of Information (section e). An additional sentence has been added to the definition of 'archaeological interest' in the glossary (Appendix G) as follows: Heritage assets of archaeological interest include below and/or above ground remains (for example, ruins and buildings).</p>
The Coal Authority (S-4)	No Comments	n/a
Aylesham Parish Council (S-5)	Q1. Yes, the Parish Council is very supportive of pages 5-12	Support noted.
	Q2. Yes. Very well. However, it is a very technical document, perhaps a simplified document for the general public would be beneficial.	Support noted. The primary purpose of the SPD is to provide guidance to planning applicants and consultants regarding the complex nature of archaeology, particularly in Dover town, and emphasises the need for development proposals to be

Respondent & submission no.	Summary of comments and main issues	How issues have been addressed in the SPD
		<p>informed by specialist advisors and so by necessity is a technical document.</p> <p>The SPD will be published on the council's website and the webpage will provide a plain English summary of the purpose of the SPD and how it should be used.</p>
	<p>Q3. (any other information useful to include)</p> <ul style="list-style-type: none"> <li>• A simplified document.</li> <li>• A document to include River, Temple Ewell, Aylesham and other omitted areas in the District.</li> <li>• Is there a need for an SPD at the 2 Heritage Regeneration sites - currently covers Western Heights but not Snowdown Colliery Site.</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to Question 2 response above.</li> <li>• The SPD focusses on Dover town as the area covered by the urban archaeological database project. The guidance in Chapters 2, 4, 5 and 6 can be applied generally to the whole district (paragraph 1.24).</li> <li>• Only the Western Heights is within the urban archaeological database project area. SPDs for the 2 heritage regeneration sites are not currently planned (refer to the Local Development Scheme in the Background Papers section at the end of this report).</li> </ul>
	Q4. No comments	n/a
Bloomfields Chartered Town Planners (S-6)	Q1. Very unclear in the introduction and on the front cover what area the guidance covers. Just the Dover Town or the whole district?	<p>The SPD focusses on Dover town as the area covered by the urban archaeological database project. The guidance in Chapters 2, 4, 5 and 6 can be applied generally to the whole district (as set out in paragraph 1.24 and 1.25 in the purpose and status section of the SPD).</p> <p>To address the issue raised by the respondent, the Main Purpose and Status section of the SPD has been moved from page 11 to page 4 of the document. To provide additional clarity, the first sentence from paragraph 1.24 ("The draft SPD focusses on the defined area of the</p>

<b>Respondent &amp; submission no.</b>	<b>Summary of comments and main issues</b>	<b>How issues have been addressed in the SPD</b>
		Dover Urban Archaeological Database Project and the complex nature of the archaeology in Dover as a historic town") has been moved to the beginning of paragraph 1.20. Additional text has also been added to the new first sentence of paragraph 1.24 as follows: "While the SPD focusses on the archaeology of Dover Town, ..."
	Q2. Note the above comment, it reads that the guidance only covers the Dover Town area	See comments above.
The Dover Society (S-7)	Q1. Welcome the publication of this SPD which will form an important role in protecting and recording Dover's rich history.	Support noted.
	Q2. On Page 32, character zone 23 appears to be incorrectly labelled as it duplicates the description of zone 21. It should refer to the Western side of the river.	The titles for these character zones on pages 32, 58, 109 and 114 have been corrected as follows: <ul style="list-style-type: none"> <li>• Zone 21 – Base of dry valley and western side of River Dour (South)</li> <li>• Zone 23 – Base of dry valley and western side of River Dour (North)</li> </ul>
Historic England (S-8)	Q1. Historic England supports this chapter.	Support noted.
	Q2. Yes, agree	Support noted.
	Q3. N/A	n/a
	Q4. No comment.	n/a
National Highways (S-9)	No comments	n/a
Archaeology South-East, UCL Institute of Archaeology (S-10)	Q3. Welcomes the Council's commitment to embedding archaeological considerations into planning policy but highlights areas where the SPD could be updated to reflect recent finds, focussed on Western Docks.	Support noted. The information in the respondent's publication reinforces and updates sections of the SPD related to the Western Docks.  Two sections of text in the SPD have been amended to take account of

