

Subject: Historic England discussion re Little South Solar Farm

Start: Thu 21/03/24 14:00

End: Thu 21/03/24 15:30

Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: [REDACTED]

All –

Please find attached an agenda for tomorrow's meeting.

Kind regards

Microsoft Teams meeting

Join on your computer, mobile app or room device

[REDACTED]

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Little South - Heritage

Location: Microsoft Teams

Date: 21 March 2024 – 2pm

Attendees:

  Historic England
Dover District Council
Dover District Council
Statkraft
Stantec Planning
Stantec Planning
Stantec Heritage
Stantec Landscape
Foundations Heritage

Item
1. Introductions
2. Purpose of Meeting
3. Proposals – scheme evolution
4. Heritage Matters
5. Landscape Matters
6. Historic England - clarification
7. Proposed next steps

From: [REDACTED]@stantec.com>
Sent: 28 March 2024 12:06
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Little South - Planning Meeting

Hi [REDACTED]

Can we go with 2pm on 2nd please? I will send an invite now.

From: [REDACTED]@DOVER.GOV.UK>
Sent: Monday, March 25, 2024 5:21 PM
To: [REDACTED]@stantec.com>
Cc: [REDACTED]@stantec.com>
Subject: Re: Little South - Planning Meeting

You don't often get email from [REDACTED]@dover.gov.uk. [Learn why this is important](#)

Dear [REDACTED]

Thank you for your email. I am available most times on Wednesday 27th, from 3:30pm on Thursday 28th or most days/times next week other than 10-12 on Tuesday 2nd. Please let me know if any of these times are convenient?

Kind regards,
[REDACTED]



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



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From: [REDACTED]@stantec.com>
Sent: 25 March 2024 17:05
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@stantec.com>
Subject: Little South - Planning Meeting

Hi [REDACTED]

Following on from the HE meeting last week, would it be possible to arrange a meeting to chat through the feedback and our next steps?

Could you let me know any slots that would be convenient for you?

Thanks

[REDACTED]

Director, Planning

Mobile: [REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 08 April 2024 08:56
To: [REDACTED]
Subject: Re: Natural Environment officer response
Attachments: Goshall Valley East Street Ash – 23.01363.docx; Senior Natural Environment Officer.docx

Dear [REDACTED]

Further to your email last week, please find attached the consultee responses from the Heritage Team and the Senior Natural Environment Officer. Should you wish to contact the Senior Natural Environment Officer to discuss BNG, her email is [REDACTED]@dover.gov.uk

I hope this is of assistance, however please email me if you have any questions.

Kind regards,



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



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From: [REDACTED]@stantec.com>
Sent: 02 April 2024 15:55
To: [REDACTED]@DOVER.GOV.UK>
Subject: Natural Environment officer response

Hi [REDACTED]

Thank you for your time today. It was good to talk through everything.

Please could you send over the response from the natural environment officer as discussed – I can't see it online.

Kind regards

[REDACTED]
Planning Associate

Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

Please note: I work part time.
I am available all day Mondays, Tuesdays and Thursdays, and Wednesday mornings.
I am not at work Wednesday afternoons or Fridays.

Stantec
3rd Floor, 50-60 Station Road
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CONSULTATION MEMO

Proposal: Goshall Valley East Street Ash – 23/01363 – Construction of a solar farm

Assessment

The Built Heritage Technical Assessment (Appendix 10.1) and Heritage Chapter 10, identifies relevant heritage assets potentially affected by the proposed development within a 1 km study area. I have reviewed this on site and have considered only those heritage assets noted in the assessment that are likely to experience an impact as a result of the development. At the time of the site visit an additional heritage asset was identified which has not been included and, in my view, requires consideration. I comment as follows:

Viewed from within the Scheduled Monument Roman Amphitheatre at Richborough, looking southwest towards the development site, the church of the Grade I listed Church of St Nicholas in the Village of Ash is clearly visible on the horizon. The church is of high significance and designated as being of national importance.

It has also been identified with other churches within the Dover District Heritage Strategy as:

- Contributing to the aesthetic appeal of the historic landscape and the rural environment.
- The spires of rural churches can often be seen over long-distances and are recognised and valued local landmarks.
- A highly visible focal point in this countryside, landscape.



The prominence of this listed building is a key aspect of its significance, and it is the only feature projecting on the horizon that can be seen from this important site. Naturally this means that it draws the eye as a point of interest. As the development will be to the foreground it is likely in my view that it will interrupt the view of the church tower and will therefore have an impact on the experience of the listed building.

In my view, due to the long distances, undulation of the land and proposed mitigation for the development site which includes increased vegetation with a landscape buffer, any harm to the significance of the listed building will be the low end of less than substantial.

Goss Hall and associated barns are grade II listed and form a historic farmstead on an ancient manorial site. The historic farmyard appears to survive intact with walls and outbuildings which give a sense of enclosure. Goss Halls wider landscape setting is rural and agricultural, and this adds to its significance as a historic farmstead. The assessment considered the proposed development would have a 'negligible' impact, with the proposed access road located 80m to the northeast of these listed buildings.

In my view it is unclear if this is correct based on the information submitted. The Landscape Strategy Plan does not show any boundary treatment such as fencing and access gates for the temporary access road; if this is correct then there will be no impact on the setting of Goss Hall as a result of the access route.

The Goss Hall site and its agricultural setting is widely visible from the junction between Copper Street Drove and East Street looking northwest (just off the A257) .



As part of the proposed development the submitted transport statement states the site requires a temporary access route for construction and decommissioning to alleviate possible traffic congestion around the tight bends within the vicinity of Goss Hall.

The drawings within the transport statement show the preliminary layout only. With no detailed design illustrated to fully assess the potential impact on the setting of Goss Hall Farm. As a temporary access the expectation would be for the landscape to be return to its existing appearance as agricultural land, as it helps to maintain the strong historic and functional relationship the farm has with the surrounding landscape. This would then hopefully result in the development works forming limited harm to this setting for only a temporary period of time.

Recommendation

Notwithstanding the comments above relating to the Church of St Nicholas, the overall level of harm to listed heritage assets, that are expected to experience an impact, is likely to be at the low end of less than substantial within the study area. This may further reduce over time with the proposed mitigation for the development site, which includes increased vegetation with a landscape buffer.

23/01363 – Goshall Valley

I have reviewed Chapter 8 of the submitted EIA, along with other associated documents, including the Ecology baseline report, Biodiversity Net Gain Strategy and the Arboricultural report.

Local Wildlife Site / Coastal and Floodplain Grazing Marsh (Priority habitat)

The proposed development is situated within and will result in impacts to the Ash Level and South Richborough Pasture LWS, including permanent and temporary loss of coastal and floodplain grazing marsh (priority habitat).

It is stated in the EIA that the proposed development will result in improvements to the condition and extent of the coastal and floodplain grazing marsh habitat that will offset the habitat losses, I acknowledge that the cessation of arable cultivation and reversion to grassland and management by low-intensity grazing, along with the creation of the nature restoration area, will provide ecological benefits. The use of the land for the solar array does though present a significant change and, to help my understanding, I query what the impact from the installation of the PV array will be (e.g. from shading and rainfall run off from the panels), as compared to a restored CFGM grassland without the PV array.

For the long-term management of the grassland, the area beneath the solar array is proposed to be managed by 'low-intensity sheep grazing'. I query what the alternative management would be for the grassland if it is not possible to secure grazing flocks for the site, and advise that further information on this is sought from the applicant. I also advise that clarification is sought as to the management of the ditch landscape buffers and whether these will be subject to grazing.

Other habitats

I note that dense / scattered (both terms are used) scrub is stated to be present on the site in small areas and seek further information regarding the justification for omitting them from the habitat survey mapping and biodiversity net gain calculations; what size are the areas of scrub? Do they have potential to support nesting birds? Will any scrub be lost as a result of the proposed development, and if so what protection measures will be implemented?

I note in the Arboricultural Report that additional trees and hedgerows to those identified in the Chapter 8 are proposed for removal (see sections 3.3 to 3.5). I advise that clarification is sought as to whether works to these trees and hedgerows present any additional potential ecological impacts to those already identified, along with justification for their omission from the biodiversity net gain strategy.

Limited information is provided regarding the loss of 4m of hedgerow; it is not clear where exactly this is, and although there is provision for method statements to ensure the potential for impacts to dormice and breeding birds are avoided and / or minimised, the potential for reptiles and amphibians to be present along or within the hedgerow is not directly addressed. I advise that further information is sought from the applicant to clearly show the location of the hedgerow, along with provision for the method statement to protect herptiles from killing and / or injury.

With regards to the proposed 7.5m landscape buffers to all ditches. It is not clear from the submitted plans whether it is realistic and achievable that these buffers will be in place prior to any construction works commencing; the General PV Layout Plan indicates that the locations of the maintenance roads and the PV panels appear in places to be in relatively close proximity to the ditches and I query whether the proposed buffers will allow sufficient space in which construction

vehicles can operate. I suggest that more detailed plans are sought, to demonstrate how construction will be achieved without incursion into the buffer zones.

Protected and designated species

I advise that there is a need for the applicant to take account of the presence of beavers in the area. Further information must be sought to demonstrate an understanding of the potential use of the site by beavers, the potential for impacts to beavers, and the need for any mitigation measures to minimise the potential for impacts during construction and operation of the proposed development.

Toad records were returned in the KMBRC data search, but they are not specifically mentioned. I assume that they are included under 'amphibians', but the detailed text refers only to great crested newts. I advise that clarification on this point is sought, to demonstrate that this species of principle importance will be protected from harm during construction.

Other matters

I also advise that clarification is sought regarding the timing of installation, and the relationship between, the perimeter fencing and the biodiversity exclusion zone fencing, noting that in some places the perimeter fence cuts through the buffer zones and in others it overlaps the exclusion zone fencing. Approaches to any necessary mitigation measures must be sought from the applicant.

It is stated in the submission that existing crossing points (over the ditches) will be used for access, though the submission includes provision for repairs to and replacement crossings, along with two new crossing points. To provide a good understanding of all the potential ecological impacts, I advise that details of the locations and structure of any replacement crossings, along with the proposed new crossing points are sought from the applicant. Approaches to any necessary mitigation measures must be sought from the applicant.

The only plans submitted are at a large scale of the whole site. To aid clarity in understanding the site and its ecological features, I advise that detailed plans of sub-sections of the habitats within the proposed development site are sought from the applicant, so that areas of suitable habitat for protected and designated species can more easily be identified, along with the areas in which there is potential for impacts to arise.

Biodiversity net gain

This application is not subject to mandatory biodiversity net gain, but is within Ash parish and proposals indicate an aim to achieve at least 10% biodiversity net gain.

In section 2.22 of the Biodiversity Net Gain Strategy, it is stated that the User Guide for Biodiversity Metric 4.0 was not followed. While I understand the rationale behind this, I advise that the User Guide for the relevant metric should be followed. I have sought advice from Natural England's Biodiversity Net Gain Policy Team, who advise that:

"It is important that the version of the Biodiversity Metric that is used adheres to its associated guidance – applications submitted using Biodiversity Metric 4.0 need to follow Metric 4.0 guidance which says that 'Any ditches within recorded FWM-CFGM are part of the FWM-CFGM condition assessment and should not be recorded in separate modules'. The professional judgement of the competent person should be used alongside the guidance to judge how to represent the habitats present at baseline and post-intervention as accurately as possible. The competent person should justify how habitats have been recorded in the Metric, especially where error flags are raised in the Metric, to assist the reviewer."

I therefore advise that a revised Biodiversity Net Gain Strategy and accompanying Biodiversity Metric are sought from the applicant, taking into account the above comments. Please note that the Statutory Metric treats the mosaic habitat situation differently to Metric 4.0, so the applicant should consider using the Statutory Metric, which does allow the fields and watercourses to be accounted for in the different modules of the metric.

The applicant should also be advised that local guidance on the application of Strategic Significance multipliers was published in January 2024 and can be found here: [Biodiversity Net Gain for Kent and Medway | Making Space For Nature Kent](#) and should be used by the applicant in their resubmitted Biodiversity Metric.

From: [REDACTED]@stantec.com>
Sent: 18 April 2024 13:31
To: [REDACTED]
Subject: Meeting Minutes
Attachments: 333100227 A7 Little South Dover Council Meeting - Minutes 02042024.docx

Dear [REDACTED]

I attach the minutes from our meeting earlier in April. Please could you review and let me know if you are happy to agree them?

Kind regards

[REDACTED]

[REDACTED]
Planning Associate

Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

Please note: I work part time. I am available all day Mondays, Tuesdays and Thursdays, and Wednesday mornings. I am not at work Wednesday afternoons or Fridays.

