



Stonestreet Green Solar

Environmental Statement

Volume 2: Main Text

Chapter 7: Cultural Heritage

PINS Ref: EN010135

Doc Ref. 5.2

Version 1

June 2024

APFP Regulation 5(2)(a)

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



Table of Contents

7	Cultural Heritage	7-2
7.1	Introduction	7-2
7.2	Legislation, Planning Policy and Guidance	7-3
7.3	Stakeholder Engagement	7-6
7.4	Assessment Methodology	7-30
7.5	Baseline Conditions	7-43
7.6	Embedded Design Mitigation	7-52
7.7	Assessment of Effects	7-56
7.8	Additional Mitigation, Monitoring and Enhancement Measures	7-98
7.9	Residual Effects	7-100
7.10	Cumulative Effects	7-101
7.11	Climate Change	7-120

List of Tables

Table 7.1:	EIA Scoping Report Response Summary	7-7
Table 7.2:	Non-Statutory Consultation Response Summary	7-10
Table 7.3:	2022 Statutory Consultation Response Summary	7-12
Table 7.4:	2023 Statutory Consultation Response Summary	7-22
Table 7.5:	2023 Targeted Consultation Response Summary	7-29
Table 7.6:	Receptor Sensitivity Descriptors	7-39
Table 7.7:	Summary of Receptor Sensitivity	7-49
Table 7.8:	Operational Phase Cultural Heritage Indirect Effects	7-93
Table 7.9:	Summary of Residual Effects	7-108

Figures (Doc Ref. 5.3)

- Figure 7.1a: Designated Heritage Assets within 2km of the Site
- Figure 7.1b: Designated Heritage Assets within 5km of the Site
- Figure 7.2: Designated Heritage Assets beyond 5km of the Site boundary
- Figure 7.3a to d: Recorded Non-designated Heritage Assets within 1km of the Site (Sheet 1 to 4)
- Figure 7.4: Heritage Viewpoints
- Figure 7.5: Highly graded designated heritage assets between 12km and 5km of the Site
- Figure 7.6: Protected Military Remains within 1km of the Site
- Figure 7.7: Non-Designated Heritage Assets: Prehistoric to Roman
- Figure 7.8: Non-Designated Heritage Assets: Early Medieval and Medieval
- Figure 7.9: Non-Designated Heritage Assets: Post Medieval, Modern and Unknown
- Figure 7.10: Historic Landscape Character
- Figure 7.11: Summary of Archaeological Evaluations Undertaken

Appendices (Doc Ref. 5.4)

- Appendix 7.1: Archaeological Desk Based Assessment
- Appendix 7.2: Heritage Statement

7 Cultural Heritage

7.1 Introduction

- 7.1.1 This chapter of the ES was prepared by Wardell Armstrong and presents an assessment of the likely significant effects on Cultural Heritage in relation to effects arising from the construction, operation, and decommissioning of the Project. Mitigation measures are identified, where appropriate, to avoid, reduce or offset any significant adverse effects identified and/or enhance likely beneficial effects. The nature and significance of the likely residual effects are reported within this document.
- 7.1.2 Detailed descriptions of the Site, the Project and the different phases of development are provided in **ES Volume 2, Chapter 2: Site and Context (Doc Ref. 5.2)** and **ES Volume 2 Chapter 3: Project Description (Doc Ref. 5.2)**. A glossary of terms and list of abbreviations used in this chapter is provided in the **Glossary (Doc Ref. 1.6)**.
- 7.1.3 The chapter is supported by the following figures and appendices:

ES Volume 3 – Figures (Doc Ref. 5.3):

- Figure 7.1a: Designated Heritage Assets within 2km of the Site;
- Figure 7.1b: Designated Heritage Assets within 5km of the Site;
- Figure 7.2: Designated Heritage Assets beyond 5km of the Site boundary;
- Figure 7.3a to d: Recorded Non-designated Heritage Assets within 1km of the Site (Sheet 1 to 4);
- Figure 7.4: Heritage Viewpoints;
- Figure 7.5: Highly Graded Designated Heritage Assets between 2km and 5km of the Site;
- Figure 7.6: Protected Military Remains within 1km of the Site;
- Figure 7.7: Non-Designated Heritage Assets: Prehistoric to Roman;
- Figure 7.8: Non-Designated Heritage Assets: Early Medieval and Medieval;
- Figure 7.9: Non-Designated Heritage Assets: Post Medieval, Modern and Unknown;
- Figure 7.10: Historic Landscape Character; and
- Figure 7.11: Summary of Archaeological Evaluations Undertaken.

ES Volume 4 – Appendices (Doc Ref. 5.4):

- **Appendix 7.1:** Archaeological Desk Based Assessment, including:
 - Annex 1: Archaeology Site Visit Plates;
 - Annex 2: Archaeology Impact Assessment Methodology;

- Annex 3: Historic Hedgerows;
- Annex 4: Archaeological Landscape Assessment;
- Annex 5: Geophysical Survey;
- Annex 6: Archaeological Monitoring Report;
- Annex 7: Trial Trenching Report; and
- Annex 8: Gazetteer; and
- **Appendix 7.2:** Heritage Statement, including:
 - Annex 1: Plates;
 - Annex 2: Heritage Viewpoints; and
 - Annex 3: Figures.

7.1.4 This assessment was informed by information from other assessments as follows:

ES Volume 2 – Environmental Statement (Doc Ref. 5.2):

- **Chapter 8: Landscape and Views;** and
- **Chapter 14: Noise.**

ES Volume 4 – Appendices (Doc Ref. 5.4):

- **Appendix 16.2:** Solar Photovoltaic Glint and Glare Study.

7.2 Legislation, Planning Policy and Guidance

Legislation

7.2.1 The following legislation is relevant to the Project:

- Planning (Listed Buildings and Conservation Areas) Act 1990¹;
- Ancient Monuments and Archaeological Areas Act 1979²;
- Protection of Military Remains Act 1986³; and
- Hedgerows Regulations 1997⁴.

Planning Policy

National

7.2.2 The following national planning policy is relevant to the Project:

- The National Planning Policy Framework (NPPF) (2023)⁵ with particular reference to Section 16: Conserving and Enhancing the Historic Environment;
- Overarching National Policy Statement (NPS) for Energy (EN-1)⁶;
- NPS for Renewable Energy Infrastructure (EN-3)⁷; and
- NPS for Electricity Networks Infrastructure (EN-5)⁸.

7.2.3 Section 5.9: Historic Environment of NPS EN-1 sets out the matters to be considered in the assessment of any likely significant heritage impacts for a development. It states that *“The construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at, and below the surface of the ground”* (paragraph 5.9.1).

7.2.4 NPS EN-1 states:

‘As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance.’ (Paragraph 5.9.10)

‘Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact.’ (Paragraph 5.9.11)

‘The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and detail of these studies will be proportionate to the significance of the heritage asset affected.’ (Paragraph 5.9.12)

‘The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected.’ (Paragraph 5.9.13)

7.2.5 NPS EN-3 confirms that solar developments may affect heritage assets (sites, monuments, buildings, and landscape) both above and below ground, and their impacts will require expert assessment in most cases. NPS EN-3 recognises, however, that *‘Equally solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated’* (paragraph 2.10.110).

7.2.6 NPS EN-3 reiterates the requirement for the submission of an appropriate desk-based assessment and, where necessary, a field evaluation, *“Where a site on which development is proposed includes, or has the potential to, include heritage assets with archaeological interest...”* (paragraph 2.10.113). Furthermore, NPS EN-3 goes on to state that *“In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, such as proposed cabling, substation*

foundations or mounting supports for solar panels on archaeological assets.” (paragraph 2.10.114). In additional NPS EN-3 states that, *“The extent of investigative work should be proportionate to the sensitivity of, and extent of proposed ground disturbance in, the associated study area.”* (paragraph 2.10.115).

7.2.7 Paragraphs 2.10.116 – 2.10.119 of NPS EN-3 state that:

“Applicants should take account of the results of historic environment assessments in their design proposal.

Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.

As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design and prominence, may cause substantial harm to the significance of the asset.

Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.”

7.2.8 With regards to mitigation paragraphs 2.10.137 – 2.10.138 of NPS EN-3 state that:

“The ability of the applicants to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology.

Where requested by the applicant, the Secretary of State should consider granting consents which allow for the micrositing within a specified tolerance of elements of the permitted infrastructure, so that precise locations can be amended during the construction phase if unforeseen circumstances, such as the discovery of previously unknown archaeology, arise.”

7.2.9 In addition, *“Solar farms are generally consented on the basis that they will be time-limited in operation. The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets.”* (paragraph 2.10.160).

Local

7.2.10 The following Ashford Borough Council (‘ABC’) Local Plan to 2030⁹ policies are of relevance:

- Policy ENV3a – Landscape Character and Design;
- Policy ENV5 – Protecting Important Rural Features;
- Policy ENV13 – Conservation and Enhancement of Heritage Assets;

- Policy ENV14 – Conservation Areas; and
- Policy ENV15 – Archaeology.

Guidance

7.2.11 The following guidance is relevant to the Project:

- Planning Practice Guidance: Historic environment¹⁰;
- Historic Environment Good Practice Advice in Planning Note 2. Managing Significance in Decision Taking in the Historic Environment: Historic England¹¹;
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets: Historic England (2017)¹²;
- Historic Environment Statement of Heritage Significance: Analysing Significance in Heritage Assets: Historic England Advice Note 12: Historic England (2019)¹³;
- Commercial Renewable Energy Development and the Historic Environment: Historic England Advice Note 15 (2021)¹⁴;
- Standards and Guidance for Historic Environment Desk-Based Assessment Chartered Institute for Archaeologists (CIfA) (2020)¹⁵;
- Code of Conduct: Chartered Institute for Archaeologists (CIfA) (2020)¹⁶;
- Principles of Cultural Heritage Impact Assessment in the UK: Institute of Environmental Management and Assessment (IEMA), the Institute of Historic Building Conservation (IHBC) and the Chartered Institute for Archaeologists (CIfA) (July 2021)¹⁷; and
- Heritage Strategy: Ashford Borough Council (October 2017)¹⁸.

7.3 Stakeholder Engagement

7.3.1 This section of the chapter summarises key stakeholder engagement undertaken to inform the assessment. It also summarises the key matters raised by consultees in relation to the EIA on the topic of Cultural Heritage. An explanation of how comments are addressed in the ES is provided.

EIA Scoping

7.3.2 **Table 7.1** provides a summary of the responses to the **EIA Scoping Report (ES Volume 4, Appendix 1.1: EIA Scoping Report (Doc Ref. 5.4))** of relevance to this assessment and how the assessment has responded to them.

Table 7.1: EIA Scoping Report Response Summary

Consultee and Comment	Response
<i>Planning Inspectorate (30 May 2022)</i>	
<p>Agrees with scoping out direct physical effects on assets during operation and decommissioning phases on the basis that physical effects will only occur during the construction phase.</p> <p>‘For clarity, the Inspectorate considers that indirect impacts on designated heritage assets should be scoped in as potential for impact remains from piling, compaction and subsequent potential changes in drainage patterns during construction and operation.’</p> <p>‘The Scoping Report provides limited detail regarding potentially significant impacts on cultural heritage. For clarity, the ES should consider potential impacts including groundwork, noise, visual, vibration, landscaping, haul roads and construction compounds.</p> <p>Agrees that direct physical effects on assets beyond the Site boundary can be scoped out. ‘However, the Inspectorate considers that indirect effects on heritage assets should be assessed in the ES where significant effects are likely to occur as there are a number of assets close to the red line boundary.’</p> <p>Recommends that ‘the study area should be determined relevant to the extent of the likely impacts and should be depicted on a supporting plan.’ The wider landscape context should also be considered in the assessment. Approach should be agreed with relevant consultation bodies.</p>	<p>ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4) includes an Archaeological Landscape Assessment within Annex 4.</p> <p>Changes to drainage patterns is a direct effect not an indirect effect and has been considered on buried archaeological remains within the Site and in the vicinity of the Site within this Chapter, however as outlined within paragraph 7.4.12, changes to drainage patterns have been scoped out of further assessment as the impact of the Project on groundwater levels within the Site will be negligible.</p> <p>The assessment in this chapter has considered all forms of potential effects including groundwork, visual and noise (refer to Section 7.7 ‘Assessment of Effects’).</p> <p>Glint effects to heritage assets, which is an indirect effect, has been considered within this Chapter (refer to Section 7.7 ‘Assessment of Effects’).</p> <p>Vibration has been scoped out of further assessment within the ES, as outlined within ES Volume 2, Chapter 16: Other Topics (Doc Ref. 5.2), as effects would not be significant. All built heritage receptors are of a distance from construction works that they would not be impacted from ground borne vibration, in addition, mitigation measures included within the Outline Construction Environmental Management Plan (‘CEMP’) (Doc Ref. 7.8) and Outline Decommissioning Environmental Management Plan (‘DEMP’) (Doc Ref. 7.12) would mitigate impacts from ground borne vibration. As such, vibration is not</p>

Consultee and Comment	Response
	<p>considered further within this assessment.</p> <p>Indirect effects on the significance of heritage assets through groundworks, noise, visual changes including landscaping, internal haulage roads and construction compounds have been assessed as part of ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4) and this chapter.</p> <p>The study area was agreed with KCC on 17th June 2022 (see Table 7.2 below for further details).</p> <p>As part of ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4), the known and potential heritage assets are placed within and discussed as part of the wider landscape context and their association with each other, rather than treated as isolated assets.</p>

KCC Senior Archaeological Advisor (18 May 2022)

<p>KCC recommends a number of additional assessments including an Archaeological Landscape Assessment, Geo-Archaeological Assessment and targeted trial trenching to inform the ES.</p> <p>‘The mitigation approach should consider all forms of potential impact including groundworks, visual and noise. This could include new tree planting, ecological works, landscaping as well as site compounds, vehicle haul roads during construction, glare from panels and humming from generators.’</p> <p>KCC ‘does not agree with the scoping out of direct physical effects on assets beyond the site boundary. There may be constructional or operational impacts on the water table and from glare which could impact on palaeoenvironmental</p>	<p>As part of ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4), the known and potential heritage assets are placed within and discussed as part of the wider landscape context and their association with each other, rather than treated as isolated assets.</p> <p>ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4) includes the following:</p> <ul style="list-style-type: none"> ▪ Annex 1: Archaeology Site Visit Plates; ▪ Annex 2: Archaeological Impact Assessment Methodology; ▪ Annex 3: Historic Hedgerows; ▪ Annex 4: Archaeological Landscape
---	--

Consultee and Comment	Response
<p>remains or upstanding sensitive assets, such as medieval farms or ritual landscapes.'</p>	<p>Assessment;</p> <ul style="list-style-type: none"> ▪ Annex 5: Geophysical Survey; ▪ Annex 6: Archaeological Monitoring Report; ▪ Annex 7: Trial Trenching Report; and ▪ Annex 8 Gazetteer. <p>The assessment in this chapter has considered all forms of potential effects including groundworks, visual and noise (refer to Section 7.7 'Assessment of Effects').</p> <p>Glint effects to heritage assets, which is an indirect effect, has been considered within this Chapter (refer to Section 7.7 'Assessment of Effects').</p> <p>PINS agreed with the assessment of the Applicant within the Scoping Report (ES Volume 4, Appendix 1.1: EIA Scoping Report (Doc Ref. 5.4)) that direct physical effects on assets beyond the Order limits can be scoped out. See PINS scoping opinion comment above.</p>
<p><i>Historic England (20 May 2022)</i></p>	
<p>Pre-application response received advising that Historic England do not consider it necessary for Historic England to participate in pre-application discussions unless the scheme develops such that there are material changes to the proposals which would affect the historic environment.</p>	<p>No further action necessary.</p>
<p><i>Aldington and Bonnington Parish Council (30 May 2022)</i></p>	
<p>We request that a full Lidar scan of the area is also submitted as part of the Environment Statement.'</p>	<p>Available LiDAR has been assessed and incorporated into the Archaeological DBA (refer to ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4) Figure GM12014/004-009) and this chapter.</p>

Consultee and Comment	Response
<i>FDHC (30 May 2022)</i>	
<p>Consideration of the impact underground cabling would have on archaeology must be drawn out in any forthcoming ES.'</p>	<p>The assessment in this chapter has considered ground disturbance caused by underground cabling to known and potential buried archaeological remains (refer to Section 7.7 'Assessment of Effects').</p>

Non-Statutory Consultation

7.3.3 **Table 7.2** provides a summary of non-statutory consultation (i.e., meetings with statutory bodies or ABC officers) that was undertaken of relevance to this assessment and how the assessment has responded to them.

Table 7.2: Non-Statutory Consultation Response Summary

Consultee and Comment	Response
<i>KCC Senior Archaeological Advisor (17 June 2022)</i>	
<p>Virtual meeting held to discuss comments received on:</p> <p>Archaeological Landscape Assessment included within KCC EIA Scoping Response. Methodology for preparing such an assessment and examples of these assessments were requested by the Applicant.</p> <p>Potential fieldwork requirements. Geophysical survey of the Site has been undertaken (excluding the north-eastern part of the Site, which will be included in the ES), and report is to be shared with KCC. Percentage of possible trial trenching was also discussed and decision on need / extent of evaluation to be based on preliminary works (Archaeological DBA and geophysical survey results).</p>	<p>Examples of historic landscape assessment and archaeological desk-based assessment at a landscape-scale provided by KCC are welcomed and have been used to inform the Archaeological Landscape Assessment within Annex 4 of ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4).</p> <p>A preliminary draft version of the Archaeological DBA, Archaeological Landscape Assessment, Geophysical Survey Report, Archaeological Monitoring Report and Trial Trenching Assessment Report was provided to KCC for initial comment and feedback received has been considered and incorporated into ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4), where relevant.</p>

Consultee and Comment	Response
<i>KCC Senior Archaeological Advisor (29 March 2023)</i>	
<p>Virtual meeting to discuss proposed approach to intrusive archaeological fieldwork and the contents of the required Archaeological Landscape Assessment Report.</p> <p>Several options were presented for discussion as follows:</p> <p>Possible buffer zones for areas of evidently higher archaeological potential;</p> <p>Targeted trial trench evaluation, to inform upon geophysical anomalies and recorded archaeological features; and</p> <p>Targeted geoarchaeological test pits, to inform on low potential areas masked by alluvium.</p> <p>Those proposed options would then further inform options for further mitigation, as follows:</p> <p>Further archaeological mitigation, including additional trial trenching, excavation and watching brief; and</p> <p>No dig/ballast/minimal impact installation.</p>	<p>The meeting reiterated KCC's requirement for ground truthing at the pre-determination stage.</p> <p>A preliminary draft version of the Archaeological Landscape Assessment was provided to KCC for initial comment and feedback received has been considered and incorporated into ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4), where relevant.</p>
<i>KCC Senior Archaeological Advisor (24 April 2023)</i>	
<p>Virtual Meeting to discuss targeted trial trenching of the substation area within Field 26. KCC welcomed intrusive evaluation however keen to see additional trenches included along Roman Road and the non-designated The Mount (outside of the Site boundary).</p> <p>Archaeological Mitigation Strategy to set out the approach for all post DCO archaeological works also discussed.</p>	<p>Additional trenches included to target Roman Road and area of The Mount. This was agreed through the preparation and submission of a Written Scheme of Investigation ('WSI'), included within Appendix B of the Archaeological Management Strategy ('AMS') (Doc Ref. 7.17).</p> <p>An AMS (Doc Ref. 7.17) has been prepared and is provided with the DCO application. The document presents the approach to engagement, field work management, project management and</p>

Consultee and Comment	Response
	<p>post-excavation analysis and publication stages that will be carried out pre-construction, post DCO consent, to inform the final design of the Project. It is considered that this will ensure any archaeological potential is fully investigated and ensure the final design of the Project mitigates any residual risk.</p> <p>A preliminary draft version of the AMS (Doc Ref. 7.17) was provided to KCC for initial comment and feedback received has been considered and incorporated into the AMS (Doc Ref. 7.17), where relevant.</p>

Kent County Council (22 January 2024)

<p>It is essential that the AMS clearly states the current evidence, sets out all the potential stages of mitigation and how the resource will be managed throughout the development -pre-construction, during construction and operational stages.</p>	<p>The AMS (Doc Ref. 7.17) has been further reviewed in light of the comments from KCC. It addresses how mitigation is proposed and staged to manage and mitigate impact on archaeological assets during the construction, operational and decommissioning phases of the Project.</p>
---	--

2022 Statutory Consultation

7.3.4 **Table 7.3** provides a summary of the responses to the PIER of relevance to this assessment and how the assessment has responded to them.

Table 7.3: 2022 Statutory Consultation Response Summary

Consultee and Comment	Response
<i>Ashford Borough Council</i>	
<p>Assessment needs to be expanded to identify all of these buildings (designated and non-designated), their significance and their setting. Each heritage asset, both designated and non-designated, needs to be assessed separately, based on a true understanding of the special character of the building/asset.</p>	<p>The identification of heritage assets which may be sensitive to the Project as presented within ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4) follows a systematic approach following Historic England guidance on setting with assets considered in terms of their significance and what their significance derives from their setting (inclusive of the land within the Site) and then ‘scoped out’ of</p>

Consultee and Comment	Response
	<p>requiring detailed assessment for various reasons where no change would result or where changes within their setting would not affect their significance. This can depend on the asset type and its special interest, the location, visibility (using the ZTV) etc. However, in view of the comments made by ABC's Conservation Officer, a Gazetteer of both designated and non-designated heritage assets has been included within the ES with proportionate assessments of significance / summary of significance provided and reasoning / explanation as to whether further assessment is to be undertaken or not, provided. As ABC does not hold a local list of buildings of special historic or architectural interest, built assets to be included within this assessment has been discussed with ABC's Conservation Officer and identified through a review of HER data and available conservation area appraisals / management plans and reflect the ZTV (refer to ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)).</p> <p>Non-designated heritage assets of a built nature recorded on the HER within a 1km (see ES Volume 3, Figure 7.3: Recorded Non-Designated Heritage Assets within 1km of the Site (Sheet 4) (Doc Ref. 5.3)) vicinity of the Site have been reviewed with those assets identified as being sensitive to changes introduced by the Project and requiring further assessment reported within this chapter.</p> <p>All assets of the highest importance (Grade I, Grade II*, scheduled monuments, Conservation Areas) within 2km of the Site (see ES Volume 3, Figure 7.1a: Designated Heritage Assets within 2km of the Site (Doc Ref. 5.3)) have been reviewed as part of the ES and included for further detailed assessment in line with Steps 2 and 3</p>

Consultee and Comment	Response
	<p>Historic England guidance within ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4). Grade II listed buildings located within 2km of the Site which the ZTV (refer to ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)) identifies as holding potential visibility have also been reviewed in line with Historic England guidance.</p>
<p>Assessment of long-range views and visibility of the heritage assets within the landscape needs to be applied. Some buildings, such as rural churches, which are often of the highest national significance, are an historic landscape feature and as such the setting of such buildings will likely be much wider than a mid-terraced cottage in a village setting, for example. Significant developments may have a harmful impact on a building's setting, even though the development is some distance away.</p>	<p>A meeting with the ABC Conservation Officer was held on 30 June 2023 to agree the approach to assessment of distant assets.</p> <p>The inclusion of additional views from Mersham Manor, Mersham Conservation Area and the church of St John the Baptist were proposed by ABC and visualisations have been produced (see ES Volume 3, Figure 7.4: Heritage Viewpoints (Doc Ref. 5.3)).</p>
<p>The assessment of the impact on the built heritage should be a qualitative not a quantitative assessment.</p>	<p>An alternative methodology to that included in the PEIR was presented and agreed with ABC and Historic England and is included within this Chapter (refer to Section 7.4 'Assessment Methodology').</p>
<p>The full ES must reference and consider the Ashford Heritage Strategy (2017) and national 2021 guidance from Historic England about solar farms. These two documents are relevant to this development and must be considered.</p>	<p>The ABC Heritage Strategy and Historic England Advice Note 15 Commercial Renewable Energy Development and the Historic Environment have been reviewed and referenced within the ES as requested by ABC's Conservation Officer (refer to Section 7.2 'Legislation, Planning Policy and Guidance').</p>
<p>The Council strongly supports the comments made by the County Council Archaeologist in respect of the need for a more detailed archaeological assessment in order to ensure that the nature and character of any archaeological site is</p>	<p>Archaeological evaluation in the form of targeted trial trenching and geoarchaeological test pits was undertaken and the results included within this ES (refer to ES Volume 4, Appendix 7.1: Archaeological Desk</p>

Consultee and Comment	Response
<p>acceptably mitigated within its particular landscape setting, including any potential barrows within the site.</p>	<p>Based Assessment (Doc Ref. 5.4)). An Archaeological Landscape Assessment was undertaken and is included as ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 4 (Doc Ref. 5.4).</p>
<p><i>Kent County Council Senior Archaeological Advisor (15 December 2022)</i></p>	
<p>The PEIR includes a heritage assessment which is reasonable and provides a currently acceptable assessment of archaeology, although it is not entirely comprehensive or wide-ranging for this landscape scale proposed development within a rural area. KCC particularly welcomes the archaeological landscape assessment but requests this is broadened. The County Council recommends that a specialist report on archaeological landscapes in view of the scale and visibility of this scheme is provided. The assessment of the archaeological landscape is restricted and integrated into the general archaeological Desk Based Assessment ('DBA') and a separate Archaeological Landscape Assessment is recommended to be completed - similar to the Landscape Visual Impact Assessment ('LVIA') report would have been preferable.</p>	<p>Discussions regarding the approach to the preparation of an Archaeological Landscape Assessment were held with KCC (Heritage) on 26 March 2023. An Archaeological Landscape Assessment was undertaken and is included as ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 4 (Doc Ref. 5.4) which addresses issues raised by KCC (Heritage) in their S.42 response.</p> <p>Considerable effort has been directed toward minimising landscape and visual impact (refer to ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2) for further details), including through the following included in the design of the Project:</p> <ul style="list-style-type: none"> ▪ Comprehensive reinforcement of existing hedgerows; ▪ Over 5km of new hedgerows including on the most visually sensitive parts of the Site (the Aldington Ridge); ▪ Diversion of PRow along field boundaries and provision of open landscape corridors; ▪ Creation of new PRow to enable better connectivity across the Site; ▪ Buffers to residential properties; ▪ Woodland belts along Calleywell Lane and Station Road; ▪ Extensive planting of characteristic trees and woodland along the East Stour River;

Consultee and Comment	Response
	<ul style="list-style-type: none"> ▪ Reinforcement of proposed planting on the southern edge of Field 20 to further limit short distance views from the National Landscape (as requested by the Kent Downs AONB Unit); ▪ Provision of an open area on the Aldington Ridge with seating to provide opportunities for views towards the North Downs to be enjoyed; and ▪ Creation of substantial areas of enhanced habitat including scrub/woodland edge planting, native wildflower grassland, ponds and scrapes and mitigation areas for skylark, brown hare, yellow hammer and ground nesting birds. <p>In reference to the 5km of new hedgerows above, some of the new hedgerows proposed across the Site would reinstate historic boundaries which have been previously lost, including east of Field 4, which is the former Parish Boundary of Mersham and Aldington, and Fields 9 and 10 will see the restoration of a 20th century boundary and re-enclosure of the land reminiscent of the 19th century enclosures.</p>
<p>Recommend that a specialist report on geo-archaeological and Palaeolithic potential is undertaken. There is potential for important geo-archaeological information and Palaeolithic remains to survive towards the northern part of this scheme.</p>	<p>A separate report on geo-archaeological and palaeolithic potential is not proposed as part of the further baseline work to inform the ES.</p> <p>KCC Senior Archaeological Officer in their response suggest a requirement within the DCO to secure geo-archaeological field evaluation including post-excavation reporting. This approach is welcomed and the approach to geo-archaeological evaluation following granting of the DCO is secured via the AMS (Doc Ref. 7.17), as agreed with KCC at a meeting on 24 April 2023.</p>

Consultee and Comment	Response
<p>The County Council welcomes the proposed retention of historic landscape features such as hedgerows. There are considerations of preservation of archaeological landscape features if currently visible which should be explored further. The County Council would encourage some flexibility with the scheme to accommodate retention of archaeological landscape features if possible as the scheme progresses.</p>	<p>The Project involves limited loss of vegetation and is secured by the Design Principles (Doc Ref. 7.5).</p> <p>The Project includes flexibility within the final design to respond to archaeological features which may be identified during the programme of archaeological mitigation post DCO consent as outlined within Section 7.6 'Embedded Design Mitigation', and to respond to features identified during construction works.</p>
<p>The archaeological assessment includes a geophysical survey and KCC welcomes the inclusion of the geophysical survey. Unfortunately, the consideration of the results and interpretation of the data is limited and more detailed assessment is required to inform appropriate mitigation.</p> <p>This survey has highlighted anomalies and many of which may be archaeological remains. No "ground truthing" or intrusive targeted archaeological work has taken place so these anomalies are undated and their significance is not known. Some may be of significance and merit preservation in situ. The County Council understands that the design of the solar panels has been re-considered but there are still areas where there may be impact on as yet unknown significant remains. It is essential that preliminary archaeological works are undertaken in time to influence the detailed scale and nature of groundworks. Preliminary targeted trenching could provide data to inform the slight adjustment of the design and location of groundworks, thereby avoiding unnecessary disturbance of significant and/or sensitive archaeology. Targeted early evaluation is therefore encouraged by the County Council.</p>	<p>The further detailed discussion around the geophysical survey results informed the ES.</p> <p>Discussions with KCC's Senior Archaeological Officer have been ongoing throughout the DCO pre-application process.</p> <p>Following the meeting with KCC's Senior Archaeological Officer on 24 April 2023 a programme of targeted pre-submission archaeological evaluation (trial trenching) was undertaken for the area of the proposed Project Substation and along the alignment of Roman Road to the southwest of the Site to inform the ES. This was agreed through the preparation and submission of a Written Scheme of Investigation ('WSI') with KCC's Senior Archaeological Officer, included within Appendix B of the AMS (Doc Ref. 7.17).</p> <p>The Archaeological Monitoring Report and Trial Trenching Assessment Report was provided to KCC for initial comment and feedback received has been considered and incorporated into ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4).</p>

Consultee and Comment

The very brief and generalised mitigation approach is not acceptable to the County Council and more detail would be helpful. Mitigation needs to consider the nature and character of the archaeological site within its landscape setting. For example, Aldington Mount may be a barrow and other barrows may be identified. Barrow Hill further to the east is also a possible sensitive area and it may be visibly impacted by glare from the panels. Some of the geophysical anomalies may reflect a ritual landscape and these areas should not be covered with solar panel.

