

## CHAPTER 12 - ARCHAEOLOGY AND CULTURAL HERITAGE

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## INTRODUCTION

12.1 This chapter presents the findings of the assessment of likely significant effects of the construction, decommissioning and operational phases of the scheme in terms of archaeology and cultural heritage. It incorporates the results of a historic environment desk-based assessment (HEDBA) contained within **Appendix 12.1** and the results of a geophysical survey of the site (**Appendix 12.2**).

This chapter has been prepared by Orion Heritage Ltd. In accordance with Regulation 18(5) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended,.

12.2 The historic environment includes a wide range of features resulting from human intervention in the landscape, varying in scope from buried archaeological remains, to late 20th century industrial and military structures. It can be broadly divided into the following two categories:

- Archaeology - which comprises Scheduled Monument (SMs) and non-designated archaeological heritage assets; and
- Built Heritage - which comprises listed buildings (all grades), non-designated buildings of heritage interest, registered parks and gardens (all grades), conservation areas, historic battlefields and World Heritage Sites (WHS).

12.3 For reference, the site has been split into 6 areas as identified on **Figure 12.1**.

## POLICY CONTEXT, LEGISLATION, GUIDANCE AND STANDARDS

### Legislation

12.4 The Ancient Monuments & Archaeological Areas Act 1979 (as amended) protects the fabric of Scheduled Monuments but does not afford statutory protection to their settings.

12.5 The Planning (Listed Building and Conservation Areas) Act 1990 sets out broad policies and obligations relevant to the protection of listed buildings and conservation areas and their settings.

Section 66(1) states:

*"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses".*

12.6 Section 69 of the Act requires local authorities to define as conservation areas any 'areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' and Section 72 gives local authorities a general duty to pay special attention 'to the desirability of preserving or enhancing the character or appearance of that area' in exercising their planning functions.

### National Planning Policy Framework (NPPF) & Planning Practice Guidance (PPG)

12.7 Government policy in relation to the historic environment is outlined in Section 16 of the National Planning Policy Framework (NPPF) (2021), entitled Conserving and Enhancing the Historic Environment. This provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:

- delivery of sustainable development;
- understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
- conservation of England's heritage assets in a manner appropriate to their significance; and
- Recognition of the contribution that heritage assets make to our knowledge and understanding of the past.

12.8 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term.

12.9 Paragraph 194 states that planning decisions should be based on the significance of the heritage asset and that level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to understand the potential impact of the proposal upon the significance of that asset.

12.10 Paragraph 195 states that local planning authorities should take account of the particular significance of any heritage asset which may be affected by a proposal, and take this into account with considering any impact to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

12.11 Paragraph 198 states that decisions regarding the removal of alteration of historic statues, plaques, memorials or monuments should have regard to the importance of their retention in situ and, where appropriate, explain their historic and social context rather than removal.

12.12 The key test in NPPF Paragraphs 199-202 is whether a proposed development will result in substantial harm or less than substantial harm to the significance of a designated heritage asset. Paragraph 200 states that;

*"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

a) Grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."

12.13 Where harm to a designated heritage asset equates to less than substantial harm, paragraph 202 states:

*"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

12.14 Paragraph 203 requires the decision-maker to take into account the effect on the significance of non-designated heritage assets and to take a balanced judgement having regard to the scale of harm or loss and the significance of the asset(s) potentially affected.

12.15 **Heritage Assets** are defined in Annex 2 of the NPPF as: a building, monument, site, place, area or

landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).

12.16 **Archaeological Interest** is defined as: a heritage asset which holds or potentially could hold evidence of past human activity worthy of expert investigation at some point.

12.17 **Designated Heritage Assets** comprise of: World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefields and Conservation Areas designated under the relevant legislation.

12.18 **Significance** is defined as: the value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

12.19 **Setting** is defined as: the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

12.20 The NPPF is supported by the PPG (July 2019). Paragraph 18a-001 (001 Reference ID: 18a-001-20190723) makes a clear statement that any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as satisfying the relevant policies within the development plan and the National Planning Policy Framework.

12.21 In relation to the historic environment, paragraph 002 (002 Reference ID: 18a-002-20190723) states that:

*"Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission"*

*and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.”*

- 12.22 Paragraph 18a-013 (Paragraph: 013 Reference ID: 18a-013-20190723) outlines that although the extent and importance of setting is often expressed in visual terms, it can also be influenced by other factors such as noise, dust and vibration. Historic relationships between places can also be an important factor stressing ties between places that may have limited or no intervisibility with each other. This may be historic as well as aesthetic connections that contribute or enhance the significance of one or more of the heritage assets. Paragraph 18a-013 concludes:

*“The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according*

*to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.”*

- 12.23 The key test in NPPF paragraphs 199-202 is whether a proposed development will result in substantial harm or less than substantial harm to a designated asset. However, substantial harm is not defined in the NPPF. Paragraph 18a-017 (Paragraph: 018 Reference ID: 18a-018-20190723) of the PPG provides additional guidance on substantial harm. It states:

*“What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting.*

*Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply.*

*Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.*

*Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest.*

*It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.*

*While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting."*

- 12.24 Paragraph 202 of the NPPF outlines that where a proposed development results in less than substantial harm to the significance of a heritage asset, the harm arising should be weighed against the public benefits accruing from the proposed development. Paragraph 18a-020 of the PPG

(Paragraph: 020 Reference ID: 18a-020-20190723) outlines what is meant by public benefits:

*"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.*

*Examples of heritage benefits may include:*

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting;*
- Reducing or removing risks to a heritage asset; and*
- Securing the optimum viable use of a heritage asset in support of its long term conservation."*

- 12.25 In considering any planning application for development, the planning authority will be mindful of the tests set out in Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

## Local Planning Policy

- 12.26 The Ashford Borough Council Local Plan 2030, adopted in 2019, contains the following policies relevant to this assessment:

### **Policy ENV13 – Conservation and Enhancement of Heritage Assets**

*Proposals which preserve or enhance the heritage assets of the Borough, sustaining and enhancing their significance and the contribution they make to local character and distinctiveness, will be supported. Proposals that make sensitive use of heritage assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate and viable use consistent with their conservation, will be encouraged.*

*Development will not be permitted where it will cause loss or substantial harm to the significance of heritage assets or their settings unless it can be demonstrated that substantial public benefits will be delivered that outweigh the harm or loss.*

*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, or where a non-designated heritage asset is likely to be impacted, harm will be weighed against the public benefits of the proposal, including securing the optimum viable use of the heritage asset.*

*All applications with potential to affect a heritage asset or its setting should be supported by a description of the asset's historic, architectural or archaeological significance with an appropriate level of detail relating to the asset and the likely impact of the proposals on its significance.*

#### **Policy ENV14 – Conservation Areas**

*Development or redevelopment within Conservation Areas will be permitted provided such proposals preserve or enhance the character and appearance of the Area and its setting.*

*Proposals should fulfil each of the following:*

*a) The scale and detailed design of all new development and alterations should respect the historical and architectural character, proportion and massing, including roofscapes, of the area, the relationship between buildings, the spaces between them and with their setting;*

*b) The materials proposed should be appropriate to the locality and complement those of the existing buildings;*

*c) Buildings and streets of townscape character, trees, open spaces, walls, fences or any other features should be retained where they contribute positively to the character and appearance of the area;*

*d) The development should not generate levels of traffic, parking or other environmental problems which would result in substantial harm to the character, appearance or significance of the area;*

*e) The use should be appropriate to and compatible with the character, appearance and historic function of the area; and,*

*f) The development would not prejudice important views into or out of the conservation area.*