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Little South Solar Farm - Meeting with Dover District Council

Date/Time: 2 April 2024 /
 Location: MS Teams
 Attendees: [REDACTED] – DDC
 [REDACTED] – DDC
 [REDACTED] – Stantec
 [REDACTED] – Stantec
 [REDACTED] – Stantec
 [REDACTED] – Statkraft
 [REDACTED] – Statkraft

Apologies: [REDACTED] – Statkraft

Item	Action
<p>Introductions</p> <p>[REDACTED] has had offline discussions with [REDACTED] and has an understanding of the site and relevant issues .</p>	
<p>Statutory Consultees</p> <p>[REDACTED] – Most consultee responses have been external. A document of all the responses received in response to the application to date will be prepared by the council and issued to the Applicant.</p> <p>[REDACTED] – The key consultation responses were discussed:</p> <p>KCC Highways – Pell Frischmann have been in contact and a revised plan is being prepared, though this has not been seen yet. KCC stated that the access is a single track with no clear line of sight, the proposal that Pell Frischmann have come up with involves traffic management to deal with this.</p> <p>Ash Parish Council – stated that BMV agricultural land is being used however a full ALC report has been submitted stating that it is not on BMV land.</p> <p>Heritage</p> <p>[REDACTED] - We are currently in the process of preparing for trial trenching, this is a priority before crops get too high.</p> <p>The position from Historic England is very firm and [REDACTED] made it clear, at the virtual meeting held with HE on 21st March 2024, that they were not open to discussion on their conclusions and recommendations, however they are open to looking at any new information.</p>	<p>[REDACTED] to send over document of combined consultee responses</p> <p>Stantec to prepare and submit a formal ES addendum</p>

Item	Action
<p>We have provided a response regarding the proximity of the site to the SAM, and will respond further specifically to Historic England's Response.</p> <p>It would be useful to understand from the Council what they would advise is the appropriate way to respond to Historic England comments.</p> <p>█ – Suggest that we go back to Historic England directly in the first instance to keep the ball rolling, even before any further archaeological work takes place.</p> <p>█ – HE will be contacted before the further archaeological work takes place.</p> <p>█ – We are preparing a response laying out the benefits of the scheme to aid an assessment of planning balance. This emphasises the ecological benefits, and other benefits.</p> <p>█ – in terms of Ecology, we worked to make the BNG proposals compatible with the LWS – we chose a bespoke approach. Whilst an approach purely focused on achieving maximum BNG could have been taken this would not have aligned with the objective of the LWS. The proposed landscape planting was considered better in terms of the LWS.</p> <p>█ – At the moment we are at too early a stage to review planning balance. The response from Historic England carries substantial weight in the planning balance and the economic and sustainable energy benefits will have to outweigh Historic England's objection. Suggest a report is prepared which lays out:</p> <ul style="list-style-type: none"> • Employment numbers • Sustainable energy benefits • Number of homes energy will power • Employment during construction and lifetime of the panels • Agricultural benefits • What it will look like post 40 years • Ecological benefits <p>All these strands should be drawn together to reach the overall positive planning balance.</p> <p>A planning balance note should be sent to the Council rather than Historic England. Historic England will be looking at things from a binary perspective, whereas the Council will take a more rounded view. It would be helpful to receive the new documents as a single package of additional information/clarification so that it is subject to a single consultation.</p> <p>█ – we'll engage with HE, submit a formal addendum package which will include a public benefits statement. This addendum can be re-consulted on.</p>	
<p>Further discussion</p>	<p>█ to send over Senior Natural</p>

Item	Action
<p>█ – The conservation team haven't raised any concerns with the proposals but the additional archaeological studies requested by the county archaeologist should provide the necessary clarification .</p> <p>█ – No more consultees are expected to respond</p> <p>█ – Has the Council received consultee comments on Ecology and BNG?</p> <p>█ – The Ecology and BNG information has been reviewed with comments, it will be sent across soon.</p> <p>█ – Within the Green Infrastructure Zone, there will be provision for access for mini buses for educational purposes (decided a car park would not be suitable) as well as bird watching areas and paths. Who would be the best person to talk about this?</p> <p>█ – will provide the details of the best person to advise on how public access can be managed, however agree that the car park is not the right approach. Would like to see more details of this in the planning balance/benefits document.</p>	<p>Environment officer comments</p>
<p>PPA</p> <p>█ – The Council originally suggested that a PPA may be appropriate in this case. We would still be open to a PPA</p> <p>█ – The Council are thinking about what everyone would want to get out of it, particularly due to where we are now being that the issues are predominantly heritage. Initially it was considered that an external landscape consultant could be beneficial, however the issues are more heritage based. Currently at a point where the gains of the PPA would be negligible, struggling to see what the value would be.</p> <p>█ – Currently don't have a landscape consultant in the Council. However, the Council Planning Officers are capable of making a judgement on landscape and visual impact.</p> <p>█ – The council feels that a lot of the landscape issues actually relate to heritage, so it's not so much of a landscape issue. If it was just about trying to balance landscape impacts vs public benefits, it would be a very easy decision – heritage is afforded more significance than landscape issues.</p> <p>█ – We previously engaged with Historic England in relation to this aspect, and they agreed on the key views.</p> <p>█ – The Council confirm that they are happy with the key views and no additional viewpoints are necessary.</p>	
<p>Extension of Time</p> <p>█ – Fine to have an extension of time</p> <p>█ – Should we wait for the trial trenching to be completed? Could have most of the things set out ready for the end of the month, but archaeology would take longer. Could extend to June?</p>	<p>Stantec to keep █ updated</p>

Item	Action
<p>■ – June would be fine.</p> <p>■ – Will keep ■ in the loop with what’s happening.</p>	
<p>Next Steps</p> <p>■ – Propose that another meeting is held in a month and the minutes of this meeting will be circulated.</p> <p>■ – Agreed.</p>	Stantec to circulate minutes

From: [REDACTED]@stantec.com>
Sent: 22 April 2024 11:13
To: [REDACTED]
Cc: [REDACTED]
Subject: Little South - LLFA
Attachments: 23_01363-LOCAL_FLOOD_AUTHORITY-2502362.pdf

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Hi [REDACTED]

I hope you're well.

I'm writing in relation to the LLFA's consultation response because it isn't quite clear what the position currently is and whether their response constitutes a holding objection.

Could you advise whether you require the applicant to carry out additional ground investigation and what design changes might be necessary before determination, or what aspects you could condition?

Kind regards

[REDACTED]

[REDACTED]
Planning Associate

Direct: +[REDACTED]
Mobile: +[REDACTED]
[REDACTED]@stantec.com

Please note: I work part time. I am available all day Mondays, Tuesdays and Thursdays, and Wednesday mornings. I am not at work Wednesday afternoons or Fridays.

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Cambridge CB1 2JH



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Dover District Council
White Cliffs Business Park
Dover
Kent
CT16 3PJ

Flood and Water Management

Invicta House
Maidstone
Kent
ME14 1XX

Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: DDC/2024/099156
Date: 26 February 2024

Application No: 23/01363

Location: Goshall Valley, East Street, Ash,

Proposal: Construction of a solar farm with associated access and infrastructure

Thank you for your consultation on the above referenced planning application.

Kent County Council as Lead Local Flood Authority have the following comments:

We have reviewed submitted information and understand it is proposed to attenuate flows via permeable paving and convey further flows from the HV compound hardstanding to an infiltration basin with an overflow discharges to an ordinary watercourse at a maximum allowable rate of 2 l/s. More flows will be conveyed from transformer stations to infiltration trenches and from access roads to infiltration blankets. A conservative infiltration rate of 1×10^{-6} m/s has been used for hydraulic calculations. This will manage flows from the site up to a 1 in 100 year +45% climate change event.

We note that there are a series of River Stour Internal Drainage Board maintained ditches where levels are managed via pumping and that they have been consulted. Also the southern half of the site lies in Flood Zone 2 and the Environment Agency has been consulted.

We would emphasize that additional ground investigation will be required to support the use of infiltration. It is recommended that soakage tests be compliant with BRE 365, notably the requirement to fill the test pit several times. Detailed design should utilise a modified infiltrate rate and demonstrate that any soakaway will have an appropriate half drain time.

As of the 10th of May 2022, the Environment Agency's climate change allowances have been updated. As part of this update, revisions have been made to the 'Peak Rainfall Intensity Allowances' that are used in applying climate change percentages to new drainage schemes.

The LLFA would now seek the 'upper end' allowance is designed for both the 30 (3.3%) and 100 (1%) year storm scenarios. The latest information on the allowances and map can be found at the following link:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

We recommend that full hydraulic calculations are included within the submission to review the peak events in the 1 in 2 year, 1 in 30 year +CC and 1 in 100 year +CC events, only the 1 in 100 year (+CC) results have been supplied.

This analysis must determine if the impacts of the greater allowance are significant and exacerbate any flood risk. The design may need to be minimally modified but may also need additional mitigation allowances, for example attenuation features or provision of exceedance routes. This will tie into existing designing for exceedance principles.

The flow rate of 2 l/s may be the maximum allowable rate but the QBAR greenfield rate is recommended if this can be achieved.

It is understood from the report that the existing surface water regime is not to change on site following the installation of the solar panels as there is little to no increase in impermeable area. The report indicates that runoff from the solar panels will fall and infiltrate into the ground below, with any overland flows are expected to follow the existing lay of the land.

The LLFA expects that any rainfall upon solar arrays are generally shed/ fall between the rows onto the ground. Whilst we have no objections to this, the possible concentration of water flow off the arrays can create flows that can erode the soil and allow a greater volume of overland flow to enter watercourses or flow to adjacent areas at a greater rate than would otherwise occur in greenfield conditions. In our view, it is essential that runoff is not increased to safeguard neighbouring areas of land.

To minimise any potential risk of overland flows, we would seek for additional measures of runoff protection are examined further. Some of these measures may include:

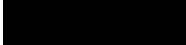
- Incorporating bunds, filter drains or other measures to interrupt flows of water between rows of solar arrays to disperse water flows over the surface and promote infiltration into the soils.
- Incorporating wide grassed filter strips at the downstream side of blocks of solar arrays and maintaining the grass at a long length to interrupt water flows and promote infiltration.
- Incorporating gravel filled filter drains or swales at the downstream side of blocks of solar arrays to help infiltrate run-off (where ground conditions allow).
- Vegetated strips through a combination of wildflowers and or grass along with buffer strips around the perimeter of the fields buffer strips will be left uncut to capture any runoff leaving the site.

Whilst such measures detailed above will reduce impacts, It is essential that the vegetated buffer strips and planting around the panels are maintained throughout the lifetime of its operation. Future removal/ lack of maintenance may result in increased runoff/ erosion. As a result, a suitable maintenance regime is required to ensure erosion and runoff are controlled. It is recommended that the LPA considers agreements with the land owner to ensure the vegetation remains in place for the duration of the sites use. We have not recommended a specific condition for the landscape provision as we think the LPA are better placed to provide a recommendation for ensuring the implementation and maintenance of the landscape buffers.

The LLFA would seek that these points are looked into further and whether any of these measures can be incorporated into the design before the application is decided along with a specific condition around future maintenance.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

A black rectangular box redacting the signature of the Flood Risk Officer.

Flood Risk Officer
Flood and Water Management

From: [REDACTED]@kent.gov.uk
Sent: 23 April 2024 11:15
To: [REDACTED]@headlandarchaeology.com
Cc: [REDACTED]@HistoricEngland.org.uk;
[REDACTED]@HistoricEngland.org.uk
Subject: RE: DOV/23/01363 - Solar Farm - Goshall Valley, East Street, Ash, Canterbury, Kent
Attachments: DO 23 01363 LE01 further info inc pre-det eval.pdf

Dear [REDACTED]

Sorry for the delay in getting back to you.

Hopefully, you have seen a copy of our consultation response to the planning application. This sets out what we think are the principal issues in terms of the site's archaeological interest and I attach a copy for reference.

I suggest that a staged programme of pre-determination evaluation works will be necessary to more fully understand the character and significance of archaeology at the solar farm site. As per the requirements of the NPPF a proper understanding the significance of heritage assets must be the starting point for any decision taking.

Given the nature of the site's landscape history and size, I recommend that any evaluation works should be deposit led in the first instance. I think a combination of geophysical and geoarchaeological techniques will be required initially. Electrical Resistivity Tomography (ERT) might be useful as a first stage to provide us with a series of virtual sections through the site to understand its subsurface architecture. This might then be followed by borehole/auger survey to ground-truth the geophysical survey and to inform our understanding of the palaeoenvironmental potential of deposit sequences and identify any areas of heightened potential.

The results from these, alongside existing Lidar, topographic information, and predictive modelling techniques could then be used to target areas for purposive trial trenching. As a starting point I would suggest channel edge areas, and any associated inlets, areas where preserved organic remains might be predicted, any gravel highs or gravel ridges and the corridor where the predicted Roman route crosses the site would seem appropriate to target. Given the low-lying nature of the site any evaluation trenching might be best timed for the drier summer months. There may also be ecological and other constraints that will affect the timing of the works.

Do you know if the applicant is looking to undertake any geotechnical site investigation works at the pre-determination stage, if so then there may be opportunity to integrate archaeological works with these?

I'd be happy to discuss the precise scope further as required. I've copied Anne de Vareilles the Historic England science advisor for the south east region into my response as she may have further advice in terms of evaluation techniques. Because of the close links between the application site and the nationally important site of Richborough I've also cc'd Rebecca Lambert, Inspector of Ancient Monuments.

I trust that the above comments are 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 |

Please help save paper by NOT printing this email unless absolutely necessary.

From: ██████████@headlandarchaeology.com>
Sent: Thursday, April 18, 2024 11:14 AM
To: ██████████@kent.gov.uk>
Subject: RE: DOV/23/01363 - Solar Farm - Goshall Valley, East Street, Ash, Canterbury, Kent

You don't often get email from ██████████@headlandarchaeology.com. [Learn why this is important](#)

Dear ██████████

I am just following up on my email below regarding the requirement for archaeological investigation at the above site in East Street, Ash, south of Richborough Roman fort, which is proposed for a solar farm. I was hoping you may have some time to discuss the potential fieldwork requirements with me?

I'm keen to get a WSI drawn up and submitted as soon as possible as the client is keen to fully understand any potential archaeological constraints there may be.

I realise you are busy and am very grateful for your time on this matter.

Kind regards,

██████████
██████████



██████████ Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
Copper offices: Third Floor, South 49 Unit 1 | Clearview Court | Twyford | Hereford | HR2 6JR
www.headlandarchaeology.com

Headland Archaeology South & East Building 68C Wrest Park Silsoe Bedfordshire MK45 4HS t 01525 861 578	Headland Archaeology Midlands & West Unit 1 Clearview Court Twyford Rd Hereford HR2 6JR t 01432 364 901	Headland Archaeology Yorkshire & North Units 23-25 Acorn Business Centre Balme Road Cleckheaton BD19 4EZ t 0127 493 8019	Headland Archaeology North West RSK Fourways House 57 Hilton St Manchester M1 2EJ t 0161 236 2757	Headland Archaeology North East 13 Janes Edinburgh t 0131
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Registered office: 65 Sussex Street, Glasgow, G41 1DX.