Response

Archaeological mitigation was informed by the results of targeted pre-submission evaluation fieldwork (trial trenching), the results of which are included within this ES and **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4)**.

An appropriate strategy for fieldwork, as set out within the **AMS (Doc Ref. 7.17)**, was discussed with KCC's Senior Archaeological Officer on 24 April 2023. It was agreed this document will set out the approach to post DCO archaeological fieldwork and will include the following:

- Summary of archaeological background / baseline;
- Summary of pre-determination evaluation works undertaken on Site;
- General methodologies for post determination evaluation fieldwork (Trial Trenching and geo-archaeological test pits);
- Mitigation Strategy – Mitigation options, general methodologies for works, reporting, consultation etc; and
- Reference to / copies of KCC specifications for archaeological works.

A preliminary draft version of the **AMS (Doc Ref. 7.17)** was provided to KCC for initial comment and feedback received has been considered and incorporated into the **AMS (Doc Ref. 7.17)**.

In consideration of the wider landscape setting, **ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)** was undertaken for Project. **ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)** includes Listed Buildings which are residential properties although heritage assets are not

Consultee and Comment	Response
	<p>identified as specific receptors in their own right which can experience glint and glare effects. As such, standard practice for glint and glare assessments for DCO projects is not to include other designated heritage assets as sensitive receptors unless public access is available.</p>
<p>It is not just burial mounds themselves which should be mitigated but the views of them and the specific landscape they rest in as well as their character. Ritual landscapes should be given particularly sensitive consideration. Further consideration of the wider ritual landscapes which may be impacted by glare would be helpful.</p>	<p>ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4) includes an Archaeological Landscape Assessment within Annex 4 which provides further baseline information of the character of the landscape in which the Site is located.</p>
<i>Community Feedback</i>	
<p>There are 77 listed properties near the application site and although there is no list of non-designated heritage assets maintained by ABC, no proper investigation appears to have been carried out on the Mersham Conservation Area, Aldington Ridge and Colliers Hill footpath where there will be a loss of amenity.</p>	<p>The identification of heritage assets which may be sensitive to the Project as presented within ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4) follows a systematic approach following Historic England guidance on setting with assets considered in terms of their significance and what their significance derives from their setting (inclusive of the land within the Site) and then 'scoped out' of requiring detailed assessment for various reasons where no change would result or where changes within their setting would not affect their significance. This can depend on the asset type and its special interest, the location, visibility (using the ZTV) etc. However, in view of the comments received, a Gazetteer of both designated and non-designated heritage assets has been included within the ES with proportionate assessments of significance / summary of significance provided and reasoning / explanation as to whether further assessment is to be undertaken or not, provided. As ABC</p>

Consultee and Comment	Response
	<p>does not hold a local list of buildings of special historic or architectural interest, built assets to be included within this assessment has been discussed with ABC's Conservation Officer and identified through a review of HER data and available conservation area appraisals / management plans and reflect the ZTV (refer to ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)).</p> <p>Non-designated heritage assets of a built nature recorded on the HER within a 1km (see ES Volume 3, Figure 7.3: Recorded Non-designated Heritage Assets within 1km of the Site (Sheet 4) (Doc Ref. 5.3)) vicinity of the Site have been reviewed with those assets identified as being sensitive to changes introduced by the Project and requiring further assessment reported within this chapter.</p> <p>All assets of the highest importance (Grade I, Grade II*, scheduled monuments, Conservation Areas) within 2km of the Site (see ES Volume 3, Figure 7.1a: Designated Heritage Assets within 2km of the Site (Doc Ref. 5.3)) have been reviewed as part of the ES and included for further detailed assessment in line with Steps 2 and 3 Historic England guidance within ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4). Grade II listed buildings located within 2km of the Site which the ZTV (refer to ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)) identifies as holding potential visibility have also been reviewed in line with Historic England guidance.</p>
<p>The PEIR gives no reference to the known Roman heritage of the area and thus, potentially the Site. Roman Road is so named because this road has been in use since the Roman period and</p>	<p>An assessment of known Roman activity within the vicinity of the Site is provided within ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4). This is also</p>

Consultee and Comment	Response
<p>connected Canterbury with the smaller iron working areas of the eastern Weald. It is not unreasonable to assume that there could be as yet undiscovered remains in the fields that have been in agricultural use for many years. We therefore request LiDAR screening of the Site prior to commencement. There should be a requirement for trial archaeological digs by independent experts at locations selected by independent experts, so that this heritage cannot be destroyed and lost forever.</p>	<p>discussed in terms of the wider Archaeological Landscape Assessment within Annex 4.</p> <p>LiDAR data has been reviewed as part of the preparation of ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4) and has also been reviewed in the context of the geophysical survey results. Further assessment of potential archaeological landscape features has been undertaken as part of an Archaeological Landscape Assessment included as Annex 4 of ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4).</p> <p>Targeted archaeological evaluation works (trial trenching and geoarchaeological test pits) (refer to ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4)) have been undertaken in line with an approved WSI (included within Appendix B of the AMS (Doc Ref. 7.17)). Further archaeological works would be undertaken in accordance with the AMS (Doc Ref. 7.17).</p>
<p>The PEIR gives one example of the setting of a heritage building. In one of the presentations given by the Applicant, Grade II listed buildings were dismissed as of little importance. We disagree and request thorough investigation of effects on their setting. The Site also lies between two important heritage buildings, St Martin's Church in Church Lane and John the Baptist Church in Mersham. Effects on the setting and views from both these historic buildings should be evaluated.</p>	<p>Please see the first response to 'Community Feedback' above for a detailed response on how the assessment of Built Heritage has followed guidance.</p>
<p>The consultation does not explain how the assertion that listed buildings have</p>	<p>The assessment of impact methodology is presented within Section 7.4 'Assessment Methodology' of this</p>

Consultee and Comment	Response
<p>'minor to moderate sensitivity' has been arrived at.</p>	<p>chapter. A summary of sensitivity is provided within Table 7.6 Receptor Sensitivity Descriptors of Section 7.4 'Assessment Methodology'.</p>

2023 Statutory Consultation

7.3.5 **Table 7.4** provides a summary of the responses to the PIER Addendum of relevance to this assessment and how the assessment has responded to them.

Table 7.4: 2023 Statutory Consultation Response Summary

Consultee and Comment	Response
<p><i>ABC Conservation Officer and Planning Officer and KCC Senior Archaeological Advisor (30 June 2023)</i></p>	
<p>Virtual meeting held to discuss PEIR response and in particular the following:</p> <ul style="list-style-type: none"> ▪ Assessment Methodology; ▪ Identification / agreement of which non-designated heritage assets are to be included for assessment within the ES; ▪ Designated Heritage Assets; ▪ Additional viewpoints to be captured to inform assessment of impact to significance of designated heritage assets; ▪ Update on Archaeological works; and ▪ Cumulative Impacts. 	<p>Four additional viewpoint / visualisation locations were identified following the meeting comprising:</p> <ul style="list-style-type: none"> ▪ views east from the PRoW towards St. Martins Church; ▪ views towards the south east from the rear of the churchyard of St John the Baptist Church, Mersham; ▪ views north west from PRoW (higher ground) towards St John the Baptist Church Mersham; and ▪ views north west from the PRoW from (lower ground) towards St John the Baptist Church, Mersham. <p>These have been included within the visual assessment work and assessed within this Chapter (refer to Section 7.7 'Assessment of Effects').</p>

Historic England (17 July 2023)

<p>1. Assessment Methodology: it is stated that the heritage impact will be assessed according to Historic England's <i>The Setting of Historic Assets</i>, as well as ICOMOS and Highways England guidance. We agree with these</p>	<p>1. Historic England agree with the assessment methodology which is presented within Section 7.4 'Assessment Methodology' of this Chapter.</p> <p>2. The assessment methodology has</p>
--	--

Consultee and Comment

methodologies and add further comments below.

2. Assessment of setting: the impact on setting is being assessed in a quantitative way using environmental assessment methodology and criteria outlined in the *Design Manual for Roads and Bridges*. We recognize this is the standard approach, but in our view, it has shortcomings when assessing historic buildings and structures above ground. The assessment of the impact on the built heritage must therefore be underpinned by a qualitative approach.

3. Landscape assessment: The large span of the proposed site contains a series of hills which give an undulated landscape within a broader 'valley'. This is visually important in its own right because the coherence of long-ranging views over fields of varying shapes and sizes and ancient wood banks, set within a network of drove ways and sunken lanes, enables us to understand the lengthy agricultural history of the valley. There is a need to appreciate those elements of the landscape 'assets' in the ES and Views Study in a broader sense, rather than just look at heritage from a focus that only considers Historic Environment Records in its approach. The historic landscape makes a significant contribution to the setting of some heritage assets and vice versa. Whilst this is intended to be addressed in the Archaeological Landscape Assessment, this should also be part of the assessment of the impact on the setting of heritage assets. As we have not yet received a revised Heritage Statement, we raise concerns about the lack of sufficient assessment.

4. Scoping range: (a) We raise concerns that the list of Conservation Areas cited within the PEIR to be scoped in is

Response

been reviewed and accepted. In identifying which assets and their settings may be affected Historic England guidance on Setting is used. In identifying harm, the assessment approach presented provides flexibility in applying professional judgement in ascribing importance to an asset which would be qualitative in approach.

3. An Archaeological Landscape Assessment has been undertaken and is presented as Annex 4 within **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4)**. The contribution of the landscape setting of heritage assets to their significance has been considered as part assessment process.

4. Scoping range: (a) Noted. Potential effects to the special character and appearance of Mersham and Smeeth Conservation Areas have been scoped into the ES and reported within **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**. In consideration of including non-designated heritage assets, buildings identified on the HER have been included for assessment within **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref 5.4)**. Para 2.10.112 of NPS EN-3 states that "*Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority*". Information has been sought from the HER and used to identify non-designated heritage assets. In identifying additional non-designated heritage assets, it was requested that consultees identify which buildings / structures they also consider to be non-designated heritage assets and why.

(b) Potential effects to the significance of Aldington Knoll have been scoped into

Consultee and Comment

incomplete (PEIR, Chapter 6, Table 6.4, pp. 147-149): further to the 2 Conservation Areas Aldington Clap Hill and Aldington Church that have already been scoped in, the Conservation Areas of Mersham and Smeeth should also be scoped in so that the heritage impact on these two CAs will be fully assessed.

Conservation Areas and non-designated heritage assets need to be included in the assessment. Not all of the non-designated heritage assets will be on the HERS, so the applicant will have to identify them on site. Advice may also be sought on identifying non-designated heritage assets from Ashford BC and Kent County Council's Archaeological Advisors.

(b) We raise concerns that the Scheduled Monument Aldington Knoll (NHLE 1012216) is not mentioned in the PEIR 5km assessment of assets. The promontory location is key to Aldington Knoll's significance which is furthermore a rare asset type in this region. We advise that this asset should therefore be scoped in and fully assessed. We also ask that a view from this monument should be included in the Long Views Study.

5. Every designated and non-designated heritage asset that has been scoped in needs to be assessed separately within the ES.

The PEIR contains only two assessments of designated heritage assets: (1) Stonelees, 1233761, GII*; (2) Bank Farmhouse and walls, 1362752, GII, and Barn and 2 stable ranges, about 20 meters north of Bank Farmhouse, 1071248, GII.

Based on our understanding of the Stonelees site, we think it could be likely that the significance of effect would be

Response

detailed assessment within the **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**. A view from the monument towards the Site has been included within the additional viewpoint assessment work (see **ES Volume 3, Figure 7.4: Heritage Viewpoints (Doc Ref. 5.3)**). The detailed assessment within the **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)** has concluded that the Project would have a Very Low impact on this asset and the effect is judged to be of neutral significance. As such, it has not been considered further within this ES Chapter.

5 and 6. The results of the updated heritage assessment area included within this Chapter and within **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**.

Stonelees (NHLE 1233761) was constructed during the 15th and 16th century and its designation is for its rarity as an example of a late medieval timber framed house with local characteristic hipped roof, set within a small parcelled close off an historic trackway. The surrounding landscape has elements of 17th to 20th century field pattern and therefore its original historic association within the wider landscape is limited. It must be added that the Project, as solar farm, by its very nature follows the contours of the landscape, and in the main, respects the historic and modern existing field pattern. Therefore, the change does not diminish our understanding or appreciation of the asset set within an 17th to 20th century fieldscape. The views to and from the asset are from Laws Lane and not across rolling undulating landscape, and historic association appears to be from

Consultee and Comment

greater than Moderate Adverse. We disagree with the PEIR judgement as set out in paragraphs 6.5.41 and 6.5.50 that this significance of effect is 'not significant'. This is because in our view, a combination of the undulation of the land which makes the building's agricultural setting more apparent, would be eroded towards the east and south.

6. We are not in a position to say whether we agree with the conclusions of the assessment approach, in drawing out a meaningful assessment of the setting of the heritage assets and their contribution to significance, the potential impact of the proposals on their significance and the extent of mitigation. This also means that we cannot yet highlight any designated heritage assets where we consider the issues may be serious in historic environment terms. Without fuller information on proposed mitigation, we also cannot conclude if this is sufficient to reduce harm to heritage significance.

7. The full Environmental Statement must reference and consider the Ashford Heritage Statement (2017) and national guidance from Historic England guidance, *Commercial Renewable Energy Development and the Historic Environment* (2021).

Given the large number of major developments south of the Kent Downs and in close proximity to the proposed site, we also raise concerns about the potential cumulative harm that could be caused by proposals.

8. Viewpoints: The list of photographic viewpoints that will be considered in the ES (Fig. 7.6 Heritage Consultation Visual Appraisal Plan) should include a viewpoint from Aldington Knoll (NHLE 1012216) towards the proposed site.

Response

the fields to the south and east towards Little Gains Farm.

The significance of the Stonelees Grade II* (NHLE 1233761) heritage asset derives from its built fabric, condition and vernacular architecture which sits with a designed, albeit altered, garden. The wider setting of rolling undulating landholdings associated with the asset has been diminished and its association altered/removed. As such, its significance comes from the building and its immediate setting within the garden and curtilage. The Project is outside the curtilage of the asset, stepped back from the asset, and appropriate screening is to be provided. As such there would not be a total loss of setting regarding the asset from the Project and the change introduced outside the curtilage of the asset would have a low impact on our understanding and appreciation of the significance of Stonelees. The assessment has followed guidance ('ICIMOS') and based on that guidance the assessment of the Grade II* asset is of high value and that the magnitude of impact is considered low resulting in a slight to moderate significance of effect to its setting. See Section 7.7, 'Assessment of Effects' for full assessment.

7. References to Ashford Heritage Strategy (2017) and national guidance from Historic England on Commercial Renewable Energy Development and the Historic Environment (2021) have been made. This Chapter includes a cumulative impact assessment at **Section 7.10**.

8. Viewpoints: Additional viewpoints including one from Aldington Knoll have

Consultee and Comment	Response
<p>As the landscape is deceptive and to help illustrate the likely impacts, a greater number of photomontages than is usual may be required to explain the impacts on heritage assets. In particular, the manorial complex of Mersham visible from Viewpoint 11 must be taken into consideration, as well as the long views across the valley from Viewpoints 6, 25, 28 and 31. Our recommendations are based on one site visit and Ashford BC may have further recommendations on Viewpoints that should be assessed through photomontages.</p>	<p>been prepared and are included in ES Volume 3, Figure 7.4: Heritage Viewpoints (Doc Ref. 5.3). Viewpoints towards the assets at Mersham from on Site have also been prepared. Viewpoints have been identified to demonstrate the potential visual effect of the Project within the historic landscape surrounding the Site and the effect of the changes upon the experience of the heritage assets within their landscape setting.</p>
<p><i>Ashford Borough Council (17 July 2023)</i></p>	
<p>The Council notes that a revised Heritage Statement has not been submitted and so it is not possible to comment on any revised assessment approach in drawing out a meaningful assessment of the setting of the heritage assets, the potential impact of the proposal on their significance and the extent of mitigation. Therefore, the Council's previously expressed concerns remain. Conservation areas and non-designated heritage assets will need to be included in that Statement. Not all of the non-designated heritage assets will be in the HERS: these will, instead, need to be identified on site.</p> <p>The Council considers that the historic landscape makes a significant contribution to the setting of some heritage assets and vice versa. Whilst the Council understands that this is intended to be addressed in the Archaeological Landscape Assessment, it considers that this should also be part of the assessment of the impact of the proposals on the setting of heritage assets in a revised Heritage Statement. The viewpoint and visualisation locations map is assumed to assist the assessment of impacts in that revised</p>	<p>In consideration of including non-designated heritage assets, buildings identified on the HER have been included for assessment within ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref 5.4). ABC do not hold a local list to assist in further identifying potential non-designated heritage assets nor does the Council have Conservation Area appraisals for Aldington, Smeeth or Mersham Conservation Areas which would assist in identifying non-designated buildings and/ or structures which make a positive contribution towards the character and appearance of the area, and which could be considered to be a non-designated heritage asset.</p> <p>Paragraph 2.10.112 of NPS EN-3 states that "<i>Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority</i>". Information has been sought from the HER and used to identify non-designated heritage assets.</p> <p>The contribution made by the landscape setting of heritage assets towards their significance has been considered as part of the assessment process. In</p>

Consultee and Comment	Response
<p>Heritage Assessment. The Council consider that there are some major views that would be visually interrupted and encroached upon by the proposed development and therefore considers that a more thorough identification and analysis of the designated and non-designated heritage assets needs to be made, to include the impact on and the impact by, long-range views of the proposed development across the historic landscape.</p>	<p>understanding the visual effect of a change within the setting of a heritage asset the viewpoint and visualisation work undertaken, including the additional heritage viewpoints agreed with consultees, have been considered alongside Noise, Glint and Glare and LVIA assessment work.</p>
<p><i>KCC Heritage Conservation (20 July 2023)</i></p>	
<p>In respect of heritage matters, the County Council has welcomed the liaison so far from the Applicant's heritage team, including the latest meeting on 30 June 2023 with Ashford Borough Council Officers and Conservation Officers. From this, the County Council received confirmation that some very limited and targeted archaeological fieldwork is going to take place and the location of these trenches has been agreed. The County Council has also received assurances that Archaeological Landscape Assessment is being undertaken and would welcome sight of this Assessment when it is available. The County Council, however, continues to be concerned regarding the lack of reasonable field intrusive investigations, which are needed to verify the geophysical survey results and to provide suitable data upon which to base mitigation.</p> <p>The meeting on 30 June 2023 focused on the heritage receptors, particularly sites which may be impacted by glint and glare. Viewpoint sites from which to take images and photographs were discussed and it is understood that there may be some additional sites suggested following further consideration by Conservation Officers. Further</p>	<p>The approach for the assessment of effects to the archaeological resource considers effects arising from all works set out in Schedule 1 of the Draft Development Consent Order (Doc Ref. 3.1) which includes service routes, compounds and temporary enabling works during the construction, operational and decommissioning phases of the Project.</p> <p>The contribution made by the landscape setting of heritage assets towards their significance has been considered as part of the assessment process. In understanding the visual effect of a change within the setting of heritage asset the viewpoint and visualisation work undertaken, including the additional heritage viewpoints agreed with consultees, have been considered alongside Noise, Glint and Glare and LVIA assessment work.</p> <p>The AMS (Doc Ref. 7.17) presents the approach to engagement, field work management, project management and post-excavation analysis and publication stages that will be carried out pre-construction, post DCO consent, to inform the final design of the Project. It is considered that this will ensure any archaeological potential is fully</p>

Consultee and Comment

engagement from the Applicant on this matter would therefore be welcomed.

In respect of the material provided as part of this Statutory Consultation, the County Council would raise the following commentary.

In consideration of the preferred order limits, the scheme seems to have increased in size by c.11ha. This increase in size and scale of impact will need to be reflected in the Archaeological Assessment. It is also not clear whether the Archaeological Assessment is taking into account service routes, compounds and temporary enabling works. The Archaeological Assessment needs to appropriately cover all areas of impact.

Regarding the design response to glint and glare effects, it is understood that adjustments have been made to avoid significant effects on residential and railway but not on heritage assets, known or as yet unknown.

The County Council understands that the most recent proposals show an *“overall increase of around 10,600 plants/trees with a total of c. 48,840 trees and shrubs”* with additional lengths of hedgerow and areas of native woodland. All these new elements need to be subject to appropriate archaeological assessment and suitable mitigation.

To ensure clarity, there are some proposals which must be subject to archaeological assessment and, if necessary, mitigation. It is currently not clear whether the archaeological assessment has considered all proposals because the archaeological assessment so far has been very broad and wide-ranging. As this scheme progresses, all elements of groundworks need to be subject to archaeological

Response

investigated and ensure the final design of the Project mitigates any residual risk.

Consultee and Comment	Response
<p>assessment whether it is site preparation works, construction of the main sub station, new planting, biodiversity enhancement works, landscaping, cable routes or temporary haul roads.</p>	

2023 Targeted Consultation

7.3.6 **Table 7.5** provides a summary of the responses to the 2023 Targeted Consultation regarding minor amendments to the Order limits of relevance to this assessment and how the assessment has responded to them.