#### **Policy ENV15 – Archaeology**

*The archaeological and historic integrity of Scheduled Monuments and other important archaeological sites, together with their settings, will be protected and where possible enhanced. Development which would adversely affect such designated heritage assets will be assessed in line with Policy ENV13.*

*In addition, where the assessment outlined in Policy ENV13 reveals that important or potentially significant archaeological heritage assets may exist, developers will be required to arrange for field evaluations to be carried out in advance of the determination of planning applications.*

*Where the case for development affecting a site of archaeological interest is accepted, any archaeological remains should be preserved in situ as the preferred approach. Where this is not possible or justified, appropriate provision for preservation by record may be an acceptable alternative dependent upon their significance. Any*

*archaeological recording should be by an approved archaeological body and take place in accordance with a specification and programme of work to be submitted to and approved by the Borough Council in advance of development commencing.*

## Other Guidance

*Historic Environment Good Practice Advice In Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015)*

12.27 The purpose of this document is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the NPPF and PPG. It outlines a six-stage process to the assembly and analysis of relevant information relating to heritage assets potentially affected by a proposed development:

- Understand the significance of the affected assets;

- Understand the impact of the proposal on that significance;
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- Look for opportunities to better reveal or enhance significance;
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

*Historic Environment Good Practice Advice In Planning Note 3: The Setting of Heritage Assets (Historic England 2017)*

12.28 Historic England's Historic Environment Good Practice Advice in Planning Note 3 provides guidance on the management of change within the setting of heritage assets.

12.29 The document restates the definition of setting as outlined in Annex 2 of the NPPF. Setting is also described as being a separate term to curtilage, character and context; while it is largely a visual term, setting, and thus the way in which an asset is experienced, can also be affected by noise, vibration, odour and other factors. The document makes it clear that setting is not a heritage asset, nor is it a heritage designation, though land within a setting may itself be designated. Its importance lies in what the setting contributes to the significance of a heritage asset.

12.30 The Good Practice Advice Note sets out a five-staged process for assessing the implications of proposed developments on setting:

- Identification of heritage assets which are likely to be affected by proposals;
- Assessment of whether and what contribution the setting makes to the significance of a heritage asset;
- Assessing the effects of proposed development on the significance of a heritage asset;

- Maximising enhancement and reduction of harm on the setting of heritage assets; and
- Making and documenting the decision and monitoring outcomes.

12.31 The guidance reiterates the NPPF in stating that where developments affecting the setting of heritage assets results in a level of harm to significance, this harm, whether substantial or less than substantial, should be weighed against the public benefits of the scheme.

12.32 The procedures and processes outlined in Commercial Renewable Energy Development and the Historic Environment Historic England Advice Note 15 (Historic England 2021), have been followed in this assessment.

## Methodology

12.33 The assessment process involves the production of a heritage desk-based assessment (DBA) contained within **Appendix 12.1** and a geophysical survey contained in **Appendix 12.2**. The desk based assessment identifies known and potential cultural heritage receptors that may be affected

by the proposed development. Heritage receptors are either designated (Scheduled Monuments, Conservation Areas, Listed Buildings, Registered Parks and Gardens or Registered Battlefields) which are identified on the National Heritage List for England (NHLE) or areas of importance identified in local planning policy, or non-designated heritage assets.

12.34 The geophysical survey was undertaken in accordance with the ClfA's Standards and Guidelines for archaeological geophysical survey (CIFA 2014). Archaeological geophysical survey uses non-intrusive and non-destructive techniques to determine the presence or absence of anomalies likely to be caused by archaeological features, structures or deposits, as far as reasonably possible, within a specified area or site on land, in the inter-tidal zone or underwater. Geophysical survey determines the presence of anomalies of archaeological potential through measurement of one or more physical properties of the subsurface.

12.35 As defined in the PPG, non-designated heritage assets are, "buildings,

monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets."

12.36 Non-designated heritage assets can comprise known heritage receptors, for example finds or features recorded in the Historic Environment Record or locally listed buildings recorded in local planning policy. The potential for previously unrecorded heritage assets is also considered, for example, previously unrecorded archaeological remains or previously unassessed built heritage asset.

12.37 Not all features recorded on Historic Environment Records are non-designated assets. As outlined in Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Records includes "assets that are known to have been or destroyed or known only from antiquarian sources"; they are no longer physically present. Similarly, there is potential for non-designated heritage assets that are not recorded on the Historic Environment Record

or recorded in local planning policy to be present. Such remains may include previously unrecorded sub-surface remains, landscape features or buildings identified through an appraisal of sources or identification through a site visit.

- 12.38 PPG states that there are two categories of non-designated sites of archaeological interest:

*“(1) Those that are demonstrably of equivalent significance to scheduled monuments and are therefore considered subject to the same policies as those for designated heritage assets...”*

*“(2) Other non-designated heritage assets of archaeological interest”*

- 12.39 The value / significance of a non-designated heritage asset may change following assessment and evaluation and move from the second to the first category. For example, a trial trench evaluation identifies previously unrecorded archaeological remains of national significance (archaeological remains which score highly with reference to the DCMS's principles of selection for scheduled monuments (Paragraph 12.3.10 and 12.3.11; DCMS 2013).

- 12.40 The PPG states that applicants should, if required, submit an appropriate DBA and, where necessary, a field evaluation.

### Study Areas

- 12.41 The following study areas have been chosen for the cultural heritage impact assessment. There are no strict parameters for the setting of study areas. This has been defined based on professional judgement and experience, of potential significant direct and indirect effects likely to arise from the scheme:

- Archaeological study area: a 1km buffer from the application site boundary has been used to identify designated or non-designated archaeological assets which might be directly or indirectly impacted by the scheme and inform the potential for previously unrecorded archaeological remains.
- Settings assessment study area: a 1km buffer from the application site boundary has been used to identify designated or non-designated built heritage assets which might be indirectly impacted by the scheme. An assessment

of designated heritage assets within a wider 2.5km area has been undertaken and no further receptors were identified.

- 12.42 The distribution of all relevant designated heritage assets are shown in **Figure 12.5**. This figure incorporates a 1km buffer from the site boundary identifying the study area. The HEDBA (**Appendix 12.1**) discusses the impacts on designated heritage assets located within the wider setting of the application site and demonstrates why these have been scoped out of consideration within this ES Chapter.

### Baseline Data Collection

- 12.43 A historic environment desk-based assessment is included as **Appendix 12.1** to this chapter. The desk-based assessment has been undertaken in line with the Chartered Institute for Archaeologists (CIfA's) Standards and Guidance for Historic Environment Desk Based Assessments (2017) and uses the following data sources in the compilation of the baseline data:

- Kent Historic Environment Record (HER) Data;

- LIDAR data held by the Environment Agency, and analysed using RVT software;
- Aerial imagery held by Google Earth and Bing Maps;
- The National Heritage List for England (NHLE) held by Historic England;
- Historic England Archive; Pastscape;
- Local studies and record office research;
- Review of historic mapping; and
- Site visit.

12.44 The application site has been subject to a geophysical survey (**Appendix 12.2**) in accordance with Chartered Institute for Archaeologists (CIfA's) Standard and Guidance for Geophysical Survey (2020).

### *Assessment Criteria*

#### ASSESSING HERITAGE SIGNIFICANCE AND SENSITIVITY

12.45 The significance of a heritage asset is defined in the NPPF as "The value of a heritage asset to this and

future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting." In the case of many heritage assets their importance has already been established through the designation (i.e. scheduling, listing and register) processes applied by Historic England (HistE).