Respondent & submission no.	Summary of comments and main issues	How issues have been addressed in the SPD
		<p>the recent works by Archaeology South-East.</p> <ul style="list-style-type: none"> <li>• The first 5 sentences of paragraph 1.17 in Appendix A on page 63 of the SPD have been replaced by the following updated text: "Other recent archaeological investigations in the town include the <a href="#">excavations by Archaeology South-East for a new navigation cut at Dover's Western Docks</a>. Finds spanning from the Pleistocene to twentieth century illustrate the long and complex development of the shoreline and harbour at Dover. The most significant discoveries include evidence for major Elizabethan engineering works attributed to Thomas Digges and subsequent improvements by the renowned military engineer Bernard de Gomme that transformed and shaped the nationally important historic port of Dover.</li> <li>• Zone 10 – The Western Docks section in Appendix B: Dover Character Zones June 2025 on pages 85 and 86. The original 2-page section of the SPD has been largely replaced by updated text. A copy of the section showing all the changes has been added as Appendix 5 to this report.</li> </ul>
Archaeology South-East, UCL Institute of Archaeology (S-11)	Duplicate submission	n/a
Marine Management	We advise that you take note of any relevant policies within the South East Marine Plan documents in	The following paragraph has been added at the end of the National Planning Policies and Guidance section of the SPD on page 16:

<b>Respondent &amp; submission no.</b>	<b>Summary of comments and main issues</b>	<b>How issues have been addressed in the SPD</b>
Organisation (S-12)	<p>regard to areas within the SPD that may impact upon the marine environment. In particular, South East Heritage policy. SE-HER-1: "Proposals that demonstrate they will conserve and enhance elements contributing to the significance of heritage assets will be supported. Proposals unable to conserve and enhance elements contributing to the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference:</p> <p>a) avoid; b) minimise; c) mitigate harm to those elements contributing to the significance of heritage assets; d) if it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets."</p>	<p><a href="#">"The South East Marine Plan</a> provides a policy framework which will be used to help inform decision-making on what activities take place in the marine environment and how the marine environment is developed, protected and improved in the next 20 years. The plan includes policies for heritage assets and managing change in the in the marine environment."</p> <p>An additional reference has also been added to Appendix E; Other Sources of Information with a link to heritage policies on pages 130-137 of the <a href="#">South East Marine Plan Technical Annex</a>.</p>
KCC Flood & Water Management	<p>No specific comments on the SPD. Advise consideration of KCC Historic Environment guidance for Sustainable Drainage Scheme developers.</p>	<p>A link to KCC's <a href="#">Historic Environment guidance for Sustainable Drainage Scheme developers</a> has been included within Appendix E: Other Sources of Information, with a note highlighting that the guidance is general advice and not KCC formal policy.</p>

3.7 In addition to amendments following a review of representations, officers from the planning policy team, heritage team and the Head of Museums reviewed the SPD and minor changes to the text were made to clarify certain points or correct factual or grammatical errors. A correction was also made in Appendix B: Dover Character Zones 2025, as the Zone 7 boundary map was found to have also been used



for Zones 8, 9 and 11. The SPD was amended to include the correct maps for Zones 8, 9 and 11.

- 3.8 A new section was added to Chapter 2 to acknowledge the climate emergency and to encourage applicants and their professionals to consider such matters in the development of their proposals with respect to archaeology. The inserted text was as follows:

*The Council declared a climate emergency in November 2019 with the intention of delivering a carbon neutral district by 2050 and the district to become a net zero carbon emitter by 2030. The Local Plan recognises that, while the planning system can contribute towards this aim by the introduction of relevant policies, working with partners and others is necessary to help reach this goal.*

*The Chartered Institute for Archaeologists Environmental Protection Policy encourages archaeological organisations and individual members to seek to minimise impacts on the environment by "reducing waste, pollution and emissions, by promoting recycling and by taking into account environmental and ethical considerations when sourcing products, supplies and equipment wherever possible". This aim is supported by the Council, and applicants and their professionals are asked to consider including details of the measures and actions they intend to undertake or put into place to help contribute towards the reduction of carbon emissions. This could, for example, be as simple as using shared transport or public transport for getting staff to a site.*

## **4. Conclusion**

- 4.1 In response to the focussed stakeholder engagement and the public consultation undertaken during preparation stages of the SPD, the council revised the scope and content of the SPD and made several revisions and refinements. The changes were made to ensure the SPD would be effective in addressing the issues raised by stakeholders and to ensure the document was useable and informative and presented in a clear and concise manner.

# Appendices

## Appendix 1 – Stakeholder consultation comments in full

**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.

## Appendix 2 –Statement of Representations Procedure and Notification of Period of Representations

### Statement of Representations Procedure and Notification of Period of Representations under Regulations 12, 13 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012

#### Document Title: Draft Archaeology of Dover Supplementary Planning Document (SPD)

Including *Strategic Environmental Assessment (SEA) Screening Determination and Habitat Regulations Assessment (HRA) Screening Determination (August 2025) and Consultation Statement (September 2025)*.