Table 7.5: 2023 Targeted Consultation Response Summary

Consultee and Comment	Response
<i>Historic England (12 December 2023)</i>	
<p>We are pleased that Aldington Knoll (NHLE 1012216) and the group of scheduled barrows located in the North Downs AONB will be scoped into the Heritage Statement. Although it is not explicitly stated, given that the Barrow Cemetery to the South-West of Barrowhill (NHLE 1475132) is shown as being within the visual envelope of the proposals (Heritage Consultation Visual Appraisal Plan; 011998.00001.731), and also that there will now be an additional viewpoint which incorporates this location (View 3), we expect that this asset will also now be scoped into the Heritage Statement.</p>	<p>The Aldington Knoll (NHLE 1012216) and Barrow Cemetery to the South-West of Barrowhill (NHLE 1475132) are included within the assessment within the Heritage Statement (refer to ES Volume 4, Appendix 7.2: Heritage Statement).</p>
<p>We raised a request for a holistic landscape assessment as part of the Heritage Statement which assesses the historic character of the overall landscape within the application site. You have said that an Archaeological Landscape Assessment would be undertaken to address this, which we would welcome. To clarify further, we would anticipate that this assessment would look to understand and characterize the area of the proposed development as a historic place. This</p>	<p>ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4) includes an Archaeological Landscape Assessment within Annex 4.</p> <p>A preliminary draft version of the Archaeological Landscape Assessment was provided to KCC for initial comment and feedback received has been considered and incorporated into ES Volume 4, Appendix 7.1: Archaeological Desk Based</p>

Consultee and Comment	Response
<p>would result in a more narrative description of the significance of the historic environment and the resultant potential for impact from the proposed development. Please contact Kent County Council to discuss the scope of this.</p>	<p>Assessment (Doc Ref. 5.4), where relevant.</p>
<p>2024 Targeted Consultation</p>	
<p>7.3.7 No responses of relevance to this assessment were received during the 2024 Targeted Consultation regarding a minor amendment to the Order limits.</p>	
<p>7.4 Assessment Methodology</p>	
<p>General Approach and Scope</p>	
<p>7.4.1 This section provides specific details of the methodology applied to the assessment of Cultural Heritage effects due to the construction, operational phase and decommissioning of the Project.</p>	
<p>7.4.2 The generic EIA methodology is detailed in ES Volume 2, Chapter 6: EIA Methodology (Doc Ref. 5.2). The detailed design for the Project will be confirmed following the grant of the DCO for the Project and completion of AMS intrusive survey works. To accommodate this flexibility, a ‘Rochdale Envelope’ approach is used, as described in PINS Advice Note Nine: Rochdale Envelope¹⁹. This involves assessing the maximum (and, where relevant, the minimum) parameters for the Project where flexibility needs to be retained while ensuring all potentially significant effects (positive or adverse) are considered.</p>	
<p>7.4.3 The assessment has been based on both the Works Plans (Doc Ref. 2.3) and Design Principles (Doc Ref. 7.5), which presents the maximum parameters, and the Illustrative Project Drawings - Not for Approval (Doc Ref. 2.6), which shows how the Project could be delivered within the parameters defined by the Works Plans (Doc Ref. 2.3) and Design Principles (Doc Ref. 7.5).</p>	
<p>7.4.4 The following key parameters from the Design Principles (Doc Ref. 7.5) have been used to assess impacts to cultural heritage assets from the Project:</p> <ul style="list-style-type: none"> ▪ PV panels (Work No. 1) will be mounted on PV frames secured using piles driven or screwed into the ground at a maximum depth of 3m. ▪ The maximum height of the PV panels (Work No. 1) will be 3.5m above ground level. ▪ PV panel (Work No. 1) areas are to be set within deer-proof fencing to a maximum height of 2.5m. ▪ Distance between proposed fencing and hedgerows outside of the deer-proof security fence would be at least 3.2m (Work No. 5). 	

- A distance of at least 3.2m will be provided between the edge of PV panels and deer-proof security fencing to allow for maintenance (Work No. 1).
- Inverter Stations and intermediate substations within Work No. 2 will not exceed 4m AGL in height and will be a dark green or similar neutral colour in keeping with the surrounding environment.
- Where any components utilise foundations for Work No. 2, these will have a depth of no greater than 2m BGL.
- Acoustic barriers provided for Works No. 2 will be a maximum of 4m AGL.
- The Project Substation will be at the location shown in Field 26 on the **Works Plans (Doc Ref. 2.3)**. The development platform level of the Project Substation will be no greater than 56m above ordnance datum ('AOD') and no lower than 55m AOD. The maximum height of any building or infrastructure within the Project Substation will not exceed 7.5m AGL. As such, no building or infrastructure will be greater than 63.5m AOD in height.
- The Grid Connection Cable within Work No. 4 is to be below ground. The cable will be laid at a maximum depth of 2m BGL except where crossing the East Stour River or third-party infrastructure. The Grid Connection Cable will have a width of up to 2m once installed.
- No new overhead lines will be constructed. Where cables (Work No. 5) are installed below ground via trenching methods this will be to a maximum depth of up to 1.5m BGL and a width of up to 2m. The final design will look to combine cables in a single trench, where possible. Joining cable pits will have a maximum depth of up to 2m BGL.
- HDD will be used to install the cabling beneath the East Stour River and IDB-managed watercourses pursuant to Work No. 4 and 5, within the areas shown within **ES Volume 4, Appendix 10.5: Schedule of Watercourse Crossings (Doc Ref. 5.4)**. Where HDD is used, a minimum depth of 2m from the bed of the river or watercourse will be maintained.
- The internal access tracks (Work No. 5) will be constructed using a 90% permeable grass-paving hardstanding surface with foundations with an approximate depth of 300mm.
- Water storage tanks (Work No. 5) for the fire suppression water will have a maximum diameter of 12m and a maximum height of 3.5m. Water storage tanks will be a dark green or similar neutral colour in keeping with the surrounding environment. Water tank foundations will have a depth of no greater than 2m BGL. Water pipes laid from the water storage tanks to the connection point located adjacent to each of the BESS units (Work No. 2) will either be installed within a trench below ground or laid along the ground between the PV panels. Where waterpipes are installed below ground via trenching methods, these will be dug to a depth of up to 1.5m BGL and a width of up to 2m.
- CCTV will be infrared. Operational lighting will be limited for emergency and overnight maintenance purposes only at Inverter Stations, Intermediate Substations and the Project Substation and will be directed within the Order limits.

- Work No. 8 - Unless otherwise agreed with the local planning authority, vegetation loss will be restricted to the maximum extents shown on the **Vegetation Removal Plan (Doc Ref. 2.8)**.

Archaeology

- 7.4.5 The **Works Plans (Doc Ref. 2.3)** and **Design Principles (Doc Ref. 7.5)** have been assessed for below ground archaeological remains, based on the maximum areas that will be disturbed.
- 7.4.6 Archaeological evaluations in the form of geophysical survey, targeted trial trench evaluation and targeted geoarchaeological test pits (**ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4)**) have been undertaken within the Site and the results have been incorporated into this assessment.

Built Heritage

- 7.4.7 Assessment of impacts on the setting of heritage assets has been based on the **Illustrative Project Drawings - Not for Approval (Doc Ref. 2.6)** in order to provide a realistic visual impression of the Project. The assessment of impacts to heritage assets as a result of changes within their setting assumes that all structures would be at the maximum heights allowed by the **Design Principles (Doc Ref. 7.5)**. The assessment also assumes the general location of the electrical infrastructure, as identified within the **Works Plans (Doc Ref. 2.3)**, will be placed in positions nearest heritage assets, or otherwise in the worst-case location within the Work Nos. defined on the **Works Plans (Doc Ref. 2.3)**, as judged by professional experience and the sensitivity of an asset's setting. Likewise, the assessment uses professional experience to judge the worst-case, least sympathetic, colour for the enclosed unit, either grey or green, based on the setting of an asset. Where relevant these assumptions are also outlined in the assessment of likely impacts and effects in **Section 7.7** in relation to specific assets.
- 7.4.8 A review of the **Illustrative Project Drawings - Not for Approval (Doc Ref. 2.6)** against the **Design Principles (Doc Ref. 7.5)** confirmed that constructing and operating the Project in other ways by the flexibility allowed by the **Draft Development Consent Order (Doc Ref. 3.1)**, **Works Plans (Doc Ref. 2.3)** and **Design Principles (Doc Ref. 7.5)** should not result in a greater impact to designated and non-designated heritage assets.

Matters Scoped In

- 7.4.9 The following potential effects are considered within this chapter for assessment:

Archaeology

- Direct physical effects on below ground assets and Historic Landscape during construction.

Built Heritage

- Indirect effects on heritage assets, including Scheduled Monuments, Grade I listed buildings, Grade II* listed buildings, Grade II listed buildings, Grade II Registered Park and Garden, Conservation Areas, Non-designated

Heritage Assets ('HER') and Historic Landscape, during construction, operational phase or decommissioning.

Matters Scoped Out

7.4.10 The following assessments have been scoped out:

Archaeology

- 7.4.11 **ES Volume 4, Appendix 1.2: EIA Scoping Opinion (Doc Ref. 5.4)** confirmed that an assessment of the direct physical effects on below ground assets (i.e., archaeological remains) during operational and decommissioning phases could be scoped out of the ES as direct physical effects will only occur during construction phase of the Project.
- 7.4.12 An **Outline Operational Surface Water Drainage Strategy ('Outline OSWDS') (Doc Ref. 7.14)** has been developed for the Project. The **Outline OSWDS (Doc Ref. 7.14)** describes measures to manage drainage from new infrastructure and manage any required changes to existing land drainage requirements. As a result, the residual effect of the Project on groundwater levels on the Site will be negligible and any changes that do occur will be restricted to the shallow subsurface and localized areas such as where major earthworks are required (Project Substation) or along tracks where drainage will be needed. Away from these areas the changes in groundwater levels and flows will not be observable. As such, there is anticipated to be no impact on below ground archaeological remains as a result of change to drainage within the Site as a result of the Project. See **ES Volume 2, Chapter 10: Water Environment (Doc Ref. 5.2)** for further details regarding the assessment of drainage.

Built Heritage

- 7.4.13 **ES Volume 4, Appendix 1.2: EIA Scoping Opinion (Doc. Ref. 5.4)** confirmed that an assessment of the direct physical effects on assets beyond the Order limits could be scoped out of the ES on the basis that there will be no construction, operational or decommissioning activities beyond the Site that could have a direct physical effect on above ground heritage assets.

Study Area

- 7.4.14 The study areas outlined below were defined to include all designated and non-designated heritage assets with the potential to be affected by the Project, and to provide information on the archaeological potential of the Site. This will ensure that the assessment is proportionate, in accordance with the requirements of NPS EN-1 paragraph 5.9.10 and NPS EN-3 paragraph 2.10.115 and in line with NPPF paragraph 200. This is also in accordance with Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets: Historic England (2017); Historic Environment Statement of Heritage Significance: Analysing Significance in Heritage Assets: Historic England Advice Note 12: Historic England (2019); Commercial Renewable Energy Development and the Historic Environment: Historic England Advice Note 15 (2021); and the Heritage Strategy: Ashford Borough Council (October 2017).

- 7.4.15 The study areas set out below have been established following the EIA Scoping Process and consultation with statutory consultees.
- 7.4.16 The purpose of the study areas is to ensure comprehensive data capture, encompassing all heritage assets, both designated and non-designated, including archaeological sites, historic buildings, conservation areas and registered parks and gardens, together with the relevant historic landscape characterisation. All of the captured data is reviewed in **ES Volume 4, Appendixes 7.1: Archaeological Desk Based Assessment** and **Appendix 7.2: Heritage Statement (Doc Ref. 5.4)** and those assets potentially affected by the Project have been taken forward for assessment in this chapter.
- 7.4.17 Effects to heritage assets are based upon effects arising from the baseline conditions (as of 2023) during the construction phase which is anticipated to commence in 2026 and be complete in 2027; operational effects where the Project is in place within the established **Design Principles (Doc Ref. 7.5)** for a period of 40 years; and effects arising from decommissioning of the Project which, based on a 40 year lifespan is estimated to commence in 2066 and be complete in 2067.

Designated Heritage Assets

- 7.4.18 A study area of up to 2km from the Project boundary has been defined to provide historical and archaeological context and to identify designated heritage assets with the potential to be affected by the Project (see **ES Volume 3, Figure 7.1a: Designated Heritage Assets within 2km of the Site (Doc Ref. 5.3)**). Designated assets will include built heritage (listed buildings) and historic landscapes assets such as Registered Parks and Gardens and registered battlefield sites, both of which comprise the topographic integrity of the historic landscape and may include above ground monuments of both historic and prehistoric periods, for example, castles, hillforts and burial mounds.
- 7.4.19 The settings of designated heritage assets of the highest significance (scheduled monuments; Grade I and Grade II* listed buildings; Registered Parks and Gardens) have also been considered up to 5km from the Project boundary (see **ES Volume 3, Figure 7.1b: Designated Heritage Assets within 5km of the Site (Doc Ref. 5.3)**). This was guided by the Zone of Theoretical Visibility (ZTV) (see **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**) prepared to support **ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2)**, but also considered physical and historical connectivity and relationships with other assets and the wider landscape.
- 7.4.20 Designated assets beyond the 5km search area comprising Scheduled Monuments located to the northeast of the Project have also been included where requested through consultees' EIA Scoping responses (refer to **Table 7.1**) (see **ES Volume 3, Figure 7.2: Designated Heritage Assets beyond 5km of the Site boundary (Doc Ref. 5.3)**). The EIA Scoping response received from KCC requested that indirect impacts from the Project on designated heritage assets located within the North Downs should be considered in this assessment. The area of the North Downs is located approximately 4.5km north-east of the Site's north-east boundary and is not recognised as a heritage asset itself; however, it is a designated National

Landscape ('NL') and potential impacts to the area as a receptor are assessed within **ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2)**.

- 7.4.21 A number of scheduled barrows which fall beyond the 5km search area, and which are located within the North Downs NL to the north-east of the edge of the Order limits have been identified for assessment in response to requests via the EIA Scoping process. These assets have been considered as an asset group illustrative of a Prehistoric funerary landscape. For further detail, refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**.

Non-designated Heritage Assets

- 7.4.22 The study area for the collation of information on non-designated heritage assets including historic landscape assets such as field systems, earthworks and boundaries has been defined as a 1km radius from the boundary of the Project (see **ES Volume 3, Figure 7.3: Recorded Non-designated Heritage Assets within 1km of the Site (Sheet 1 to 4) (Doc Ref. 5.3)**) which has been judged as appropriate to identify known archaeological assets and assess the potential for the survival of archaeological remains within the Site given the nature, size and location of the Project.

Establishing Baseline Conditions

- 7.4.23 Sources of information that have been consulted to establish the current baseline conditions include:
- National Heritage List for England ('NHLE')²⁰;
 - Kent Historic Environment Record ('HER')²¹,
 - Historic Landscape Characterisation ('HLC')²²;
 - The Archaeological Data Service²³,
 - British Geological Survey (BGS) Geology of Britain Viewer²⁴
 - Local planning portal for the Local Plan, Neighbourhood Plans and other planning information;
 - Online sources holding historic Ordnance Survey (OS) and Tithe map²⁵;
 - Groundsure Historic Mapping;
 - Documentary, cartographic and other resources as deposited within the Kent Archives and the Local History Centre and Historic England Archives;
 - Published and unpublished literature (including a detailed review of reports for previous fieldwork carried out within the proximity to the Order limits)²⁶;
 - LiDAR data²⁷;
 - Photographic baseline images included within **ES Volume 2, Chapter 8: Landscape and Views** (see **ES Volume 4, Appendix 8.4: Site Appraisal Photographs (Doc Ref. 5.4)**);
 - Results of the Geophysical Survey (see **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 5 (Doc Ref. 5.4)**);

- Results of the Trial Trench Evaluation and Geoarchaeological Test Pits (see **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 7 (Doc Ref. 5.4)**); and
- Results of Archaeological Monitoring of targeted ground investigation works (see **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 6 (Doc Ref. 5.4)**).

- 7.4.24 A site walkover survey was undertaken in March 2022. The Cable Route Corridor was subject to a site walkover survey in December 2022. A further site walkover was undertaken in October 2023 regarding views from fields connected to the PRowS and then in February 2024 to confirm that the baseline conditions at the Site had not changed since December 2022.
- 7.4.25 The walkover surveys were undertaken to record the survival, extent, condition, setting and significance of heritage assets within the Site and to identify potentially affected assets including listed buildings, conservation areas and registered parks and gardens within the study areas. The setting of these heritage assets was also identified, and potential impacts as a result of the Project were considered.
- 7.4.26 The heritage assets discussed within this assessment, including designated and non-designated heritage assets, are identified by their unique identification numbers, as assigned by the NHLE for designated assets and by the HER for non-designated heritage assets. Where any new assets have been identified as a result of the work undertaken to inform the cultural heritage baseline these have been provided with a unique identification number prefixed with *WA* and numbered sequentially.
- 7.4.27 All assets are identified within the text using their unique identification number and can be cross-referenced to the tables in **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment** and **Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**.
- 7.4.28 Cross-reference has been made to the ZTV (see **ES Volume 3, Figure 8.1: Zone Of Theoretical Visibility (Doc Ref. 5.3)**) prepared to support the Landscape and Visual Impact Assessment within **ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2)** to highlight any potential intervisibility between the Project and heritage assets; however, this assessment also takes into consideration the fact that setting goes beyond visual relationships.
- 7.4.29 A number of viewpoints and visualisations have been prepared as part of the Landscape and Visual Impact Assessment within **ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2)** and these are also useful for in assessing the effects of the Project on the setting of heritage assets. They are cross-referred to within this chapter where relevant to the assessment. Nine additional viewpoints, as shown within **ES Volume 3, Figure 7.4: Heritage Viewpoints (Doc Ref. 5.3)**, have been captured and visualisations produced (included within **ES Volume 4, Appendix 7.2: Heritage Statement, Annex 2 (Doc Ref. 5.4)**) which concern views to, from or which feature designated heritage assets. These additional viewpoints have been developed following consultation with ABC and Historic England.

- 7.4.30 Archaeological evaluations were also undertaken to refine and augment the desk-based data, including a geophysical survey (detailed magnetometry) and targeted trial trenching and geoarchaeological test pits. The scope and specification of each field investigation was set out in Written Schemes of Investigation ('WSI'), which were submitted for approval to and approved by KCC's Senior Archaeological Advisor in December 2021 (detailed magnetometry) and June 2023 (trial trenching). The first phase of this, comprising geophysical (magnetometer) survey, was undertaken in January 2022. A second phase of geophysical (magnetometer) survey was undertaken in September and December 2022. Targeted trial trenching survey was carried out in July 2023. The results of these surveys are included within **ES Volume 4, Appendix 7.1: Archaeological Desk-based Assessment, Annex 5: Geophysical Survey; Annex 6: Archaeological Monitoring Report; and Annex 7: Trial Trenching Report (Doc Ref. 5.4)**, and have been incorporated into the desk-based assessment (**ES Volume 4, Appendix 7.1: Archaeological Desk-based Assessment (Doc Ref. 5.4)**) and the assessment of impact within this chapter.
- 7.4.31 In addition, monitoring of targeted ground investigation works under archaeological watching brief conditions was undertaken in February 2023 by Wardell Armstrong in accordance with the ClfA *Standard and guidance for field evaluation* (2020), and the Wardell Armstrong Technical Manual No.1 Excavation Manual (2020). The trial pits and window samples were excavated following a method statement prepared by Wardell Armstrong, in advance of the fieldwork programme. The results of this monitoring survey (**ES Volume 4, Appendix 7.1: Archaeological Desk-based Assessment, Annex 6: Archaeological Monitoring Report (Doc Ref. 5.4)**) have been incorporated into the desk-based assessment (**ES Volume 4, Appendix 7.1: Archaeological Desk-based Assessment (Doc Ref. 5.4)**) where relevant.

Identifying Likely Significant Effects

- 7.4.32 This chapter considers that Very Large, Large and Moderate effects are significant for the purposes of the EIA Regulations. For the avoidance of doubt Slight/Moderate effects are not significant. Once the effect has been identified, additional mitigation can be used to avoid, reduce or offset any significant adverse effects. Reassessing the significance of the effect after applying any additional mitigation allows the level of residual effect to be assessed.
- 7.4.33 Within the NPPF, impacts affecting the value of heritage assets are considered in terms of harm. There is a requirement to determine whether the level of harm amounts to 'substantial harm' or 'less than substantial harm'. There is no direct correlation between the significance of effects identified in this EIA chapter and the level of harm caused to heritage significance. The assessment of harm arising from the impact of the Project has been determined using professional judgement and is provided within **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**. **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)** concludes that the identified harm to those assets that will experience harm will in all cases be less than substantial. It further concludes that the harm would be at the lowest level of the spectrum for all assets barring Stonelees which is on the lower level of the spectrum.

Cumulative Effects

- 7.4.34 Cumulative effect assessment will identify for each receptor those areas where the predicted effects of the Project could interact with effects arising from other plans and / or developments on the same receptor based on a spatial and / or temporal basis.
- 7.4.35 With reference to the methodology and guidance set out in **ES Volume 2, Chapter 6: EIA Methodology (Doc Ref. 5.2)** and the 'Focused Long List' of cumulative schemes identified within **ES Volume 4, Appendix 6.1: List of Cumulative Schemes (Doc Ref. 5.4)** and **ES Volume 3, Figures 6.1 to 6.3 (Doc Ref. 5.3)**, the following schemes have been taken forward for cumulative assessment:
- ID No. 3: Pivot Power Battery Storage (PA/2022/2544) (Construction and Operational effects);
 - ID No. 4: Walsh Power Condenser Project (PA/2022/2950) (Construction and Operational effects);
 - ID No. 7: Land north of 1 Church View, Aldington (19/00895/AS) (Operational effects);
 - ID No. 8: Land south west of Goldwell Court, Goldwell Lane (20/000652/AS) (Operational effects);
 - ID No. 9: East Stour Solar Farm (22/00668/AS) (Construction, operational and decommissioning effects); and
 - ID No. 10: Otterpool Park Development (Y19/0257/FH) (Operational effects).

Determining Effect Significance

- 7.4.36 The assessment methodology to be employed in assessing the impact of the Project during the construction, operational and decommissioning phases upon cultural heritage assets has been guided and informed by the following documents:
- Guidance on Heritage Impact Assessments for Cultural World Heritage Properties; ICOMOS (2011);
 - Principles of Cultural Heritage Impact Assessment in the UK; IEMA, IHBC and ClfA (2021);
 - NPPF (2023);
 - The Setting of Heritage Assets; Historic England (2017); and
 - Design Manual for Roads and Bridges, LA 104 Environmental Assessment and Monitoring (Highways England, 2020).
- 7.4.37 The purpose of the assessment approach is to understand the cultural heritage assets affected and evaluate the consequences of change.
- 7.4.38 To evaluate the consequences of change, the following three steps are followed:
- understanding change (a factual statement of how a proposal would change a cultural heritage asset or its setting, including how it is experienced);

- assessing impact (a measure of the degree to which any change would impact on cultural significance); and
- weighting the effect (the measure that brings together the magnitude of the impact and the cultural heritage asset's importance).

7.4.39 This approach is advocated by ICOMOS, IEMA and Standards for Highways .

Sensitivity of Receptor

7.4.40 The value of a heritage asset (its heritage significance) is guided by its designated status, and is derived also from its heritage interest, which may be archaeological, architectural, artistic or historic as defined in NPPF Annex 2, Glossary. The setting of a heritage asset can also contribute to its value.

7.4.41 Using professional judgement, the value of heritage assets is assessed on an individual basis and regional variations and individual qualities are considered, where applicable.

Table 7.6: Receptor Sensitivity Descriptors

Value (Sensitivity)	Descriptor
Very High	Very high importance and rarity, international scale and very limited potential for substitution such as World Heritage Sites, Scheduled Monuments, Grade I listed buildings, Grade I Registered Parks and Gardens, archaeological remains of equal significance to a scheduled monument.
High	High importance and rarity, national scale, and limited potential for substitution such as Grade II* listed buildings, some Grade II listed buildings, some Conservation Areas, Grade II* and some Grade II Registered Parks and Gardens, Registered Battlefields. Non-designated heritage assets (archaeological sites, historic buildings, monuments, parks, gardens or landscapes) that can be shown to have demonstrable national or international importance. Well preserved historic landscape character areas, exhibiting considerable coherence, time-depth or other critical factor(s).
Medium	Medium or high importance and rarity, regional scale, limited potential for substitution such as some Grade II listed buildings, some Conservation Areas, some non-designated heritage assets which retain a high degree of integrity and authenticity.

Value (Sensitivity)	Descriptor
	<p>Non-designated heritage assets (archaeological sites, historic buildings, monuments, park, gardens or landscapes) that can be shown to have demonstrable regional importance.</p> <p>Averagely preserved historic landscape character areas, exhibiting reasonable coherence, time-depth or other critical factor(s).</p> <p>Historic townscapes with historic integrity in that the assets that constitute their make-up are clearly legible.</p>
Low	<p>Low or medium importance and rarity, local scale such as some non-designated heritage assets including some archaeological sites, historic buildings, monuments, park, gardens or landscapes that can be shown to have demonstrable local importance.</p> <p>Assets whose values are compromised by poor preservation or survival of contextual associations to justify inclusion into a higher grade.</p>
Very Low	<p>Very low importance and rarity, local scale such as non-designated heritage assets which have been largely altered previously in terms of fabric, context for example.</p> <p>Assets whose values are compromised by poor preservation or survival of contextual associations to justify inclusion into a higher grade.</p> <p>Landscape with no or little significant historical merit</p>

7.4.42 The above values are based upon the 2011 guidance presented by ICOMOS, Highways England and in consideration of the NPPF.

Magnitude of Impact

7.4.43 In understanding the effect of a change of a heritage asset, magnitude or scale of impact to a heritage asset is assigned with reference to a four-point scale, as follows:

Table 7.7: Magnitude of Impact Descriptors

Impact Magnitude	Descriptor
High	Changes such that the asset and its significance are totally altered or destroyed. Comprehensive change to, or total loss of, elements of

Impact Magnitude	Descriptor
	setting that would result in harm to the asset and the ability to understand and appreciate its significance.
Medium	Change such that the asset and its significance are significantly altered or modified. Changes such that the setting of the asset is notably different, affecting the significance and resulting in changes in the ability to the understand and appreciate the significance of the asset.
Low	Changes such that the significance of the asset is slightly altered. Changes to the setting that have a slight impact on the significance resulting in changes in our ability to understand and appreciate the significance of the asset.
Very Low	Changes to the asset that hardly affect significance. Changes to the setting of an asset that have little effect on significance and no real change in our ability to understand and appreciate the significance of the asset.

Assessing Significance

7.4.44 An assessment to classify the effect, having taken into consideration any embedded mitigation, is determined using the matrix below which has been adapted from the 2011 ICOMOS guidance. In assessing whether the effect is deemed to be significant in terms of EIA, this is also based upon professional judgement with full consideration as to the significance of an asset and where that significance is derived from.