12.46 In order to assess the heritage significance of previously unrecorded or non-designated heritage assets, the criteria used by the Department of Culture, Media, and Sports publication, 'Principles for Selection of Listed (DCMS 2010) and the Scheduled Monuments Policy Statements published by the same body (DCMS 2013), are used. The criteria for establishing significance of heritage assets for this assessment are presented in **Table 12.1** below.

Table 12.1 - *Determining the heritage significance of a Heritage Asset*

| Heritage Significance | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| International         | <ul style="list-style-type: none"> <li>Archaeological sites or monuments of international importance, including World Heritage Sites.</li> <li>Structures and buildings inscribed as of universal importance as World Heritage Sites.</li> <li>Other buildings or structures of recognised international importance.</li> </ul>                                                                                                                             |
| National              | <ul style="list-style-type: none"> <li>Scheduled Monuments and remains of comparable quality, assessed with reference to the DCMS's principles of selection for scheduled monuments (Paragraph 12.3.10 and 12.3.11; DCMS 2013).</li> <li>Listed Buildings.</li> <li>Non-designated built assets of national importance, assessed with reference to the Secretary of State's published Principles of Selection for Listing Buildings (DCMS 2010).</li> </ul> |
| Regional/<br>County   | <ul style="list-style-type: none"> <li>Archaeological sites and remains which, while not of national importance, score well against most of the DCMS's principles of selection for scheduled monuments (DCMS 2013).</li> <li>Conservation Areas.</li> </ul>                                                                                                                                                                                                 |
| Local                 | <ul style="list-style-type: none"> <li>Archaeological sites and remains which, while not of national importance, score well against most of the DCMS's principles of selection for scheduled monuments (paragraph 12.3.10 and 12.3.11; DCMS 2013)</li> <li>Historic buildings on a 'local list'. Non-designated built assets of local significance.</li> </ul>                                                                                              |
| None                  | <ul style="list-style-type: none"> <li>Areas in which investigative techniques have produced negligible or only minimal evidence for archaeological remains, or where previous large-scale disturbance or removal of deposits can be demonstrated.</li> </ul>                                                                                                                                                                                               |

12.47 Significance has been assigned to effects relative to the heritage significance, its sensitivity to change and the magnitude of impact in accordance with best practice.

12.48 The sensitivity of a heritage receptor / resource is determined by evaluating a receptor's susceptibility to change and heritage significance. For direct physical impacts to below ground archaeological remains or built heritage assets, this is assessed in terms of potential reduction of heritage significance through the physical impact of a monument or building.

12.49 For indirect impacts to the setting of heritage assets, the heritage significance of an asset is not the same as its sensitivity to change (Historic England 2019). Thus, in determining effects upon the setting of assets by a proposed development, both heritage significance and sensitivity to changes to setting need to be considered. Factors considered when assessing sensitivity to indirect change include, but are not limited to, heritage significance (**Table 12.1**), condition, type and period of asset and landscape positioning. The assessment of settings impact

follows the methodology set out in the Historic Environment Good Practice Advice in Planning Note 3, The Setting of Heritage Assets. The heritage assets which require assessment have been selected with reference to the National Heritage List for England

(NHLE) database held by Historic England, as well as information held by the Local Planning Authority (LPA) on Conservation Areas.

12.50 The criteria for assessing sensitivity to change is set out in **Table 12.2** below.

Table 12.2 - *Sensitivity of Heritage Receptor / Resource*

| Sensitivity          | Receptor                                                                                                                                                                                                                                                                              |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| High                 | The receptor/resource has little ability to absorb change without fundamentally altering its present international or national heritage significance; or<br><br>The Application Site makes a high contribution to the setting / heritage significance of a designated heritage asset. |
| Moderate             | The receptor/resource has moderate capacity to absorb change without significantly altering its present regional heritage significance; or<br><br>The Application Site makes a moderate contribution to the setting / heritage significance of a designated heritage asset.           |
| Low                  | The receptor/resource is tolerant of change without detriment to its heritage significance, is of low or local heritage significance; or<br><br>The Application Site makes a minor contribution to the setting of a designated heritage asset.                                        |
| Negligible / Neutral | Negligible perceptible change to the significance of a building, archaeological site, or Conservation Area due to a change in setting.                                                                                                                                                |

12.51 Not all designated heritage assets will require full assessment for impacts on an individual basis. Where a designated heritage asset has been excluded, a clear justification is provided, for example if the asset is sufficiently far away, and well screened from the application site. Also, not all assets require the same level of assessment. As set out in paragraph 194 of the NPPF, the level of detail required is that which is sufficient to inform the nature and degree of effect of development within the application site on the significance of the heritage asset in question.

### *Assessing Magnitude of Impact/ Change*

12.52 The nature and likelihood of the impacts of the scheme on archaeological and heritage features is assessed against clearly defined criteria.

12.53 1 Archaeological and built heritage resources are susceptible to a range of direct impacts during site preparation as well as construction related activities, including:

- Site clearance/site preparation activities that disturb archaeological remains;
- Demolition or alteration of designated and non-designated built cultural heritage assets;
- Excavation that extends into archaeological sequences, for example foundations, or re-landscaping (for example attenuation ponds) resulting in the removal of the resource;
- Piling activities resulting in disturbance and fragmentation of the archaeological resource; and
- Dewatering activities resulting in desiccation of waterlogged remains and deposits.

12.54 Any such impacts are discussed, and value/sensitivity criteria applied. The significance of effects has been assessed using the magnitude of impact/change criteria set out in **Table 12.3**. Magnitude of impact/change are both used in this assessment; magnitude of impact may be more accurate when assessing physical impact to archaeological remains or a built heritage asset, whilst magnitude of change may be more appropriate

when considering changes to the setting of heritage assets.

12.55 In terms of indirect impacts on heritage, the impacts of the development include the impact on the setting of a Listed Building / Conservation Areas / Scheduled Monument / non-designated heritage asset.

12.56 The magnitude of impact/change is a product of the extent of development impact on an asset or its setting. The magnitude of change is rated as Major, Moderate, Minor, Negligible and Minor. Change can be direct or indirect, adverse or beneficial. The criteria for assessing the magnitude of change are set out in **Table 12.3**.

Table 12.3 - *Magnitude of Impact/Change*

| Magnitude of Impact/Change | Direct Impact                                                                                                                                                                                                                     | Indirect Change                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Major Adverse              | Demolition of built heritage assets or demolition within a Conservation Area.<br><br>Complete removal of an archaeological site.                                                                                                  | Substantially harmful change to the significance of a designated heritage asset through change in setting.                                                                                                                                                                                                                                                                      |
| Moderate Adverse           | Harmful alteration (but not demolition) of a built heritage asset or alterations to a building in a Conservation Area.<br><br>Removal of a major part of an archaeological site and loss of research potential / significance.    | Less than substantial harm to the significance of a designated heritage asset due to a change in setting.<br><br>Partial transformation of the significance of an archaeological site e.g. the introduction of significant noise or vibration levels to an archaeological monument leading to changes to amenity use, accessibility, or appreciation of an archaeological site. |
| Minor Adverse              | Alterations to a built heritage asset or Conservation Area resulting in minor harm. Removal of an archaeological site where a minor part of its total area is removed but the site retains significant future research potential. | Minor harm to the significance of an archaeological monument or built heritage asset or Conservation Area due to a change in setting.                                                                                                                                                                                                                                           |
| Negligible                 | Negligible impact from changes in use, amenity, or access.<br><br>Negligible direct impact to the built heritage asset or Conservation Area.                                                                                      | Negligible perceptible change to the significance of a building, archaeological site, or Conservation Area due to a change in setting.                                                                                                                                                                                                                                          |
| Minor Beneficial           | Alterations to a built heritage asset or Conservation Area resulting in minor beneficial impacts.<br><br>Land use change resulting in improved conditions for the protection of archaeological remains.                           | Minor enhancement to the setting of a built heritage asset or Conservation Area.<br><br>Decrease in visual or noise intrusion on the setting of a building, archaeological site, or monument.                                                                                                                                                                                   |