The Archaeology of Dover Supplementary Planning Document (SPD) is intended to be for everyone involved in development proposals within Dover Town, including residents looking to extend their homes, developers and their professional advisors seeking to bring a site forward, and to those undertaking archaeological work as part of a development scheme.

This SPD seeks to help applicants meet the policy requirements in the Local Plan and offer a level of confidence to those looking to invest in Dover by helping to highlight the potential for archaeology and providing an understanding of its relative significance. The SPD will be a material consideration in the determination of planning applications (once adopted).

Whilst the draft SPD focusses on the complex nature of the archaeology in Dover as a historic town, Chapters 2, 4, 5 and 6 can be applied generally to the whole district for the wider benefit of the district's important archaeological resource. Applicants would need to consider that there may be differences in the approach and techniques appropriate for sites in other contexts, for example in rural areas.

#### Period of Representations:

Comments can be made between Wednesday 5<sup>th</sup> November and 11.59pm on Wednesday 3<sup>rd</sup> December 2025.

Representations (comments) received after this time will not be accepted.

#### Document Availability:

During the representation period, the consultation documents and all supporting documents will be available to view online via the web address: <https://www.dover.gov.uk/Planning/Planning-Policy/News-and-planning-consultations.aspx> or www. <https://dover-consult.objective.co.uk/kse/folder/19736>

Paper copies of the consultation documents will be available at the following locations:

Location	Address
Council Offices	White Cliffs Business Park, Whitfield
Mobile Library	
Deal Library	Broad Street
Dover Library	Dover Discovery Centre, Market Square
Dover Museum	Market Square
Sandwich Library	13 Market Street

The Council Offices at Whitfield are open Monday to Friday 10am-4pm, while library opening times can be checked online at [www.kent.gov.uk/libraries](http://www.kent.gov.uk/libraries) and Dover Museum opening times at [Visitor Information](#)

If you need a copy of a document in paper form, or an alternative format (such as large print or other language) please contact us: 01304 872244 or [planning.policy@dover.gov.uk](mailto:planning.policy@dover.gov.uk)

### **How to submit a representation (comment):**

Representations must be made on the standard representation forms.

Representations are encouraged to be made through the Council's online consultation portal (<https://dover-consult.objective.co.uk/kse>) where you can view the Draft Archaeology of Dover Supplementary Planning Document (SPD), Strategic Environmental Assessment (SEA) Screening Determination and Habitat Regulations Assessment (HRA) Screening Determination and the Consultation Statement.

A paper copy of the representation forms and guidance notes can also be provided on request by contacting the team using the information below, or by collecting from the Council offices, one of the libraries listed above or Dover Museum during opening hours.

Paper copies of representation forms should be returned to: Planning Policy and Projects, Dover District Council, White Cliffs Business Park, Dover, Kent. CT16 3PJ

Please note that your representation will be publicly available, and a copy will be published on the Council's website. Your representations and name/name of your organization, comments and town of residence will be published, but other personal information will remain confidential. Data will be processed and held in accordance with the Data Protection Act 2018. 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](http://www.dover.gov.uk/privacy)

All representations must be received by **11.59pm on Wednesday 3<sup>rd</sup> December 2025**.

### **What happens next?**

After the consultation ends, we will consider all the comments received and make changes to the document where necessary. A summary of the comments received and how they've been taken into account will be presented to Cabinet and Full Council alongside the final SPD. Once adopted, the SPD will be a material consideration and will be used when assessing planning applications.

### **Notification request:**

Using the representation forms you can request to be notified at an address or email address of any future updates to the Archaeology of Dover Supplementary Planning Document.

### **For assistance or further information:**

- Visit: <https://www.dover.gov.uk/Planning/Planning-Policy>
- Email: [planning.policy@dover.gov.uk](mailto:planning.policy@dover.gov.uk)
- Call: 01304 872244