Table 7.8: Significance of Effect Matrix

Sensitivity / Value of Receptor	Magnitude of Impact			
	Very Low	Low	Medium	High
Very High	Slight	Moderate/Large	Large/ Very Large	Very Large
High	Slight	Slight/Moderate	Moderate/Large	Large/Very Large
Medium	Neutral/Slight	Slight	Slight/Moderate	Moderate/Large

Sensitivity / Value of Receptor	Magnitude of Impact			
	Very Low	Low	Medium	High
Low	Neutral Or Slight	Neutral/ Slight	Slight	Slight/Moderate
Very Low	Neutral	Neutral/ Slight	Neutral/ Slight	Slight

Limitations and Assumptions

- 7.4.45 The information provided by Historic England National Datasets and Kent HER (consulted November 2021, January 2022 and January 2024) is representative of the known recorded archaeology. The assessment of the archaeological potential of the Site is based on the information provided, desk-based assessment and research, on-Site observations; and from archaeological field evaluation, comprising geophysical survey, trial trench evaluation, geoarchaeological test pits and the archaeological monitoring of site investigation works.
- 7.4.46 As discussed within **Section 7.5: Baseline Conditions**, the archaeological investigations at the Site followed a structured sequence, starting with the archaeological desk-based assessment. **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4)** assessed the potential for archaeology across the Site which was augmented by geophysical survey to identify anomalies and guide further targeted evaluation.
- 7.4.47 Following discussions with the KCC Archaeological Officer the Applicant agreed to undertake a series of intrusive investigations, including a targeted geoarchaeological survey (Palaeoenvironmental assessment test pits) combined with targeted trial trench evaluation. The investigations were focused on high-potential areas identified in the desk-based assessment and geophysical survey but also specifically targeted the Project Substation area to reduce risk to archaeological assets, advocating mitigation by record as opposed to mitigation by design based on assessment and evaluation results and deemed significance of archaeological features found.
- 7.4.48 Results from each assessment have been incorporated into the archaeological baseline (i.e., **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4)**) and provide an understanding of the Site's archaeological significance in order to reduce and mitigate impact upon the significance of non-designated below ground assets.
- 7.4.49 While acknowledging the potential for unrecorded archaeological remains within an undeveloped site, the results obtained from the archaeological assessment and comprehensive evaluation which included geophysical survey across the Site, where appropriate, targeted paleoenvironmental test pitting and trial trenching to understand the condition, extent, depth and significance of below ground

archaeological assets within the development Site has provided a proportionate baseline to adequately assess potential significant effects for archaeological assets. Therefore, further intrusive works are not considered necessary to inform the archaeological assessment within this chapter. The assessment and evaluative work undertaken to date is considered to fully comply with the requirements of NPS EN-3, as outlined within **Paragraph 7.2.5 to 7.2.9 of Section 7.2: Legislation, Planning Policy and Guidance.**

- 7.4.50 The Applicant proposes to commit to further trial trenching evaluation prior to construction, as outlined in the **AMS (Doc Ref. 7.17)**, as secured by Requirement in the **Draft Development Consent Order (Doc Ref. 3.1)**. It is considered that this will ensure any archaeological potential is fully investigated and ensure the final design of the Project mitigates any residual risk.
- 7.4.51 The baseline is drawn from the assessments produced for the Project included within **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4)** and **Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**. It is assumed that data therein provided by third parties is accurate at the time of reporting.
- 7.4.52 Access to privately owned land outside of the control of the Applicant was not possible. As such, assumptions relating to the inter-visibility with nearby heritage assets with the edge of the Order limits have been determined by on-Site observations, the ZTV (see **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**), visualisations (included within **ES Volume 4, Appendix 7.2: Heritage Statement, Annex 2 (Doc Ref. 5.4)**) and from publicly accessible land.

7.5 Baseline Conditions

- 7.5.1 An Archaeological DBA (refer to **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4)**) supported by a walkover survey, geophysical survey, trial trench evaluation, geoarchaeological test pits and an Archaeological Landscape Assessment and a Heritage Statement (refer to **Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**) have been undertaken to assess the potential effects of the Project on the significance of buried archaeological remains and heritage assets within the Order limits and on the significance of heritage assets within the vicinity of the Site. A summary of the findings of the baseline reporting is provided in this section to provide context to the assessment of the likely significant effects of the Project. Full details of the baseline conditions are included within **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4)** and **Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**.

Designated Heritage Assets

- 7.5.2 Details of designated heritage assets were gathered based on the parameters as set out below (refer to **ES Volume 3, Figure 7.1a and 7.1b: Designated Heritage Assets; Figure 7.2: Designated Heritage Assets beyond 5km of the Site**

boundary; and Figure 7.5: Highly graded designated heritage assets between 2km and 5km of the Site (Doc Ref. 5.3):

- World Heritage Sites – within 5 km of the Site;
- Scheduled Monuments – within 5 km of the Site, plus assets on the North Downs, between 5 and 7km from the Site;
- Grade I Listed Buildings – within 5 km of the Site;
- Grade II* Listed Buildings – within 5 km of the Site;
- Grade II Listed Buildings – within 2 km of the Site;
- Registered Parks and Gardens (RPG) – within 5 km of the Site;
- Historic Battlefields – within 5 km of the Site;
- Conservation Areas – within 5 km of the Site; and
- Protected Military Remains – within 1km of the Site.

7.5.3 The Site contains one designated heritage asset comprising the crash site of the Second World War aircraft Messerschmitt Bf109E-4 (HER DKE22255) which crashed on near the Site (in the vicinity of Handen Farm) The crash site is a protected Protection of Military Remains ('PMR') site under the Protection of Military Remains Act 1986.. The Ministry of Defence granted a licence to the Applicant under the Protection of Military Remains Act 1986 which applies to a radius of 100m around OS grid reference TR 059374.

7.5.4 Designated heritage assets recorded within the search parameters set out above comprise:

- 30 Scheduled Monuments;
- 18 Grade I Listed Buildings;
- 11 Grade II* listed buildings;
- 155 Grade II Listed Buildings;
- 5 Conservation Areas;
- 3 Registered Park and Garden; and
- 4 PMR Sites (including 1 located within the Order limits).

7.5.5 **Table 7.9** below outlines which designated heritage assets could potentially be impacted by the Project and thus taken forward for further assessment within this Chapter.

7.5.6 No World Heritage Sites or Registered Battlefields are identified within the search areas. A full list of designated heritage assets within the search areas is provided within **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**.

Non-designated Heritage Assets

- 7.5.7 Details on non-designated heritage assets were gathered on a 1km search radius of the Order limits (refer to **ES Volume 3, Figure 7.3: Recorded Non-designated Heritage Assets within 1km of the Site (Sheet 1 to 4) (Doc Ref. 5.3)**).
- 7.5.8 Within 1km of the Site there are 26 above ground non-designated heritage assets of a built nature recorded by the Kent HER. **Table 7.9** below outlines which above ground non-designated heritage assets could potentially be impacted by the Project and thus taken forward for further consideration within the Built Heritage assessment of this Chapter.
- 7.5.9 The Kent HER records 18 entries within the Order limits, as shown on **ES Volume 3, Figure 7.7: Non-Designated Heritage Assets: Prehistoric to Roman; Figure 7.8: Non-Designated Heritage Assets: Early Medieval and Medieval; and Figure 7.9: Non-Designated Heritage Assets: Post Medieval, Modern and Unknown (Ref Doc. 5.3)**. Of these recorded entries, 15 are findspots largely found through metal detecting and are of Roman to Post Medieval date. The remaining three entries comprise Bank Road/Roman Road which bisects the central and western part of the Site and respects the alignment of a projected Romano Road (HER TR 04 SE 120), and two Post Medieval farmsteads (HER MKE88378 and MKE88379) as shown within drawings within **ES Volume 3, Figure 7.7: Non-Designated Heritage Assets: Prehistoric to Roman; Figure 7.8: Non-Designated Heritage Assets: Early Medieval and Medieval; and Figure 7.9: Non-Designated Heritage Assets: Post Medieval, Modern and Unknown (Ref Doc. 5.3)**.

Archaeological Landscape Assessment

- 7.5.10 The Archaeological Landscape Assessment (included within **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 4 (Doc Ref. 5.4)**) identified that the current landscape within the Site derives from 17th to 18th century enclosure, with few earlier elements of the landscape surviving (see **ES Volume 3, Figure 7.10: Historic Landscape Character Areas (Doc Ref. 5.3)**).

Archaeological Investigation

Geophysical Survey

- 7.5.11 Geophysical survey evaluation has highlighted possible features within Fields 1, 3, 4 - 16, 21, 26 and 27 (see **ES Volume 3, Figure 7.11: Summary of Archaeological Evaluations Undertaken (Doc Ref. 5.3)**). The geophysical survey identified the majority of these features as being of agricultural origin, comprising earlier field boundaries and ridge and furrow cultivation (Fields 9 - 15 and 27). Features in Fields 16 and 27 were noted as likely being of natural origin. However, several of the Fields, including Fields 1, 3, 4, 6 and 7 were highlighted by the geophysical survey as containing possible archaeological features, including a potential square enclosure within Field 7.

Archaeological Monitoring

- 7.5.12 To inform the EIA, archaeological monitoring of ground investigation, which comprised the excavation of 3 trial pits and 3 windowless sample boreholes, was undertaken in February 2023 (see **ES Volume 4, Appendix 7.1: Archaeological Desk-based Assessment, Annex 6 (Doc Ref. 5.4)**).
- 7.5.13 The trial pits and boreholes were spread across the Site. Windowless sample borehole 3 (WS3) positioned in the Northern Area of the Site, Field 27; the final two (WS5 and WS8) were situated in the South-Western Area, in Fields 4 and 7 respectively. Trial Pit 3 (TP3) was located in the Central Area, within Field 25, TP4 within the cable route to Sellindge Substation, and finally, TP5 in the South-Eastern Area, within Field 21.
- 7.5.14 No archaeological deposits or features were observed during the course of the ground investigation. Much of the Site was set to grass with topsoil to a maximum depth of 0.40m. Below this, alluvium comprising fine silty sandy clays were encountered to a minimum thickness of 0.50m and a maximum thickness of 1.15m to the north, in close proximity to the East Stour River.
- 7.5.15 However, the absence of observed archaeology within the trial pits and windowless borehole samples does not preclude the possibility of the presence of below ground archaeology. It should be noted that geologically recent fluvial deposits, such as the alluvium recorded during this ground investigation, can mask and preserve in-situ archaeological deposits.

Archaeological Trial Trench Evaluation

Site

- 7.5.16 A trial trench archaeological evaluation, which comprised the excavation of 13 trenches and 4 geoarchaeological test pits, was undertaken in July 2023 (see **ES Volume 4, Appendix 7.1: Archaeological Desk-based Assessment, Annex 7 (Doc Ref. 5.4)**). Four of the trenches, along with the test pits, were placed within the Northern Area, specifically within Field 26. The remaining nine trenches were positioned either side of Bank Road, with Trenches 5, 6, 7 and 8 to the north-east, within the Central Area of the Site, and Trenches 9, 10, 11, 12 and 13 to the south-west, in the South-Western Area as shown on **ES Volume 3, Figure 7.11: Summary of Archaeological Evaluations Undertaken (Doc Ref. 5.3)**.
- 7.5.17 The geoarchaeological test pits were undertaken in order to form a palaeoenvironmental assessment of the palaeolithic archaeological and Pleistocene/Holocene palaeoenvironmental potential of the sediments. Bedrock was attained in all of the test pits and no substantial body of Pleistocene sediments was encountered. Pleistocene sediments, where present, were fine grained, thin and probably discontinuous down slope and represent poorly developed Head/Solifluction deposits.
- 7.5.18 The investigation revealed evidence of activity dating to the Bronze Age in Field 26. This activity was represented by struck flint, including a possible 'horned' scraper, recovered in two ditches and small pit in the southern end of Trench 1.

- 7.5.19 Evidence of Roman settlements was established at Bank Farm. This activity was represented by a series of pits and postholes and two ditches cut into a deposit containing a flint blade in Trench 9. These pits and ditches were all aligned with features indicated on the geophysical survey, suggesting that there is possibly a Roman enclosure within the field Trench 9 was excavated in, on the southwestern side of Roman Road. Roman pottery and iron nails were recovered from the deposits.
- 7.5.20 Further Roman activity was indicated by a series of three pits and a large, shallow sub rectangular feature. These features were all observed in Trench 6. Roman pottery dating to the 1st Century AD was recovered from the fills of these features. These features, while separated by several fields, suggest that there were settlements along this section of the projected Roman road that may have begun in the Prehistoric period, and flourished in the Roman period with the introduction of the road.
- 7.5.21 Modern deposits relating to the construction of the railway bank were encountered in Trench 4, and a large natural depression was recorded in Trench 10. Undated features were also recorded in Trench 8, but as this trench was opposite the modern farmyard for Bank Farm, it is considered that they could be related to post medieval agricultural activity.

East Stour Solar Farm (ID No. 9, Planning Ref. 2200668AS)

- 7.5.22 The results from the Palaeoenvironment test pitting and archaeological trial trenching, dated May 2023, included within the East Stour Solar Farm (ID No. 9, Planning Ref. 22/00668/AS) planning application have provided evidence that largely substantiates the results from the geophysical survey. The anomalies targeted appear to be enclosures of Romano-British date, mainly datable to the 1st century AD, according to the finds and environmental assessment. The focus of the archaeology is centred around the enclosure feature with diagnostic pottery suggesting a small Early Romano-British farmstead settlement close to the vicinity of the postulated Roman Road. Prehistoric features are also apparent suggestive of agricultural systems and boundaries, which appear dispersed with no known focal point. The results suggest evidence for past human activity across the site and surrounding area from the Prehistoric to the Early Romano-British periods indicative of a wider agricultural landscape. The archaeological evidence also indicates that settlement did not continue into the 2nd century AD and was fairly short lived in terms of continuance.

Future Baseline

- 7.5.23 When determining the future baseline, the EIA Regulations focus on the ‘likely evolution’ of the baseline in the absence of a proposed development as far as natural changes from the baseline scenario can be assessed on the basis of available environmental information and scientific knowledge. For the purposes of this assessment, it is anticipated that the baseline conditions in the absence of the Project would remain the same as set out above for the baseline conditions.

- 7.5.24 However, for the purposes of this future baseline section, some professional judgement has been applied to discuss a likely evaluation on the baseline based on current existing information.

Built Heritage

- 7.5.25 It is possible that additional non-designated heritage assets of a built nature may be identified within the vicinity of the Site as a result of the production of a Conservation Area Appraisal by the Local Authority. However, it is not possible to confirm or predict this with any reasonable scientific knowledge or accuracy.

Archaeology

- 7.5.26 Non-designated heritage assets of an archaeological nature within the vicinity of the Site may be identified through archaeological evaluation and investigation works for other developments. However, it is not possible to confirm or predict this with any reasonable scientific knowledge or accuracy.
- 7.5.27 In addition, from an archaeological perspective there are limited 'natural' aspects that would influence the change in the baseline as most changes would be as a consequence of human activity or intervention. The Site is under arable cultivation, which causes well-understood and demonstrable damage to archaeological remains. As such, continued ploughing within the Site would be expected to cause damage to the proven underlying archaeological remains.
- 7.5.28 Although some deeply stratified archaeological remains have been identified in the north west part of the Site, the upper parts of these are directly beneath the topsoil and recent damage from ploughing, as well as from historic agricultural practices such as drainage, were noted during the archaeological evaluation. Consequently, the future baseline is a particular mitigating factor in terms of the perceived severity of the loss of any archaeological remains in arable areas; where these will be lost in the event of development, although with the completion of a comprehensive record; whereas damage to the remains would go entirely unrecorded in the event the Project did not proceed.
- 7.5.29 It is considered that the excavation and recording of any archaeological remains, realising their evidential value, would mitigate the adverse effect of their loss to some degree.

Historic Landscape

- 7.5.30 Historic landscape of the Site and surrounding area consist of 17th to 18th field pattern with elements of 19th and modern features boundaries, trackways and roads interspersed with modern built features. Earlier historic landscape is represented by the Roman Road/Bank Road and Aldington Mount indicators of the postulated Roman Road on a south east – north west alignment from the coast towards the Thames estuary area.
- 7.5.31 It is indicated that the documentation and understanding of this historic landscape would enhance its evidential value, and with adequate screening and landscaping

keeping the existing field pattern, would mitigate the adverse effect on the limited loss of hedgerow boundaries, minimal realignment of pathways and the introduction of minimal infrastructure.

Summary of Receptors and Sensitivity

7.5.32 In summary, having accounted for the desk-based baseline information and Site observations, the potential cultural heritage receptors (heritage assets) identified as being potentially sensitive to the Project comprise the following included within **Table 7.9** as identified within **ES Volume 4, Appendix 7.1: Archaeological Desk-based Assessment** and **Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**.

Table 7.7: Summary of Receptor Sensitivity

Receptor	Sensitivity (Value)
<i>Designated Heritage Assets: Scheduled Monuments</i>	
North Downs Asset Group	Very High
Barrow Cemetery to the south-west of Barrowhill (NHLE 1475132)	Very High
<i>Designated Heritage Assets: Grade I listed buildings</i>	
Church of St Martin (NHLE 1071208)	Very High
Mersham Manor (NHLE 1233281)	Very High
Church of St John The Baptist (NHLE 1276693)	Very High
<i>Designated Heritage Assets: Grade II* listed buildings</i>	
Stonegreen Hall (NHLE 1233498)	High
Stonelees (NHLE 1233761)	High
Evegate Manor (NHLE 1362798)	High
<i>Designated Heritage Assets: Grade II listed buildings</i>	
Stonegreen Cottage (NHLE 1233284)	Medium
Goodwin Farmhouse (NHLE 1300136)	Medium
Evegate Mill (NHLE 1071180)	Medium

Receptor	Sensitivity (Value)
Evegate Millhouse (NHLE 1185369)	Medium
The Old Cottage (NHLE 1071249)	Medium
Goldwell (NHLE 1184459)	Medium
Barn and 2 stable ranges attached, about 20 metres north of Bank Farmhouse (NHLE 1071248)	Medium
Bank Farmhouse and walls attached (NHLE 1362752)	Medium
Quested's Cottage (NHLE 1184383)	Medium
Stable/ Outhouse about 10m north of Goldwell (NHLE 1362780)	Medium
Stable/Outbuilding about 20 yards North-west of Evegate Mill House (NHLE 1185387)	Medium
Symnells and Walled Forecourt (NHLE 1184484)	Medium
Church House (NHLE 1362794)	Medium
<i>Grade II Registered Park and Garden</i>	
Hatch Park (NHLE 1001291)	Medium
<i>Conservation Areas</i>	
Smeeth	Medium
Mersham	Medium
Bilsington	Medium
Aldington Clap Hill	Medium
Aldington Church	Medium

Receptor	Sensitivity (Value)
<i>Non-Designated Heritage Assets: Off-Site Receptors</i>	
Aldington Mount (TR 03 NE 6)	Low
Little Gains Farm (MKE83194)	Low
Handen Farm (MKE88354)	Low
Littlestock Farm (MKE88358)	Low
Farmstead North Of Little Stock (MKE89064)	Low
Stone Street Farm (MKE88359)	Low
Goldwell Manor Farm (MKE88362)	Low
<i>Non-Designated Heritage Assets: On-Site Receptors</i>	
Palaeolithic Remains	Low -Medium
Roman Road (HER TR 04 SE 120)	Low
Potential Roman roadside features	Low
Undated probable former field systems/enclosures/trackways	Low
Potential features associated with Parish Boundaries	Low
Post medieval agricultural features (former field boundaries, orchard boundaries, footbridge, sheepfolds, farmsteads, structures)	Low
Upstanding historic hedgerows (elements of 17th / 18th century landscape)	Medium
Post medieval industrial remains (lime kiln, quarrying activity, structures associated with Smeeth Station)	Low
Messerschmitt Bf109E-4 PMR crash site (HER DKE22255)	High
Findspots of various periods	Very Low

Receptor	Sensitivity (Value)
Undated features of uncertain origin	Low

7.6 Embedded Design Mitigation

Construction Phase

- 7.6.1 The **Works Plans (Doc Ref. 2.3)** include flexibility to respond to archaeological features which may be identified during further archaeological investigation and to respond to features identified during construction works. The **AMS (Doc Ref. 7.17)** sets out the scope, guiding principles and methods for the planning and implementation of further archaeological mitigation surveys and works which will inform the final design and construction methods for the Project and ensures that the final design responds appropriately to archaeological features identified during further archaeological investigation post-DCO consent.
- 7.6.2 As such, the following outlines the inherent mitigation incorporated into the design of the Project as outlined within the **Works Plans (Doc Ref. 2.3)**, **Design Principles (Doc Ref. 7.5)** and **ES Volume 2, Chapter 3: Project Description (Doc Ref. 5.2)** for the components of the Project most likely to affect heritage assets. No intrusive works are involved for Work No. 6, therefore, there will be no impact on archaeology.

Works No. 1

PV Panels and mounting structures

- 7.6.3 PV panels will be fixed to a metal frame mounting structure (an **Indicative Framing Detail (4 No. Landscape PV Panel Format)** is provided within **Illustrative Project Drawings - Not for Approval (Doc Ref. 2.6)**) in groups known as 'strings'. The metal mounting structure is expected to be attached to galvanized steel piles that will be driven up to 3m into the ground.
- 7.6.4 An alternative mounting solution is proposed should it not be appropriate to use the piling method outlined above due to ground conditions or other potential constraints, such as archaeology. This alternative mounting solution is a non-invasive system that uses pre-cast reinforced concrete blocks or similar to provide ballast to support the PV panels above ground, thereby avoiding subsurface impact. An **Indicative Framing Detail (Ballast Mounting PV Panel Format)** provided within **Illustrative Project Drawings - Not for Approval (Doc Ref. 2.6)** provides an illustration of this method. This alternative method would avoid significant adverse effects on features of archaeological value.

Works No.2

Inverter Stations/BESS/Intermediate Substation

- 7.6.5 Prior to the **Works Plans (Doc. Ref. 2.3)** being finalised, the siting of Inverter Stations/BESS/Intermediate Substations (including acoustic fencing) was adjusted to ensure they are located outside areas of potential archaeological significance in Fields 8, 14 and 17 (as identified by **ES Volume 4, Appendix 7.1: Archaeological**

Desk-based Assessment (Doc. Ref. 5.4). The design has therefore already responded to archaeological features which may be present and avoid significant adverse effects on these features of archaeological value.

Work No. 3

Project Substation

- 7.6.6 The Project Substation cannot be mitigated by design, due to the nature of development and requirements for its location. As a result, pre-determination targeted trial trench evaluation was undertaken for the Project Substation site, as outlined within **ES Volume 4: Appendix 7.1: Archaeological Desk-based Assessment, Annex 7 (Doc. Ref. 5.4)**. The results of the pre-determination targeted trial trench evaluation are outlined within **paragraph 7.5.16 to 7.5.21** above.

Works No.4

High Voltage Cables

- 7.6.7 The cabling trenches required for Work No. 4 can be installed anywhere within the Work No. 4 area. Thus, flexibility is included within the **Works Plans (Doc. Ref. 2.3)** to respond to archaeological features which may be identified during further archaeological evaluation following granting of the DCO and avoid significant adverse effects on features of archaeological value. The extension to the Sellindge Substation is proposed on a pre-existing manmade platform constructed for the Sellindge Substation.

Works No.5

Associated Works

- 7.6.8 The electrical output from the PV panels will be exported by low/medium voltage cabling to Work No. 2. Where connecting cables are installed below ground via trenching methods, these will be dug to a depth of up to 1.5m below existing ground level (BGL) and a width of up to 2m. The cabling trenches required for Works No.1 can be installed anywhere within the Works No. 5 area. Thus, flexibility is included within the **Works Plans (Doc. Ref. 2.3)** to respond to archaeological features which may be identified during further archaeological evaluation following granting of the DCO and avoid significant adverse effects on features of archaeological value.
- 7.6.9 Fence posts or poles, for fencing, lighting and CCTV etc., can be micro-sited anywhere within the Work No. 5 area. Thus, flexibility is included within the **Works Plans (Doc. Ref. 2.3)** to respond to archaeological features which may be identified during further archaeological evaluation following granting of the DCO and avoid significant adverse effects on features of archaeological value.
- 7.6.10 To allow access to each of the Work No. 2 areas that contain BESS Units in the event of an emergency, permeable hardstanding access tracks will be provided and will have a minimum width of 3.7m. The access tracks required for Work No.2 can be installed anywhere within the Work No. 5 area. Thus, flexibility is included within the **Works Plans (Doc. Ref. 2.3)** to respond to archaeological features which may

be identified during further archaeological evaluation following granting of the DCO and avoid significant adverse effects on features of archaeological value.

Work No. 7

Construction and Decommissioning Works

- 7.6.11 Other than the installation of the security fence around the primary and secondary compounds, no intrusive works are anticipated. In addition, the primary and secondary compounds are located outside areas of potential archaeological significance (as identified by **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc. Ref. 5.4)**). The design has therefore already responded to archaeological features which may be present and identified during further archaeological evaluation following granting of the DCO and avoid significant adverse effects on features of archaeological value.

Internal Haulage Road

- 7.6.12 The internal haulage road will not involve intrusive construction work. The internal haulage road will be water permeable to prevent any alterations to the current flow of surface water and will be removed and reused elsewhere following completion of construction (and the same for decommissioning).
- 7.6.13 The design has therefore already responded to archaeological features which may be present and identified during further archaeological evaluation following granting of the DCO and avoid significant adverse effects on features of archaeological value.

Work No. 8

Landscaping and Biodiversity enhancements

- 7.6.14 Flexibility is included within the **Works Plans (Doc. Ref. 2.3)** to respond to archaeological features which may be identified during further archaeological evaluation following granting of the DCO and avoid significant adverse effects on features of archaeological value. Depending on the results of the further archaeological evaluation, the final landscape design will be subject to minor amendment, dependant on wider environmental or design constraints.

CEMP

- 7.6.15 The **Draft Development Consent Order (Doc Ref. 3.1)** provides that no phase of the construction of the authorised development may be commenced until a CEMP for that phase has been approved by ABC, and the detailed CEMP(s) must be in accordance with the **Outline CEMP (Doc Ref. 7.8)** which accompanies the DCO Application. It further provides that construction works must be carried out in accordance with the approved CEMP for that phase. The **Outline CEMP (Doc Ref. 7.8)** prescribes measures to protect heritage assets from direct/indirect harm during construction, as well as also good practice in terms of site housekeeping etc.

Operational Phase

- 7.6.16 The primary mitigation measures incorporated into the Project include the design response to potential effects identified in the iterative design process, which seek to avoid significant adverse effects through careful planning, siting, access, layout, and the scale of infrastructure.
- 7.6.17 The following key principles of mitigation relevant to cultural heritage receptors are embedded within the design of the Project via the **Works Plans (Doc Ref. 2.3)**, the **Design Principles (Doc Ref. 7.5)**, **Vegetation Removal Plan (Doc Ref. 2.8)** and **Outline LEMP (Doc Ref. 7.10)**:
- The retention of the existing field boundary structure of hedgerows and trees, with limited hedgerow removal to provide access where required;
 - Reinforcement of existing hedgerows and other field boundary vegetation;
 - The provision of new native hedgerows to visually break up the extent of PV panels, particularly in views from the north, and to provide new habitat connectivity. The location of new native hedgerows has been informed by historic maps of the area, such that characteristic features will be reinstated in accordance with published landscape character guidance;
 - 3.2m minimum buffers between the deer-proof security fencing and hedgerows outside of the security fencing to protect existing landscape features;
 - Field 8 includes a landscape buffer, from which PV Panels have been set back. This would retain the immediate agricultural setting to Quested's Cottage and views south from Bank Farmstead.
 - Buffer to residential properties including Becketts Green and Handen Farm;
 - PV panels have been removed from the western edge of Field 3 adjacent to the barn located close to Stoneless (Grade II* listed building). A new hedge is proposed and the security fence adjusted to accommodate a 15m buffer from the property line. This would supplement the existing c. 2m high stone and brick wall to the north and vegetative boundaries enclosing the asset to the north east and assist in minimising intervisibility with the Site. A section of the previously proposed hedge along the western boundary of Field 3 has been removed;
 - Proposed woodland buffers on Calleywell Lane; and
 - Native 'carr' woodland along the East Stour River to reinforce existing planting and provide visual containment.
- 7.6.18 **Illustrative Landscape Drawings – Not for Approval (Doc Ref. 2.7)** and the **Outline LEMP (Doc Ref. 7.10)** provide indicative planting schedules, which seek to focus on reducing or avoiding landscape and visual and cultural heritage effects and maximising the enhancement of the landscape. The main elements of the **Illustrative Landscape Drawings – Not for Approval (Doc Ref. 2.7)** include:
- Existing hedgerows - reinforcement of existing hedgerows by infill with native species including hedgerow trees;

- New hedgerows;
- New woodland;
- New scrub/woodland edge;
- Wetland trees – planting of native wetland trees along the East Stour River; and
- Orchard trees.