| Magnitude of Impact/ Change | Direct Impact                                                                                                                                                                                                                                                         | Indirect Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Moderate Beneficial         | <p>Alterations to a built heritage asset or Conservation Area resulting in moderate beneficial impacts.</p> <p>Land use change resulting in improved conditions for the protection of archaeological remains plus interpretation measures (heritage trails, etc.)</p> | <p>Significant reduction or removal of visual or noise intrusion on the setting of a building, archaeological site, or monument.</p> <p>Improvement of the wider landscape setting of a built heritage asset, Conservation Area, archaeological site, or monument.</p> <p>Improvement of the cultural heritage amenity, access or use of a built heritage asset, archaeological site or monument.</p> <p>Moderate enhancement to the setting of the built heritage asset and Conservation Area.</p> |
| Major Beneficial            | <p>Arrest of physical damage or decay to a built heritage asset or structure.</p> <p>Alteration to a built heritage asset or Conservation Area resulting in significant beneficial impact.</p>                                                                        | <p>Significant enhancement to the setting of a built heritage asset, Conservation Area or archaeological site, its cultural heritage amenity and access or use.</p>                                                                                                                                                                                                                                                                                                                                 |

12.57 It is acknowledged that **Table 12.3** above primarily deals with visual factors affecting setting. Whilst the importance of visual elements of settings, e.g. views, intervisibility, prominence etc., are clear, it is also acknowledged that there are other non-visual factors which could potentially result in impacts to setting. Such factors could be other sensory factors, e.g. noise or odour, or could be associative. In coming to a conclusion about magnitude of change upon the significance of an asset, this assessment makes reference to traffic, noise, air quality, and townscape and visual assessments, reported in the ES, as appropriate.

### *Significance of Effect*

12.58 The significance of the impact of the proposed development on archaeological and heritage assets is determined by the heritage significance of the asset and the magnitude of impact to the asset.

12.59 The judgement of the significance of effects takes into consideration the impact on the heritage asset's heritage significance (as defined in Annex 2 of the NPPF). As part of this assessment,

the impact on the contribution that the setting of a heritage asset makes to its significance is also considered. The nature of the contribution that the setting of an asset makes to its heritage significance varies from asset to asset (i.e. the setting of some assets have a greater contribution to the significance and vice versa). Consequently, where there are effects from a development on the setting of an asset that has only a limited contribution to the significance of that asset, the effect on the significance of the asset itself may be very limited or

even potentially non-existent. Where a heritage asset has a setting that has a large contribution to the significance of that asset, effects on the significance of the asset itself will be greater. This is undertaken in line with Historic England guidance on the assessment of setting (Historic England 2017) and using professional judgement.

12.60 **Table 12.4** below presents a matrix that demonstrates how the significance of effect is established:

Table 12.4 - *Evaluation of Significance of Effect*

|                               |            | Magnitude of Impact/Change |            |                    |                      |
|-------------------------------|------------|----------------------------|------------|--------------------|----------------------|
|                               |            | Major                      | Moderate   | Minor              | Negligible / Neutral |
| Sensitivity of Heritage Asset | High       | Major                      | Major      | Moderate - Minor   | Negligible           |
|                               | Moderate   | Major                      | Moderate   | Minor              | Negligible           |
|                               | Low        | Moderate                   | Minor      | Minor - Negligible | Negligible           |
|                               | Negligible | Negligible                 | Negligible | Negligible         | Negligible           |

12.61 'Major' and 'Moderate' levels of effect are 'significant' in the context of the EIA Regulations. 'Minor' and 'Negligible' are not significant in the context of the EIA Regulations. Professional judgement is also used in considering the significance of effects.

## Limitations

12.62 This assessment is based upon data obtained from publicly accessible archives as described in paragraph 12.5.12. Data was received from Kent Historic Environment Record in April 2021 and downloaded from the HistE website in April 2021.

## BASELINE CONDITIONS

### Archaeology

12.63 The locations of archaeological assets considered in the assessment are presented in **Figures 12.1, 12.2 and 12.4**. The locations of designated and built heritage assets are presented in **Figure 12.5**.

12.64 The historic environment desk-based assessment (**Appendix 12.1**) outlines the archaeological and historical

background for the study area. In brief summary, the application site is located within the East Stour River valley and is considered to have a moderate to high potential to contain archaeological finds and features from all prehistoric periods, except for the Palaeolithic, for which a low to moderate potential is considered. There is general theoretic potential for Iron Age to Romano-British occupation evidence based on proximity to known occupation sites and settlement evidence. In the early medieval, medieval and post-medieval periods the application site lies in the agricultural hinterland of known settlement.

12.65 The archaeological investigations conducted within the application site consist of the following (most recent first);

- A geophysical survey, undertaken with fluxgate gradiometer, has been conducted across the majority of the application site (102ha) (**Figure 12.3**).
- Archaeological excavation in Park Wood in 1967, in the northern area

of the application site (**Figure 12.4**; EKE3720);

- Geophysical survey was carried out in 1995 prior to the Channel Tunnel Rail Link (CTRL) construction in part of the application site's northern area (**Figure 12.4**; EKE12235);
- Archaeological evaluation within and adjacent to the application site's northern area (**Figure 12.4**; EKE5094);
- Archaeological excavation was carried out in the same area in 1999 (**Figure 12.4**; EKE5097); and
- Archaeological watching brief was carried out immediately adjacent to the application site's southern and south-eastern areas during the construction of the transformer bases and during the cutting of associated cable trenches for the Sellindge Solar Farm (**Figure 12.4**; EKE15038).

12.66 The application site contains the following non-designated archaeological assets, which are recorded on the Kent HER, the HER reference numbers are shown alongside the assets (**Figure 12.2**):

- The location of a possible windmill mound (TR03NE20) and residual prehistoric lithic material (TR03NE242) from under the possible windmill mound in the centre-west of Area 1 (EKE3720). These have been effectively recorded and removed by archaeological investigation in the 1960's;
- Four Bronze Age ditches, maybe part of a field system (TR03NE60) recorded as part of an evaluation and excavation by OAU between 1997-99;
- Mesolithic to Bronze Age flint scatter at Station Road / Church Lane (TR03NE59) recorded as part of an evaluation and excavation by OAU between 1997-99; and
- A medieval silver coin findspot (MKE55982) in the north of Area 1.

## Summary of Archaeological Potential and Assessment of Significance

- 12.67 Past impacts within the application site comprise general historic ploughing / agricultural activity which may have

impacted sub-surface remains across the application site as well as the planting and felling of trees and the removal and re-instatement of field boundaries, which may have had a localised impact. The construction and demolition of the sheepfold and radio station in the application site's southern area will have had a minor, localised impact.

- 12.68 Kent Historic Environment Record (KHER) records a number of archaeological interventions which in Area 1 will have effectively recorded and removed potential archaeological deposits in the following areas: the location of a possible windmill mound (TR03NE20) and residual prehistoric lithic material (TR03NE242) from under the possible windmill mound in the centre-west of Area 1 (KHER EKE3720); the south-west and south-east of Area 1 has been subject to archaeological investigation (EKE5094, EKE5097 and EKE12235; **Figure 12.4**). It is also noted that the KHER records a medieval silver coin findspot (MKE55982) in the north of Area 1 that has been removed from the site. Geophysical survey of the area has identified no evidence of associated features with either the

find spot or the possible windmill mound (**Figure 12.2**).