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From: ██████████@headlandarchaeology.com>
Sent: Wednesday, April 3, 2024 9:49 AM
To: ██████████@kent.gov.uk
Subject: Re: DOV/23/01363 - Solar Farm - Goshall Valley, East Street, Ash, Canterbury, Kent

Dear ██████████

I am writing to you about the above project and in response to your letter dated 8th February 2024 (attached) in reference to a proposed Solar Farm near Sandwich (NGR: TR 3111 5933). As a response to the direct impacts of the scheme you request a field evaluation should be provided before the planning application is determined, I am hoping to discuss the scope of such a field evaluation with you.

Despite the limited results of the geophysical survey, the archaeological desk-based assessment (attached) and ES chapter have highlighted the potential of archaeological deposits of interest within the site. As noted in the letter its position within the Wantsum Channel means that there is potential for important palaeoenvironmental and organic archaeological remains, particularly around the raised spur/peninsula of higher ground within the centre of the site and about the margins of the raised spur/peninsula and in the southern part of the site (both east and west of Little East Street Farm). In these locations archaeology buried beneath the alluvium could include preserved organic remains, potentially including structures of Prehistoric and Romano-British date not visible on the geophysical survey.

I believe a geo-archaeological investigation would be beneficial given the site location. This could lead on to targeted trial trenching in the locations above if anything of interest is found. It would also help define the extent of the channel and may provide important data on changes to this environment during past periods.


If you are in agreement I will progress with producing a WSI for the geoarchaeological fieldwork. Is there anything else that may be useful to note in the preparation of the methodology?

I'm obviously also more than happy to talk this through with you on the phone or virtual meeting.

I am very grateful for your time on this matter.

Kind regards,



 Archaeology and Built Heritage Consultant

Headland Archaeology Midlands & West
Copper offices: Third Floor, South 49 Unit 1 | Clearview Court | Twyford | Hereford | HR2 6JR
www.headlandarchaeology.com

Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire I MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

Headland Archaeology Yorkshire & North
Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

Headland Archaeology North West
RSK Fourways House | 57 Hilton St
Manchester | M1 2EJ
t 0161 236 2757

Headland Archaeology East
13 Jane St
Edinburgh
t 0131 552 2222

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Environment, Planning & Enforcement

Invicta House
County Hall
MAIDSTONE
ME14 1XX

Phone: 03000 413375

Ask for: [REDACTED]

Email: [REDACTED]@kent.gov.uk

08 February 2024

Your Ref: DOV/23/01363

[REDACTED]
Planning Section
Dover District Council
White Cliffs Business Park
DOVER
CT16 3PJ

SENT BY EMAIL

Re: DOV/23/01363

Location: Goshall Valley, East Street, Ash, Canterbury, Kent

Proposal: Construction of a solar farm with associated access and infrastructure

Dear [REDACTED],

Thank you for consulting KCC Heritage Conservation on the above planning application. Our advice is principally concerned with two aspects of the scheme, namely 1) its impact on the setting of nearby heritage assets, most notably the important Roman site at Richborough; and 2) the direct impacts of the proposals on buried archaeological remains.

Attached to this letter are detailed comments on the site's archaeological background; on the impact of the proposed development on the setting of heritage assets; and on the direct impacts on buried archaeological remains. These detailed comments support and should be read in conjunction with our advice below.

Summary

The proposed solar farm lies close to the scheduled Roman site of Richborough, which includes the grade I listed 'Richborough Castle'. Richborough is a site that is of exceptional importance in understanding the complete story of Roman Britain. It is here that the emperor Claudian is believed to have landed his troops during his invasion of Britain in AD 43, and it is at sites such as Richborough that the

withdrawal of the last vestiges of Roman administration in *circa* AD 410 can be observed.

We do not agree with the applicant's conclusions about the degree of harm that the proposed solar farm would cause to the heritage significance of Richborough. The applicant suggests that the proposals will result in a minor-adverse impact to the scheduled Roman. In reaching such a conclusion the applicant has not adequately taken into account the contribution that the landscape of the former Wantsum Channel makes to our understanding and appreciation of Roman Richborough.

Furthermore, we also do not agree with the applicant's assessment of the effects of the development on buried archaeology. Nor do we agree with their recommendations for how this might be addressed and mitigated. We suggest that there is a clear need for further information on buried archaeology to inform decision-taking. We therefore recommend that further intrusive evaluation works are required before the application is determined.

Advice

The proposed solar farm is located in an area that is archaeologically complex and sensitive. It lies within the former Wantsum Channel and to the south of the important Roman site of Richborough. The proposed development will be harmful to the setting of this nationally important Roman site, and we advise that this harm will be significantly greater than is suggested in the Environmental Statement (ES) that accompanies the application.

The landscape context of Richborough is highly important as it enables us to understand why the Romans first landed here in AD43 and subsequently why Richborough developed into an important town and port of entry to the province. The proposed development will affect the ability to understand and appreciate Richborough's landscape context and therefore will cause harm to its significance.

We also advise that the site's archaeological potential is greater than is stated in the ES. The proposed development has the potential to impact a range of buried archaeology, including waterlogged organic remains and other palaeoenvironmental features associated with the former Wantsum Channel. The archaeology of the site has the potential to significantly further our understanding of the landscape context of Richborough island and the nationally important Roman site that developed there.

Recommendations

1) The impact of the scheme on the setting of the Roman site of Richborough is a major consideration. We recommend that the views of Historic England are sought on the impact of the proposals on the setting of the scheduled monument. We think the harm to the monument is serious.

2) Richborough is managed as a visitor site by English Heritage. The managed site includes the Roman amphitheatre which lies on high ground overlooking the

proposed solar farm. We think the proposals will harm the experience of visitors to the amphitheatre. We therefore recommend that English Heritage is consulted on the scheme.

3) The proposed development may also affect the setting of nearby listed buildings and we recommend that the views of your council's conservation officer are sought on this aspect.

4) Three possible *tumuli* (burial mounds) have been identified a short distance north of the proposed development site. The identification and date of these potential barrows is uncertain and insufficient information is currently provided to understand how the proposed scheme will impact their setting. In a worst-case scenario we advise the proposed development could result in harm to the setting of archaeological remains of equivalent significance to a scheduled monument.

5) Further information in the form of a field evaluation is required **prior to the determination of the planning application** so that the significance of buried archaeological remains can be properly understood and taken into account. The evaluation should make use of a range of investigative techniques, potentially including ERT survey, borehole/auger survey, trial trenching and deposit modelling.

6) Because of the potential for waterlogged organic archaeological remains and palaeoenvironmental features further information on the potential impacts of the development on the site's water-environment is needed to ensure the ongoing-preservation of any such deposits.

7) Further information on the detailed design measures proposed at the decommissioning phase is needed so that archaeological impacts can be understood and measures to minimise and avoid harm can be agreed.

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

Yours sincerely

██████████
Senior Archaeological Officer
Heritage Conservation

Cc

██████████, *Properties Curator (South), English Heritage*
██████████, *Principal Heritage Officer, Dover District Council*
██████████, *Inspector of Ancient Monuments, Historic England*
██████████, *Casework Officer, Council for British Archaeology*

KCC Heritage Conservation – detailed comments on application:

**DOV/23/01363 | Goshall Valley, East Street, Ash, Canterbury, Kent |
Construction of a solar farm with associated access and infrastructure**

Archaeological Background

The proposed development lies on reclaimed land within the former Wantsum Channel. Historically this was a major waterway which separated the Isle of Thanet from 'mainland' Kent. The history and development of the Wantsum Channel is complex; it was an open, navigable waterway in the later Prehistoric and early Roman period but subsequently silted up before being reclaimed for agriculture. The present landscape is a product of millennia of coastal change and landscape evolution.

Within the channel are various 'islands' which acted as foci for past human activity. Richborough is perhaps the most well-known of these islands, but others include Boxlees Hill and Weatherlees Hill, both of which lie on the Thanet side of Richborough island. Within the proposed development site, a raised 'spit' of land extends northwards from Little East Street Farm towards the Goshall Stream and may have similarly acted as a focus for human activity.

Analysis of archaeological sites and findspots recorded in the Kent HER show how the channel edge and islands and promontories acted as foci for human activity in the later Prehistoric and Romano-British periods, with the channel being a valuable resource in its open, marshland and reclaimed states. Drier conditions and lower sea-levels in the late Neolithic and Early Bronze Age led to increased human activity within the Wantsum Channel and the adjoining Lydden Valley. This is evidenced by the identification of buried land surfaces and artefacts of these periods recorded within and sealed by alluvium to the southeast and west of Sandwich. By the Late Bronze Age, the sea-level had risen which resulted in the flooding of the earlier land surfaces. As such the proposed development site might contain former prehistoric land surfaces and occupation activity lying buried in organic-rich deposits within the alluvium of the Wantsum Channel.

Richborough (known to the Romans as *RVTVP(A)E*) was located on an island at the eastern mouth of the channel, and it is here, within the sheltered anchorage of the Wantsum Channel, that the emperor Claudius is believed to have landed his troops during his invasion of Britain in AD 43. The southern edge of Richborough island lies about 90m north of the application site at its nearest point.

Following the invasion, Richborough would develop into a major port of entry to the new province. A great monumental arch (one of the biggest in the Roman empire) was erected here by Domitian around AD 85 to celebrate the conquest of Britain. Early structures at the wider Richborough site include a pair of temples, erected in the first or perhaps second century AD. Also constructed early in the town's

development, perhaps by military authorities, was an amphitheatre, built to provide entertainment for those living in or passing through the port town.

The amphitheatre is located on the southern edge of Richborough island, on one of its highest points, atop a bluff and overlooking the Wantsum Channel. It survives as a notable and distinctive earthwork and was one of the first Roman amphitheatres to be identified in the country. The top of the amphitheatre's earthworks are at about 19.5m aOD and it is notably elevated above the area of the former Wantsum Channel which generally lies at about 2.0 to 2.5m aOD. As such the amphitheatre site had – and still has – extensive views across the area of the proposed solar farm.

Recent archaeological investigation of the amphitheatre suggests that it was an early structure, built before the town of Richborough had significantly developed. Thus, the amphitheatre's position on a high point at the southern edge of Richborough island wasn't dictated by the presence of existing settlement but instead seems to have been deliberately chosen.

In the second century AD Roman Richborough flourished as stone buildings were constructed, roads re-laid and the port and its associated settlement (*vicus*) expanded, eventually covering a substantial part of Richborough island. The scheduled monument therefore covers only part of this extraordinary Roman site.

Recent excavations at the amphitheatre site suggest that activity occurred across the full extent of the town into the late fourth and early fifth centuries, i.e. until the very end of the Roman period.

In the third century AD the Roman military increased their presence at the site, initially by fortifying the monumental arch, and latterly through the construction of a major stone-built fort (now known as Richborough Castle and grade I listed). This fort was one of a series built in southern and eastern England that are collectively known as the Forts of the Saxon Shore. The fort's massive stone walls and defensive ditches are the most visible element of Roman occupation at Richborough.

The fort at Richborough continued to be used as a base for the *Legio II Augusta* until their withdrawal to Gaul in AD 406. Evidence shows that Richborough was one of the last places in Britain to be supplied with Roman coinage. There is evidence for some occupation following the army's withdrawal continuing into the later fifth and sixth centuries AD, but unlike other major Roman settlements in Kent only limited occupation continues into the post-Roman periods. Amongst the later features at the site is a small Christian Chapel that was constructed at Richborough in the later Anglo-Saxon period. The Chapel is dedicated to St Augustine who landed in East Kent in 597 AD.

In its later history the Wantsum Channel suffered from the formation of shingle spits within its southern mouth. The development of these spits and shingle banks affected the flow of water such that by the end of the fourth century AD the channel had begun to silt, and marshland develop. This process was exacerbated by reclamation works carried out by the Monks of St Augustine's Abbey in the twelfth

and thirteenth centuries. By the later medieval period, the landscape of the former channel had evolved yet further, with marshland having largely been reclaimed and developed to form an extensive tract of drained grazing pasture. This reclaimed marshland can be seen in the low-lying, open landscape of the proposed development site.

Impact of the proposed development on the setting of heritage assets

The application is accompanied by an Environmental Statement (ES) which in turn is informed by several technical studies. Chapter 7 of the ES addresses the impact of the scheme on Landscape and Views and names (ES para 7.53) various designated heritage assets whose setting might be affected by the proposed development. Further consideration of the impact of the scheme on built heritage assets is provided in Chapter 10, whilst Chapter 6 (Archaeology) considers the impact of the scheme on non-designated heritage assets of archaeological interest.

In our advice below we focus on the impact of the development on the setting of Roman Richborough and other archaeological remains. The ES also identifies a selection of grade II listed buildings whose setting might potentially be affected. We recommend that advice is sought from your council's conservation officer on the effect of the scheme on these assets.

Roman Richborough and its setting

The Roman site of Richborough is of very high significance and includes elements designated at the highest level. The Saxon Shore fort, Roman port and associated remains at Richborough are designated together as a scheduled monument (NHLE entry 1014642) which extends over an area of some 40 hectares and includes the site of the Roman amphitheatre. The scheduled monument lies about 160m north of the proposed development site at its closest point. Richborough Castle is also a grade I listed building (NHLE entry 1363256).

The Roman site of Richborough is situated on an area of raised ground that was once an island within the Wantsum Channel. The Wantsum Channel is now silted up but is still discernible today as an extensive and distinctive low-lying landscape. Because of its elevated position Richborough commands views across the former Wantsum Channel. This is especially the case from the site of the Roman amphitheatre which sits at the highest point on the southern edge of the island.

Verified viewpoint C is taken from within the scheduled monument on the south side of the amphitheatre, looking across the former Wantsum Channel. Verified viewpoint D supplies a counterview, looking north from the far bank of the former channel. From this southerly direction the raised bluff of Richborough island can be clearly and readily identified. The proposed development site falls between these two viewpoints within the Goshall Valley, part of the Ash Levels landscape character area (LCA), which is described in the Dover District Landscape Character Assessment as "*a distinctive large scale, flat and low-lying area of arable and*

pasture grazing. The landscape is reclaimed grazing marsh and retains marshland qualities including drainage ditches and an open expansive character".