7.6.19 Most hedgerows within the Site will be managed to a minimum height of 2.5 - 3m, with some key lengths of hedgerow identified to be managed to 4.5 - 5m for screening related to visual effects and glint and glare. Other lengths will be managed at a reduced height of 2 - 2.5m.

7.6.20 Further details on establishment and management of the landscape proposals for the Project are set out within the **Outline LEMP (Doc Ref. 7.10)** and are shown within the **Illustrative Landscape Drawings - Not for Approval (Doc. Ref. 2.7)**.

7.6.21 Details of landscape planting measures included to mitigate potential impacts on specific off-site heritage receptors, as described above, are included in the **Section 7.7 'Assessment of Effects'**.

Decommissioning Phase

7.6.22 Post-decommissioning the Site will be returned to the control of the landowners. For the purposes of the EIA, it has been assumed that the landowners will return those areas of the Site that are currently in arable use under the baseline condition (i.e., assessment year 2023) to arable use. It is assumed that established habitats such as hedgerows and woodland provided by the Project will be retained. In addition, the Project will re-establish historic field boundaries with hedgerow planting, particularly on the north facing slopes of the Aldington Ridge line and create new field margins as a result. It is assumed that these new hedgerows will also be retained.

7.6.23 The decommissioning phase will be subject to the same mitigation measures set out for the construction phase, where these are still applicable, i.e. where archaeological remains have not been fully evaluated and/or excavated. These measures are set out in the **Outline DEMP (Doc Ref. 7.12)**

7.7 Assessment of Effects

Construction Phase

Direct Effects

7.7.1 There is potential for the Project to impact physically (direct effects) upon below ground archaeological remains, associated palaeoenvironmental remains and other heritage assets (e.g. historic hedgerows, historic landscape character) within the Site.

- 7.7.2 Direct effects would arise as a result of ground disturbance associated with the installation of the PV panels and associated infrastructure, including the cable route, and landscaping, including the removal of limited sections of hedgerow.
- 7.7.3 In terms of the potential for direct effects on the archaeological resource within the Site, it is appropriate to note that the physical impact of the Project would be very low over the majority of the Site. As previously outlined within **Section 7.6**, the **Works Plans (Doc. Ref. 2.3)** include flexibility for Work No.s 1, 4, 5 and 8 to respond to archaeological features which may be identified during further archaeological investigation and to respond to features identified during construction works.
- 7.7.4 In addition, the agricultural use of land within the Order limits, including post medieval drainage; and particularly the intensive post War arable farming, will have caused some damage and truncation to any below ground archaeological remains. This is evidenced by the removal of field boundaries and levelling of earthworks relating to medieval ridge and furrow cultivation. Any effects from the Project should therefore be seen in the context of the likely continuing truncation of archaeological deposits over time, which would be expected to result in the reduction of their heritage significance; therefore, this deteriorating baseline, and the opportunity for the recovery of information through additional mitigation, is taken into account in the determination of the residual effect in **Table 7.12**.
- 7.7.5 It is expected that below ground archaeological remains associated with identified receptors within the Site are likely to be generally of Low value, being of interest at a local level. Effects would generally be permanent, direct and adverse, although in the case of upstanding historic hedgerows there will be short to medium term adverse effects, although long term beneficial effects would arise from proposed replanting as part of the landscape strategy of the Project.

PMR Crash Site

- 7.7.6 Any remains associated with the Messerschmitt Bf109E-4 PMR crash site would be of High value. However, it is anticipated, based on contemporary accounts, and the results of the geophysical survey and LiDAR analysis, that the plane was completely removed shortly after landing and that no evidence now remains on Site.
- 7.7.7 Thus, the impact of the Project on the PMR crash site would be Very Low as this is expected to result in no change to its current level of survival.

Archaeological Remains

- 7.7.8 All direct effects on below ground archaeological remains and associated palaeoenvironmental remains, in the absence of further mitigation, will be permanent and adverse.

Bronze Age

- 7.7.9 The trial trench evaluation, undertaken as part of archaeological works supporting the DCO Application (see **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 7 (Doc Ref. 5.4)**), identified evidence of activity dating to the Bronze Age in Field 26. This activity was represented by struck flint, including a possible 'horned' scraper, recovered from two ditches and small pit in the southern

end of Trench 1. It is possible that these features relate to Prehistoric agricultural activity, perhaps on the very outskirts of a settlement. Whilst the remains identified within the Site will be entirely lost to development (therefore a High impact), these are likely to represent part of wider activity extending outside the Order limits and will be excavated and recorded as part of additional mitigation measures.

Roman Road

- 7.7.10 Bank Road/Roman Road which bisects the central and western part of the Site and respects the alignment of a projected Romano-British road (HER TR 04 SE 120). Adjacent fields within the Site are Fields 2, 4, 5, 6, 9, 10 and 11. No direct evidence of the road itself was identified by the trial trench evaluation, although contemporary roadside features suggest that the Roman road may closely follow the course of the current road; and there is some possibility that this could be revealed within the Order limits, where and if this deviates from the course of the current road.

Roman Roadside Features

- 7.7.11 Roman 1st century roadside features were identified by the trial trench evaluation, including a possible domestic settlement enclosure in Field 4 (Trench 9), and a series of three pits and a large, shallow sub rectangular feature in Field 10 (Trench 6) suggest that there was settlement along this section of the projected Roman road that may have begun in the Prehistoric period, and flourished in the Roman period with the introduction of the road.

Undated probable former field systems/enclosures/trackways

- 7.7.12 The geophysical survey, undertaken as part of archaeological works supporting the DCO Application (see **ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 5 (Doc Ref. 5.4)**), identified possible features of archaeological origin within the south west of the Site across Fields 1 and 2, 4, 5, 7 and 8 (**ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment (Doc Ref. 5.4)**), **Drawing GM12014/004-010: Features identified through geophysical survey**). Fragmented partial enclosures, possibly indicating the presence of former field systems, were recorded in the western extent of Field 1, with similar, more concentrated features across the centre of Field 2. A possible enclosure, measuring c. 70m by c. 30m with internal subdivisions, was identified in the centre of Field 4 and the western extent of Field 5, along with possible associated anomalies surrounding the enclosure. Two possible double-ditched trackways were identified across the centre of Fields 7 and 8, with the trackway in Field 8 appearing to culminate at a sub-rectilinear enclosure, measuring c. 53m by c. 17m. These features are undated, although their form suggests a possible late Prehistoric to Medieval date (and more likely Prehistoric or Roman).

Potential features associated with Parish Boundaries

- 7.7.13 The routes of former parish boundaries within the Site have been identified by Tithe maps (mid-18th century) and early OS editions in Fields 7, 10, 19 and 28. These are not respected by present field boundaries (which largely respect the 17th/18th century arrangement), which suggests that they have earlier, perhaps medieval, origins. Analysis of LiDAR data, site walkovers and geophysical survey results have

not identified any physical remains of these boundaries within the Site; however, the potential for subsurface remains of these cannot be ruled out.

Post medieval agricultural features (former field boundaries, orchard boundaries, footbridge, sheepfolds, farmsteads, structures)

- 7.7.14 As would be expected of a site within an agricultural landscape which is largely post medieval in form, there is extensive evidence for features related to agricultural activity of this date. This includes two farmsteads or outfarms recorded on the HER (HER MKE88378 and MKE88379) in Fields 29 and 26 respectively; and a sheepfold in Field 26; potential remains associated with an orchard in Field 20; and a former footbridge in Field 23 (although the footbridge is unlikely to be affected). The geophysical survey results and LiDAR data (**ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 5 (Doc Ref. 5.4)**) show former field boundaries and likely agricultural features across the Site.

Post medieval industrial remains

- 7.7.15 A stone quarry and limekiln are depicted on the Tithe map within Field 5. Further evidence for small scale industrial activity within the Site is also suggested by the fieldname 'kiln field', within Field 6, though this could be related to the stone quarry with limekilns to the north-west, rather than be indicative of a separate kiln site.
- 7.7.16 These features demonstrate that there was some industrial activity within the Site, albeit small scale and likely related to agricultural activity, which was commonplace in this period.
- 7.7.17 Buildings associated with the former Smeeth Station are shown on the OS 1st Edition map in Field 26. The station closed in 1954, and all above ground structures have since been cleared.

Artefact Findspots

- 7.7.18 Artefact findspots recorded within the Site on the HER include a Roman copper alloy brooch (MKE94405) in Field 6; early medieval finds of three silver coins (MKE55817, MKE55777, MKE55778), a copper alloy brooch (MKE 55816) and a copper alloy key (MKE55834) in Field 10; a Roman copper alloy brooch (MKE 55849) and Post medieval copper alloy jetton (MKE 112330) in Field 12; a Post medieval silver coin (MKE 55835) in Field 13; a Roman copper alloy mount (MKE 55807) in Field 29; and a Medieval copper alloy padlock (MKE109471) from the cable route.
- 7.7.19 Four Mesolithic findspots were recovered during the trial trench evaluation undertaken in support of the DCO Application. However, these were all recovered from topsoil.
- 7.7.20 Artefact finds recorded in the HER have been removed and therefore there would be no impact. The artefact finds in Field 10 likely suggest of lost possessions, especially since these were to the north of the Roman Road.
- 7.7.21 Artefact finds, when not directly associated with the below ground archaeological remains, are generally 'ex-situ'; and therefore, their interest lies in their physical form

and the information that can be derived from this. The impact on any stray artefact finds would therefore be Very Low: they are not assets in and of themselves (and do not necessarily indicate any associated archaeological remains). However, findspots can suggest contemporary activity in the area and add to the body of evidence for archaeological activity.

Undated features of uncertain origin

- 7.7.22 Field boundaries and a small curved structure are shown in Field 17 on historic OS maps, and evidence for the realignment of a field boundary in Field 20. Uncertain features were also identified on LiDAR imagery in Fields 6 and 17.
- 7.7.23 Observations made during the Site visit include a potential linear feature in Field 29 and a semi-circular feature showing in the crop in Field 22, however, nothing in these locations from the geophysical survey or the LiDAR data suggest that these could relate to modern activity.
- 7.7.24 The features are undated, although seem likely to date from between the late Prehistoric and Post medieval periods. However, it is notable that none of the features are located in proximity to any known water sources, unlike that which is often found with Prehistoric and Roman sites. Furthermore, none of the features appear to relate to the projected Romano-British road, which transects the Site.

Hedgerows

- 7.7.25 Direct effects on historic hedgerows will be long term, adverse, although largely temporary and reversible on the eventual decommissioning of the Project.
- 7.7.26 Effects on historic landscape character are considered as an indirect effect, which is properly considered at the operational phase.
- 7.7.27 For the surviving historic hedgerows forming present external field boundaries, the small sections removed to facilitate construction will be replanted during the operational phase, as secured via the **Outline LEMP (Doc Ref. 7.10)**. In addition, additional hedgerow planting will occur, resulting in the re-instatement of the identified 17th/18th century layout (see **Archaeological Landscape Assessment (ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 4 (Doc Ref. 5.4))**) as depicted on mid-19th century mapping. This will result in impacts to hedgerow boundaries between Fields 1/2, between Fields 3/4 and Fields 3/7, between Fields 4/5, Fields 6/7, Fields 10/11, Fields 12/13, Fields 13/14, Fields 14/16, Fields 15/17, Fields 15/18, Fields 17/18 and Fields 23/24. Further detail at a landscape level is provided in the **Archaeological Landscape Assessment (ES Volume 4, Appendix 7.1: Archaeological Desk Based Assessment, Annex 4 (Doc Ref. 5.4))**.

Table 7.10: Construction Phase Cultural Heritage Direct Effects

Receptor	Value	Magnitude of Impact	Significance of Effect	Significant / Not Significant
Bronze Age activity	Low	High	Slight/ moderate (Adverse/ Permanent)	Not Significant
Roman Road	Low	Low	Neutral/slight (Adverse/ Permanent)	Not Significant
Roman roadside features	Low	Low	Neutral/slight (Adverse/ Permanent)	Not Significant
Undated probable former field systems/ enclosures/ trackways	Low	Low	Neutral/slight (Adverse/ Permanent)	Not Significant
Potential features associated with Parish Boundaries	Low	Very Low	Neutral or slight (Adverse/ Permanent)	Not Significant
Post medieval agricultural features (former field boundaries, orchard boundaries, footbridge, sheepfolds, farmsteads, structures)	Low	Low or Very Low	Neutral or slight (Adverse/ Permanent)	Not Significant
Post medieval industrial remains (lime kiln, quarrying activity, structures)	Low	Low	Neutral/slight (Adverse/ Permanent)	Not Significant

Receptor	Value	Magnitude of Impact	Significance of Effect	Significant / Not Significant
associated with Smeeth Station)				
Messerschmitt Bf109E-4 PMR crash site (Field 17)	High	Very Low	Slight	Not Significant
Findspots of various periods	Very Low	Very Low	Neutral	Not Significant
Undated features of uncertain origin	Low	Low	Neutral/slight (Adverse/Permanent)	Not Significant
Upstanding historic hedgerows (elements of 17 th /18 th century landscape)	Medium	Low	Slight (Adverse/Temporary)	Not Significant

Indirect Effects

- 7.7.28 During construction, there is potential for temporary impacts to the historic landscape character; and off-site heritage assets, in terms of changes to their setting. The impact will be as a result of alterations to the existing agricultural land to energy infrastructure. However, effects on off-site designated heritage assets, are considered most relevant to the built, operational phase of the Project. It is recognised that such effects will first arise during construction, including from noise and visual intrusion, landscaping, the internal haulage road and construction compounds as a result of the construction works within the Site and through accessing the Site. These impacts are considered temporary and short term, limited to working hours and for the duration of the construction phase only. Changes will emerge over time and will ultimately reach their fullest extent once the construction phase has ended. Impacts caused by the construction phase will be minimal and temporary; and are therefore not considered further. The effect of these impacts is therefore slight and considered to be not significant.
- 7.7.29 Impacts on groundwater and surface water are considered in **ES Volume 2, Chapter 10: Water Environment (Doc Ref. 5.2)**. Built heritage assets to the south of the Site are not within the surface water or groundwater flow path, which is to the north-west. Aldington is not within the same surface water body catchment, so does not contribute to the water budget of this catchment. As such no effect identified.

- 7.7.30 Impacts on noise are considered in **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)**. None of the built heritage assets are associated with a particular sound which contributes to its heritage value that would be lost or diminished by the sound of construction activity. As such, the noise produced by the construction process would not change the setting of these assets to an extent that it would affect the appreciation of their heritage interest. As such no effect is identified on heritage assets.

Operational Phase

Direct Effects

- 7.7.31 **ES Volume 4, Appendix 1.2: EIA Scoping Opinion (Doc Ref. 5.4)** confirmed that an assessment of the direct physical effects on below ground assets (i.e., archaeological remains) during the operational phase could be scoped out of the ES as direct physical effects will only occur during construction phase of the Project.
- 7.7.32 The Project will alter the land use taking it from arable land to energy infrastructure, but there is potential the land could still be used as pasture, thereby retaining its agricultural use. It is not anticipated that there will be alterations to existing field boundaries during the operational phase and, as such, the existing land formation should be retained. As such it is anticipated the direct impact on the historic landscape would be not significant.

Indirect Effects

- 7.7.33 This section assesses the likely significant environmental effects of the Project on off-site heritage assets and the overall character of the historic landscape, following completion of the construction phase, with embedded design mitigation, including replacement of hedgerows accentuating existing boundaries, and good practice in place. It defines the value of heritage assets that are receptors to the indirect effect of development, i.e. changes to their setting, such that its contribution to their heritage value is affected. It then defines the significance of the effect on these receptors.
- 7.7.34 The assessment within this section of the Chapter represents Step 3 of the Settings Assessment Process (HE, 2017) as it relates to the effect of the Project on heritage receptors. Steps 1 and 2 of the process have been described in the Baseline Conditions section above.
- 7.7.35 Effects on off-site heritage assets as a result of the Project will be indirect and adverse. They will be largely temporary and reversible in the eventuality of the decommissioning of the Project following its 40-year operational phase, although landscape planting measures will have a residual permanent effect, which is judged to be neutral and not significant.

Scheduled Monuments

North Downs Asset Group Scheduled Monuments (NHLE 1013144, 1012259, 1012220, 1012218, 1017618, 1012206, 1012221, 1012210, 1019994 and 1005167)

- 7.7.36 Land within the Site forms an element of the wider landscape setting of the asset group, at distances of between 4.5km and 7km, which contributes minimally to an understanding of its significance and to the Prehistoric funerary landscape of which these barrows form part. Setting elements which contribute most strongly to an understanding of their function and archaeological and historic interests include their location along the North Downs and association with one another which contributes to group value.
- 7.7.37 Only intervisibility between the Site and barrows 1012259 and 1005167 is theoretically possible as demonstrated by the ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**). However, barrow 1005167 is positioned to the east of Tumulus Farm, such that views are likely to be effectively screened. Owing to the significant intervening distance, topography and intervening vegetation and buildings, the Site forms only a very small part of the extended landscape of the monuments. Photomontage visualisation 34 of the Photomontage Methodology prepared as part of **ES Volume 4, Appendix 8.10: LVIA Visualisations (Doc Ref. 5.4)** for **ES Volume 2, Chapter 8: Landscape and Views (Doc Ref. 5.2)** illustrates that the Project would be negligible in the view at such a distance.
- 7.7.38 The impact of the Project on such views would have little effect on their significance and no real change in our ability to understand and appreciate the significance of the assets. The Project would not affect an appreciation of the monuments' archaeological and historic interests and would not interrupt or block long-distance views from, to or between the monuments where they are currently experienced, nor disrupt any visual or intangible cultural relationship with other contemporary barrows, nor compete for dominance within the surrounding landscape.

Barrow cemetery to the south-west of Barrowhill Scheduled Monument (NHLE 1475132)

- 7.7.39 Whilst the ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**) highlights potential intervisibility with the Project, this would be largely limited to the Project Substation with some visibility of PV panels from the south of the monument. Site observations confirmed that intervening vegetation and buildings precluded intervisibility between the Site and the monument; and over this distance the Site is not readily discernible as a feature in outward views. Visualisations prepared from the PRoW to the east of the monument (refer to **ES Volume 4, Appendix 7.2: Heritage Statement, Annex 2: Heritage Viewpoints (Doc Ref. 5.4)**) demonstrate the subtle elevation of the asset and confirm that the Project would not be visible in views towards the monument from this position.
- 7.7.40 Land within the Site has little bearing on understanding the special archaeological and historic interest held by the monument. The aspects of setting which are deemed to contribute towards significance include the elevated position of the monument and the group value the monument has with other similar assets which collectively offer evidence as to a wider prehistoric landscape and ritual activity.
- 7.7.41 The changes resulting from the Project to the setting of the asset would have little effect on its significance and no real change in our ability to understand and

appreciate the significance of the asset within the wider landscape. The Project would not affect the appreciation of the asset's archaeological and historic interests. In addition, the Project would not interrupt or block important views currently experienced from the monument nor disrupt any visual or intangible relationships with other contemporary barrows and occupation features.

Grade I Listed Buildings

Church of St Martin (NHLE 1071208)

- 7.7.42 The ZTV indicates that intervisibility between the asset (at ground level) and the land within the Site will not be possible. As such the experience of the church from within its immediate churchyard setting would not be affected. Furthermore, the experience of the church within its medieval manorial setting which is expressed by the physical relationship with nearby Court Lodge Farmhouse and outbuildings, Parsonage Farmhouse and Church Farmhouse would also be conserved.
- 7.7.43 Some views in which the church tower features as a prominent feature of the rural landscape would experience change during the construction, operational and decommissioning phases of the Project where aspects of the Project would be perceptible.
- 7.7.44 Viewpoint 1aH (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**) clearly shows the church tower visible within the wider landscape in views southeast from the south of Field 20. There will be some screening of the Site from hedgerows and trees to be planted as part of the landscape strategy which would establish during the operational phase.
- 7.7.45 Viewpoints 1H and 2H (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**) are representative of views offered from the northwest and the southeast in which the church tower may be experienced within the wider rural landscape. In Viewpoint 1H, views are interrupted by existing vegetation where only glimpses of the church are likely to be available when moving along Goldwell Lane. In Viewpoint 2H, the tower of the church is clearly visible within the mid-ground of the view where the tower punctuates above the enclosing tree canopy. In both visualisations, the Project is not visible and the experience of the church and its function as an ecclesiastical building would not be affected.
- 7.7.46 Due to the intervening distance, no acoustic impacts to the setting of the asset during the construction, operational and decommissioning phases of the Project are predicted.
- 7.7.47 The Project would introduce change which would affect the ability to appreciate the wider rural setting of the church with changes to some views in which the church tower features as a prominent and distinguishable historic landmark. However, there are many views of the church tower, visibility of the tower being a key and deliberate design feature. Views would not be lost but altered and due to the form and scale of the tower, a clear understanding of function of the asset would remain despite visual changes, and its presence as a landmark feature within the wider landscape would be sustained.

7.7.48 It is judged that the visual changes introduced by the Project would result in **slight adverse** significance of effect. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the church which holds intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset and which is not elucidated by the land within the boundary of the Site;
- The Project would not be visible from the publicly accessible interior of the church which is the space where the architectural and historic interests are engineered to facilitate worship, religious celebration and contemplation and which hold spiritual value;
- The historic and aesthetic association with its churchyard, and its relationship with Aldington Church Conservation Area, would not be altered;
- The prominence of the church as a landmark structure and as the foci of historic development within the settlement would be conserved;
- The Site is a neutral element of the setting of the building and is incidental within the wider, extended landscape setting surrounding the asset;
- The Site is situated at a distance from the asset within a varied landscape context and the agricultural land to the immediate south of the asset which is assessed as a positive element of the asset's setting would be sustained; and
- The key elements of the asset's setting which are judged to contribute to an understanding of special interest comprising its surrounding churchyard, the Aldington Church Conservation Area, and prominence within the settlement would be sustained.

Mersham Manor (NHLE 1233281)

7.7.49 The ZTV indicates the potential for intervisibility between the asset and the Site with the PV panels and Inverter Stations likely to be visible within south and southeast facing views from the asset. Site observations confirmed that intervisibility with the Site is possible from windows at the south-east gable end of the house and from within its associated garden where views are not interrupted by intervening vegetation (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**).

7.7.50 Visualisation 31 (**ES Volume 4, Appendix 8.10: LVIA Visualisations (Doc Ref. 5.4)**) provides a south facing view from the south of Mersham Manor. The visualisation indicates that the back of the PV panels would be perceptible in the background of the view. The PV panels would not be a prominent feature of this view with an extensive area of agricultural land remaining to the immediate south of the asset.

7.7.51 Due to the orientation of the south-facing fixed panel arrays, there would be no glint effects experienced from the asset.

7.7.52 Due to the intervening distance between the asset and the Site, there would be no acoustic impacts within the setting of the asset which would significantly affect the

current ambiance experienced by the asset during the construction, operational phase and decommissioning of the Project.

7.7.53 It is judged that the visual changes introduced by the Project would result in **slight adverse** significance of effect. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the asset which holds intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset and which is not elucidated by the land within the boundary of the Site;
- The historic association with the asset's outbuildings, and the visual and built relationship with the adjacent Church of St John The Baptist, where the assets have group value as part of a historic manorial complex would not be altered;
- Any significance drawn by the asset from the land within the Site is minimal; the Site itself forms part of the wider, extended setting which is not an aspect of the current setting integral to understanding the historic interest of the asset;
- The Site is situated at a distance from the asset within a varied landscape context and the agricultural land to the immediate south of the asset which is assessed as positive element of the asset's setting would be sustained; and
- The key elements of the asset's setting which are judged to contribute to an understanding of its special interest comprising its surrounding immediate grounds, farm buildings and the adjacent church, would be sustained.

Church of St John The Baptist (NHLE 1276693)

7.7.54 The Project has the potential to impact upon how the church is experienced within its wider landscape setting particularly from the south, southeast and southwest where the church tower is perceptible as a feature within views.

7.7.55 Views towards the church from Roman Road and from public footpaths on the Site would experience change where the solar PV panels would be visible within the foreground of views in which the tower of the church is visible or where the panels, due to their scale in comparison to the viewer, would remove some existing views towards the church tower. Heritage Viewpoint 5H (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**), taken from within the graveyard associated with St John the Baptist, does however not show any immediately perceivable intervisibility.

7.7.56 Site observations confirmed that intervisibility with the Site is possible from within the grounds of the church (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**) gaps within intervening vegetation permit distant views. However, Heritage Viewpoint 5H does not indicate any noticeable visual impact would be experienced from within the immediate surroundings of the church as a result of the Project.

- 7.7.57 Visualisation 31 (**ES Volume 4, Appendix 8.10: LVIA Visualisations (Doc Ref. 5.4)**) provides a south facing view from the south of the church and Mersham Manor. The visualisation indicates that the back of the PV panels would be perceptible in the background of the view during the operational phase of the Project although planting included in the landscape strategy would offer some screening. The solar PV panels would not be a prominent feature of this view with an extensive area of agricultural land remaining to the immediate south of the asset.
- 7.7.58 Due to the orientation of the south-facing fixed panel arrays, no glint effects would be experienced from the asset.
- 7.7.59 Due to distance, no acoustic impacts to the asset from the construction, operational and decommissioning phases of the Project are anticipated.
- 7.7.60 It is judged that the visual changes introduced by the Project as set out above would result in **slight adverse** significance of effect. This is based on the following grounds:
- The Project would not cause direct impact to the fabric of the asset which holds intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset and which is not elucidated by the land within the Site;
 - The Project would not be visible from the publicly accessible interior of the church which is the space where the architectural and historic interests are engineered to facilitate worship, religious celebration and contemplation and which hold spiritual value;
 - The historic and aesthetic association with its churchyard, and its relationship with the adjacent Mersham Manor, would not be altered;
 - The prominence of the church as a landmark structure and as the foci of historic development within the settlement would be conserved;
 - The Site is a neutral element of the setting of the building and is incidental within the wider, extended landscape setting surrounding the asset;
 - The Site is situated at a distance from the asset within a varied landscape context and the agricultural land to the immediate south of the asset which is assessed as a positive element of the asset's setting would be sustained; and
 - The key elements of the asset's setting which are judged to contribute to an understanding of special interest comprising its surrounding churchyard, the adjacent Mersham Manor and prominence within the settlement would be sustained.