- 12.69 Geophysical survey identified three possible areas of extraction that have probably been infilled with local material in the centre of the survey area; they are surrounded by archaeological anomalies, to which they are potentially related. Extensive drainage was noted in the eastern limit of the application site and evidence of modern ploughing.
- 12.70 The application site was part of the Stour Basin Palaeolithic Project, which was funded by English Heritage and took place between February 2013 and March 2015. The project produced a broad predictive model that identified and characterised areas of Palaeolithic potential of the underlying quaternary sands and gravels. The south-eastern part of Area 1 lies in character area 36, for which a moderate palaeolithic potential was established. The remainder of the application site lies in character area 38, for which a low palaeolithic potential was established.
- 12.71 In November 2021 a fluxgate gradiometer survey was completed across the c. 102ha study area (**Appendix 12.2**). The survey detected

anomalies of an archaeological origin, with possible rectilinear enclosures, ring ditch and field systems identified in the centre and east, and more disjointed linear and curvilinear anomalies identified in the southeast and east. A zone of more enhanced material has been identified surrounding the archaeology in the centre, related to the weathering of the underlying geology, with natural banding possibly obscuring any further archaeology. Further geological variations were present in the north, east and southeast, as a result of the topographic changes across the area. Three areas of possible extraction and natural infilling have been identified in the centre of the area. Further anomalies representing former field boundaries and watercourses have been identified on historical mapping. Drainage features follow the topography of the survey area. Anomalies of an undetermined origin have also been detected, and whilst these may relate to modern, natural or agricultural features, an archaeological origin cannot be ruled out. The impact of modern activity on the results is present around field edges, and surrounding pylons,

overhead cables and a buried service, which may have obscured any weaker anomalies, if present, along with an area of made ground in the north and a former radio station in the centre. Geophysical survey has identified the following possible and undetermined areas of archaeological interest (**Figure 12.3**):

- [MS2a] linear and curvilinear anomalies (probable archaeology) in the centre of Area 2;
- [MS2b] linear and curvilinear anomalies (probable archaeology) in the centre of Area 2;
- [MS2c] two strong parallel linear anomalies (undetermined) in the east of Area 2;
- [MS5a] partial rectilinear enclosure measuring c. 100m wide with possible internal subdivision (probable archaeology) in the north-west of Area 5;
- [MS5b] partial enclosures (probable archaeology) in the south of Area 5;
- [MS5c] curvilinear anomaly which may represent a ring ditch

(probable archaeology) in the south-east of Area 5;

- [MS5d] linear and curvilinear (probable archaeology) in the east of Area 5;
- [MS5e] area of possible extraction (probable archaeology) in the east of Area 5.

12.72 Based on the form of the geophysical anomalies, there is considered high potential for prehistoric occupation evidence in the centre of Area 2 [MS2a and 2b], the potential for multi-phase occupation evidence in this area cannot be ruled out entirely. The date and character of the linear anomalies of undetermined character [MS2c] in the west of Area 2 is currently unknown. Taking into consideration past impact, based on available evidence, this potential archaeological resource is considered likely to be of local to regional, rather than national heritage significance. The sensitivity of these remains is considerate moderate in line with the criteria outlined in **Table 12.4**.

12.73 Based on the form of the geophysical anomalies there is considered high potential for prehistoric – Romano-

British occupation across Area 5. A later, medieval to post-medieval date for the rectilinear enclosures [MS5a and 5b] cannot be ruled out at this stage. Taking into consideration past impact, based on available evidence, this potential archaeological resource is considered likely to be of local to regional, rather than national, heritage significance. The sensitivity of these remains is considered moderate in line with the criteria outlined in **Table 12.4**.

- 12.74 There is considered low potential for remains of national significance that would pose a design or planning constraint.

## Designated Archaeological Assets

- 12.75 No statutory designations (Scheduled Monuments) are located within or immediately adjacent to the application site.
- 12.76 The scheduled remains of a Romano-British building (south of Burch's Rough) (NHLE 1004216) is recorded c. 975m south of the application site. The monument comprises a Roman villa surviving as buried remains,

identified as a cropmark on aerial photography. It is situated on a north-west facing slope above a tributary of the East Stour River near Court-at-Street. Due to distance and lack of historical connection, the application site is not considered within the setting of this designated asset and it is not considered sensitive to change by the proposed development. No further assessment is considered necessary.

## Built Heritage

- 12.77 As outlined in Section 5 of the Historic Environment Desk Based Assessment **Appendix 12.1**, the application site does not fall within or near a Conservation Area, Registered Parks and Gardens, Registered Battlefields and World Heritage Sites. The application site does not contain or lie immediately adjacent to a listed building.
- 12.78 Within the 1km study area the following designated assets are recorded: Aldrington Church Conservation Area, Smeeth Conservation Area, two grade I listed buildings, two grade II\* listed buildings and 37 grade II listed buildings. These lie between 250 and 1km from the application site. The area

beyond this buffer was also reviewed and no sensitive designated heritage assets were identified as requiring assessment.

- 12.79 A site visit was undertaken in May 2021 to assess the setting of identified designated heritage assets. The conditions were cloudy with good visibility. Additional desk-based assessment using Google Earth and maps was also utilised. Due to a combination of the intervening M20 and associated planting, the railway embankment, topography, vegetation and distance the majority of these are not considered sensitive to change by the proposed development. This is further detailed in **Appendix 12.1**.
- 12.80 Based on the results of the site visit, desk-based GIS analysis and historical research, following assets are considered as being potentially sensitive to indirect change by the proposed development:
- Aldrington Conservation Area;
  - Grade I listed Church of St Martin (NHLE 1071208) c.1km south of the application site;
  - Grade II\* listed Court Lodge Farmhouse (NHLE 1071209) c.1km south of the application site; and

- Grade II\* listed Evegate Manor (NHLE 1362798) c.550m west of the application site.

### *Aldington Conservation Area – Church Area and Aldington – Clap Hill*

- 12.81 Aldington – Church Area Conservation Area was designated in July 1996 and covers the historic core of the settlement of Aldington. Aldington – Clap Hill, designated in February 1985 lies to the west of the modern settlement and comprises three listed buildings and their grounds.
- 12.82 The Church Area Conservation Area covers an area of c. 12ha and contains fourteen listed buildings, including the Grade I listed Church of St Martin and the Grade II\* listed Court Lodge Farm House assessed separately above. The remaining twelve buildings are listed at Grade II, and are dispersed as ribbon development along Church Lane which runs north-south through the conservation area. No conservation area appraisal is available for the asset, and a brief summary of its character and appearance is therefore given below.

- 12.83 The key characteristics of the area are considered to be:

- The historic and architectural special interest derived from the historic buildings within the conservation area, particularly the group associated with the church and Court Lodge Farm House.
- The sinuous nature of the principal thoroughfare, Church Lane, which provides sequential glimpsed and clear views of the listed buildings within the conservation area.
- The sloping topography of the landscape which allows for some long views north of the wider surrounding landscape. Although these are partial and glimpsed as one passes through the settlement, the views open out in the vicinity of St Martin's Church.

- 12.84 The setting of the conservation area comprises the wider agricultural landscape and buildings within it, with the farm complex at Ruffin's Hill (Comprising one Grade II\* listed and three Grade II listed buildings) being of particular importance for its illustrative and architectural value. In its present state the study site makes a positive

contribution to the wider setting of the asset though the provision of rural context.