## **Appendix 3 – Public consultation list of Statutory Consultees**

### **Public Consultation - List of Statutory Consultees contacted:**

1. Kent Local Planning Authorities
2. Kent County Council
3. Dover Town and Parish Councils
4. Neighbouring Parish Councils
5. Kent Police & Kent Fire & Rescue Service
6. Mining Remediation Authority (was The Coal Authority)
7. The Environment Agency
8. Homes England
9. Historic England
10. Natural England
11. English Heritage
12. Marine Management Organisation
13. Port of Dover
14. National Highways
15. Mobile Phone Operators Association
16. NHS
17. Utilities and Service providers
18. Network Rail
19. Mayor of London
20. Civil Aviation Authority
21. South East Local Enterprise Partnership
22. Kent Downs National Landscape (AONB Unit)
23. Kent Wildlife Trust
24. Kent Local Nature Partnership
25. The National Trust – South East
26. The Land Trust

## Appendix 4 – Public consultation social media record



### Dover District Council

Published by Andy Steele · 6 November ·



We have a number of consultations currently running - and your views are sought:

- Draft Archaeology of Dover Supplementary Planning Document - deadline for comments 3 Dec 2025
- Proposed changes to the Council Tax Support Scheme - deadline for comments 28 Nov 2025
- Design Codes for Dover District – deadline for comments 9 Nov 2025.

For more information, or to have your say, please see [www.dover.gov.uk/consultations](http://www.dover.gov.uk/consultations)



### Dover District Council

Published by Andy Steele · 27 November at 15:58 ·



Don't forget, we have a number of consultations currently running – and your views are sought:  
This includes:

- Proposed changes to the Council Tax Support Scheme - deadline for comments is 5pm tomorrow, (Friday 28 Nov)
- Draft Archaeology of Dover Supplementary Planning Document - deadline for comments is Wednesday 3 Dec
- Outdoor sports pitches and facilities - the deadline for comments is Friday 30 Jan 2026.

For more information, or to have your say, please see [www.dover.gov.uk/consultations](http://www.dover.gov.uk/consultations)



## Appendix 5 – SPD Zone 10 consultation version with updated text

### *EXTENT OF THE ELIZABETHAN HARBOUR AND 19th CENTURY SHORE-FRONT DEVELOPMENT*

This Character Zone ~~encompasses~~ covers part of ~~the modern shoreline at~~ Dover's modern shoreline, ~~as well as an~~ including areas that ~~were~~ as open sea until the later 16th century. ~~Today, it includes but now~~ comprise Wellington Dock, Granville Dock, and the tidal harbour. Archaeological and geoarchaeological investigations have revealed a long and complex history beneath these docks. Recent scholarship (Margetts, The Honour and Safety of the Realm, 2024) has significantly advanced our understanding of Dover's Western Docks, particularly the Wellington Dock. This research situates the dock within the wider framework of national defence and maritime infrastructure, underscoring its importance not only locally but nationally.

From earlier periods, two woolly mammoth teeth were discovered in the Navigation Cut, evidence of late glacial activity, while borehole surveys have identified early riverine and estuarine sediments. In addition, rare,



well-preserved medieval to early post-medieval mudflats have been identified, formed behind a now-lost shingle barrier.

~~Originally~~Initially, boats ~~would have been~~were moored in the haven ~~created~~within the river Dour estuary. Later, As silting increased during the Medieval period, ~~after the tidal harbour had silted up, boats were likely~~hauled presumably brought up onto the beach below ~~the cliffs of the~~the Western Heights. ~~By t~~The late Medieval and early Post Medieval period, the ~~main~~main harbour ~~was located further to the south (Zone 7) shifted southwards~~with its earliest pier dating to around 1500. Work on this harbour eventually tailed off in ~~However, by 1551, shingle had blocked the harbour~~mouth when its mouth had become ~~so choked by shingle carried across by~~the sea that it was no longer ~~accessible. In response, a series of~~ambitious engineering projects began ~~in the 1580s. To deal with this problem,~~between 1581 and 1582 a series of new ~~proposals for the layout of the harbour were drawn up.~~By 1583 the Pent (now Wellington Dock) ~~had been created, enclosing an area of about 17.5~~acres with ~~enclosed by earthen walls embankments and timber~~revetments (notably Digges' Wall), and equipped with a sluice on its cross ~~wall (now Union Street) with a wooden sluice. The Pent and its sluice~~were ~~system was designed to retain water from the river Dour at high tide~~and, with a controlled outflow at low tide, clear and scour the harbour mouth of any accumulated shingle and sand.