Grade II Listed Buildings*

Stonegreen Hall (NHLE 1233498)

- 7.7.61 The Project would lead to visual change within the wider agricultural landscape setting of Stonegreen Hall, although no change to views directly from the asset itself. Site observations confirmed that intervisibility is possible between the Site and the

upper storeys of the hall (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**).

- 7.7.62 Due to the location of the asset to the north of the Project and the orientation of the south-facing fixed panel arrays, it is anticipated that the asset would not experience glint effects. Visible glint may be generated from the northwestern part of the Site but there is proposed an appropriate amount of screening between the asset and the panels which would intervene. This asset is outside the area where potential glint and glare impacts are predicted.
- 7.7.63 **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** confirms that changes to noise levels experienced by Stonegreen Hall (represented by 'NSR 06 Stonegreen Hall Farm') would not result in significant noise effects. Therefore, the current rural ambiance experienced by the asset within its setting would not be adversely impacted by the Project during the construction, operational or decommissioning phases.
- 7.7.64 It is judged that the visual changes introduced by the Project as set out above would result in an impact of **slight adverse** significance of effect. This is based on the following grounds:
- The Project would not cause direct impact to the fabric of the hall which holds intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset and which is not elucidated by the land within the boundary of the Site;
 - The Site is a neutral element of the setting of the building and is incidental within the wider, extended landscape setting surrounding the asset – the asset does not draw significance from the land within the Site which contributes towards an appreciation of its special interest;
 - The Site is situated at a distance from the asset within a varied landscape context and the agricultural land to the immediate south of the asset which is assessed as a positive element of the asset's setting would be sustained; and
 - The key elements of the asset's setting which are judged to positively contribute to an understanding of its special interest comprising its surrounding extensive estate grounds, would be sustained.

Stonelees (NHLE 1233761)

- 7.7.65 Effects would arise from loss of the traditional agricultural use of land bounding the curtilage of the asset to the north and east which historically comprised part of the historic land holding of Stonelees. However, the Project has been set back from the asset as part of the landscape strategy to reduce the visual impact.
- 7.7.66 Site observations confirmed that views of the house from the Site were limited to its roofline and chimney stack only and that these views did not contribute to an understanding and appreciation of its significance as a 15th century timber framed house illustrative of the Wealden type (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**). Visual changes introduced by the Project

within the setting of the asset would not be visible from the body of the building itself, nor its immediate gardens to the north, east and west.

- 7.7.67 The Project would be experienced as part of the background to the asset, notably on approach towards the asset from along Laws Lane where extensive views over the surrounding countryside are permitted over the hedgerows enclosing the lane. This would noticeably alter the wider landscape setting in which the asset is located and would dilute an understanding of the historic rural content of the asset to a moderate degree. However, once the proposed hedgerow planting to the north is established to its proposed 4.5 to 5m height, as secured via the **Outline LEMP (Doc Ref. 7.10)**, and new hedgerows proposed to the east of the asset and existing hedgerows to the southeast of asset reach the proposed 2.5m to 3m maintained height, as secured via the **Outline LEMP (Doc Ref. 7.10)**, this will offer effective screening to the solar PV panels and the Intermediate Substation in Field 3, minimising the ability to experience these panels in approaching near views towards the asset.
- 7.7.68 **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** has confirmed that changes to noise levels experienced by Stonelees during the operational phase of the Project would result in a minor adverse or negligible noise effect. Therefore, the current rural ambiance experienced by the asset within its setting would be minimally impacted by the Project during the operational phase.
- 7.7.69 Whilst the land within the Site historically formed part of the landholding to Stonelees, this association is not tangible or evident today with the asset boundary clearly separated from the Site by vegetated boundaries. Furthermore, no designed views or access routes between the curtilage of the asset and the Site have been identified that offer illustration of this former association. It is considered that today, the contribution of the Site to an understanding and appreciation of the special interest of the building is limited to offering some understanding of the historic rural context and historic association with the land in which the asset is located. The special interest stems primarily from the fabric of the asset which holds significant historic and architectural interest evidencing the 15th century origins of the building as a likely Wealden type house which was rebuilt in the 16th century, and which retains early construction and architectural details including timber framing, mullioned windows, panelled door, moulded interior timbers and remnants of the early floor plan.
- 7.7.70 The asset is best experienced within near views from within its surrounding gardens and from views towards the principal west frontage from Laws Lane, where an understanding of its special architectural interest is gained through the architecture of the domestic accommodation. These elements of the asset's setting would not be affected by the Project.
- 7.7.71 The change within the asset's setting introduced by the Project would equate to a loss of part of the surrounding rural scene within the existing wider rural landscape setting of the building. Whilst the Project would not directly alter the values held by the asset, the Project would alter part of its historic landholding, albeit a landholding with no obvious visual connection in current times.

7.7.72 On this basis, it is anticipated that the residential visual changes introduced by the Project within the asset's setting as set out above would result in a **slight / moderate adverse** significance of effect. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset and which is not elucidated by the land within the boundary of the Site due to the intervening vegetation and buildings;
- No important or designed views to or from the asset would be blocked or interrupted by the Project;
- Elements of setting of the asset which contribute most strongly to its significance comprise its private grounds and views towards the asset from Laws Lane to the west, which would not be altered; and
- The Project would introduce built development on the historic landholding of the asset altering the historic use of the land from traditional agricultural to energy use. A large landholding associated with the asset is reflective of the status of the building which is expressed by the quality of the internal detail and embellishment and also reflects the functional association between the asset and the land. However, given that the link between the building and the former landholding is intangible and not perceptible on the Site, the effect on the historic relationship between the asset and the land is limited.

Evegate Manor (NHLE 1362798)

7.7.73 Impacts would be long-term and visual in character arising from loss of part of the surrounding agricultural landscape to the south and southwest of the asset over which some intervisibility with the land within the Site is possible. However, it is judged that land within the Site does not contribute towards an understanding of the asset's special interest.

7.7.74 This asset is outside the area where potential glint and glare impacts are predicted, due to distance and the orientation of the south-facing fixed panel arrays.

7.7.75 The impact of the Project would equate to a **slight adverse** significance of effect, with the changes resulting from the Project to the setting of the asset having little effect on its significance and no real change in our ability to understand and appreciate the significance of the asset within the wider landscape. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset and which is not elucidated by the land within the boundary of the Site due to distance, lack of historic association and intervening vegetation;
- The Site is not an element of the asset's setting which positively adds to an appreciation or understanding of its special interests, the wider rural landscape of the building being incidental to the setting of the building; and
- The key elements of the asset's setting which are judged to contribute to an

understanding of special interest comprising its surrounding private grounds, and its relationship with its associated ancillary outbuildings would be sustained.

Grade II listed Buildings

Stonegreen Cottage (NHLE 1233284)

- 7.7.76 Impacts would be long-term and visual in character arising from the change to the traditional agricultural use of land which forms the landscape setting to the cottage, albeit the Project would not affect the appreciation of the asset's historic and architectural interests as a vernacular service building to a larger county house. Site observations confirmed that intervisibility is possible between the Site and the upper windows of the cottage (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**), although the ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**) indicates very limited intervisibility at ground level from the surroundings of the asset.
- 7.7.77 The impact of the Project would equate to a **neutral / slight adverse** significance of effect, with the changes resulting from the Project to the setting of the asset having little effect on its significance. The Project would not affect the appreciation of the asset's historic and architectural interests as a vernacular service building to a larger county house. There would also be no change to the immediate setting of the building which would impact upon its overall significance, the elements of setting which contribute to an understanding of its significance primarily being limited to the surrounding estate grounds to Stonegreen Hall and the proximity to Stonegreen Hall where these aspects reveal a historic and functional association.

Goodwin Farmhouse (NHLE 1300136)

- 7.7.78 Operational impacts would be long-term and visual in character and arising from loss of the traditional agricultural use of land which forms landscape setting to the farmhouse.
- 7.7.79 The ZTV indicates that there will be no intervisibility between the Project and the asset; however, there may be glimpsed views north where vegetation is less dense. Site observations confirmed that the house is screened within views from Frith Road and the PRow to the west by a mixture of mature hedgerow, trees and associated farm buildings located to the north of the house. Views from higher ground within the Site were screened by intervening farm buildings and trees (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**).
- 7.7.80 Visualisation 6 (**ES Volume 4, Appendix 8.10: LVIA Visualisations (Doc Ref. 5.4)**) provides a northeast facing view towards the Site from Frith Road to the south of the Site. The view is within the vicinity of Goodwin Farmhouse and includes the asset within the view frame to the right. The image indicates that the Project would not be visible within the backdrop to the asset and would not be visible on approach towards the asset from the west along Frith Road.
- 7.7.81 The setting of the farmhouse is associated with its farm buildings located to its north and the immediate surrounding farmland to its east and north-east where there is a visual link between the farmhouse and the agricultural land which informs on historic

function. The asset is considered to derive some significance from the immediate surrounding agricultural landscape to the farmstead where there is a visual link, providing context and an understanding of its historic role and function within the landscape. The Site forms part of the wider landscape to the asset, although its distance and lack of historic association limits the contribution made by land within the Site to appreciating overall significance.

- 7.7.82 Embedded mitigation includes for the reinforcement of the existing hedgerow boundary to the south of the Site to a proposed height of 2.5 to 3m, as secured via the **Outline LEMP (Doc Ref. 7.10)**, which would assist in screening the Project.
- 7.7.83 Given the lack of historic association between the land within the Site and the landholding of the farm, the limited glimpses of the roofline and chimney of the farmhouse only from within the Site, it is judged that the Project would have a minimal effect on the appreciation of the asset's historic and architectural interests and would not introduce change to the setting of the building which would impact upon its overall significance. As such, changes arising from the Project are anticipated to have little effect on significance and no real change in our ability to understand and appreciate the significance of the asset. This would equate to an impact of **neutral / slight** significance of effect.

Evegate Mill (NHLE 1071180)

- 7.7.84 Operational impacts would be long-term and visual in character and arising from loss of the traditional agricultural use of land surrounding the asset. This wider agricultural context being an aspect of the current setting which contributes towards an understanding of the historic role of the mill.
- 7.7.85 Site observations confirmed that intervisible views from the Site and the asset were possible (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**).
- 7.7.86 Whilst existing trees and intervening hedgerows would provide some degree of screening to the asset, there will be areas of the Project that will be intervisible with the asset. No impact upon the asset has been identified in the Glint and Glare Assessment (**ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**) however glint impacts have been identified along the section of Goldwell Lane to the north of the asset, which may impact upon the appreciation of the asset.
- 7.7.87 Landscape planting will screen the Site to the south-west and to the east with native trees, as well as the installation of woodland and meadow grassland to the east.
- 7.7.88 **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** confirms that changes to noise levels experienced by Evegate Mill (represented by 'NSR 36 The Mill House' in **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)**) would not be significant. Therefore, the current ambiance experienced by the asset within its setting would not be significantly impacted by the Project.

7.7.89 It is judged that the visual changes introduced by the Project as set out above would result in an impact of **slight adverse** significance of effect. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset and which is not elucidated by the land within the boundary of the Site; and
- The key elements of the asset's setting which are judged to contribute to an understanding of special interest comprising its location on the East Stour whereby the river provided a power source, and its relationship with its associated millhouse where the buildings have group value as a compact cluster of mid-19th century agri-industrial buildings, would be sustained.

Evegate Millhouse (NHLE 1185369)

7.7.90 Operational impacts would be long-term and visual in character and arising from loss of the traditional agricultural use of land surrounding the asset. This wider agricultural context being an aspect of the current setting which contributes towards an understanding of the historic interest of the Millhouse as part of a historic agri-industrial complex.

7.7.91 Site observations confirmed that intervisible views between the asset and the Site were possible (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**). The Project would introduce change within the wider landscape setting of Evegate Millhouse. This change would be visual. Whilst existing trees and intervening hedgerows would provide some degree of screening, there will be areas of the Project that will be intervisible with the asset. Specifically, the ZTV indicates that there would be patchy visibility with the solar PV panels from the asset and land to the north-east, with the Project Substation also visible from the south-west of the asset and BESS Units and Inverter Stations visible from land to the south-east of the asset. No impact upon the asset has been identified in the Glint and Glare Assessment (**ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**). Impact by glint has been identified along the section of Goldwell Lane to the north of this heritage asset, which may impact upon the appreciation of the asset within its current setting.

7.7.92 **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** has confirmed that changes to noise levels experienced by Evegate Millhouse (represented by 'NSR 36 in **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)**') would not result in significant noise effects. Therefore, the current ambiance experienced by the asset within its setting would not be significantly impacted by the Project.

7.7.93 It is proposed to screen the Project to the south-west and to the east with native planting of trees, as well as the installation of woodland and meadow grassland to the east.

7.7.94 On this basis, it is judged that the visual changes introduced by the Project as set out above would result in an impact of **slight adverse** significance in effect. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset;
- The contribution of the land within the Site as an element of the asset's setting which elucidates significance is limited to offering some understanding of the historic function of the millhouse as a former agricultural building with existing areas of agricultural land maintained within the immediate setting of the asset and proposed vegetative screening to the north of the Order limits assisting in conserving a sense of this earlier context; and
- The key elements of the asset's setting which are judged to contribute to an understanding of special interest comprising its location on the East Stour whereby the river provided a power source, and its relationship with its associated mill where the buildings have group value as a compact cluster of late 18th and mid-19th century agri-industrial buildings would be sustained.

Stable/ Outbuilding about 20 yards North-west of Evegate Mill House (NHLE 1185387)

7.7.95 The assessment of effect is as for Evegate Millhouse, above, although the impact is reduced due to the ancillary nature of the building.

7.7.96 It is judged that the visual changes introduced by the Project as set out above would result in an impact of **neutral / slight adverse** significance in effect. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset and which is not elucidated by the land within the boundary of the Site; and
- The key elements of the asset's setting which are judged to contribute to an understanding of special interest comprising of the building's relationship with the associated millhouse and mill, which results in these structures' group value as a compact cluster of mid-19th century agri-industrial buildings would be sustained.

The Old Cottage (NHLE 1071249)

7.7.97 Operational impacts would be long-term and visual in character and arising from loss of the traditional agricultural use of land which forms the wider landscape setting of the cottage. The change within the setting has the potential to impact upon how the special interests of the cottage are appreciated.

7.7.98 The asset is located within close proximity to the boundary of Field 18 and the ZTV indicates that there will be intervisibility between the Project and the asset, although with some filtering due to intervening screening.

7.7.99 The proposed layout and landscape strategy include for an area of native woodland planting along the eastern boundary of Field 18 with Callywell Lane. This planting will screen the proposed solar panels within this field from view when approaching

the asset from the south Calleywell Lane. In addition, a new hedgerow boundary to the south of the Field 23 to Goldwell Lane is also proposed, which will also screen the more distant views currently available owing to the topography of the surrounding landscape to the north. The new hedgerow to the southern boundary of Field 23 will inhibit views of the proposed panels and the substation on approach towards the asset on Calleywell Lane.

7.7.100 **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** has confirmed that changes to noise levels experienced by the Old Cottage (represented by 'NSR 35 The Old Cottage Lodge' in **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)**) would not result in significant noise effects. Therefore, the current ambiance experienced by the asset within its setting would not be significantly impacted by the Project.

7.7.101 No glint impact upon the asset has been identified in the Glint and Glare Assessment (**ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**).

7.7.102 It is judged that the changes introduced by the Project, as set out above, would result in an impact of **slight adverse** significance in effect. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest as a medieval vernacular building and which is not elucidated by the land within the boundary of the Site;
- The wider rural landscape of the building is not considered to be integral to appreciating the significance of the asset; and
- The key elements of the asset's setting which are judged to have some limited contribution to understanding its special interest, which have been assessed to comprise of its orientation and interaction with Calleywell Lane, its associated private grounds and formerly associated barns, would be sustained.

Goldwell (NHLE 1184459)

7.7.103 Operational impacts would be long-term and visual in character and arising from loss of the traditional agricultural use of land surrounding the asset which historically comprised part of the historic landholding of the asset.

7.7.104 Visualisation 25 (**ES Volume 4, Appendix 8.10: LVIA Visualisations (Doc Ref. 5.4)**) presents a view looking east from a public footpath towards Field 21 which lies to the east of Goldwell. The view is taken from the north of the asset however it demonstrates the effects of the proposed landscape strategy to screen views of the proposed panels during the operational phase of the Project. Along the western boundary of Fields 20 and 21, proposed landscape planting is to include reinforcing existing hedgerows to a proposed height of 2.5m to 3m and planting of new hedgerows, where required, to be maintained to a height of 2.5m to 3m and new native tree planting, as secured via the **Outline LEMP (Doc Ref. 7.10)**. This will assist in minimising the visibility of the Project in eastwards views from the asset.

Views westwards from the asset towards Field 17 are limited to due to the undulation of the surrounding topography.

7.7.105 It is anticipated that there will be some glimpses through to the panels however no noticeable impact upon the asset has been identified in the **ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**.

7.7.106 **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** has confirmed that changes to noise levels experienced by Goldwell (represented by 'NSR 26 Goldwell Farm' in **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)**) would not result in significant noise effects. Therefore, the current ambiance experienced by the asset within its setting would not be significantly impacted by the Project.

7.7.107 Whilst the land within the Site was historically associated with the former landholding of Goldwell, it is considered today that the contribution of the Site to the understanding and appreciation of the building as part of a former farmstead has been diluted. This former function of the asset is best experienced through its visual relationship with its associated outbuildings to the immediate north where the materials continuity and proximity between Goldwell as the principal building and its ancillary buildings contributes more expressively to appreciating significance of the asset. This visual relationship is best appreciated from the immediate grounds of the farmstead itself, to which the Site does not contribute. Filtered views of the asset from within the Site do not offer an opportunity to understand its architectural interest.

7.7.108 It is anticipated that the visual changes introduced by the Project as set out above would result in changes to the setting that have a slight impact on the significance that will result in some change in our ability to understand and appreciate the significance of the asset. This would equate to an impact of **slight adverse** significance in effect. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development and function of the asset;
- The Site is no longer a feature of the setting of the building which is integral to an appreciation or understanding of its special interests, the Site being screened by hedgerow such that there is no longer an obvious visual or functional link remaining with the land within the Site; and
- The key elements of the asset's setting which are judged to contribute primarily to an understanding of special interest comprising its orientation and interaction with its associated farm buildings and yard, its associated private grounds, and immediate paddocks and surrounding land, would be sustained.

Stable/ Outhouse about 10m north of Goldwell (NHLE 1362780)

7.7.109 Operational impacts would be long-term and visual in character and arising from loss of the traditional agricultural use of land which forms the wider landscape setting to the outbuilding and which was historically associated.

- 7.7.110 The Project would introduce change within the wider setting of the Stable and Outhouse at Goldwell with parts of the Site historically comprising part of the historic landholding of the asset.
- 7.7.111 The Stable and Outhouse at Goldwell lies within the ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**). Visualisation 25 (**ES Volume 4, Appendix 8.10: LVIA Visualisations (Doc Ref. 5.4)**) presents a view looking east from a public footpath towards Field 21 which lies to the northeast of Goldwell. The view is taken from the north of the asset; however, it demonstrates the effects of the proposed landscaping to screening views of the proposed panels during the operational phase of the Project. Along the western boundary of Fields 21 and 20, proposed landscaping is to include reinforcing existing hedgerows to a proposed height of 2.5m to 3m and planting of new hedgerows, where required, to be maintained to a height of 2.5m to 3m, as secured via the **Outline LEMP (Doc Ref. 7.10)**, and new native tree planting. This will assist in minimising the visibility of the Project in eastwards views from the asset. Views westwards from the asset towards the Field 17 are limited to due to the undulation of the surrounding topography.
- 7.7.112 **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** (represented by 'NSR 26 Goldwell Farm' in **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)**) has confirmed that changes to noise levels experienced by the heritage asset would not result in significant noise effects on the receptor. Therefore, the current ambience experienced by the asset within its setting would not be significantly impacted by the Project.
- 7.7.113 Whilst the land within the Site was historically associated with the former landholding of Goldwell, it is considered today that the contribution of the Site to the understanding and appreciation of the building as part of a former farmstead is limited. This former function of the asset is best experienced through its visual relationship with the main house of Goldwell which is located to the south. The continuity and proximity between the principal building of Goldwell and the associated outbuildings contributes to appreciating significance of the asset. This visual relationship is best appreciated from the immediate grounds of the farmstead itself, to which the Site does not contribute.
- 7.7.114 Whilst partial views of the asset are possible from within the Site, these views do not offer an opportunity to understand its historic function or appreciate its architectural interest and are not assessed as being integral to an understanding of significance.
- 7.7.115 On this basis, it is judged that the visual changes introduced by the Project as set out above would result in an impact of **slight adverse** significance in effect. This is based on the following grounds:
- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development and function of the asset;
 - The Site is no longer a feature of the setting of the building which positively

adds to an appreciation or understanding of its special interests, the Site being screened by hedgerow such that there is no obvious visual or functional link remaining with the land within the Site; and

- The key elements of the asset's setting which are judged to contribute primarily to an understanding of special interest comprising its orientation and interaction with its associated farm buildings and yard, its associated private grounds, and immediate paddocks and surrounding land, would be sustained.

Bank Farmhouse and walls attached (NHLE 1362752) and Barn and 2 stable ranges attached, about 20 metres north of Bank Farmhouse (NHLE 1071248)

- 7.7.116 Operational impacts would be long-term and visual in character and arising from loss of the traditional agricultural use of land bounding the curtilage of the asset to the north and east which historically comprised part of the historic land holding of Bank Farm.
- 7.7.117 Due to the slope to the south of the farmstead, the solar PV panels may be visible in far southwestern views from the rear of the farmhouse, although its existing garden trees would help to screen views. The panels would also be visible from the northern part of the northwest elevation of the farmhouse, where Site observations confirmed views were possible northwest through the farmyard and into the Site.
- 7.7.118 For the most part, views of the Project to and from the barn to the north would be effectively screened by intervening barns adjacent to its northwest and to its northeast, although views would be possible from the western end of its northeast elevation, where views are possible north into the Site.
- 7.7.119 The Project would be visible on approach towards the asset from Bank Road where the proposed solar arrays would be positioned within fields to the northwest of the trackway. This approach currently presents the assets as part of a modern, altered farming complex with a mix of large, modern agricultural buildings prominent in views on arrival. The farmhouse, located the south-west, is not readily visible on this approach, being screened by the barn.
- 7.7.120 **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** has confirmed that changes to noise levels experienced by Bank Farmhouse (represented by 'NSR 08 Broadbanks' in **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)**) would not result in significant noise effects on the receptor. Therefore, the current rural ambiance experienced by the asset within its setting would not be significantly impacted by the Project.
- 7.7.121 Due to the existing screening of the surrounding buildings and trees to the north-east, it is anticipated that that glint impacts will be limited. The Glint and Glare Assessment (**ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**) confirmed that solar reflections are geometrically possible for more than 3 months per year but less than 60 minutes on any given day, although this would be significantly screened by the existing vegetation and surrounding buildings. This would result in no impact on the building by glare.

- 7.7.122 The existing agricultural setting enjoyed by the asset would be altered through the introduction of the solar panel arrays on land to the north of the asset (to the north of Roman Road) and to the west and southwest. The resulting visual changes would alter views on approach to the asset along Roman Road and alter views on leaving the asset moving northwards along the access drive where panels would be perceptible within the immediate and wider landscape.
- 7.7.123 Mitigation in the form of an open area as part of landscape proposals to the southern corner of Field 8 to the south-west of Bank Farm will assist in maintaining the open quality of existing views over agricultural land currently experienced from the asset.
- 7.7.124 Land within the Site is considered to contribute to an understanding and appreciation of the buildings as part of a farmstead. The change resulting from the Project would alter the agricultural landscape setting of the farmstead. Although retention of the field patterns would reduce the loss of legibility of the landscape, such that although this will be notably different, it will have a slight impact on the appreciation of the asset's significance.
- 7.7.125 Whilst the Project would not directly alter the values held by the collection of farm buildings, nor directly alter the remaining group value held by the buildings, it would alter the character of the historic landholding to the farmstead. However, the land directly to the south and east of the buildings would remain unchanged, retaining part of its historic agricultural setting; and even land affected by the implementation of solar PV panels will retain its historic layout (as much as it does so currently) and therefore some legibility of the agrarian landscape will be retained.
- 7.7.126 It is judged that the visual changes caused by the Project as set out above would result in an impact of **slight adverse** significance of effect. This is based on the following grounds:
- The Project would alter the historic use of the land from agricultural to energy use and affecting the historic relationship between the farmstead and the land;
 - No important or designed views from the assets would be blocked or interrupted;
 - The group value, relationships and historic associations expressed between the assets and the farmstead as a whole would not be altered;
 - The proposals would not cause direct impact to the fabric of the buildings which hold intrinsic special historic and architectural interest evidencing the origins, development, function and value of the assets; and
 - The garden elements of the existing setting of the farmhouse building that contribute to an understanding of its use as a residential house would not be altered; and the group value of farmhouse and outbuilding expressed by their visual and built relationship would not be altered.

Quested's Cottage (NHLE 1184383)

- 7.7.127 Operational impacts would be long-term and visual in character and arising from loss of the traditional agricultural use of land which forms the landscape setting to the cottage.
- 7.7.128 Site observations confirmed that intervisibility between the asset and the Site was possible (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**). The Project includes for an area of landscaping to the north of Quested's Cottage which along with vegetative screening would mitigate against visual changes to the wider setting of the cottage.
- 7.7.129 Effects from glint are not anticipated, with no impact upon the asset identified in the **ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**.
- 7.7.130 **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** has confirmed that changes to noise levels experienced by Quested's Cottage (represented by 'NSR 018 Quested's Cottage' in **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)**) would not result in significant noise effects. Therefore, the current ambiance experienced by the asset within its setting would not be significantly impacted by the Project.
- 7.7.131 The impact of the Project would equate to a **slight adverse** significance of effect. This is based on the following grounds:
- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development and function of the asset and which is not elucidated by the land within the boundary of the Site;
 - The Site is not an element of the setting of the building which positively adds to an appreciation or understanding of its special interests; the Site as part of the wider rural landscape setting of the asset being incidental to the setting; and
 - The key elements of the asset's setting which are judged to contribute to an understanding of special interest comprising its surrounding associated private grounds would be sustained.