This character is clearly discernible in the baseline (as existing) image at verified viewpoint C where the extensive, cohesive and distinctive nature of this low-lying flat landscape can be clearly seen, and the extent of the former Wantsum Channel can be appreciated and understood. As such we do not agree with the applicant's description of the landscape here as "*little more than a post-medieval agricultural valley landscape*" (ES para 6.80).

Views across the former channel are important in understanding the landscape context of Roman Richborough and its strategic topographical position on an island in what was once an extensive sea channel. This appreciation of Richborough's position on a raised island is crucial to understanding why the Roman invasion of AD 43 landed here, and why Richborough subsequently developed into an important port of entry and gateway to the newly conquered province. As such we judge that the landscape setting of Richborough makes a considerable contribution to the significance of the place.

The verified views provide accurate visual representations of how the proposed development will look at year 1 and again at year 15 when landscape planting has become established. The year 1 image from viewpoint C demonstrates how the proposed solar farm will sit as an alien and visually intrusive element in the landscape. It will take in a large part of the visible open, low-lying landscape and will diminish the ability to appreciate the extent of the former sea channel.

The year 15 image shows how the proposed landscape planting will largely mask the panels of the solar farm. However, the planting also has the effect of foreshortening the view, such that the former channel is no longer appreciable as "*a distinctive large scale, flat and low-lying area of arable and pasture grazing*" but is instead reduced to a narrow strip of land between the planting and the bluff edge, where the scale of the former channel can no longer be properly appreciated. In the corresponding view looking north towards Richborough island the raised bluff is entirely obscured by the arrays.

We suggest that the applicant's setting assessment has not adequately considered the contribution that the distinctive and expansive low-lying reclaimed marshes of the Wantsum Channel makes to the significance of Richborough. The applicant's assessment has largely separated consideration of the impact of the scheme on landscape character (in ES Chapter 7) from the impact on views from Richborough scheduled monument (in ES Chapter 10) but has not properly taken into account the contribution that the landscape setting makes to the significance of the monument. The two cannot be separated because it is the very character of the surrounding landscape which helps visitors to Richborough understand and appreciate the strategic position of Richborough on a raised island within the former channel.

The significance of the Wantsum to Roman Richborough is acknowledged elsewhere in the ES which notes that "*the Wantsum Channel itself is of key importance within*

the Roman landscape" (ES 6.52). Therefore, the ability to understand the extent of the former channel (as reflected in the extensive low-lying reclaimed marshland) must contribute to the significance of the site. The marked difference between Richborough 'island' and the low-lying reclaimed marshland of the former sea channel forms part of the experience of Richborough. This is clear at the amphitheatre site where views over the former channel are extensive.

We therefore suggest that **the construction of the proposed solar farm would be harmful to the significance of the scheduled monument of Richborough** and advise that this harm is greater than the minor (adverse) harm indicated in the ES.

Additionally, we note that the Roman amphitheatre which overlooks the application site is located at one of the highest points on Richborough island. Archaeological evidence indicates the construction of the amphitheatre here was intentional and not dictated by existing settlement constraints. Elsewhere, such as at London and other urban centres, amphitheatres were constructed to take advantage of existing natural depressions or dry valleys which could be shaped to form the arena. This does not apply to Richborough, and further consideration might be given to whether the landscape setting influenced the location of the amphitheatre.

The setting of other heritage assets

The ES identifies in Chapter 6 Archaeology the presence of three possible *tumuli* (burial mounds) which are located some 135m from the application site. The ES considers that these mounds must be of Anglo-Saxon date or later as the Wantsum was an open channel in the Prehistoric period. We suggest that this over-simplifies the situation and that the potential barrows lie within an area where conditions may have fluctuated between tidal and marshland up to about the second millennium BC, from when the Wantsum would have been an open navigable body of water. There are several known examples of low-lying barrows in alluvial/channel edge locations of Late Neolithic/Early Bronze Age date and seemingly associated with watercourses or inlets. We do not agree therefore with the assertion in the applicant's Archaeological Impact Assessment (AIA) that such a location would be "uncharacteristic" for barrows of Neolithic or Bronze Age date (AIA 9.6.9).

Archaeological works carried out in advance of the Thanet Supply Main scheme some 250m from the possible barrows has demonstrated the presence of archaeological horizons buried at depth beneath alluvial and marsh reclamation deposits. The possibility that these mounds are the tops of barrows of Late/Neolithic or Bronze Age date, otherwise largely buried by alluvium, cannot yet be discounted.

The ES acknowledges that these receptors are potentially of high significance (ES para 6.72), but their precise character and significance is not currently understood. This is agreed. Because they are not properly understood it is not sound to assume that setting does not contribute to their significance, and therefore we do not agree with the conclusion of the ES that the proposed development would at worst result in a negligible impact (ES 6.101). Because these barrows are not adequately understood, it remains possible that the proposed development could result in a moderate or even major impact on setting of archaeological assets that are

potentially of high importance (equivalent to a scheduled monument). We therefore advise that **in any worst-case scenario the environmental effect of the proposed development on the setting of the possible barrows would be major or major-moderate.**

Policy

The NPPF notes the environmental benefits associated with the production of energy from renewable sources. It highlights (NPPF 157) how the planning system should support the transition to a low carbon future and should support renewable and low carbon energy and associated infrastructure. The NPPF explains that applications should be approved where impacts are acceptable for the proposed location (and by inference that applications in unacceptable locations – or in locations that cannot be made acceptable – should be refused).

The Planning Practice Guidance (PPG) provides further advice on judging whether a location is acceptable or not. The PPG acknowledges that development of large-scale solar farms in rural environments can have a negative impact. It highlights that when considering large-scale solar farms great care should be taken to ensure that heritage assets are conserved in a manner appropriate to their significance, including impacts on views important to a heritage asset's setting. It notes that – depending on the scale, design and prominence of a scheme – the impact of large-scale solar farms on the setting of heritage assets can be considerable and may result in substantial harm (Paragraph 013 Reference ID: 5-013-20150327).

Paragraph 195 of the NPPF explains that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. NPPF 205 states that “*great weight*” should be given to the conservation of designated heritage assets and that the more important the asset the greater the weight should be. Richborough is undoubtedly a heritage asset of the greatest importance. The possible barrows might also be assets whose importance is equivalent to a scheduled monument whereby footnote 72 of the NPPF would apply (albeit this is as yet uncertain). NPPF 206 goes on to explain that any harm to the significance of a designated heritage asset (including harm from development within an asset's setting) should require clear and convincing justification.

Using the assessment criteria detailed in the ES we judge that the impact of the proposed development on the setting of Roman Richborough will as a minimum lead to “*the alteration to a key element of the baseline conditions and that post development the setting of the baseline will be materially changed*”. This would be a moderate magnitude adverse effect. Roman Richborough is a site of high importance and therefore, following the matrix for assessing the significance of an environmental effect the impact on Roman Richborough must be **major-moderate adverse**. We think in a worst-case scenario a major-moderate or even major adverse effect could apply to the ‘barrows’ also.

In considering the level of harm the NPPF refers to substantial harm, less than substantial harm and no harm. There is no direct translation from the significance of an environmental effect in EIA terminology to substantial or less than substantial

harm as described in the NPPF. As a minimum we suggest that a major-moderate adverse effect must fall at the very upper end of the less than substantial harm spectrum and that this harm should be given great weight in any planning judgement. We strongly recommend that the views of Historic England are sought on the impact of the proposals on the setting of the scheduled monument at Richborough and whether this amounts to substantial or less than substantial harm.

Direct impacts on buried archaeological remains

Nature of the direct impacts

As well as impacting the setting of nearby heritage assets the construction (and decommissioning) of the proposed solar farm will directly affect any buried archaeological remains present within the footprint of the proposed development. These direct impacts will result from construction activities for the installation of the arrays; construction of access tracks, substation, transformer stations and monitoring cabin; installation of cabling (including grid-connection), fencing and CCTV cameras. Impacts may also arise from construction enabling works such as the installation of compound and lay-down areas, the formation of construction access tracks and through any temporary drainage infrastructure. Additionally, the creation of drainage ditches, scrapes, swales and reed beds as well as landscape planting will also have a direct impact during their formation. Landscape planting might also impact archaeology during the operational phase through root growth which could damage buried archaeology directly and through water uptake which could result in the localised drying-out of waterlogged deposits.

Chapter 6 of the ES considers how the proposed development might affect the site's archaeological interest and this chapter is supported by the AIA (which forms ES Appendix 6.2). The application is also accompanied by a report detailing the results of a geophysical survey (magnetometry). The ES suggests that the proposed development site is "*of low archaeological potential*". We think that this is incorrect. The proposed development covers a large area, and the archaeological potential of the site will vary, but parts of the site clearly have a significantly greater potential than the ES suggests.

The character of the archaeology

The ES suggests that the site would have lain in open water in the Prehistoric period. The development of the Wantsum Channel in the Prehistoric period is more complex and there will be times (because of climatic differences and changes in relative sea-levels) when the channel would have been dryer and accessible and buried ancient land-surfaces and archaeological remains might be preserved within the alluvial sequence. This has been demonstrated by archaeological works carried out for the Thanet Main Supply scheme which passed to the north of the application site. Here archaeological remains were preserved beneath later alluvium at a depth of about 1m. Because of the depth that they are buried it is unlikely that such features would be revealed through magnetometry and therefore the geophysical survey carried out

across the proposed development site is unlikely to be useful in identifying archaeological features of land-surfaces buried under later alluvium.

Elsewhere in the Wantsum Channel the presence of islands and peninsulas have been proven to act as a focus for Prehistoric and later activity. LiDAR and topographical data indicate that there is a raised projecting spur of land within the centre of the proposed development site. This is an area where activity might be expected. On and around the margins of this higher ground, as well as along the channel edge, we suggest the archaeological potential is significantly raised. In these areas evidence for the exploitation of the marshland and open channel might be expected. Here, because of the waterlogged ground conditions, organic remains that might not otherwise survive could be preserved. The ES identifies the potential for *“evidence for wetland exploitation such as fish traps, boats, wooden jetties, and hides and traps for wild fowling may survive as buried finds/features”* (ES para 6.66).

Additionally, the waterlogged soils, are favourable for the preservation of organic material of palaeoenvironmental interest. These have the potential to provide information that a) sets an environmental framework to provide a landscape and ecological context for recorded human activities, b) illustrates the impact of human activity on the vegetational environment of the Wantsum Channel and c) demonstrates locally how plants and animals were responding to environmental change (including fluctuations between marine and freshwater dominated environments). This preserved paleoenvironmental record, including evidence for marine transgression and regression, could contribute to our understanding of regional effects on historic climate and relative sea level changes.

The sedimentary sequences that evidence the development of the Wantsum Channel and the palaeoenvironmental indicators that they contain are of at least regional importance and their significance might be higher where they can advance understanding of the landscape development and context of the nationally important Roman site of Richborough. The ES states that for both palaeoenvironmental and organic archaeological receptors the development could result in a **major adverse effect** (ES para 6.68).

The ES also notes that the extent and character of palaeoenvironmental and organic archaeological remains is unknown. This is because of the lack of intrusive archaeological/geoarchaeological or geotechnical investigation (ES para 6.75). This is not a satisfactory position, given the potential for a major adverse effect. We think **this issue needs to be addressed through further intrusive investigation before the application is determined.**

Similarly, we judge the archaeological potential for remains of Romano-British date to be greater than the application suggests. To the north of the application site geophysical survey within the scheduled monument at Richborough has revealed part of the layout of the Roman town. A notable feature is a principal street that heads south from Watling Street before curving around the northern side of the amphitheatre. The projected line of this road then heads south-westwards towards the application site. Excavations for the Thanet Supply Main (some 330m to the

north of the proposed solar farm site) revealed a section of road on the projected alignment.

About 750m to the south of the proposed development site archaeological excavations at Each End, Ash revealed further evidence for Roman occupation, including a section of Roman road projecting towards the solar farm site. The projected line of this Roman road heads towards the abovementioned spur/peninsula of raised land located within the application site and projecting into the former Wantsum Channel. The presence of a Roman road heading towards the site from the south-west and again from the north-east strongly indicates that this route continues through the application site. The nature of this route remains uncertain and could have taken the form of a ferry crossing or causeway across the Wantsum.

The ES suggests that the route must have taken the form of a ferry crossing because the Wantsum Channel was open during the Roman period. If this is the case, then some form of landing-stage or wharf might be expected. English Heritage's 'Richborough Environs Project' identified two rectangular enclosures or inlets about 300m to the north of the application site and suggests these "*may have been the location of a beaching or crossing point*" in the Roman period. The topography of the channel indicates that any corresponding southern landing point would likely lie within the proposed development site. Notably, archaeological investigation of the road to the north indicated that it remained in use into the late fourth century AD. The ES identifies that the channel south of Richborough island may have already silted-up and substantially narrowed by this date (ES para 6.53) and this may have affected the nature of the crossing here, meaning that a causeway or trackway might be more viable in the later-Roman period. Such a feature may not be visible on geophysical survey depending on its construction and the depth of overlying later alluvium.

The mitigation suggested in the Environmental Statement

The ES states that the proposed development site is of low archaeological potential (ES para 6.83). This is not agreed. As demonstrated above the archaeological potential of the site varies but we suggest the site has a good potential for buried archaeology on the raised spur/peninsula of higher ground within the centre of the site. That no archaeological features were shown on the geophysical survey here might be a result of masking by later alluvium.

We also suggest that the archaeological potential is significantly raised in channel edge areas, for example about the margins of the raised spur/peninsula and in the southern part of the site both east and west of Little East Street Farm. In these locations archaeology buried beneath the alluvium could include preserved organic remains, potentially including structures of Prehistoric and Romano-British date. Applying a blanket level of potential across a site as the ES attempts to do is not reasonable or realistic.