- 12.85 The Clap Hill Conservation Area covers an area of c. 1.25ha and contains three Grade II listed buildings. Principal among these is Clap Hill House, an eighteenth century property, with the other two buildings dating from the early nineteenth century.

- 12.86 The key characteristics of the area are considered to be:

- The historic and architectural special interest derived from the historic buildings within the conservation area
- The raised topography enabling views to the south-west.

- 12.87 The setting of the asset contributes illustrative value by way of rural context, although long views north are screened by belts of tree planting and the modern settlement of Aldington lies to the east. There are dispersed historic and designated farmsteads to the south-west of the conservation area and these contribute illustrative value to the setting. There is no intervisibility with the study site owing to distance, intervening built form and tree-screening.

*Grade I listed Church of St Martin  
(NHLE 1071208)*

- 12.88 The Church of St Martin is a Grade I listed building located c.1km south of the application site, within Aldington Church Area Conservation Area. The listing description is included in the desk-based assessment (**Appendix 12.1**).
- 12.89 Due to its proximity to Canterbury, Ashford Borough has churches of great historical significance. The significance of the church resides in its architectural and historical interest as a former chapel to the adjacent hunting lodge of the Archbishops of Canterbury (see Court Lodge below), which was restored in 1876 by Sir Arthur Blomfield. Blomfield became president of the Architectural Association in 1861, a Fellow of the Royal Institute of British Architects in 1867 and vice-president of the RIBA in 1886. The application site was never owned by the church and there is no historic functional connection, however, the Deedes Family, who owned part of the southern part of the application site in the 19th century, were associated with the Church of St Martin and there is a monument to William Deedes at the church.

- 12.90 The church is visible from the highest point within the application site ('Bested Hill' on historic mapping) and from the south-eastern boundary of the application site. Due to intervening development in the form of Court Lodge and its associated structures, at ground level there are no views of the application site from the church.
- 12.91 The church stands overlooking the area to its north, east and west from an elevated position (LVIA viewpoints 8, 9 and 10). Its setting is formed by its immediate surroundings in the form of the churchyard and Court Lodge with its associated structures, as well as the wider agricultural/rural landscape surrounding the church. While the views from the application site towards the church are not designed views, the topography and sparse development do mean that they have a positive contribution to the significance of the church, as it allows for an appreciation of the church from a distance.
- 12.92 Whilst the Church is of national heritage significance it is considered to be of low sensitivity to the proposed development: the application site makes a minor contribution to the setting of this designated heritage asset.

*Grade II\* listed Court Lodge  
Farmhouse (NHLE 1071209)*

- 12.93 Court Lodge Farmhouse is a Grade II\* listed building located c.1km south of the application site, within Aldington Conservation Area. The listing description is included in the desk-based assessment (**Appendix 12.1**).
- 12.94 The significance of Court Lodge Farmhouse resides in its archaeological interest as the whole complex is said to have had five kitchens, six stables and eight dovecotes in the 16th century, as well as in its architectural and historic interest as the former manor house and hunting lodge of the Archbishops of Canterbury.
- 12.95 The farmhouse sits on the eastern plot boundary, set back c.105m from Church Lane to the west. The Church of St Martin is located c.15m to the south. The setting of the farmhouse comprises its plot, the church and churchyard to the south and the field immediately to the east. It is within the plot and from the access track off Church Lane that the setting has a positive contribution to the significance of the house, as it is

within this context that the house has been experienced throughout most of its existence. The modern agricultural structures associated with the farmhouse have a negative contribution to its significance.

12.96 Court Lodge Farmhouse has a historic ownership link with the application site. At the time of the tithe survey in 1842 Court Lodge Farm was owned by William Deedes Esq, whose tenant was Stephen Southon. The estate included the application site's southern area. In 1950, the estate was put up for sale, and the application site's southern area formed part of Lot 2, which also included Court Lodge Farmhouse.

12.97 The rural and agricultural wider context of the asset generates a degree of illustrative context to the farmhouse. Under the proposed development the field boundaries would remain intact, therefore the legibility of historic field parcels remains unchanged, leaving the illustrative historic value to Court Lodge Farmhouse unaffected. The historic ownership link has been severed for 70 years and no functional connection to the application site remains. The application site in its

current state is considered to make a neutral contribution to the setting, with no material contribution to the significance of the asset.

12.98 Whilst the Farmhouse is of national heritage significance it is considered to have negligible sensitivity to the proposed development.

## *Grade II\* listed Evegate Manor (NHLE 1362798)*

12.99 Evegate Manor is a grade II\* listed building located c.550m west of the application site. The listing description is included in the desk-based assessment (**Appendix 12.1**).

12.100 The significance of Evegate Manor (sometimes 'Thevegate') resides in its archaeological, architectural and historic interest as a former 14th century manor house, part of which appears to have been demolished by 1975. It was first mentioned in the 993AD Charter of Monastery of Hyde. The Domesday Book records Evegate as a settlement of only one household with one meadow of 8 acres, belonging to Hugh de Monfort. Some time after the compilation of the Domesday Book and the inquest of

service in 1212, Evegate Manor was alienated from Constable's Honour and became part of the Honour of the Archbishop of Canterbury. The 1840 Smeeth tithe apportionments associated list Evegate House as belonging to Sir Edward Knatchbull. Sir Edward Knatchbull's tenant, William W. Tilt. Knatchbull, owned the whole of the application site's northern area at that time, and plots 391 and 405 within the northern area were tenanted to William W. Tilt. This historic ownership link has since been severed.

12.101 The house sits along the western plot boundary, with access from the north-west, off Station Road, and the garden to the east and south of the house. The setting of the house comprises its plot and the open countryside to the south. The plot is bound by shrubs and trees and it is within it that the setting has a positive contribution to the significance of the house.

12.102 Due to topography and distance, only the top of the chimneystacks of Evegate Manor can be glimpsed from within the application site. Due to vegetation and topography, there are no views of the application site from

the house. The application site in its current state is considered to make a neutral contribution to the setting of Evegate Manor, with no material contribution to the significance of the asset.

- 12.103 Whilst the Manor House is of national heritage significance it is considered to have negligible sensitivity to the proposed development.

### *Locally Listed Heritage Assets*

- 12.104 Ashford Borough Council does not hold a list of locally listed heritage assets; no locally listed heritage assets have been identified that have the potential to be affected by the scheme.

### *Other Non-Designated Heritage Assets*

- 12.105 The application site contains no structures; the assessment has identified no non-designated heritage assets that have the potential to be affected by the scheme.

### *Baseline Evolution*

- 12.106 In general terms, changes in the baseline may result from the scheduling or listing of heritage assets within the study area or the discovery of new sites within or adjacent to the application site. The assessment has not identified any sites which are likely to be designated within the 1km study area. Archaeological intrusive works may occur prior to construction. These works have the potential to alter the heritage baseline.

- 12.107 In a 'no development' scenario, the heritage baseline conditions remain unchanged.

## EMBEDDED MITIGATION

### Construction and Decommissioning

- 12.108 The scheme has been designed to avoid the construction of solar panels across the entire site. The retention of open space in Area 2 serves to preserve in situ identified archaeological remains in this area. Specific fields were removed from

development to minimise impacts (as discussed in **Chapter 3** – Site Selection and Design).

### Operation

- 12.109 No embedded mitigation is considered to be required.