#### EXISTING DESIGNATIONS

SCHEDULED MONUMENTS: 1  
LISTED BUILDINGS: 7  
CONSERVATION AREAS: 1

Subsequent centuries saw continual adaptation and expansion. The 17th century brought major works by Bernard de Gomme, including substantial timber sea defences. Additions and alterations were made to the western docks throughout the centuries following the creation of the Pent. By the mid-18th century, Granville Dock had been separated from the tidal harbour and in the later 19th century saw further widening and the addition of features such as the Patent Slipway, warehouses, the Fairburn-type crane, and the lifeboat house and clocktower. The seaward side of the Pent was consolidated and repurposed, serving as a bowling green, ropewalk, and later as Dover's 'visitors' quarter' with grand terraces and hotels, the tidal harbour was widened on its eastern side, resulting in the present layout. Several features surrounding the docks have survived, and these illustrate the docks' varied use throughout the centuries. Some examples include the Patent Slipway, located in Wellington Dock, which



was created in the mid 19th century for use both in ship building and repair work, the 19th century warehouses on Cambridge Road, the Fairburn type crane which is a scheduled monument and the lifeboat house and clocktower which is a listed building.

The seaward side of the Pent was consolidated throughout the Post Medieval period and has had various uses. For example, by the mid 17th century it was the site of a bowling green and later a ropewalk. In the 19th century the area had become the 'visitors' quarter' of Dover and saw the creation of large and attractive terraces which included several hotels that were surrounded by gardens and recreational buildings.

The northern end of ~~Snargate Street~~, on the western side of the Pent, became a commercial hub in the 19th century, with shops and industrial premises backing onto the docks. Archaeological potential in this Zone is high, with evidence for prehistoric, medieval, and post-medieval activity. Deep deposits may preserve further remains of ancient landscapes, Bronze Age features, and the full sequence of harbour engineering, as well as cellars and wall footings from later buildings. The area's rich stratigraphy reflects Dover's enduring role as a gateway and stronghold from prehistory to the present, falls within this Zone. Located on the western side of the Pent below the cliffs, it links the town centre with the far southern end of the western docks. This was a commercial hub in the 19th century with numerous shops, businesses and industrial structures, some of which backed directly onto the docks.

## **ARCHAEOLOGICAL POTENTIAL**

This Zone has both early and later Prehistoric potential as well as the potential to reveal important geoarchaeological deposits. For example, a borehole survey on Northampton Quay revealed early riverine sediments that may represent the course of a relict channel that has since been covered and sealed as the sea level rose. The northern end of this Zone is also close to the site of the Bronze Age Boat discovery and there is potential to reveal similar features across this Zone at a depth of around 6 m below ground level.

It is also possible that nationally important archaeological remains relating to the 16th century and later Post Medieval harbour works could be revealed within this Zone, particularly at depth, alongside later pPost Medieval industrial features surrounding the docks. It is also likely that

cellars and wall footings relating to the Post Medieval buildings along Snargate Street are also present just below the modern ground level.

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### *Key Considerations – Archaeological*

This Zone offers strong potential for prehistoric and later remains, highlighted by the discovery of woolly mammoth teeth and well-preserved riverine and estuarine sediments, including medieval to early post-medieval mudflats. The area is also close to the Bronze Age boat find, with the possibility of similar features at depth.

There is significant potential for uncovering remains of the 16th-century Elizabethan harbour works, later engineering phases, and post-medieval industrial features around the docks. These include nationally significant harbour structures attributed to Thomas Digges, directly linking Dover's waterfront to Elizabethan defence policy and maritime engineering. Additionally, cellars and wall footings from post-medieval buildings along Snargate Street are likely to survive just below the modern surface, reflecting the area's rich and layered history. Important geoarchaeological deposits and possible Prehistoric features may be located within this Zone at depth. Features may be uncovered relating to the development of the harbour, some possibly as early as 16th century in date. Wall footings of later Post Medieval buildings fronting the harbour, as well as 19th century features relating to travel across the region, may be present in several locations.

### *Key Considerations – Built Heritage*

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The ~~attractive and~~ historic character of the buildings along the ~~inner~~ Harbour, particularly the 19th-century terraces such as Waterloo Crescent, has been largely retained ~~has remained largely unchanged~~ since their construction ~~in the mid 19th century~~. Today, Waterloo Crescent is within its own conservation area and is Grade II listed. ~~There are s~~Several surviving upstanding features and buildings surrounding the harbour which relate to its use throughout from the 19th century survive around the harbour, including the Fairburn-type crane which is (a scheduled monument) and should be protected from harmful alteration, and the clock tower which is (a listed building) the lifeboat house, and historic warehouses. These structures illustrate the area's varied use and architectural significance and scheduled or listed features should be protected from harmful alteration. Some losses and changes have occurred, particularly due to wartime damage and redevelopment, but the area remains a key part of Dover's built heritage.