The ES acknowledges that the potential for palaeoenvironmental and organic archaeological remains to exist locally across the proposed development site (ES para 6.65). It explains that the extent, character and significance of such remains is

currently undefined because no intrusive investigation has taken place (ES para 6.75). It also recognises that where present such remains could be of high significance (ES para 6.46).

Because their survival is dependent on their waterlogged state the on-going preservation of such organic archaeological remains and palaeoenvironmental indicators is susceptible to changes to the water-environment. This is acknowledged in the ES which states that “*organic archaeological remains... are sensitive to change and require a stable and wet environment for preservation*” (ES para 6.66). The ES also notes that such remains “*could suffer total loss in the event that the introduction of the panels results in a change in these levels*”. The ES does not definitively state whether such changes will occur but notes the installation of the panels has the potential to do so. Given the extent of the array it is possible that such an impact could be widespread. The proposed landscape (willow-carr) planting also has the potential to locally impact the water-table through water-uptake.

The ES identifies that preventing changes to the levels of water is an important consideration (ES 6.75) but no mitigation measures to achieve this are put forward.

We recommend that further intrusive investigation is required to adequately understand the potential for important palaeoenvironmental and organic archaeological remains within the development site. Without such intrusive investigation the effect of the development on the site’s archaeological interest cannot be adequately defined and measures to minimise or avoid harm cannot be agreed. We therefore recommend that **further information in the form of a field evaluation is needed prior to determination of the planning application**. This is important because the ES acknowledges that these remains could be of high significance and because the proposed development could lead to their total loss (ES para 6.68).

We note that the ES identifies (para 6.83) that archaeological remains may be present whose significance is such that preservation in situ is needed (i.e. harm or loss to these assets needs to be avoided). The ES suggests that such preservation might be achieved by alternative foundation design (the use of surface mounted concrete shoes) and through the exclusion of development from parts of the site.

Areas where development might need to be excluded are not – and cannot – currently be defined. This is because no intrusive field evaluation works have been carried out. The ES suggests such field evaluation could be carried out following the granting of planning permission and be secured by condition. We cannot see how this would allow for exclusion of areas from development. The application under consideration is for full (detailed) planning permission. Therefore, if exclusion might be required as a mitigation response this needs to be determined before the design is fixed and plans approved.

We also note that the ES identifies that the removal of the arrays at the decommissioning stage might have a greater impact than their original construction. The ES identifies that removal of piles without the implementation of additional

mitigation measures will result in further harm to the archaeological resource (ES para 6.82). The ES subsequently explains that “no additional mitigation measures [during the decommissioning phase] have been identified” (ES para 6.87). Instead, it suggests that detailed design proposals for the careful removal of piles could be used to minimise impacts. However, no details of such detailed design proposals are given. We recommend that they need to be clearly set out and understood at this stage, otherwise how can they be agreed and conditioned?

Policy

The NPPF identifies that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance (NPPF 195).

NPPF 209 explains that the effect of the development on non-designated heritage assets should be taken into account when determining planning applications. In doing so the scope of any harm or loss and the significance of the asset will need to be considered. In our comments above we have advised that the archaeological potential of the site is greater than is suggested in the ES.

Footnote 73 of the NPPF states that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments should be treated as if they were designated. If the three mounds to the north of the application site identified as possible *tumuli* were confirmed as upstanding burial mounds, then these would be of a level of significance that footnote 73 would apply.

The ES has assigned a low potential to the overall site. It does acknowledge that there may be areas within the site that contain archaeological remains of high importance, but the location and extent of such remains (if present) is not fully understood.

NPPF 200 states that applicants should be required to describe the significance of any heritage assets affected by a proposal, including any contribution made by their setting. It goes on to note that the information should be sufficient to understand the impact of a proposal on the significance of affected heritage assets.

The ES itself identifies that archaeological remains may be present whose level of significance is such that they require preservation *in situ*, and this may necessitate excluding parts of the site from development. Because no intrusive field evaluation works have been carried out the location and extent of any such archaeology cannot be defined. As such the present application does not contain sufficient information to understand the significance of heritage assets present or how these might be affected by the proposals.

NPPF 200 acknowledges that for heritage assets with archaeological interest a desk-based assessment should be submitted. It notes that this may not be sufficient on its own to adequately understand the significance of any archaeological remains present or the impact that might arise from the development proposal. The NPPF therefore states that where necessary a field evaluation should be submitted. No

field evaluation has been submitted and we advise that one should be provided before the application is determined. We would be pleased to discuss the scope of such a field evaluation with the applicant.

From: [REDACTED]@stantec.com>
Sent: 25 April 2024 15:15
To: [REDACTED]
Subject: RE: Little South

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Hi [REDACTED]

Just wondering if you've heard from the LLFA?

Kind regards

[REDACTED]

[REDACTED]
Planning Associate

Direct: +[REDACTED]
Mobile: +[REDACTED]
[REDACTED]@stantec.com

Please note: I work part time. I am available all day Mondays, Tuesdays and Thursdays, and Wednesday mornings. I am not at work Wednesday afternoons or Fridays.

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Tuesday, April 23, 2024 1:22 PM
To: [REDACTED]@stantec.com>
Subject: Re: Little South

Good afternoon [REDACTED]

Thank you for advising, we look forward to meeting you there at 10:30am on 7th May.

In respect of the comments from KCC Flood and Water Management, I have sought clarification from them and will update you as soon as it is received.

If you have any questions in the meantime then please contact me.

Kind regards,

[REDACTED]



██████████
Principal Planning Officer

Dover District Council

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

Email: ██████████@DOVER.gov.uk

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

Phone: ██████████



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From: ██████████@stantec.com>

Sent: 23 April 2024 10:10

To: ██████████@DOVER.GOV.UK>

Cc: ██████████@DOVER.GOV.UK>; ██████████@DOVER.GOV.UK>

Subject: RE: Little South

Hi ██████████

██████████ from Statkraft suggests a meeting point at the end of the track circled in red below. He'll have access to the gate lock so we can drive and park up a few metres along the track that extends into the field.



We will meet you there at 10.30am on 7th May.

Kind regards

[Redacted]

[Redacted]

Planning Associate

Direct: + [Redacted]
Mobile: + [Redacted]
[Redacted]@stantec.com

Please note: I work part time. I am available all day Mondays, Tuesdays and Thursdays, and Wednesday mornings.

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Thursday, April 18, 2024 3:56 PM
To: [REDACTED]@stantec.com>
Cc: [REDACTED]@DOVER.GOV.UK>; [REDACTED]
[REDACTED]@DOVER.GOV.UK>
Subject: Re: Little South

Hi [REDACTED]

10:30am would probably work best for us. Where would you suggest we meet?

Kind regards,

[REDACTED]



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

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From: [REDACTED]@stantec.com>
Sent: 18 April 2024 15:32
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Thanks [REDACTED] – no need for the heritage officer as clearly it's mostly an HE issue. We would find it useful to meet the Senior Natural Environment Officer – shall we say that we'll meet at 11am? (or 10:30, if that's better for them?)

[REDACTED]

Planning Associate

Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Thursday, April 18, 2024 2:36 PM
To: [REDACTED]@stantec.com>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: Re: Little South

Good afternoon [REDACTED]

Myself and the Team Leader ([REDACTED]) are available on the morning of 7th. Is there a specific query your consultant has for the heritage officer as unfortunately they are not available? If it would be of assistance, the Senior Natural Environment Officer is available until 12 on the Morning of 7th May?

Kind regards,

[REDACTED]



[REDACTED]
Principal Planning Officer

Dover District Council

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

Email: [REDACTED]@DOVER.gov.uk

Web: dover.gov.uk

Phone: [REDACTED]



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From: [REDACTED]@stantec.com>
Sent: 18 April 2024 11:55
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Hi [REDACTED]

Any news from your end on 7th May – we would prefer the morning if possible.

Kind regards

[REDACTED]

[REDACTED]

Planning Associate

Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Monday, April 15, 2024 4:25 PM
To: [REDACTED]@stantec.com>
Subject: Re: Little South

Good afternoon [REDACTED]

Thanks for your emails, I'm awaiting a response from the Heritage Officer and will let you know as soon as possible.

Kind regards,

[REDACTED]



[REDACTED]
Principal Planning Officer

Dover District Council

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

Email: [REDACTED]@DOVER.gov.uk

Web: dover.gov.uk

Phone: [REDACTED]



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From: [REDACTED]@stantec.com>
Sent: 15 April 2024 16:17
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Hi again [REDACTED] – sorry for the bombardment – could we aim for 7th May? What time works best for you?

[REDACTED]

Planning Associate

Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED]
Sent: Monday, April 15, 2024 3:49 PM
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Ps currently [REDACTED] diary suggests the best options are May 7th, 9th or 10th.



Planning Associate

Direct: +[REDACTED]
Mobile: +[REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED]
Sent: Monday, April 15, 2024 3:48 PM
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Hi [REDACTED]

I am trying to find a good time for the site visit. In terms of attendees, obviously the client, Statkraft, are keen to attend, and one of us from Stantec planning will attend – but in terms of specialisms – could you let me know who would be the best to have – I am hoping to find a time that [REDACTED] (heritage) and [REDACTED] (landscape) can make it but can you confirm that would be ok from your point of view?

Kind regards

[REDACTED]

[REDACTED]

Planning Associate

Direct: +[REDACTED]
Mobile: +[REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Tuesday, April 9, 2024 2:08 PM
To: [REDACTED]@stantec.com>
Subject: Re: Little South

Good afternoon [REDACTED]

Thank you for the extension of time until the end of June, which has been accepted. Yes, I am available to meet on site to review the scheme, please let me know which dates you had in mind and I will confirm my availability over the next few weeks.

Kind regards,

[REDACTED]



[Redacted]

Senior Planning Officer

Dover District Council

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

Email: [Redacted]@DOVER.gov.uk

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

Phone: [Redacted]

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From: [Redacted]@stantec.com>
Sent: 09 April 2024 14:01
To: [Redacted]@DOVER.GOV.UK>
Cc: [Redacted]@stantec.com>
Subject: Little South

Hi [Redacted]

Please could we formally agree the extension of time, for now until the end of June 2024?

Also, we discussed potentially meeting on site to review the scheme. Are you available to make that over the next few weeks?

Kind regards

[Redacted]

[Redacted]

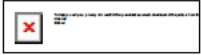
Planning Associate

Direct: + [Redacted]
Mobile: + [Redacted]
[Redacted]@stantec.com

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 30 April 2024 16:16
To: [REDACTED]
Subject: Re: Little South
Attachments: 23_01363-LOCAL_FLOOD_AUTHORITY-2502362.pdf

Dear [REDACTED]

Thank you for your email yesterday. The LLFA have emailed today to advise that their consultation response is a holding objection. Their consultation response advises they would seek that the points they raise are looked into further and questions whether any of the measures suggested can be incorporated into the design before the application is decided along with a specific condition around future maintenance. If your consultants have any specific questions, the LLFA have advised they can be contacted at SUDS@kent.gov.uk

I hope this is of assistance, however please contact me if you have any questions.

Kind regards,
[REDACTED]



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



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From: [REDACTED]@stantec.com>
Sent: 29 April 2024 09:22
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Dear [REDACTED]

Any news from the LLFA? The flood/drainage consultants are keen to know what work they need to do.

Kind regards

[REDACTED]

[REDACTED]
Planning Associate

Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Tuesday, April 23, 2024 1:22 PM
To: [REDACTED]@stantec.com>
Subject: Re: Little South

Good afternoon [REDACTED]

Thank you for advising, we look forward to meeting you there at 10:30am on 7th May.

In respect of the comments from KCC Flood and Water Management, I have sought clarification from them and will update you as soon as it is received.

If you have any questions in the meantime then please contact me.

Kind regards,
[REDACTED]



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



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From: [REDACTED]@stantec.com>
Sent: 23 April 2024 10:10
To: [REDACTED]@DOVER.GOV.UK>

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

Subject: RE: Little South

Hi [REDACTED]

[REDACTED] from Statkraft suggests a meeting point at the end of the track circled in red below. He'll have access to the gate lock so we can drive and park up a few metres along the track that extends into the field.



We will meet you there at 10.30am on 7th May.

Kind regards

[REDACTED]

[REDACTED]

Planning Associate

Direct: + [REDACTED]

Mobile: + [REDACTED]

[REDACTED]@stantec.com

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Thursday, April 18, 2024 3:56 PM
To: [REDACTED]@stantec.com>
Cc: [REDACTED]@DOVER.GOV.UK>; [REDACTED]
[REDACTED]@DOVER.GOV.UK>
Subject: Re: Little South

Hi [REDACTED]

10:30am would probably work best for us. Where would you suggest we meet?

Kind regards,
[REDACTED]



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



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From: [REDACTED]@stantec.com>
Sent: 18 April 2024 15:32
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Thanks [REDACTED] – no need for the heritage officer as clearly it's mostly an HE issue. We would find it useful to meet the Senior Natural Environment Officer – shall we say that we'll meet at 11am? (or 10:30, if that's better for them?)

[REDACTED]
Planning Associate
Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED] <[REDACTED]@DOVER.GOV.UK>
Sent: Thursday, April 18, 2024 2:36 PM
To: [REDACTED] <[REDACTED]@stantec.com>
Cc: [REDACTED] <[REDACTED]@DOVER.GOV.UK>
Subject: Re: Little South

Good afternoon [REDACTED]

Myself and the Team Leader ([REDACTED]) are available on the morning of 7th. Is there a specific query your consultant has for the heritage officer as unfortunately they are not available? If it would be of assistance, the Senior Natural Environment Officer is available until 12 on the Morning of 7th May?

Kind regards,

[REDACTED]



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



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From: [REDACTED] <[REDACTED]@stantec.com>
Sent: 18 April 2024 11:55
To: [REDACTED] <[REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Hi [REDACTED]

Any news from your end on 7th May – we would prefer the morning if possible.

Kind regards

[REDACTED]

[REDACTED]
Planning Associate

Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Monday, April 15, 2024 4:25 PM
To: [REDACTED]@stantec.com>
Subject: Re: Little South

Good afternoon [REDACTED]

Thanks for your emails, I'm awaiting a response from the Heritage Officer and will let you know as soon as possible.