### Potential Impact

#### *Potential Direct Impacts*

- 12.110 The following archaeological and cultural heritage receptors are identified as having the potential to be directly impacted by the proposed development:

- Non-designated prehistoric (or multi-period) occupation evidence in Area 2 of local significance, low sensitivity (this comprises peripheral features associated with a complex of features which will be retained in open space in Area 2);
- Non-designated prehistoric to Romano-British (or medieval to post-medieval) occupation evidence of local to regional significance, moderate sensitivity, in Area 5.

12.111 The desk-based assessment has considered the potential for Palaeolithic remains within the application site. The south-eastern part of Area 1 lies on quaternary sands and gravels which are considered to have moderate potential for Palaeolithic remains. This area of potential lies almost entirely outside the area of proposed solar panels and infrastructure. Taking this, and the anticipated depth of Palaeolithic remains into consideration, the sensitivity of this resource is considered low and no magnitude of impact or environmental effect is expected and no further assessment is considered necessary.

## *Potential Indirect Impacts*

12.112 Development of the site has the potential to have indirect impacts on the following designated heritage assets:

- Grade I listed Church of St Martin (NHLE 1071208) c.1km south of the application site;
- Grade II\* listed Court Lodge Farmhouse (NHLE 1071209) c.1km south of the application site; and

- Grade II\* listed Evegate Manor (NHLE 1362798) c.550m west of the application site.

12.113 The impacts upon these heritage assets are discussed individually below. The assessment of the overall impact of the scheme on the significance of heritage assets is evaluated by considering both the heritage significance of the heritage asset and the magnitude of the predicted effect on that significance. Mitigation is provided where necessary.

## ASSESSMENT OF LIKELY EFFECTS

### Construction and Decommissioning

12.114 It is proposed to install and operate a solar farm within the application site, together with all associated works, equipment and necessary infrastructure. The panels would be mounted on small piled foundations which would be driven to the ground. On average the piled foundations for the solar arrays would be driven

approximately 1.5m into the ground and each pile would measure no more than 0.01m<sup>2</sup> in area.

12.115 Foundations for the buildings to house welfare, store and substation are understood to be minimal (further information is provided separately in **Chapter 6** – The Development Proposal and associated figures). No large-scale ground reduction or landscaping is planned for the development.

12.116 The heritage desk-based assessment and the geophysical survey of the site concludes that the application site is considered to have a high potential for finds and features of prehistoric – Romano-British (or medieval to post-medieval) occupation across Area 5 (**Figure 12.2**). Taking into consideration past impact, based on available evidence, this potential archaeological resource is considered likely to be of local to regional, rather than national, heritage significance. The sensitivity of these remains is considered moderate in line with the criteria outlined in **Table 12.4**. No substantial groundworks are proposed in this area, impacts are restricted to the erection of the

panel piles. As such the magnitude of impact of the proposed solar panels on the potential archaeological resource within Area 5 is considered minor adverse: removal of a minor part of its total area but the site retains significant future research potential. This effect is considered Minor; not significant.

- 12.117 The heritage desk-based assessment and the geophysical survey of the site concludes that the application site is considered to have high potential for prehistoric occupation evidence in the centre of Area 2 [MS2a and 2b] (**Figure 12.2**), the potential for multi-phase occupation evidence in this area cannot be ruled out entirely. The date and character of the linear anomalies of undetermined character [MS2c] in the west of Area 2 is currently unknown. As shown in **Figure 12.2** these will be largely retained as open space as part of the proposed development. Two peripheral linear features lie within the area of the proposed solar panels which have the potential to be physically impacted by the proposed development. These remains are unlikely to be of more than local significance. Taking into consideration the proposed retention

of the majority of the archaeological site and the limited impact of the proposed solar panels, the magnitude of change on this complex of archaeological remains is considered negligible: negligible perceptible change to the significance of an archaeological site from change in use, amenity or access. This effect is considered Negligible; not significant.

- 12.118 The impacts of the construction/decommissioning of the scheme on surrounding designated and locally listed heritage assets will be of a comparable nature to those occurring at the operational stage, albeit of a much shorter duration.

## Operation

- 12.119 It is anticipated that there will be no operational and maintenance direct impacts on buried archaeological assets as impacts would occur during the construction phase as assessed above.
- 12.120 The operation of the scheme would potentially have indirect impacts on the setting of designated assets of national importance within the wider study area. That is, the scheme

may be experienced visually within the settings of these assets and consequently may have an effect on the contribution that the settings have to the heritage significance of those assets.

## *Aldington Conservation Area – Church Area and Aldington – Clap Hill*

- 12.121 Aldington – Church Area Conservation Area was designated in July 1996 and covers the historic core of the settlement of Aldington. Aldington – Clap Hill, designated in February 1985 lies to the west of the modern settlement and comprises three listed buildings and their grounds.

- 12.122 The setting of the asset contributes illustrative value by way of rural context, although long views north are screened by belts of tree planting and the modern settlement of Aldington lies to the east. There are dispersed historic and designated farmsteads to the south-west of the conservation area and these contribute illustrative value to the setting. There is no intervisibility with the study site owing to distance, intervening built form and tree-screening.

12.123 It is considered that the development will cause the lowest levels of less than substantial harm to the Church of St Martin and Court Lodge Farm House, which in turn impacts on the significance of the Aldrington – Church Area Conservation Area, generating harm at the lowest level of less than substantial: Minor-Negligible in line with **Table 12.4**, and not significant.

## *Grade I listed Church of St Martin (NHLE 1071208)*

12.124 The Church of St Martin is a grade I listed building located c.1km south of the application site southern corner within Aldrington Conservation Area. The Church of St Martin is located on an elevated position overlooking the wider surrounding countryside. Its setting is formed by its immediate surroundings in the form of the churchyard and Court Lodge with its associated structures, as well as the wider agricultural/rural landscape surrounding the church. While the views from parts of the application site towards the church are not designed views, the topography and sparse development do mean that they have a positive contribution to the

significance of the church, as it allows for an appreciation of the church from a distance, as demonstrated in Viewpoints 8, 9 and 10 (ES Volume 4). Whilst the Church is of national heritage significance it is considered to be of low sensitivity to the proposed development: the application site makes a minor contribution to the setting of a designated heritage asset.

12.125 The proposed solar farm would mean that views of the church tower will still be possible from parts of the application site but will be seen in the context of the solar farm. Due to this change, the contribution that this view makes to the significance of the church will be reduced, but not removed entirely. The effect of the proposed development on the view from the application site towards the church is considered to have a very minor visual impact on the setting of the church. It is considered to be a less than substantial harmful effect on the lowest end of the scale, Minor-Negligible in line with **Table 12.4**, and not significant.

## *Grade II\* listed Court Lodge Farmhouse (NHLE 1071209)*

12.126 Court Lodge Farmhouse is a grade II\* listed building located c.1km south of the application site, within Aldrington Church Area Conservation Area. As previously discussed, there is a historic ownership link between Court Lodge Farmhouse and the southern area of the application site, which has been severed for the last 70 years. The application site forms part of the wider countryside within which the farmhouse is located. Whilst the Farmhouse is of national heritage significance it is considered to have negligible sensitivity to the proposed development.

12.127 Under the proposed development the field boundaries would remain intact, therefore the legibility of historic field parcels remains unchanged, leaving the illustrative historic value to Court Lodge Farmhouse unaffected. It is considered that the proposed development would therefore have a negligible visual impact which equates to the lowest level of less than substantial harm, Negligible in line with **Table 12.4** and not significant.