Symnells and Walled Forecourt (NHLE 1184484)

- 7.7.132 Operational impacts would be long-term and visual in character and arising from loss of the traditional agricultural use of land forming part of the landscape setting of the asset.
- 7.7.133 Existing trees, a small woodland to the north and intervening hedgerows would provide a noticeable degree of screening to the asset, however, there will be areas of the Project that will be open to views from this asset. No potential for glint impacts had been identified by the **ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**.
- 7.7.134 The ZTV indicates that some of solar PV panels and Project Substation could theoretically be visible from the asset, although at a distance of some 280m. In view of the location of the asset, surrounding topography and the vegetation, it is

anticipated that development within Field 21 could be viewed from the asset, although the proposed mitigation planting to the western boundary of Field 21 would limit such visibility.

7.7.135 Heritage Viewpoint 1H (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**) illustrates the existing and potential view southeastward towards the Site from outside of the asset on Goldwell Lane. The visualisation demonstrates that existing vegetation to Goldwell Lane intervenes in views of the Site from this location. As such the Project would unlikely affect the current experience of the asset within its immediate setting facing Goldwell Lane.

7.7.136 It is judged that the visual changes introduced by the Project as set out above would result in an impact of **slight adverse** significance in effect. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset and which is not elucidated by the land within the boundary of the Site;
- The perceived impact is predominantly derived from the construction phase, which would be a temporary impact. Very low impact would be received from the operational phase, with minor intervisibility identified in the ZTV; and
- The key elements of the asset's setting which are judged to contribute to an understanding of special interest would be sustained.

Church House (NHLE 1362794)

7.7.137 Operational impacts would be long-term and visual in character and arising from change to the traditional agricultural use of land within longer-range views from the vicinity of the asset. The ZTV indicates patchy intervisibility from within the gardens to the asset to the south, and from the driveway to the west, although no impact on the publicly available views of the asset from Church Road. It is noted that the ZTV models buildings and major blocks of woodland, although not individual trees and hedgerows. It is in practice difficult to gain any views of the Site from land in this part of the A20 corridor. It is therefore expected that existing trees, including those within the garden, and intervening hedgerows - especially that bounding the south of the garden along the A20 - would provide heavy filtering of the Project in these views. No potential for glint impacts had been identified by the **ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**.

7.7.138 Change to the asset's setting during the construction and decommissioning phases would be short-term and would be visual in nature arising from the importing of equipment associated with the Project into the Site, although given the distance of the asset from the Site, and intervening landscape features which provide extensive filtering of views, the impact associated with these phases would be negligible. Visual impacts during the operational phase would be substantially reduced owing to distance and the filtering effects of intervening hedgerows and trees, particularly in proximity to the asset and within its gardens.

7.7.139 It is judged that the visual changes introduced by the Project as set out above would result in an impact of **neutral/slight adverse** significance in effect, which through the lens of professional judgement would be expected to be **neutral**, as this would not cause harm to the asset. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset and which is not elucidated by the land within the boundary of the Site;
- The perceived impact is predominantly derived from the operational phase, with patchy intervisibility identified in the ZTV, which would be likely to be substantially reduced in actuality, given the filtering effect of hedgerows and trees; and
- The key elements of the asset's setting which are judged to contribute to an understanding of special interest would be sustained, including views of the asset from Church Road to the west. The Project would not impact the experience of the viewer of the asset in the context of the special interest of Smeeth Conservation Area.

Registered Park and Garden *Hatch Park (NHLE 1001291)*

7.7.140 The Project would introduce changes within distant elements of the wider landscape setting of the asset. Operational impacts would be long-term and visual in character. The ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**) highlights that views from within the Site are possible of the south-east corner of the asset only. This area comprises a field under pastoral use directly adjacent to the A20 (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**). Site observations confirmed that the presence of extensive intervening vegetation and the distance between the Site and the south-east corner of the park were such that the Site was not readily discernible from the asset (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref 5.4)**) and forms part of an extended, visual backdrop to views.

7.7.141 The setting of the asset is associated with the estate and the views outwards to the north which establishes the estate within a rural landscape. To the south, the A20 and the M20 effectively provide a buffer between the estate and the landscape to the south.

7.7.142 The Project would not affect the appreciation of the asset's historic, architectural and artistic interests as a designated parkland landscape associated with a county house of some status, nor would the Project affect the current, limited contribution that its setting makes towards an understanding and appreciation of these interests. As such, the Project is not anticipated to introduce changes which would affect the setting of the parkland or consequently its significance. Changes arising from the Project are judged to have an impact of **neutral / slight adverse** significance in effect.

Conservation Areas

Smeeth

- 7.7.143 The Project would introduce visual change to a small part of the wider rural landscape surrounding the Conservation Area during the operational phase. The ZTV indicates patchy intervisibility from within the southern part of the Conservation Area; and from the north-western edge of the designated area, although it is noted that the ZTV models buildings and major blocks of woodland, although not individual trees and hedgerows. It is in practice difficult to gain any views of the Site from land in this part of the A20 corridor and Site observations confirmed that due to the intervening vegetation and distance between the Conservation Area and the Site, no views of the Site from within (publicly accessible areas of) the Conservation Area were identified, although the viewer may be aware of the Project from travelling around the area and some heavily filtered views may be possible from areas that are not publicly accessible.
- 7.7.144 Due to distance and lack of historic association it is considered that the Site is not an element of the setting of the Conservation Area which contributes to an understanding of its significance.
- 7.7.145 The Project would not affect the special interest and character and appearance of the Conservation Area nor affect the contribution that its existing setting makes towards an understanding and appreciation of these interests.
- 7.7.146 The Project is judged to cause minimal potential change to the setting of the Conservation Area and the Project is judged to result in an impact of, at most, **neutral / slight adverse** significance in effect.

Mersham

- 7.7.147 The Project would introduce visual change to a small part of the wider rural landscape surrounding the Conservation Area during the operational phase.
- 7.7.148 The ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**) confirms that intervisibility between the Conservation Area with the Site would be limited to a very small area in the southern part of the designation from Bower Road. Site observations confirmed that due to the intervening vegetation and distance between the Conservation Area and the Site, no views of the Site from the Conservation Area are possible.
- 7.7.149 The Project would not affect the special interest and character and appearance of the Conservation Area nor the contribution that its current setting makes towards an understanding and appreciation of these interests. In any views from the southern end of the Conservation Area, on Bower Road, the viewer would be facing away from the special interest of the area, such that the impact would be minimal. As there is some intervisibility indicated by the ZTV, the Project could result in an impact of **neutral / slight adverse** significance in effect.

Bilsington

- 7.7.150 The Project would introduce visual change to a small part of the wider landscape setting surrounding the Conservation Area during the operational phase.

- 7.7.151 The ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**) indicates minimal visibility of the Project from within the Conservation Area and its surroundings. Site observations confirmed that due to the intervening vegetation and distance between the Conservation Area and the Site, no views of the Site from the Conservation Area would be possible.
- 7.7.152 The Conservation Area is located within an undulating landscape which slopes southwards towards Romney Marsh (away from the Site), with open views out across the marsh and encompassing distinctive stone churches which are prominent features within the landscape to the south. To the north, the landform ascends and is heavily wooded and limits distant views including views towards the Site.
- 7.7.153 Due to distance and lack of historic association it is considered that the Site is not an element of the setting of the Conservation Area which contributes to an understanding of its significance.
- 7.7.154 The Project would not affect the special interest and character and appearance of the Conservation Area nor the contribution that its current setting makes towards an understanding and appreciation of these interests.
- 7.7.155 The Project is not anticipated to introduce changes which would affect the setting of the area, although as there is some intervisibility indicated by the ZTV, the Project is judged to result in an impact of **neutral / slight adverse** significance in effect.

Aldington Clap Hill

- 7.7.156 The Project would introduce visual change to a small part of the wider rural landscape surrounding the Conservation Area during the operational phase.
- 7.7.157 The resulting visual change from the Project would not be visible from within the Conservation Area itself due to the presence of woodland plantations to the north and north-west and intervening buildings to the west which inhibit views outwards from the Conservation Area whereby the land within the Site would form part of the wider, rural backdrop. This is confirmed by the ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**).
- 7.7.158 The Project would not directly alter the key features of special interest which provide the Conservation Area with its character and appearance, notably the group value of the listed buildings within the Conservation Area boundary would be unaffected. These buildings in grouping, positing, materials and use inform upon the historic development of the area and contribute towards its architectural interest.
- 7.7.159 It is judged that the change introduced within the wider landscape setting of the Conservation Area by the Project would result in an impact of **neutral / slight adverse** significance in effect. This is based on the following grounds:
- The character and appearance of the Conservation Area stems principally from the development, architecture, function and position of its buildings. This has been influenced by the junction of the historic Roman Road and

Frith Road. These features would be unaffected by the Project;

- The immediate landscape setting to the north and south which forms the principal setting elements to the Conservation Area would remain unaltered; and
- No key views through, out and towards the Conservation Area which contribute towards its significance would be altered.

Aldington Church

- 7.7.160 The ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**) indicates that the Project Substation and solar PV panels would be visible from limited parts of the Conservation Area and its vicinity: notably from areas under pasture within the Conservation Area to the north-east, areas outside the northern part of the Conservation Area to the west of Church Lane; and from Church Lane in the very south of the Conservation Area and outside it. This would introduce visual change to a relatively distant part of the wider agricultural landscape surrounding the Conservation Area during the operational phase. However, notably, the ZTV indicates very limited visibility from Church Road, such that there could only be a very limited impact on the appreciation of the special interest of the Conservation Area from the viewer within it.
- 7.7.161 Viewpoint 1aH (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**) clearly shows the church tower, as the visual focus of the Conservation Area, visible within the wider landscape in views southeast from the south of Field 20. There will be some screening of the Site from hedgerows and trees to be planted as part of the embedded mitigation which would establish during the operational phase.
- 7.7.162 Viewpoints 1H and 2H (refer to **ES Volume 4, Appendix 7.2: Heritage Statement (Doc Ref. 5.4)**) are representative of views offered from the northwest and the southeast in which the church tower, as the focus of the Conservation Area, may be experienced within the wider rural landscape. In viewpoint 1, views are interrupted by existing vegetation where only glimpses of the church are likely to be available when moving along Goldwell Lane. In viewpoint 2H, the tower of the church as the centre of the Conservation Area is clearly visible within the mid ground of the view where the tower punctuates above the enclosing tree canopy. In both visualisations, the Project is not visible and the experience of the church and its function as an ecclesiastical building would not be affected.
- 7.7.163 Due to the intervening distance, no acoustic impacts to the setting of the Conservation Area during the construction, operational and decommissioning phases of the Project are anticipated.
- 7.7.164 The resulting change to the wider surrounding landscape of the Conservation Area would not be visible from large parts of the Conservation Area itself due to the intervening buildings and vegetation which inhibit intervisibility however parts of the Project may be visible from limited areas within the Conservation Area, where the land within the Site is visible within the backdrop of more distant, outwards views.

7.7.165 The Project would not however directly alter the key features of special interest within the Conservation Area; notably, the Project would not alter the group value of the listed buildings in the area which contribute to an understanding of historic development and the role of the area as a former foci of settlement prior to the black death in the medieval period, and to architectural significance. It is the cluster of buildings around the Church of St Martin which provide the area with its sense of place.

7.7.166 It is judged that the change introduced within the wider landscape setting of the Conservation Area by the Project would result in an impact of **slight adverse** significance in effect. This is based on the following grounds:

- The character and appearance of the Conservation Area stems principally from the development, architecture, function and position of its numerous and highly graded listed buildings. This has been influenced by the high ground where the elevation adds prominence to the buildings. These features would be unaffected by the Project;
- The immediately surrounding agricultural landscape surrounding the historic core of the area which positively contributes to the significance of the Conservation Area would remain unaltered;
- The prominence of the church within the Conservation Area and its role in views towards the Conservation Area will not be diminished; and
- There would be highly limited visibility of the Project from within the historic core of the Conservation Area, such that the relationship between key buildings will not be affected.

Non-designated Heritage Assets (HER)

Aldington Mount (TR 03 NE 6)

7.7.167 The Project would introduce changes within the immediate setting of the asset which lies to the west of Field 9 (to the west of the access track into the working yard at Bank Farm) and to the south of Field 12 (located to the north of Roman Road), which would culminate during the operational phase.

7.7.168 Being in close proximity to Bank Farm, it is likely that the asset will experience similar changes to noise levels to that confirmed at Bank Farmhouse, which have been assessed by **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** as not being significant. Therefore, the current acoustic ambiance experienced by the asset within its setting would not be significantly impacted by the Project.

7.7.169 It is judged that the visual changes introduced by the Project as set out above would result in an impact of **slight adverse** significance in effect. This is based on the following grounds:

- The Project would not cause direct impact to the physical remains of the monument which holds archaeological interest evidencing the origins, development and function the asset and which is not elucidated by the land within the boundary of the Site;
- The landscape is much altered from the contemporary situation of the

monument and therefore has less currency in the appreciation of its primary archaeological interest; and

- The potential historic and archaeological relationship of the asset to Roman Road to the north and possibly Bank Farm would be sustained.

Little Gains Farm (MKE83194)

7.7.170 There is a potential visual impact from the surroundings of the asset, as identified by the ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**), although the building itself is being screened by woodland and hedgerows, which would reduce the visual impact. The property is bound by a cluster of trees to the north and surrounded by agricultural fields.

7.7.171 Glint effects to the asset are not anticipated and no impact upon the asset has been identified in the Glint and Glare Assessment (**ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**).

7.7.172 It is judged that changes arising from the Project would have a **neutral / slight adverse** significance in effect. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development and function of the asset and which is not elucidated by the land within the boundary of the Site;
- None of the parcels of land within the Site are historically associated with the building, although they contribute to the setting of the building. The fields historically associated with the farmstead will not be directly impacted upon. While the agricultural landscape formed part of the wider landscape of the building, the Site does not add to an appreciation or understanding of its special interests, the Site is incidental within the wider setting of the asset and is not historically associated with the building; and
- The key elements of the asset's setting which are judged to contribute to an understanding of special interest comprising its principal approach route towards Frith Road and its associated fields marked by field boundaries and woodland would be sustained.

Handen Farm (MKE88354)

7.7.173 The Project would introduce visual change to the setting of the Handen Farm during the operational phase. The asset was historically associated with a large landholding, most of which is within the Site.

7.7.174 The ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**) indicates visibility with the Project, although the intermittent nature of the ZTV indicates partial filtering from existing landscape features. In addition, substantial planting in the form of woodland and grassland is proposed, as part of the embedded mitigation measures which would provide additional screening to the Site. Furthermore, the built elements of the Project are to be stood off from the asset with landscaped areas proposed to the west on the access track leading to the asset and the north of the asset.

- 7.7.175 The Project would be visible on approach towards the asset from Frith Road. This approach currently presents the residents of this asset with a private access route, historically crossing the farmland associated with the farmhouse.
- 7.7.176 **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** has confirmed that changes to noise levels experienced by Handen Farm (represented by 'NSR Handen Farm') would result in a very low to medium magnitude of impact caused by noise effects on the receptor. However, based on the existing noise level perceived, this would not result in a significant effect.
- 7.7.177 The Glint and Glare Assessment (**ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**) does not identify any impact, with the asset being significantly screened by the existing vegetation and proposed planting.
- 7.7.178 Land within the Site is considered to contribute to an understanding and appreciation of the buildings as part of a farmstead. The change resulting from the Project would equate to the loss of part of the rural scene within the existing rural landscape setting of the former farmstead and which was historically associated with the function of the asset.
- 7.7.179 Whilst the Project would not directly alter the values held by the building, the Project would alter the historic landholding to the farmstead. However, the land directly to the south and east of the building would remain unchanged, retaining part of its historic agricultural setting which would be experienced as part of the setting on approach from south.
- 7.7.180 It is judged that the impact of the Project would equate to **neutral / slight adverse** significance in effect. This is based on the following grounds:
- The Project would introduce built development on the existing historic landholding of the former farmstead altering the historic use of the land from agricultural to energy use and affecting the historic relationship between the building and the land;
 - No important or designed views from the assets would be blocked or interrupted;
 - The proposals would not cause direct impact to the fabric of the buildings which hold intrinsic special historic and architectural interest evidencing the origins, development, function and value of the assets; and
 - The garden elements of the existing setting of the farmhouse building that contribute to an understanding of its use as a residential house would not be altered.

Littlestock Farm (MKE88358)

- 7.7.181 The asset and its immediate surroundings are within the ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**) and the Project would introduce visual change to the setting of the asset during the operational phase, although this impact would be reduced by the distance of the asset from the Site,

where changes would be viewed over intervening trees and hedgerows, with planting as part of the embedded mitigation measures providing additional filtering of views. The impact would also be reduced by the topographical situation of the asset, which is in a localised low point.

7.7.182 Land within the Site is considered to contribute to an understanding and appreciation of the asset as a former farmstead, although it is not historically associated with the function of the asset as it did not form part of the landholding of the asset.

7.7.183 As such, changes arising from the Project are anticipated to be noticeable in the context of the asset's setting and would change the ability to understand and appreciate the significance of the asset. The impact of the Project would equate to **neutral/slight adverse** significance in effect. This is based on the following grounds:

- The Project is outside the historic landholding of the former farmstead;
- There are no important or designed views which would be affected;
- The proposals would not cause direct impact to the fabric of the buildings which hold intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset; and
- The garden elements of the existing setting of the farmhouse building, and the immediately surrounding agricultural land that contribute to an understanding of its former use would not be altered.

Farmstead North Of Little Stock (MKE89064)

7.7.184 The asset and its immediate surroundings are within the ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**), although the visibility indicated is patchy, owing to surrounding trees and hedgerows. The Project would introduce visual change to the setting of the asset during the operational phase, although this impact would be reduced by the distance of the asset from the Site, where changes would be viewed over intervening trees and hedgerows, with planting as part of the embedded mitigation measures providing additional filtering of views. The impact would also be reduced by the topographical situation of the asset, which is in a localised low point.

7.7.185 Land within the Site is considered to contribute to an understanding and appreciation of the asset as a former farmstead, although is not historically associated with the function of the asset as it did not form part of the landholding of the asset.

7.7.186 Changes arising from the Project are anticipated to be noticeable in the context of the asset's setting and would change the ability to understand and appreciate the significance of the asset. The impact of the Project would equate to **neutral/slight adverse** significance in effect. This is based on the following grounds:

- The Project is outside the historic landholding of the former farmstead;
- There are no important or designed views which would be affected;

- The proposals would not cause direct impact to the fabric of the buildings which hold intrinsic special historic and architectural interest evidencing the origins, development, function and value of the asset; and
- The garden elements of the existing setting of the farmhouse building that contribute to an understanding of its use as a residential house would not be altered.

Stone Street Farm (MKE88359)

7.7.187 The Project would introduce visual change to the setting of the asset during the operational phase. There are low hedgerows to the west but because of the relative height of the building, this would provide good screening of the panels to the west. Landscape mitigation proposed to the north of the asset would sustain screening of the panels during the operational phase.

7.7.188 No impact upon the asset has been identified in the Glint and Glare Assessment (**ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**).

7.7.189 Changes arising from the Project are judged to have little effect on significance and no real change in our ability to understand and appreciate the significance of the asset. On this basis, it is anticipated that the visual changes introduced by the Project as set out above would result in an impact of **neutral / slight adverse** significance in effect. This is based on the following grounds:

- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest as a medieval vernacular building and which is not elucidated by the land within the boundary of the Site;
- The Site is not an element of the setting of the building which positively adds to an appreciation or understanding of its special interests; the special interest deriving principally from its historic fabric and its architecture which reveal the medieval origins of the building, its subsequent development, and its domestic function. The wider rural landscape of the building is not considered to be integral to appreciating the significance of the asset; and
- The key elements of the asset's setting which are judged to have some limited contribution to understanding its special interest, which have been assessed to comprise of its orientation and interaction with Calleywell Lane and its associated private garden, would be sustained.

Goldwell Manor Farm (MKE88362)

7.7.190 The Project would introduce visual change to the setting of the asset during the operational phase and would alter the use of the land historically comprising part of the historic landholding of the asset.

7.7.191 No impact upon the asset has been identified in the Glint and Glare Assessment (**ES Volume 4, Appendix 16.2: Solar Photovoltaic Glint and Glare Study (Doc Ref. 5.4)**).

- 7.7.192 **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)** has confirmed that changes to noise levels experienced by Goldwell (represented by 'NSR 26 Goldwell Farm' in **ES Volume 2, Chapter 14: Noise (Doc Ref. 5.2)**) would not result in significant noise effects on the receptor. Therefore, the current ambiance experienced by the asset within its setting would not be significantly impacted by the Project.
- 7.7.193 Whilst the land within the Site was historically associated with the former landholding of Goldwell Manor Farm, it is considered that the contribution of the Site to the understanding and appreciation of the significance of the building as part of a former farmstead is limited. This former function of the asset is best experienced through its visual relationship with its surrounding buildings (Goldwell and Goldwell barn). This visual relationship is best appreciated from the immediate grounds of the farmstead itself, to which the Site does not contribute.
- 7.7.194 Whilst some intervisibility between the asset and the Site is identified by the ZTV (refer to **ES Volume 3, Figure 8.1: Zone of Theoretical Visibility (Doc Ref. 5.3)**), these views do not offer an opportunity to understand historic function or appreciate the architectural interest of the asset and are not assessed as being an element of the setting which adds to an understanding of significance.
- 7.7.195 It is judged that the visual changes introduced by the Project as set out above would result in an impact of **neutral / slight adverse** significance in effect. This is based on the following grounds:
- The Project would not cause direct impact to the fabric of the building which holds intrinsic special historic and architectural interest evidencing the origins, development and function of the asset;
 - The Site is no longer a feature of the setting of the building which positively adds to an appreciation or understanding of its special interests, the Site being screened by hedgerow such that there is no obvious visual or functional link remaining with the land within the Site; and
 - The key elements of the asset's setting which are judged to contribute primarily to an understanding of special interest comprising its orientation and interaction with its associated farm buildings and yard, and its associated private grounds, would be sustained.

Historic Landscape

- 7.7.196 Effects on historic landscape character are considered as both a direct and indirect effect, although given the intangible nature of the receptor, direct effects are considered on physical landscape features, such as hedgerows, above.
- 7.7.197 Effects on historic landscape character will be long term, adverse, although largely temporary and reversible on the eventual decommissioning of the Project.
- 7.7.198 Mitigation measures including sensitive planting and screening combined with adherence to the existing landscape pattern would also reduce adverse effects to slight.

Table 7.8: Operational Phase Cultural Heritage Indirect Effects

Receptor	Value	Magnitude of Impact	Significance of Effect (Adverse/ Temporary)	Significant / Not Significant
<i>Scheduled Monuments</i>				
North Downs Asset Group (NHLE 1013144, 1012259, 1012220, 1012218, 1017618, 1012206, 1012221, 1012210, 1019994 and 1005167)	Very High	Very Low	Slight	Not Significant
Barrow Cemetery to the south-west of Barrowhill (NHLE 1475132)	Very High	Very Low	Slight	Not Significant
<i>Grade I listed buildings</i>				
Church of St Martin (NHLE 1071208)	Very High	Very Low	Slight	Not Significant
Mersham Manor (NHLE 1233281)	Very High	Very Low	Slight	Not Significant
Church of St John The Baptist (NHLE 1276693)	Very High	Very Low	Slight	Not Significant

Receptor	Value	Magnitude of Impact	Significance of Effect (Adverse/ Temporary)	Significant / Not Significant
----------	-------	---------------------	---	-------------------------------

Grade II listed buildings*

Stonegreen Hall (NHLE 1233498)	High	Very Low	Slight	Not Significant
Stonelees (NHLE 1233761)	High	Low	Slight / Moderate	Not Significant
Evegate Manor (NHLE 1362798)	High	Very Low	Slight	Not Significant

Grade II listed buildings

Stonegreen Cottage (NHLE 1233284)	Medium	Very Low	Neutral / slight	Not Significant
Goodwin Farmhouse (NHLE 1300136)	Medium	Very Low	Neutral / slight	Not Significant
Evegate Mill (NHLE 1071180)	Medium	Low	Slight	Not Significant
Evegate Millhouse (NHLE 1185369)	Medium	Low	Slight	Not Significant
Stable/ Outbuilding about 20 yards North-west of Evegate Mill	Medium	Very low	Neutral / slight	Not Significant

Receptor	Value	Magnitude of Impact	Significance of Effect (Adverse/ Temporary)	Significant / Not Significant
House (NHLE 1185387)				
The Old Cottage (NHLE 1071249)	Medium	Low	Slight	Not Significant
Goldwell (NHLE 1184459)	Medium	Low	Slight	Not Significant
Stable/ Outhouse about 10m north of Goldwell (NHLE 1362780)	Medium	Low	Slight	Not Significant
Barn and 2 stable ranges attached, about 20 metres north of Bank Farmhouse (NHLE 1071248)	Medium	Low	Slight	Not Significant
Bank Farmhouse and walls attached (NHLE 1362752)	Medium	Low	Slight	Not Significant
Quested's Cottage (NHLE 1184383)	Medium	Low	Slight	Not Significant
Symnells and Walled Forecourt (NHLE 1184484)	Medium	Low	Slight	Not Significant

Receptor	Value	Magnitude of Impact	Significance of Effect (Adverse/ Temporary)	Significant / Not Significant
Church House (NHLE 1362794)	Medium	Very Low	Neutral	Not Significant

Grade II Registered Park and Garden

Hatch Park (NHLE 1001291)	Medium	Very Low	Neutral / slight	Not Significant
---------------------------	--------	----------	------------------	-----------------

Conservation Areas

Smeeth	Medium	Very Low	Neutral / slight	Not Significant
Mersham	Medium	Very Low	Neutral / slight	Not Significant
Bilsington	Medium	Very Low	Neutral / slight	Not Significant
Aldington Clap Hill	Medium	Very Low	Neutral / slight	Not Significant
Aldington Church	Medium	Low	Slight	Not Significant

Non-designated Heritage Assets (HER)

Aldington Mount (TR 03 NE 6)	Low	Medium	Slight	Not Significant
Little Gains Farm (MKE83194)	Low	Low	Neutral / slight	Not Significant
Handen Farm (MKE88354)	Low	Low	Neutral / slight	Not Significant

Receptor	Value	Magnitude of Impact	Significance of Effect (Adverse/ Temporary)	Significant / Not Significant
Littlestock Farm (MKE88358)	Low	Very Low	Neutral / slight	Not Significant
Farmstead North Of Little Stock (MKE89064)	Low	Very Low	Neutral / slight	Not Significant
Stone Street Farm (MKE88359)	Low	Low	Neutral / slight	Not Significant
Goldwell Manor Farm (MKE88362)	Low	Low	Neutral / slight	Not Significant

Historic Landscape

Historic Landscape	Medium	Low	Slight	Not Significant
--------------------	--------	-----	--------	-----------------

Decommissioning Phase

Direct Effects

7.7.199 **ES Volume 4, Appendix 1.2: EIA Scoping Opinion (Doc Ref. 5.4)** confirmed that an assessment of the direct physical effects on below ground assets (i.e., archaeological remains) during decommissioning could be scoped out of the ES as direct physical effects will only occur during construction phase of the Project.