Kind regards,
[REDACTED]



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



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From: [REDACTED]@stantec.com>
Sent: 15 April 2024 16:17
To: [REDACTED]@DOVER.GOV.UK>
Subject: RE: Little South

Hi again [REDACTED] – sorry for the bombardment – could we aim for 7th May? What time works best for you?

[REDACTED]
Planning Associate
Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED]
Sent: Monday, April 15, 2024 3:49 PM
To: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: RE: Little South

Ps currently [REDACTED] diary suggests the best options are May 7th, 9th or 10th.

[REDACTED]
Planning Associate
Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED]
Sent: Monday, April 15, 2024 3:48 PM
To: [REDACTED] [@DOVER.GOV.UK](mailto:[REDACTED]@DOVER.GOV.UK)>
Subject: RE: Little South

Hi [REDACTED]

I am trying to find a good time for the site visit. In terms of attendees, obviously the client, Statkraft, are keen to attend, and one of us from Stantec planning will attend – but in terms of specialisms – could you let me know who would be the best to have – I am hoping to find a time that [REDACTED] (heritage) and [REDACTED] (landscape) can make it but can you confirm that would be ok from your point of view?

Kind regards

[REDACTED]
[REDACTED]
Planning Associate

Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

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From: [REDACTED]@DOVER.GOV.UK>
Sent: Tuesday, April 9, 2024 2:08 PM
To: [REDACTED]@stantec.com>
Subject: Re: Little South

Good afternoon [REDACTED]

Thank you for the extension of time until the end of June, which has been accepted. Yes, I am available to meet on site to review the scheme, please let me know which dates you had in mind and I will confirm my availability over the next few weeks.

Kind regards,
[REDACTED]



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



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From: [REDACTED]@stantec.com>
Sent: 09 April 2024 14:01
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@stantec.com>
Subject: Little South

Hi [REDACTED]

Please could we formally agree the extension of time, for now until the end of June 2024?

Also, we discussed potentially meeting on site to review the scheme. Are you available to make that over the next few weeks?

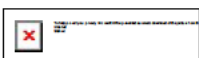
Kind regards

██████████
████████████████████
Planning Associate

Direct: +██████████
Mobile: +██████████
██████████@stantec.com

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Dover District Council
White Cliffs Business Park
Dover
Kent
CT16 3PJ

Flood and Water Management

Invicta House
Maidstone
Kent
ME14 1XX

Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: DDC/2024/099156
Date: 26 February 2024

Application No: 23/01363

Location: Goshall Valley, East Street, Ash,

Proposal: Construction of a solar farm with associated access and infrastructure

Thank you for your consultation on the above referenced planning application.

Kent County Council as Lead Local Flood Authority have the following comments:

We have reviewed submitted information and understand it is proposed to attenuate flows via permeable paving and convey further flows from the HV compound hardstanding to an infiltration basin with an overflow discharges to an ordinary watercourse at a maximum allowable rate of 2 l/s. More flows will be conveyed from transformer stations to infiltration trenches and from access roads to infiltration blankets. A conservative infiltration rate of 1×10^{-6} m/s has been used for hydraulic calculations. This will manage flows from the site up to a 1 in 100 year +45% climate change event.

We note that there are a series of River Stour Internal Drainage Board maintained ditches where levels are managed via pumping and that they have been consulted. Also the southern half of the site lies in Flood Zone 2 and the Environment Agency has been consulted.

We would emphasize that additional ground investigation will be required to support the use of infiltration. It is recommended that soakage tests be compliant with BRE 365, notably the requirement to fill the test pit several times. Detailed design should utilise a modified infiltrate rate and demonstrate that any soakaway will have an appropriate half drain time.

As of the 10th of May 2022, the Environment Agency's climate change allowances have been updated. As part of this update, revisions have been made to the 'Peak Rainfall Intensity Allowances' that are used in applying climate change percentages to new drainage schemes.

The LLFA would now seek the 'upper end' allowance is designed for both the 30 (3.3%) and 100 (1%) year storm scenarios. The latest information on the allowances and map can be found at the following link:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

We recommend that full hydraulic calculations are included within the submission to review the peak events in the 1 in 2 year, 1 in 30 year +CC and 1 in 100 year +CC events, only the 1 in 100 year (+CC) results have been supplied.

This analysis must determine if the impacts of the greater allowance are significant and exacerbate any flood risk. The design may need to be minimally modified but may also need additional mitigation allowances, for example attenuation features or provision of exceedance routes. This will tie into existing designing for exceedance principles.

The flow rate of 2 l/s may be the maximum allowable rate but the QBAR greenfield rate is recommended if this can be achieved.

It is understood from the report that the existing surface water regime is not to change on site following the installation of the solar panels as there is little to no increase in impermeable area. The report indicates that runoff from the solar panels will fall and infiltrate into the ground below, with any overland flows are expected to follow the existing lay of the land.

The LLFA expects that any rainfall upon solar arrays are generally shed/ fall between the rows onto the ground. Whilst we have no objections to this, the possible concentration of water flow off the arrays can create flows that can erode the soil and allow a greater volume of overland flow to enter watercourses or flow to adjacent areas at a greater rate than would otherwise occur in greenfield conditions. In our view, it is essential that runoff is not increased to safeguard neighbouring areas of land.

To minimise any potential risk of overland flows, we would seek for additional measures of runoff protection are examined further. Some of these measures may include:

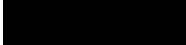
- Incorporating bunds, filter drains or other measures to interrupt flows of water between rows of solar arrays to disperse water flows over the surface and promote infiltration into the soils.
- Incorporating wide grassed filter strips at the downstream side of blocks of solar arrays and maintaining the grass at a long length to interrupt water flows and promote infiltration.
- Incorporating gravel filled filter drains or swales at the downstream side of blocks of solar arrays to help infiltrate run-off (where ground conditions allow).
- Vegetated strips through a combination of wildflowers and or grass along with buffer strips around the perimeter of the fields buffer strips will be left uncut to capture any runoff leaving the site.

Whilst such measures detailed above will reduce impacts, It is essential that the vegetated buffer strips and planting around the panels are maintained throughout the lifetime of its operation. Future removal/ lack of maintenance may result in increased runoff/ erosion. As a result, a suitable maintenance regime is required to ensure erosion and runoff are controlled. It is recommended that the LPA considers agreements with the land owner to ensure the vegetation remains in place for the duration of the sites use. We have not recommended a specific condition for the landscape provision as we think the LPA are better placed to provide a recommendation for ensuring the implementation and maintenance of the landscape buffers.

The LLFA would seek that these points are looked into further and whether any of these measures can be incorporated into the design before the application is decided along with a specific condition around future maintenance.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

A black rectangular box redacting the signature of the Flood Risk Officer.

Flood Risk Officer
Flood and Water Management

[REDACTED]

From: [REDACTED]@stantec.com>
Sent: 02 May 2024 11:45
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Meeting Minutes
Attachments: 333100227 A7 Little South Dover Council Meeting - Minutes 02042024.docx

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Dear [REDACTED]

I sent you the meeting minutes for our meeting at the beginning of April a couple of weeks back.
Have you had a chance to review them and let us know whether you feel they're accurate?

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]
Planning Associate

Direct: +[REDACTED]
Mobile: +[REDACTED]
[REDACTED]@stantec.com

Please note: I work part time. I am available all day Mondays, Tuesdays and Thursdays, and Wednesday mornings. I am not at work Wednesday afternoons or Fridays.

Stantec
3rd Floor, 50-60 Station Road
Cambridge CB1 2JH



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From: [REDACTED]
Sent: Thursday, April 18, 2024 1:31 PM
To: [REDACTED]@DOVER.GOV.UK>
Subject: Meeting Minutes

Dear [REDACTED]

I attach the minutes from our meeting earlier in April. Please could you review and let me know if you are happy to agree them?

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]
Planning Associate

Direct: + [REDACTED]
Mobile: + [REDACTED]
[REDACTED]@stantec.com

Please note: I work part time. I am available all day Mondays, Tuesdays and Thursdays, and Wednesday mornings. I am not at work Wednesday afternoons or Fridays.

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Cambridge CB1 2JH



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Little South Solar Farm - Meeting with Dover District Council

Date/Time: 2 April 2024 /
 Location: MS Teams
 Attendees: [REDACTED] – DDC
 [REDACTED] – DDC
 [REDACTED] – Stantec
 [REDACTED] – Stantec
 [REDACTED] – Stantec
 [REDACTED] – Statkraft
 [REDACTED] – Statkraft

Apologies: [REDACTED] – Statkraft

Item	Action
<p>Introductions</p> <p>[REDACTED] has had offline discussions with [REDACTED] and has an understanding of the site and relevant issues .</p>	
<p>Statutory Consultees</p> <p>[REDACTED] – Most consultee responses have been external. A document of all the responses received in response to the application to date will be prepared by the council and issued to the Applicant.</p> <p>[REDACTED] [REDACTED] – The key consultation responses were discussed:</p> <p>KCC Highways – Pell Frischmann have been in contact and a revised plan is being prepared, though this has not been seen yet. KCC stated that the access is a single track with no clear line of sight, the proposal that Pell Frischmann have come up with involves traffic management to deal with this.</p> <p>Ash Parish Council – stated that BMV agricultural land is being used however a full ALC report has been submitted stating that it is not on BMV land.</p> <p>Heritage</p> <p>[REDACTED] - We are currently in the process of preparing for trial trenching, this is a priority before crops get too high.</p> <p>The position from Historic England is very firm and [REDACTED] [REDACTED] made it clear, at the virtual meeting held with HE on 21st March 2024, that they were not open to discussion on their conclusions and recommendations, however they are open to looking at any new information.</p>	<p>[REDACTED] to send over document of combined consultee responses</p> <p>Stantec to prepare and submit a formal ES addendum</p>

Item	Action
<p>We have provided a response regarding the proximity of the site to the SAM, and will respond further specifically to Historic England's Response.</p> <p>It would be useful to understand from the Council what they would advise is the appropriate way to respond to Historic England comments.</p> <p>█ – Suggest that we go back to Historic England directly in the first instance to keep the ball rolling, even before any further archaeological work takes place.</p> <p>█ – HE will be contacted before the further archaeological work takes place.</p> <p>█ – We are preparing a response laying out the benefits of the scheme to aid an assessment of planning balance. This emphasises the ecological benefits, and other benefits.</p> <p>█ – in terms of Ecology, we worked to make the BNG proposals compatible with the LWS – we chose a bespoke approach. Whilst an approach purely focused on achieving maximum BNG could have been taken this would not have aligned with the objective of the LWS. The proposed landscape planting was considered better in terms of the LWS.</p> <p>█ – At the moment we are at too early a stage to review planning balance. The response from Historic England carries substantial weight in the planning balance and the economic and sustainable energy benefits will have to outweigh Historic England's objection. Suggest a report is prepared which lays out:</p> <ul style="list-style-type: none"> • Employment numbers • Sustainable energy benefits • Number of homes energy will power • Employment during construction and lifetime of the panels • Agricultural benefits • What it will look like post 40 years • Ecological benefits <p>All these strands should be drawn together to reach the overall positive planning balance.</p> <p>A planning balance note should be sent to the Council rather than Historic England. Historic England will be looking at things from a binary perspective, whereas the Council will take a more rounded view. It would be helpful to receive the new documents as a single package of additional information/clarification so that it is subject to a single consultation.</p> <p>█ – we'll engage with HE, submit a formal addendum package which will include a public benefits statement. This addendum can be re-consulted on.</p>	
<p>Further discussion</p>	<p>█ to send over Senior Natural</p>

Item	Action
<p>█ – The conservation team haven't raised any concerns with the proposals but the additional archaeological studies requested by the county archaeologist should provide the necessary clarification .</p> <p>█ – No more consultees are expected to respond</p> <p>█ – Has the Council received consultee comments on Ecology and BNG?</p> <p>█ – The Ecology and BNG information has been reviewed with comments, it will be sent across soon.</p> <p>█ – Within the Green Infrastructure Zone, there will be provision for access for mini buses for educational purposes (decided a car park would not be suitable) as well as bird watching areas and paths. Who would be the best person to talk about this?</p> <p>█ – will provide the details of the best person to advise on how public access can be managed, however agree that the car park is not the right approach. Would like to see more details of this in the planning balance/benefits document.</p>	<p>Environment officer comments</p>
<p>PPA</p> <p>█ – The Council originally suggested that a PPA may be appropriate in this case. We would still be open to a PPA</p> <p>█ – The Council are thinking about what everyone would want to get out of it, particularly due to where we are now being that the issues are predominantly heritage. Initially it was considered that an external landscape consultant could be beneficial, however the issues are more heritage based. Currently at a point where the gains of the PPA would be negligible, struggling to see what the value would be.</p> <p>█ – Currently don't have a landscape consultant in the Council. However, the Council Planning Officers are capable of making a judgement on landscape and visual impact.</p> <p>█ – The council feels that a lot of the landscape issues actually relate to heritage, so it's not so much of a landscape issue. If it was just about trying to balance landscape impacts vs public benefits, it would be a very easy decision – heritage is afforded more significance than landscape issues.</p> <p>█ – We previously engaged with Historic England in relation to this aspect, and they agreed on the key views.</p> <p>█ – The Council confirm that they are happy with the key views and no additional viewpoints are necessary.</p>	
<p>Extension of Time</p> <p>█ – Fine to have an extension of time</p> <p>█ – Should we wait for the trial trenching to be completed? Could have most of the things set out ready for the end of the month, but archaeology would take longer. Could extend to June?</p>	<p>Stantec to keep █ updated</p>

Item	Action
<p>■ – June would be fine.</p> <p>■ – Will keep ■ in the loop with what's happening.</p>	
<p>Next Steps</p> <p>■ – Propose that another meeting is held in a month and the minutes of this meeting will be circulated.</p> <p>■ – Agreed.</p>	Stantec to circulate minutes

From: [REDACTED]@stantec.com>
Sent: 24 May 2024 09:58
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Little South Solar Farm

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Hi [REDACTED]

Thank you for confirming.