### *Grade II\* listed Evegate Manor (NHLE 1362798)*

12.128 Evegate Manor is a grade II\* listed building located c.550m west of the application site. The top of the chimneystacks of Evegate Manor can be glimpsed from the western boundary of Area 1. Due to vegetation and topography, there are no views of the application site from the house. The historic ownership link with the application site's northern area has since been severed, with no contemporary connection to the application site. Therefore, the application site does not contribute to the significance of the farmhouse and the proposed development would have an impact of no harm on the asset's significance.

## CUMULATIVE EFFECTS

### Construction and Decommissioning

12.129 There are no strict guidelines for assessing cumulative effects. In terms of direct cumulative effects, due to the physical localised character of

sub-surface archaeological remains, construction of 'other developments' will generally not result in cumulative direct impacts on designated or non-designated archaeological assets. The exception to this is archaeological deposits which extend beyond the development site which would be impacted by removal of contemporary deposits by development in the immediate vicinity. The potential for archaeological deposits to extend substantially beyond the limit of the site and be impacted by 'other developments' is considered low. No cumulative effects are identified. As the Pivot Power Battery Energy Storage (forthcoming application) is within the study site's boundary, it is necessary to consider potential cumulative effects resulting from this application.

### *Pivot Power Battery Energy Storage*

12.130 The Pivot Power Battery Energy Storage (separate application) is located in the south-east of Area 1 (**Figure 12.1, Volume 3**), west of Church Lane and the National Grid Sub Station. The area of the proposed Pivot Power Battery Energy Storage has been subject to

previous archaeological evaluation and mitigation between 1997 and 2001 (KHET EKE5094; Oxford Archaeology 1997 and EKE5097; Oxford Archaeology 2001 and 2003). These investigations resulted in the identification and recording of the following finds or features in this part of the site:

- Medieval ditch (TR03NE206) recorded during 2001 evaluation and excavation (OAU 2001);
- Mesolithic to Bronze Age flint scatter (TR03NE59) recorded during 2001 evaluation and excavation (OAU 2001);
- Four Bronze Age ditches, which may have been part of a field system (TR03NE60) recorded during 1997-99 evaluation and excavation (OAU 2001); and
- A late Iron Age/early Roman field system (TR03NE205) recorded during 1997-99 evaluation and excavation (OAU 2001).

12.131 As this area has been fully evaluated and mitigated no effects to archaeology are anticipated to result from the forthcoming Pivot Battery Energy Storage application. As

such, no cumulative effects are also anticipated.

## Operation

- 12.132 No significant adverse effects have been identified in relation to the setting of heritage receptors. No cumulative effects are therefore identified.

## *Pivot Power Battery Energy Storage*

- 12.133 Cumulative effects in relation to Pivot Power Battery Energy Storage have been considered. This application will result in the construction of a c. 3m high structure. Due to intervening topography and vegetation no impacts on the setting, and therefore the significance, of the nearby Grade II listed buildings of Water Farm House (NHLE1185259) and the stable/granary about 20m north west of Water Farm House (NHLE1362797) have been identified. No other receptors close by have been identified which may be sensitive to change. No cumulative effects are identified.

## FURTHER MITIGATION AND ENHANCEMENT

### Construction and Decommissioning

- 12.134 The heritage desk-based assessment and the geophysical survey of the site concludes that the application site is considered to have a high potential for finds and features of prehistoric – Romano-British (or medieval to post-medieval) occupation across Area 5. Based on available evidence, this potential archaeological resource is considered likely to be of local to regional. The assessment has also identified potential for prehistoric to Romano-British remains of local significance in Area 2. In Area 2 the majority of the archaeological resource will be preserved in situ in open space. The archaeological resource in Area 5 is located in an area of proposed solar panels.
- 12.135 Taking into consideration the limited impact of the proposed solar panels, the magnitude of change on the potential archaeological resource within Areas 2 and 5 is considered

minor adverse: removal of a minor part of its total area but the site retains significant future research potential. This effect is considered Minor; not significant.

- 12.136 It is anticipated that a programme of archaeological evaluation will be required as a condition of planning to confirm the results of this assessment and supplement the existing record of the archaeological resource within the application site.
- 12.137 This would allow an appropriate strategy for the conservation of the archaeological remains to be developed and agreed with the LPA, either by protection via concrete foundations, archaeological recording, or a combination of these approaches.

## Operation

- 12.138 No significant adverse effects have been identified and therefore no further mitigation or enhancement is proposed.

## RESIDUAL EFFECTS

Table 12.5 - Summary of Residual Effects

Construction and  
Decommissioning

12.139 **Table 12.5** sets out a summary of the potential mitigation and assessment of residual effects arising from the scheme during demolition and construction. The assessment of the effects has used the significance criteria matrices set out in **Table 12.1**, **Table 12.2**, **Table 12.3** and **Table 12.4**.

12.140 The implementation of the programme of archaeological work at the application site will result in the preservation by record of archaeological deposits impacted by the proposed development. The resulting research will contribute to the increased knowledge and understanding of the landscape and settlement evolution of the wider area. This is considered to slightly reduce the overall effects on archaeology to Negligible - Minor Adverse, not significant in EIA terms.

|              | Receptor Name and Description           | Potential Mitigation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Assessment of Residual Effects     |
|--------------|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| Construction | Non-designated archaeological deposits. | <p>It is anticipated that a programme of archaeological evaluation will be required as a condition of planning to confirm the results of this assessment and supplement the existing record of the archaeological resource within the application site.</p> <p>This would also allow an appropriate strategy for the conservation of the archaeological remains to be developed and agreed with the LPA, either by exclusion, protection via concrete foundations, archaeological recording, or a combination of these approaches.</p> | Negligible - Minor Adverse effect. |

## Operation

- 12.141 No further mitigation or enhancement is proposed. The residual effect will be Minor/Negligible and Not Significant in EIA terms.

## MONITORING

- 12.142 No significant adverse effects have been identified and therefore no monitoring is proposed.

## SUMMARY

- 12.143 This chapter presents the findings of the assessment of likely significant effects of the construction and operational phases of the proposed developments in terms of archaeology and cultural heritage. It incorporates the results of a heritage desk-based assessments (**Appendix 12.1**) and a geophysical survey contained in **Appendix 12.2**.
- 12.144 A review of the National Heritage List for England confirmed that there are no designated heritage assets within the application site. As such no designated assets will be

directly impacted by the proposed development.

- 12.145 The heritage desk-based assessment and the geophysical survey of the site concludes that the application site is considered to have a high potential for finds and features of prehistoric – Romano-British (or medieval to post-medieval) occupation across the west-central part of the application site. Based on available evidence, this potential archaeological resource is considered likely to be of local to regional. The assessment has also identified potential for prehistoric to Romano-British remains of local significance in the east central part of the application site. In the east-central part of the application site the majority of the archaeological resource will be preserved in situ in open space. The archaeological resource in the west-central part of the site is located in an area of proposed solar panels.
- 12.146 Taking into consideration the limited impact of the proposed solar panels, the magnitude of change on the potential archaeological resource is considered minor adverse: removal of a minor part of its total area but the site retains significant future research

potential. This effect is considered Minor; not significant.

- 12.147 It is anticipated that a programme of archaeological evaluation will be required as a condition of planning to confirm the results of this assessment and supplement the existing record of the archaeological resource within the application site.
- 12.148 This would allow an appropriate strategy for the conservation of the archaeological remains to be developed and agreed with the LPA, either by protection via surface mounted concrete foundations, archaeological recording, or a combination of these approaches. The resulting research will contribute to the increased knowledge and understanding of the landscape and settlement evolution of the wider area. This is considered to slightly reduce the overall effects on archaeology to Negligible - Minor Adverse, not significant in EIA terms.
- 12.149 No significant adverse effects have been identified in relation to the setting of heritage receptors.

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