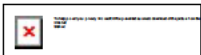
Kind regards,

[REDACTED]

[REDACTED]
Graduate Planner

Direct: + [REDACTED]
[REDACTED]@stantec.com

Stantec
7 Soho Square
London W1D 3QB



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From: [REDACTED]@DOVER.GOV.UK>
Sent: Friday, May 24, 2024 9:51 AM
To: [REDACTED]@stantec.com>
Cc: [REDACTED]@stantec.com>
Subject: Re: Little South Solar Farm

Good morning [REDACTED]

Thank you for your email. Yes, this was discussed at the site visit earlier this month. The extension of time until the end of October is accepted and has been recorded on our systems.

If you have any questions in the meantime then please contact me.

Kind regards,

[REDACTED]



[REDACTED]
Principal Planning Officer

Dover District Council

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

Email: [REDACTED]@DOVER.gov.uk

Web: dover.gov.uk

Phone: [REDACTED]



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From: [REDACTED]@stantec.com>
Sent: 24 May 2024 09:26
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@stantec.com>
Subject: RE: Little South Solar Farm

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Hi [REDACTED]

I hope you're well.

We have spoken to the client who has requested that the extension of time is extended till the end of October instead of August. This is to take into consideration the archaeological field evaluation which will likely be submitted in September/October. [REDACTED] has said he discussed this with you during the site visit. Please can you confirm if this would be ok?

Many thanks,

[REDACTED]

[REDACTED]

Graduate Planner

Direct: + [REDACTED]
[REDACTED]@stantec.com

Stantec
7 Soho Square
London W1D 3QB



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From: [REDACTED]@DOVER.GOV.UK>
Sent: Thursday, May 23, 2024 5:04 PM
To: [REDACTED]@stantec.com>
Subject: Re: Little South Solar Farm

Dear [REDACTED]

Thank you for the up-date. I note we have an extension of time agreed until the end of June, however please could we extend this to the end of August to cover the submission of further information at the end of the summer?

If you have any questions in the meantime then please contact me. I look forward to hearing from you in due course.

Kind regards,

[REDACTED]



██████████
Principal Planning Officer

Dover District Council

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

Email: ██████████@DOVER.gov.uk

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

Phone: ██████████



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From: ██████████@stantec.com>
Sent: 23 May 2024 16:42
To: ██████████@DOVER.GOV.UK>
Cc: ██████████@stantec.com>; ██████████@stantec.com>
Subject: Little South Solar Farm

Dear ██████████

I hope you're well.

I just wanted to touch base to let you know that we are working on responses to all the consultees. We are awaiting the results of various archaeological investigations, and these are being agreed with Kent County Council.

The plan is to submit everything together once we have a response to all aspects of the scheme, and we are intending to engage with e.g. the Senior Natural Environment Officer and the County Archaeology team as well as other consultees where necessary to ensure that our responses are appropriate and deal with the issues remaining. We expect to be in a position to provide the full addendum document at the end of the summer.

Please do let me know if you have any questions, we will be in touch in due course.

Kind regards

[Redacted]

[Redacted]

Planning Associate

Direct: + [Redacted]
Mobile: + [Redacted]
[Redacted]@stantec.com

Please note: I work part time. I am available all day Mondays, Tuesdays and Thursdays, and Wednesday mornings.

I am not at work Wednesday afternoons or Fridays.

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From: [REDACTED]@DOVER.GOV.UK>
Sent: 31 May 2024 12:32
To: [REDACTED]
Subject: FW: Little South Solar - ecology matters

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Hi [REDACTED]

I am not sure what to do with this – I am happy to talk to them, but I think they should be the ones coming with any questions for me?!

What do you think?
[REDACTED]



[REDACTED]
Senior Natural Environment Officer
Dover District Council
Council Offices, White Cliffs Business Park, Whitfield,
Dover CT16 3PJ

Email: [REDACTED]@dover.gov.uk
Phone: [REDACTED]
Web: dover.gov.uk

My working days are Tuesdays, Wednesdays, Thursdays and Fridays.

From: [REDACTED]@bsg-ecology.com>
Sent: Friday, May 24, 2024 3:58 PM
To: [REDACTED]@DOVER.GOV.UK>
Cc: [REDACTED]@bsg-ecology.com>
Subject: Little South Solar - ecology matters

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Dear [REDACTED]

I hope you are well. We are the ecologists working on behalf of Stantec and Statkraft on the proposed solar scheme at Little South Solar. I understand that there was a site meeting recently to discuss some of the matters raised during the consultation period so far.

Thanks for the comments you provided with regard to ecology. We have read these carefully and we are putting together a letter which hopefully addresses some of the concerns raised (as well some of the matters raised by other consultees). In the meantime I thought it might be helpful to get in touch to hopefully discuss any of the matters in more detail and understand if there is any other input that might be needed from us.

I am on holiday until 12th June but I have cc'd in my colleague [REDACTED] who is around in the meantime. Look forward to catching up on this.

Kind regards,
[REDACTED]

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From: [redacted]@headlandarchaeology.com>
Sent: 16 August 2024 09:16
To: [redacted]@dover.gov.uk
Cc: [redacted]
Subject: RE: Geophysics report and next phases - Little South Solar scheme (DOV/23/01363).

You don't often get email from [redacted]@headlandarchaeology.com. [Learn why this is important](#)

Hi [redacted]

Thanks for letting me know. I have forwarded the invite to [redacted]

@ [redacted]@dover.gov.uk hopefully received ok?

Kind regards,

[redacted]



[redacted] Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com

Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire | MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

Headland Archaeology Yorkshire & North
Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

Headland Archaeology North West
RSK Fourways House | 57 Hilton St
Manchester | M1 2EJ
t 0161 236 2757

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13 Jane
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From: [redacted]@DOVER.GOV.UK>
Sent: Thursday, August 15, 2024 1:48 PM
To: [redacted]@headlandarchaeology.com>
Cc: [redacted]@stantec.com>
Subject: Re: Geophysics report and next phases - Little South Solar scheme (DOV/23/01363).

Dear [redacted]

Thank you for the meeting invite, however unfortunately I am unable to attend on Monday as I am at another meeting. I have asked the Team Leader to attend in my absence. Please could you invite [redacted]@dover.gov.uk

Kind regards,

[redacted]



Principal Planning Officer

Dover District Council

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

Email: [redacted]@DOVER.gov.uk

Web: dover.gov.uk

Phone: [redacted]



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From: [redacted]@headlandarchaeology.com>

Sent: 14 August 2024 10:48

To: [redacted]@HistoricEngland.org.uk>; [redacted]@kent.gov.uk

[redacted]@kent.gov.uk>; [redacted]@headlandarchaeology.com>; [redacted]

[redacted]@headlandarchaeology.com>

Cc: [redacted]@statkraft.com [redacted]@statkraft.com>; [redacted]
[redacted]@DOVER.GOV.UK>; [redacted]@stantec.com [redacted]@stantec.com>;

[redacted]@statkraft.com>

Subject: Geophysics report and next phases - Little South Solar scheme (DOV/23/01363).

When: 19 August 2024 11:00-12:00.

Where: Microsoft Teams Meeting

You don't often get email from [redacted]@headlandarchaeology.com. [Learn why this is important](#)

Meeting to share the results of the EM/ERT survey and discuss programme for the following phases of work.

To include.

Stantec: [redacted]

LPA case officer: [redacted]

Statkraft engineer: [redacted]

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting ID: [REDACTED]

Passcode: [REDACTED]

For organizers: [Meeting options](#)

From: [REDACTED] [@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>
Sent: Tuesday, August 13, 2024 10:56 AM
To: [REDACTED] [@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>; [REDACTED] [@kent.gov.uk](mailto:[REDACTED]@kent.gov.uk)
Subject: RE: Geophysics report and next phases - Little South Solar scheme (DOV/23/01363).

Hi [REDACTED]

I'm free on the 19th from 10:30-14:30.

Thank,

[REDACTED]



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Sent: Monday, August 12, 2024 4:38 PM
To: [REDACTED] [@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>; [REDACTED] [@kent.gov.uk](mailto:[REDACTED]@kent.gov.uk)
Subject: Geophysics report and next phases - Little South Solar scheme (DOV/23/01363).

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Dear both

We have had the EM/ERT survey results back for this site and would like to discuss the findings and share with you our plan for the boreholes and trenching.

Are you possibly available for a catch-up meeting next **Monday 19th August**?

Kind regards,



 Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com

Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire | MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

Headland Archaeology Yorkshire & North
Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

Headland Archaeology North West
RSK Fourways House | 57 Hilton St
Manchester | M1 2EJ
t 0161 236 2757

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Sent: Friday, June 28, 2024 4:07 PM
To:  <[@kent.gov.uk](mailto:kent.gov.uk)>
Cc:  <[@HistoricEngland.org.uk](mailto:HistoricEngland.org.uk)>
Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

Hi [redacted] and [redacted]

I was hoping to arrange a meeting with you to discuss the results of the EM survey and the placement of ERT transects.

Currently we have the following schedule:

- w/c Mon 24th June – EM surveys (5-10 days)
- w/c 8th July – EM reporting and agreement of ERT transects
- w/c 15th July – ERT survey (5 days)

[redacted] who is conducting the survey has suggested a meeting on the **12th July** to go through the EM data and ERT proposals, if this day would work at all for you both?

If so I will send a teams invite out.

Many thanks,

[redacted]



[redacted] Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com



Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire I MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

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Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

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Sent: Wednesday, June 19, 2024 12:24 PM
To: [REDACTED] <[\[REDACTED\]@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>; [REDACTED] <[\[REDACTED\]@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>; [REDACTED] <[\[REDACTED\]@kent.gov.uk](mailto:[REDACTED]@kent.gov.uk)>
Cc: [REDACTED] <[\[REDACTED\]@statkraft.com](mailto:[REDACTED]@statkraft.com)>
Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

Many thanks [REDACTED]

I'd be happy to be involved in placing the ERT transects once the EM data has been interpreted.

[REDACTED]



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Sent: Wednesday, June 19, 2024 12:05 PM
To: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>; [REDACTED] <[\[REDACTED\]@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>; [REDACTED] <[\[REDACTED\]@kent.gov.uk](mailto:[REDACTED]@kent.gov.uk)>
Cc: [REDACTED] <[\[REDACTED\]@statkraft.com](mailto:[REDACTED]@statkraft.com)>
Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

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Dear [REDACTED]

Many thanks for your review and input.

The landowner has confirmed that the site has been planted with field beans which could be 60cm-80cm by this time of year, depending on the weather. As the EM equipment is held about 1m above the ground this should be ok.

I believe a field visit was taking place yesterday to examine access and site conditions. I will liaise with [redacted] and the surveyors to ensure that field conditions were suitable and that the surveys will be going ahead as scheduled, and feedback as appropriate.

Kind regards,

[redacted]



[redacted] Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com



Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire | MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

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Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

Headland Archaeology North West
RSK Fourways House | 57 Hilton St
Manchester | M1 2EJ
t 0161 236 2757

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13 Jane St
Edinburgh | EH1 1JN
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To: [redacted] <[redacted]@headlandarchaeology.com>; [redacted] <[redacted]@headlandarchaeology.com>; [redacted] <[redacted]@kent.gov.uk>
Cc: [redacted] <[redacted]@statkraft.com>
Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

Dear [redacted]

Thank you for sharing the methodology, which seems fine to me.

My only concern is that vegetation should not be above knee-height for EM surveys. Crops are reaching their maximum height at this time of year. Can you reassure us that you have the required permissions for the outlined area (Fig.1) and that field conditions are appropriate?

Many thanks,

[Redacted]

[Redacted]

Science Advisor

South East Region

Investigative Science Team | National Specialist Services Department

Historic England

[Redacted]



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From: [Redacted] <[\[Redacted\]@headlandarchaeology.com](mailto:[Redacted]@headlandarchaeology.com)>

Sent: Friday, June 14, 2024 11:20 AM

To: [Redacted] <[\[Redacted\]@headlandarchaeology.com](mailto:[Redacted]@headlandarchaeology.com)>; [Redacted]

[Redacted] <[\[Redacted\]@HistoricEngland.org.uk](mailto:[Redacted]@HistoricEngland.org.uk)>; [Redacted] <[\[Redacted\]@kent.gov.uk](mailto:[Redacted]@kent.gov.uk)>

Cc: [Redacted] <[\[Redacted\]@statkraft.com](mailto:[Redacted]@statkraft.com)>

Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

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Dear [Redacted] and [Redacted]

Further to your meeting on 24th May with [REDACTED] we have now finalised our approach for the initial stage of the archaeological investigations at Little South Solar, East Steet, Ash (DOV/23/01363). Attached is a methodology for the proposed EM and ERT surveys, with costs removed. The work is currently booked in for w/c 24th June.

We would welcome your input on the placement of the ERT transects once we have the EM data back. If you are happy to be involved in a meeting I can arrange one down the line once we know more.

Kind regards,

[REDACTED]



[REDACTED] Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com



Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire | MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

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Units 23-25 | Acorn Business Centre | Balme Road
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Sent: Monday, May 20, 2024 4:14 PM
To: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>; [REDACTED] <[\[REDACTED\]@kent.gov.uk](mailto:[REDACTED]@kent.gov.uk)>
Cc: [REDACTED] <[\[REDACTED\]@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>; [REDACTED] <[\[REDACTED\]@statkraft.com](mailto:[REDACTED]@statkraft.com)>
Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

Hi [REDACTED] ([REDACTED]) and [REDACTED]

Further to our recent meeting and correspondence, we have just had a catch up with our Statkraft client ([REDACTED] cc'd in here).

[REDACTED] thoroughly understands the need for an iterative approach to establishing the heritage significance of any archaeological remains at the Little South Solar site (and how they might be impacted by the scheme).

To this end would you (and [REDACTED] be available for a brief discussion to select the most appropriate geophysical technique(s) to employ next. We have sought costs from geophysicists for:

- EM followed by ERT transects, and
- TEM alone

The costs are pretty much the same for the respective approaches. TEM is marginally more expensive but has the advantage of being a single survey and won't require the multiple rounds of arranging access, survey (and disruption for landowners) and reporting.

We are assuming that the results of the geophysical survey will be used to inform selection of borehole transect(s) for modelling of the geoarchaeology of the site and establishing paleoenvironmental potential. With this then informing where to place trial trenches (as well as the projected line of the Roman road).

I will send a Teams invite. Please feel free to suggest an alternative date/time if you prefer.

Thanks for your help with the scheme,

Best wishes,

[REDACTED]



[REDACTED] Director of Consultancy
BA MA PhD MCIfA

Headland Archaeology North West
172 Chester Road | Helsby | WA6 0AR
t [REDACTED] | m [REDACTED]

www.headlandarchaeology.com

Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire I MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
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Cc: [REDACTED] <[\[REDACTED\]@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>
Subject: RE: summary of discussion on archaeological aspects of Little South Solar scheme

Dear [REDACTED]

That summary seems fair to me (without commenting on points specifically relating to [REDACTED] position).

Just a typo: my name is spelt [REDACTED] (not obvious from my email address).

Many Thanks,

[REDACTED]

[REDACTED]

Science Advisor

South East Region

Investigative Science Team | National Specialist Services Department

Historic England

[REDACTED]

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Subject: summary of discussion on archaeological aspects of Little South Solar scheme

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Dear [REDACTED] and [REDACTED] ([REDACTED])

Many thanks for your time this morning discussing the archaeological aspects of the Little South Solar scheme. It was really helpful to develop a better understanding of your expectations for information required to determine the planning application with respect to buried archaeology at the site.

I thought it helpful to send a brief email outlining the key points covered during our discussion and what the next steps might be. Please feel free to proffer comments or suggest adjustments. I'd like to use this to inform a briefing to our client at Statkraft.

Present: [REDACTED] (Historic England Regional Science Advisor); [REDACTED] (Kent CC archaeological advisor); [REDACTED] and [REDACTED] (Headland Archaeology Ltd consultancy team).

- The site is located on reclaimed ground within the former Wantsum Channel close to the Richborough Roman fort and amphitheatre
- There is a possible Roman road passing through the site towards Roman Richborough
- There may have been an earlier ferry crossing during the Roman period (with associated structures/waterfront facilities)
- LiDAR data suggest that there is a ridge of high ground projecting into the channel which may have carried the road (possible a causeway or a natural feature)
- The shape of the channel, its edges and islands within it are currently unknown

- The periphery and islands within the channel are likely to have been the focus of human activity during the prehistoric periods
- The location of areas of greatest archaeological potential within the site are currently unknown (apart from the projected road and ridge)
- The earlier magnetometry survey did not identify anomalies of likely pre-Medieval date since the near surface deposits consist of boundaries and drain of late Medieval /post medieval date associated with reclamation of the land
- Archaeologically sensitive deposits and structures (if present) are likely to be located at unknown and variable depth within the development area
- There are likely to be deposits within the Wantsum Channel which contain palaeoenvironmental information on landuse and reclamation from the prehistoric periods through to the post-medieval period. The location and depth of these deposits is currently unknown
- Geoarchaeological modelling of the site will inform an understanding of the location and archaeological significance of remains
- Solar development is less damaging to archaeology than many forms of development with a potential to minimise impacts through adjustment to layout or design.
- Taking an area of arable land out of agricultural use for solar development for 30+ years will likely have a net benefit to any near-surface archaeological deposits
- Foundations from solar development (i.e. piles) can disrupt the moisture/oxygen levels in buried archaeological deposits leading to irreversible damage

At present:

- [REDACTED] does not feel like he has enough information on the likely and potential archaeological remains at the site to determine the application.
- [REDACTED] previously offered pre-application advice on the need to select the most appropriate geophysical and evaluation techniques for understanding this site- this was not followed up and a magnetometry geophysical survey was undertaken which doesn't give all the information required
- A single ERT and borehole transect across the site will not give [REDACTED] (or [REDACTED] confidence that the archaeological significance of the site will be well-understood
- [REDACTED] would prefer an iterative approach to understanding the archaeology of the site with either:
 - an initial EM survey to map the underground topography, followed by targeted ERT transects, then targeted boreholes for geoarchaeological/palaeoenvironmental investigation and subsequent targeted trial trenching.
 - Use of a combined technique (TEM) then targeted boreholes for geoarchaeological/palaeoenvironmental investigation and subsequent targeted trial trenching
- [REDACTED] is uncomfortable with the use of a mitigation strategy to defer extensive archaeological investigation to a post-determination phase. He isn't convinced that measures such as redesign of the layout to secure preservation in situ of archaeological remains of national importance (for example securing a no-dig, no development of a corridor over a Roman road) can be secured by condition, since it would make the consented scheme unbuildable.

Actions:

- Confirm the substance of the discussions ([REDACTED] and [REDACTED] – this email)
- Brief Statkraft on what is currently required to determine the application with respect to buried archaeology (AT/BR)
- Discuss with Statkraft's planning consultant to see if there might be mechanisms for securing design flexibility into the post-consent phase to give Ben confidence that a mitigation strategy could work for this

project (and thereby defer some archaeological costs into the stage where the scheme is viable and the expense isn't incurred whilst project is still at risk). (■■/■■ Statkraft)

- Resume discussions with ■■ and ■■ about the scope of the investigations required to determine the application and what mitigation measures might be considered acceptable (■■/■■/Statkraft).

Hope this makes sense. Can you let us know soon if you are happy with the above or would like adjustments? I can then use it to brief Statkraft.

Cheers,

■■■



■■■ Director of Consultancy
BA MA PhD MCIfA

Headland Archaeology North West
172 Chester Road | Helsby | WA6 0AR
t ■■■ | m ■■■

www.headlandarchaeology.com

Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

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t 0127 493 8019

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From: [redacted]@statkraft.com>
Sent: 10 September 2024 09:20
To: [redacted]@kent.gov.uk; [redacted]@HistoricEngland.org.uk
Cc: [redacted]; [redacted]
[redacted]@dover.gov.uk
Subject: RE: WSI for trial trenching Little South Solar (DOV/23/01363)
Importance: High

You don't often get email from [redacted]@statkraft.com. [Learn why this is important](#)

Following up on [redacted] email below to highlight that the WSI is consistent with what was agreed with you at the meeting on the 19th August, so should hopefully be straightforward.

We would be grateful if you could advise as soon as you are able to.

Copying in the LPA case officer so that they are in the loop.

Many thanks in advance.

[redacted]
Senior Project Manager, European Wind and Solar

-- [redacted]@statkraft.com
-- Mobile +[redacted]

Statkraft UK LTD (Reg. No. 05742795)
22 Bishopsgate, London, EC2N 4BQ (Reg. Address)
The Garment Factory, 10 Montrose Street, Glasgow G1 1RE
www.statkraft.co.uk



From: [redacted]@headlandarchaeology.com>
Sent: Tuesday, September 10, 2024 8:47 AM
To: [redacted]@kent.gov.uk; [redacted]@HistoricEngland.org.uk
Cc: [redacted]@statkraft.com>; [redacted]@statkraft.com>; [redacted]
[redacted]@formationarchaeology.com>; [redacted]@headlandarchaeology.com>
Subject: RE: WSI for trial trenching Little South Solar (DOV/23/01363)

Dear [redacted]

I am hoping you may have had a chance to look at the WSI as we are keen to get out on site next week.

We have our fieldwork team ready to go and I am concerned we may lose our slot as the farmer is planting crop imminently.

If you have any questions or comments please feel free to drop me line or call on [REDACTED]

Many thanks

[REDACTED]



part of the **RSK** Group



[REDACTED] Archaeology and Built Heritage Consultant

Headland Archaeology Midlands & West
2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com



Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire I MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
Hereford | HR2 6JR
t 01432 364 901

Headland Archaeology Yorkshire & North
Units 23-25 | Acorn Business Centre | Balme Road
Cleckheaton | BD19 4EZ
t 0127 493 8019

Headland Archaeology
RSK Fourways House | S
Manchester | M1 2EJ
t 0161 236 2757

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From: [REDACTED]
Sent: Wednesday, September 4, 2024 10:01 AM
To: [REDACTED] [@kent.gov.uk](mailto:[REDACTED]@kent.gov.uk); [REDACTED] [@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)
Cc: [REDACTED] [@statkraft.com](mailto:[REDACTED]@statkraft.com)>; [REDACTED] [@statkraft.com](mailto:[REDACTED]@statkraft.com)>; [REDACTED] [@formationarchaeology.com](mailto:[REDACTED]@formationarchaeology.com)>; [REDACTED] [@headlandarchaeology.com](mailto:[REDACTED]@headlandarchaeology.com)>
Subject: RE: WSI for trial trenching Little South Solar (DOV/23/01363)

Dear [REDACTED]

Following the site visit this week and conversations with the landowner it has become apparent that trenches T9 and T10 in the east of the site coincide with a former railway line that ran roughly north/south through this area. It is visible on historic OS mapping of 1919-1947 and 1937-1961 and referenced in the DBA but not illustrated.

I attach an image with the georeferenced OS map of 1937-1961 showing the proposed trench realignment and former railway line as well as the updated WSI.

I hope you agree that the trenches are appropriately located? If possible it would be great to be able to confirm the coordinates with the fieldwork team asap, in preparation for getting out on site next week.

Many thanks,

[REDACTED]



██████████ Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
 2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com



Headland Archaeology South & East
 Building 68C | Wrest Park
 Silsoe | Bedfordshire I MK45 4HS
 t 01525 861 578

Headland Archaeology Midlands & West
 Unit 1 | Clearview Court | Twyford Rd
 Hereford | HR2 6JR
 t 01432 364 901

Headland Archaeology Yorkshire & North
 Units 23-25 | Acorn Business Centre | Balme Road
 Cleckheaton | BD19 4EZ
 t 0127 493 8019

Headland Archaeology North West
 RSK Fourways House | 57 Hilton St
 Manchester | M1 2EJ
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From: ██████████
Sent: Friday, August 23, 2024 6:34 PM
To: ██████████@kent.gov.uk; ██████████@HistoricEngland.org.uk
Cc: ██████████@statkraft.com>; ██████████@statkraft.com>; ██████████@formationarchaeology.com>; ██████████@headlandarchaeology.com>
Subject: WSI for trial trenching Little South Solar (DOV/23/01363)

Dear ██████████

I attach the Written Scheme of Investigation for our proposed archaeological trial trenching and archaeological monitoring. I append the KCC generic spec requirements - many thanks for sending those through.

FYI - we are hoping to begin the watching brief of the soakaway pits w/c 2nd September. All being well we are aiming to get the evaluation underway asap in conjunction with this.

Kind regards,

██████████



██████████ Archaeology and Built Heritage Consultant
Headland Archaeology Midlands & West
 2nd Floor Chancery Exchange 10 Furnival Street | London | EC4A 1AB
www.headlandarchaeology.com

Headland Archaeology South & East
 Building 68C | Wrest Park
 Silsoe | Bedfordshire I MK45 4HS
 t 01525 861 578

Headland Archaeology Midlands & West
 Unit 1 | Clearview Court | Twyford Rd
 Hereford | HR2 6JR
 t 01432 364 901

Headland Archaeology Yorkshire & North
 Units 23-25 | Acorn Business Centre | Balme Road
 Cleckheaton | BD19 4EZ
 t 0127 493 8019

Headland Archaeology North West
 RSK Fourways House | 57 Hilton St
 Manchester | M1 2EJ
 t 0161 236 2757

Headland Archaeology Edinburgh
 13 Juncostone St
 Edinburgh | EH1 1JH
 t 0131 225 2252

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From: [REDACTED]@kent.gov.uk <[REDACTED]@kent.gov.uk>
Sent: Thursday, August 22, 2024 6:29 PM
To: [REDACTED]@headlandarchaeology.com>
Cc: [REDACTED]@headlandarchaeology.com>
Subject: RE: WSI prep

Hi [REDACTED]

Please find attached a copy of KCC's generic requirements for trial trenching.

As discussed in our meeting if you could note in the WSI that the works will be carried out in accordance with these requirements and a copy of them appended to the WSI that would be helpful.

I appreciate that there may be some areas where these generic requirements have become outdated (for example we agree that high-resolution digital photographs taken using professional quality (DSLR or equivalent) cameras can be used instead of 35mm transparencies). Similarly, some of the professional standards and guidance referenced have likely been updated and where out of date guidance is referred to its successor/replacement should be used instead.

If any major deviation from our generic requirements is proposed this should be identified within the WSI and a justification provided for why an alternative approach is proposed.

I trust that the above is helpful and would be happy to discuss further if needed.

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 |

Please help save paper by NOT printing this email unless absolutely necessary.

From: [REDACTED]@headlandarchaeology.com>
Sent: Thursday, August 22, 2024 1:54 PM
To: [REDACTED]@kent.gov.uk>
Cc: [REDACTED]@headlandarchaeology.com>
Subject: WSI prep

Hi [REDACTED]

Many thanks for your input earlier in the week into the Little South Solar scheme.

Can you send through the Kent County guidance/standards for inclusion in our WSI?

Thanks,

Best wishes,

[REDACTED]



██████████ Director of Consultancy
BA MA PhD MCifA

Headland Archaeology North West
172 Chester Road | Helsby | WA6 0AR
t ██████████ | m ██████████

www.headlandarchaeology.com

Headland Archaeology South & East
Building 68C | Wrest Park
Silsoe | Bedfordshire | MK45 4HS
t 01525 861 578

Headland Archaeology Midlands & West
Unit 1 | Clearview Court | Twyford Rd
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Cleckheaton | BD19 4EZ
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Headland Archaeology North West
RSK Fourways House | 57 Hilton St
Manchester | M1 2EJ
t 0161 236 2757

Headland Archaeology
13 Jane
Edinbu
t 0131

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