Indirect Effects

7.7.200 Decommissioning related impacts will be temporary and slight, due to the relative ease of returning the land back to agricultural use, with minimal effects. As such, all direct and indirect effects are considered to be no more than **slight adverse** and not significant.

7.8 Additional Mitigation, Monitoring and Enhancement Measures

Construction Phase

Direct Effects

- 7.8.1 As noted previously, archaeological evaluation comprising geophysical survey and trial trenching was commissioned and undertaken for those parts of the Project that are not flexible in location; namely the Project Substation; where this cannot be mitigated by design, due to the nature of development and requirements for its location. The scope of work undertaken was established through consultation with the KCC. This has enabled characterisation of the archaeological potential of those parts of the Project where impacts are anticipated.
- 7.8.2 An **AMS (Doc Ref. 7.17)** has been prepared to set out the scope, guiding principles and methods for the planning and implementation of further archaeological mitigation works in relation to the Project.
- 7.8.3 The **AMS (Doc Ref. 7.17)** identifies a strategy which will reduce the impact of the Project on the archaeological resource and preserve and record archaeological features. This will be achieved through a programme of further archaeological evaluation. The evaluation will take place following agreement with KCC and the submission of detailed WSI and will target both those areas of archaeological interest as well as those perceived to be void of archaeological remains: 'blank' areas.
- 7.8.4 Following the completion of the field evaluation, written, drawn and photographic records as well as environmental samples and artefacts generated during the evaluation will be subject to a programme of detailed assessment, followed by appropriate analysis and reporting. The field evaluation will determine a further programme of post DCO consent works, as set out in the **AMS (Doc Ref. 7.17)**, which will:
- Facilitate the *in-situ* preservation of noteworthy archaeological features or deposits discovered during the trial trench evaluation;
 - Ensure preservation through the excavation and recording of other archaeological remains uncovered during the trial trench evaluation; and
 - Conduct an analysis and produce reports on the dating, nature, interconnections, condition, and heritage significance of archaeological features, artefacts, and deposits found within the Site.
- 7.8.5 The **AMS (Doc Ref. 7.17)** sets out the scope, guiding principles and methods for the planning and implementation of the required WSI(s) for the programme of archaeological mitigation post DCO consent.
- 7.8.6 The **Works Plans (Doc. Ref. 2.3)** include flexibility to respond to archaeological features which may be identified during further archaeological investigation and to respond to features identified during construction works. The implementation of the

AMS (Doc Ref. 7.17) will inform locations where embedded design mitigation, set out in **Section 7.6**, above, will be used to avoid impacts on archaeological remains.

7.8.7 The full scope of potential mitigation measures, following further archaeological evaluation, is set out in the **AMS (Doc Ref. 7.17)**, but briefly this will comprise:

- Archaeological excavation;
- Archaeological watching brief;
- Palaeoenvironmental analysis;
- Post-excavation analysis and reporting;
- Archive Preparation and Deposition; and
- Publication and dissemination of results, for example via an article in a journal, as appropriate depending on the nature of the results of the mitigation.

7.8.8 The programme of archaeological work proposed in the **AMS (Doc Ref. 7.17)** also offers the opportunity for the realisation of the communal value of archaeological remains, through the reporting and public dissemination of the results of the investigation, public outreach and interpretation.

7.8.9 Archaeological details will need to be submitted to ABC prior to commencement of the authorised development, and such details must be generally in accordance with the **AMS (Doc Ref. 7.17)**, which will be secured by DCO Requirement.

Indirect Effects

7.8.10 No additional mitigation, monitoring or enhancement measures have been identified in terms of indirect effects as part of the construction stage.

Operational Phase

Direct Effects

7.8.11 No additional mitigation, monitoring or enhancement measures have been identified in terms of direct effects as part of the operational phase.

Indirect Effects

7.8.12 No additional mitigation, monitoring or enhancement measures have been identified in terms of indirect effects as part of the operational phase, although landscape planting measures as part of the landscape strategy, implemented during the construction phase, will continue to mitigate indirect effects on off-site heritage assets, in terms of setting, through a reduction of visual impacts.

Decommissioning Phase

Direct Effects

7.8.13 It is likely that no additional mitigation, monitoring or enhancement measures of direct effects on archaeological remains will be appropriate as part of the

decommissioning phase, unless new intrusive activities form part of this phase of works. Appropriate contingency measures in the event of ground disturbance are secured via the **Outline DEMP (Doc Ref. 7.12)**.

Indirect Effects

- 7.8.14 No additional mitigation, monitoring or enhancement measures have been identified in terms of indirect effects as part of the decommissioning stage. The effect on off-site heritage assets, through changes to their setting as part of the Project, will be reversible following the decommissioning phase.

7.9 Residual Effects

Construction Phase

Direct Effects

- 7.9.1 Residual effects on archaeological remains within the Order limits have taken into account the measures set out within **Section 7.6** and the **AMS (Doc Ref. 7.17)** are outlined below:
- Bronze Age activity (Field 26): Slight Adverse; Permanent (Not significant)
 - Roman Road: Neutral (Not significant)
 - Roman roadside features: Neutral (Not significant)
 - Undated probable former field systems/ enclosures/ trackways: Neutral/ slight Adverse; Permanent (Not significant)
 - Potential features associated with Parish Boundaries: Neutral (Not significant)
 - Post medieval agricultural features (former field boundaries, orchard boundaries, footbridge, sheepfolds, farmsteads, structures): Neutral/ slight Adverse; Permanent (Not significant)
 - Messerschmitt Bf109E-4 PMR crash site (Field 17): Neutral (Not significant)
 - Findspots of various periods: Neutral (Not significant)
 - Undated features of uncertain origin : Neutral (Not significant)
 - Upstanding historic hedgerows (elements of 17th/18th century landscape): Slight; Adverse / Temporary (Not significant)
- 7.9.2 As with any greenfield site, there is some potential for hitherto unrecorded below ground archaeological remains to survive; however, measures set out in the **AMS (Doc Ref. 7.17)** and the **Works Plans (Doc Ref. 2.3)** allow for areas of important archaeological remains to be preserved through design alternatives, where appropriate.

Indirect Effects

- 7.9.3 Residual effects on off-Site heritage assets, through changes to their setting, will remain as **Section 7.7 'Assessment of Effects'**, as no additional mitigation, monitoring and enhancement measures have been identified for indirect effects.

Operational Phase

Direct Effects

- 7.9.4 **ES Volume 4, Appendix 1.2: EIA Scoping Opinion (Doc Ref. 5.4)** confirmed that an assessment of the direct physical effects on below ground assets (i.e., archaeological remains) during the operational phase could be scoped out of the ES as direct physical effects will only occur during construction phase of the Project.

Indirect Effects

- 7.9.5 Residual effects on off-Site heritage assets, through changes to their setting, will remain as **Section 7.7 'Assessment of Effects'**, as all appropriate mitigation is established through embedded design mitigation and no additional mitigation, monitoring and enhancement measures have been identified for indirect effects.

Decommissioning Phase

Direct Effects

- 7.9.6 **ES Volume 4, Appendix 1.2: EIA Scoping Opinion (Doc Ref. 5.4)** confirmed that an assessment of the direct physical effects on below ground assets (i.e., archaeological remains) during decommissioning could be scoped out of the ES as direct physical effects will only occur during construction phase of the Project.

Indirect Effects

- 7.9.7 Residual effects on off-Site heritage assets, through changes to their setting, will remain as **Section 7.7 'Assessment of Effects'**, as no additional mitigation, monitoring and enhancement measures have been identified for indirect effects.

7.10 Cumulative Effects

- 7.10.1 The following section of this chapter assesses the likely cultural heritage effects of the Project in cumulation with the effects of the following schemes as outlined within **ES Volume 4, Appendix 6.1: List of Cumulative Schemes (Doc Ref. 5.4)**:

- ID No. 3: Pivot Power Battery Storage (PA/2022/2544) (Construction and Operational effects);
- ID No. 4: Walsh Power Condenser Project (PA/2022/2950) (Construction and Operational effects);
- ID No. 7: Land north of 1 Church View, Aldington (19/00895/AS) (Operational effects);
- ID No. 8: Land south west of Goldwell Court, Goldwell Lane (20/000652/AS)

(Operational effects);

- ID No. 9: East Stour Solar Farm (22/00668/AS) (Construction, operational and decommissioning effects); and
- ID No. 10: Otterpool Park Development (Y19/0257/FH) (Operational effects).

7.10.2 For full details of the cumulative schemes, refer to **ES Volume 4, Appendix 6.1: List of Cumulative Schemes (Doc Ref. 5.4)**.

7.10.3 The remainder of cumulative schemes identified in **ES Volume 4, Appendix 6.1: List of Cumulative Schemes (Doc Ref. 5.4)** have been scoped out due to the scale or type of developments proposed, distance between the Project and the scheme, or lack of intervisibility (between the Project, the scheme and heritage assets).

Construction Phase

Direct effects

7.10.4 Although archaeological remains that may be present within the Project may extend beyond the boundary of the Order limits, it is reasonably assumed that the determination of planning approvals for each cumulative development for which consent has been granted (ID No. 3, 4 and 10), and for those yet to be granted, will have been made in accordance with national, regional and local planning policy and guidance, within which buried archaeological assets would be a material consideration and would have included the provision of appropriate archaeological mitigation measures, including the requirement for investigation and recording.

7.10.5 In addition, the archaeological (non-built) remains affected within each site would be discrete features or remains of archaeological interest, where no potential cumulative effect has been identified; i.e. no archaeological asset has been identified which is sufficiently extensive that it would be affected by both the Project and any of those schemes being considered cumulatively. The consideration of archaeological 'themes'; i.e. the potential of cumulative effects on an identifiable archaeological resource, for example: 'remains of a Roman date alongside the Roman road', would be too broad, and the evidence base too biased towards those sites which have been evaluated, to draw reliable conclusions.

7.10.6 Therefore, it is considered that cumulative effects would be no worse than from the Project alone.

Indirect effects

7.10.7 During construction, there is potential for temporary impacts to the historic landscape character; and off-site heritage assets, in terms of changes to their setting within cumulative schemes. The impact will be as a result of alterations to the existing agricultural land to energy infrastructure. However, effects on off-site designated heritage assets, are considered most relevant to the operational phase. It is recognised that such effects will first arise during construction, from noise and visual intrusion as a result of the presence of plant, cranes, vehicles, lights. These impacts are considered temporary and short term, limited to working hours and for

the duration of the construction phase only. Changes will emerge over time and will ultimately reach their fullest extent following the Project's and cumulative schemes' completion.

7.10.8 Therefore, it is considered that there would be no cumulative construction phase indirect effects on those receptors identified, once the construction phase has ended.

Operational Phase

Direct effects

7.10.9 **ES Volume 4, Appendix 1.2: EIA Scoping Opinion (Doc Ref. 5.4)** confirmed that an assessment of the direct physical effects on below ground assets (i.e., archaeological remains) during the operational phase could be scoped out of the ES as direct physical effects will only occur during the construction phase of the Project. As such, no cumulative effects have been identified for direct effects within the operational phase.

Indirect effects

7.10.10 The cumulative assessment is supported by a series of cumulative ZTV figures to illustrate the areas where each cumulative scheme and the Project will both be visible. If the cumulative ZTV figures do not show an overlap to a heritage asset, there cannot be a cumulative effect and the heritage asset is not considered further. The cumulative ZTVs are presented on the following plans:

- **ES Volume 3, Figure 8.11.1 Cumulative Zone of Theoretical Visibility (Doc Ref 5.3) – Otterpool Park (ID No. 10)** – Maximum height parameter – 12m, 15m and 18m;
- **ES Volume 3, Figure 8.11.2: Cumulative Zone of Theoretical Visibility (Doc Ref 5.3) – East Stour Solar Farm (ID No. 9)** – Maximum height parameter – 3m;
- **ES Volume 3, Figure 8.11.3: Cumulative Zone of Theoretical Visibility (Doc Ref 5.3) – Walsh Power Condenser Project (ID No. 4)** – Maximum height parameter – 11m and 12m; and
- **ES Volume 3, Figure 8.11.4: Cumulative Zone of Theoretical Visibility (Doc Ref 5.3) – Pivot Power Battery Storage (ID No. 3)** – Maximum height parameter – 3m and 6m.

7.10.11 Cumulative ZTVs have not been prepared for Cumulative Schemes ID No. 7 and ID No. 8 as these are relatively small scale residential schemes located adjacent to the existing settlement pattern in Aldington. On this basis, they are considered unlikely to combine with the Project in such a way as to cause cumulative cultural heritage effects and are not considered further within this assessment.

7.10.12 The cumulative assessment is also supported by cumulative heritage visualisations which illustrate the appearance of the Project alongside the main parameters of each cumulative scheme. The cumulative heritage visualisations are included in **ES Volume 4, Appendix 7.2: Heritage Statement, Annex 2 (Doc Ref. 5.4)**. The only

potential cumulative effects indicated by the prepared visualisations are those on the Grade I listed Church of St Martin (NHLE 1071208), as discussed below.

7.10.13 No other cumulative effects are indicated in any of the other heritage viewpoints.

7.10.14 Potential cumulative effects are identified on the following heritage assets as the cumulative ZTV figures, outlined within **paragraph 7.10.10**, illustrate that there is potential for the cumulative scheme and the Project to both be visible:

- **North Downs Asset Group:** One of the barrows (NHLE 1012259) may have cumulative views of all four of the schemes under consideration (ID No. 3, 4, 9 and 10). However, at this distance, the impact of the schemes on such long-range views would have little effect on their significance and no real change in our ability to understand and appreciate the significance of the assets. The assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **slight adverse** and not significant.
- **Barrow Cemetery to the south-west of Barrowhill (NHLE 1475132):** This asset may have cumulative views of all four of the schemes under consideration (ID No. 3, 4, 9 and 10), although the indicated visibility is patchy. Such views would have little effect on the significance of the asset and would cause no real change in our ability to understand and appreciate the significance of the asset. The assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **slight adverse** and not significant.
- **Church of St Martin (NHLE 1071208):** The cumulative ZTV indicates that ID No. 10 Otterpool Park Development may be visible from the vicinity of the church and therefore affect views towards the tower. Viewpoint 1aH (**ES Volume 4, Appendix 7.2: Heritage Statement, Annex 2 (Doc Ref. 5.4)**) clearly shows the church tower visible within the wider landscape in views southeast from the south of Field 20. The viewpoint indicates that there would be no cumulative visual impact on the assessed views, although Viewpoint 1aH indicates that East Stour Solar Farm (ID No. 9) would be visible to the background left of the view, and that Otterpool Park (ID No. 10) would also be visible at year 1 planting, although not at year 15 planting. Viewpoint 2H indicates that Pivot Power Battery Storage (ID No. 3) and Walsh Power Condenser (ID No. 4) may be visible to the background right of the view at year 15 planting, partially screened; although the Project would not be visible and there is therefore no potential for cumulative effects on this view. The presence of the church tower as a landmark feature within the wider landscape would be sustained and the assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **slight adverse** and not significant.
- **Evegate Manor (NHLE 1362798):** The cumulative ZTVs indicates that three of the schemes (ID No. 3, 9 and 10) may be visible from the asset. This would have a small additional impact on the agricultural landscape setting of the asset, although this assessment bears in mind that views from the asset over the wider rural landscape - and the Project - are partly

filtered by surrounding vegetation and are incidental to its heritage significance. The cumulative effect would not affect the key elements of the asset's setting which are judged to contribute to an understanding of special interest, comprising its surrounding private grounds, and its relationship with its associated ancillary outbuildings. The assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **slight adverse** and not significant.

- **Evegate Mill (NHLE 1071180):** The cumulative ZTV indicates that the East Stour Solar Farm (ID No. 9) may be visible from the asset, although the asset lies on the edge of the ZTV. This will not affect the key elements of the asset's setting which are judged to contribute to an understanding of special interest -namely its location on the East Stour River and its relationship with its associated millhouse. The assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **slight adverse** and not significant.
- **Stable/ Outbuilding about 20 yards North-west of Evegate Mill House (NHLE 1185387):** The cumulative ZTV indicates that the Walsh Power Condenser Project (ID No. 4) may be visible from the asset. However, this would cause only a marginal increase in effect owing to the primacy of the relationship of the asset with surrounding buildings. The assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **neutral/slight adverse** and not significant.
- **Goldwell (NHLE 1184459):** The cumulative ZTV indicates that the East Stour Solar Farm (ID No. 9) and the Otterpool Park Development (ID No. 10) may be visible from the asset. However, no cumulative impact has been identified on Viewpoint 25 included within **ES Volume 4, Appendix 8.10: LVIA Visualisations (Doc Ref. 5.4)**, which demonstrates the effects of the proposed Illustrative Landscape Strategy to screen views of the Project during the operational phase of the Project. It is therefore judged that the marginal increase in impact as a result of the cumulative effect will not cause an increase, and the assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **slight adverse** and not significant.
- **Bank Farmhouse and walls attached (NHLE 1362752):** The cumulative ZTV indicates that the East Stour Solar Farm (ID No. 9) may be visible from the asset, although the asset is on the edge of the ZTV; such that the adjacent Barn and 2 stable ranges attached, about 20 metres north of Bank Farmhouse (NHLE 1071248) would experience no cumulative effect. It is therefore judged that the marginal increase in impact as a result of the cumulative effect will not cause an increase to the assessment of the Project in isolation and the cumulative effect is judged to remain as **slight adverse** and not significant.
- **Church House (NHLE 1362794):** The cumulative ZTV indicates that East Stour Solar Farm (ID No. 9) may be visible from the asset. However, it is expected that existing trees, including those within the garden, and intervening hedgerows - especially that bounding the south of the garden

along the A20 -would provide heavy filtering of the Project and East Stour Solar Farm in these views. The assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **neutral adverse** and not significant.

- **Smeeth Conservation Area:** The cumulative ZTV indicates a cumulative effect from a small part of the Conservation Area from the East Stour Solar Farm (ID No. 9). Intervisibility with Walsh Power Condenser Project (ID No. 4) and Otterpool Park Development (ID No. 10) is also indicated from within the Conservation Area, although not from the same areas as the Project. It is in practice difficult to gain any outward views from land in this part of the A20 corridor, although there may be glimpsed views of the schemes from within small parts of the Conservation Area. Due to distance and lack of historic association between the asset and the schemes, these are judged not to contribute in any specific sense to an understanding of its significance. Such minimal cumulative impacts would not affect the special interest and character and appearance of the Conservation Area nor affect the contribution that its existing setting makes towards an understanding and appreciation of these interests. The assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **neutral/ slight adverse** and not significant.
- **Aldington Clap Hill Conservation Area:** The cumulative ZTV indicates some cumulative effect from a small part of the edge of the Conservation Area from the East Stour Solar Farm (ID No. 9). The conclusion remains that such marginal cumulative effects would not directly alter the key features of special interest which provide the Conservation Area with its character and appearance and special interest. The assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **neutral/ slight adverse** and not significant.
- **Aldington Church Conservation Area:** The cumulative ZTV indicates some cumulative visibility with the Otterpool Park Development (ID No. 10) from the north of the Conservation Area; East Stour Solar Farm (ID No. 9), from the west of the Conservation Area and from the north of the church; and the Walsh Power Condenser Project (ID No. 4) from the northwest of the Conservation Area. However, localised screening from intervening buildings and vegetation would certainly further reduce this intervisibility, such that the change to the wider surrounding landscape of the Conservation Area would not be visible from large parts of the Conservation Area itself. There would be some visual change, from small more open areas, to relatively distant parts of the wider agricultural landscape surrounding the Conservation Area, although this would not affect the character and appearance of the asset, nor directly alter the key features of special interest within it; notably, the group value of the buildings which contribute to an understanding of historic development of the settlement and the sense of place that can be gained from the interrelationship between these assets. The cumulative visual impact would be very limited from key areas of the Conservation Area such as Church Road, such that there could only be a very limited impact on the appreciation of the special interest of the Conservation Area from the viewer within it. It is therefore

judged that the marginal increase in impact as a result of the cumulative effect will not cause an increase to the **slight adverse** (not significant) effect of the Project in isolation.

- **Aldington Mount (TR 03 NE 6):** The cumulative ZTV indicates some cumulative visibility with the East Stour Solar Farm (ID No. 9). However, the proximity of the Project is such that this would form the larger part of the effect on the asset and the additional cumulative impact on a more distant part of the agricultural landscape would not be judged to elevate the impact on the significance of the monument. The assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **slight adverse** and not significant.
- **Handen Farm (MKE88354):** The cumulative ZTV indicates some cumulative visibility with the East Stour Solar Farm (ID No. 9). However, the proximity of the Project is such that this would form the larger part of the effect on the asset and the additional cumulative impact on a more distant part of the agricultural landscape would not be judged to elevate the impact on the significance of the monument. The assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **neutral/slight adverse** and not significant.
- **Littlestock Farm (MKE88358):** The cumulative ZTV indicates some cumulative visibility with the East Stour Solar Farm (ID No. 9) and Otterpool Park Development (ID No. 10), both from the southeastern edge of the asset. The presence of these schemes in filtered views away from the asset, and in land that is not directly associated with it, would not change the ability to understand and appreciate the significance of the asset. The assessment therefore stands from the consideration of the Project in isolation and the cumulative effect is judged to remain as **neutral/slight adverse** and not significant.

Decommissioning Phase

Direct Effects

7.10.15 **ES Volume 4, Appendix 1.2: EIA Scoping Opinion (Doc Ref. 5.4)** confirmed that an assessment of the direct physical effects on below ground assets (i.e., archaeological remains) during the decommissioning phase could be scoped out of the ES as direct physical effects will only occur during the construction phase of the Project. As such, no cumulative effects have been identified for direct effects within the decommissioning phase.

Indirect Effects

7.10.16 The effect on off-site heritage assets from the Project, through changes to their setting, will be reversible following the decommissioning phase. Decommissioning related impacts will be temporary and slight, due to the relative ease of returning the land back to agricultural use, with minimal effects. As such, all indirect cumulative effects are considered to be no more than **slight adverse** and not significant.

Table 7.9: Summary of Residual Effects

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
Construction Phase				
<i>Direct Effects</i>				
Bronze Age activity (Field 26)	Direct: The remains are likely to be entirely lost to the construction of the Project Substation	Slight/ moderate Adverse; Permanent	The remains will be excavated and recorded as part of additional mitigation measures set out in the AMS (Doc Ref. 7.17) , which will document their archaeological interest and represent partial mitigation of their loss	Slight Adverse; Permanent (Not significant)
Roman Road	None currently identified (Direct)	Neutral/ slight Adverse; Permanent	Additional mitigation measures set out in the AMS (Doc Ref. 7.17) allow the potential for effects to be substantially reduced, or entirely avoided, where appropriate	Neutral (Not significant)
Roman roadside features	Direct: loss of remains from construction of solar PV panels, cable runs, access track and intermediate substations	Neutral/ slight Adverse; Permanent	Additional mitigation measures set out in the AMS (Doc Ref. 7.17) allow the potential for effects to be substantially reduced, or entirely avoided, where appropriate	Neutral (Not significant)
Undated probable former field systems/	Direct: loss of remains from construction impacts	Neutral/ slight Adverse; Permanent	Additional mitigation measures set out in the AMS (Doc Ref. 7.17) allow the potential for effects to be	Neutral/ slight Adverse; Permanent (Not significant)

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
enclosures/ trackways			substantially reduced, or entirely avoided, where appropriate	
Potential features associated with Parish Boundaries	None currently identified (Direct)	Neutral/ slight Adverse; Permanent	Additional mitigation measures set out in the AMS (Doc Ref. 7.17) allow the potential for effects to be substantially reduced, or entirely avoided, where appropriate	Neutral (Not significant)
Post medieval agricultural features (former field boundaries, orchard boundaries, footbridge, sheepfolds, farmsteads, structures)	Direct: loss of part of the remains from construction impacts (footbridge unlikely to be affected)	Neutral/ slight Adverse; Permanent	Additional mitigation measures set out in the AMS (Doc Ref. 7.17) allow the potential for effects to be substantially reduced, or entirely avoided, where appropriate	Neutral/ slight Adverse; Permanent (Not significant)
Post medieval industrial remains (lime kiln, quarrying activity, structures associated with Smeeth Station)	Direct: loss of part of the remains from construction impacts	Neutral/ slight Adverse; Permanent	Additional mitigation measures set out in the AMS (Doc Ref. 7.17) allow the potential for effects to be substantially reduced, or entirely avoided, where appropriate	Neutral/ slight Adverse; Permanent (Not significant)

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
Messerschmitt Bf109E-4 PMR crash site (Field 17)	Direct; remains not confirmed, although any survival likely to be at a very low level	Slight; Adverse/ Permanent	Additional mitigation measures set out in the AMS (Doc Ref. 7.17) allow the potential for effects to be substantially reduced, or entirely avoided, where appropriate	Neutral (Not significant)
Findspots of various periods	Direct: remains would be removed from Site, although their archaeological interest would remain intact	Neutral	None applicable	Neutral (Not significant)
Undated features of uncertain origin	Direct: loss of remains from construction impacts	Neutral/slight; Adverse/ Permanent	Additional mitigation measures set out in the AMS (Doc Ref. 7.17) allow the potential for effects to be substantially reduced, or entirely avoided, where appropriate	Neutral (Not significant)
Upstanding historic hedgerows (elements of 17 th /18 th century landscape)	Direct: removal during construction	Slight; Adverse/ Temporary	None applicable	Slight; Adverse / Temporary (Not significant)

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
<i>Indirect Effects</i>				
Historic Landscape Character and off-site Heritage Assets	Indirect: Change to the significance of the asset through changes to its setting	Slight; Adverse / Temporary (Not significant)	None applicable	Slight; Adverse / Temporary (Not significant)
Historic Landscape Character and off-site Heritage Assets	Indirect: Change to the significance of the asset through changes to its setting from construction noise	No effect	None applicable	No effect
Historic Landscape Character and off-site Heritage Assets	Indirect: Impact to assets due to changes of surface water or groundwater flow paths	No effect	None applicable	No effect
<i>Operational phase</i>				
<i>Scheduled Monuments</i>				
North Downs Asset Group (NHLE 1013144, 1012259,	Indirect: Change to the significance of the asset	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
1012220, 1012218, 1017618, 1012206, 1012221, 1012210, 1019994 and 1005167)	through changes to its setting			
Barrow Cemetery to the south-west of Barrowhill (NHLE 1475132)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)
<i>Grade I listed buildings</i>				
Church of St Martin (NHLE 1071208)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)
Mersham Manor (NHLE 1233281)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
Church of St John The Baptist (NHLE 1276693)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)

Grade II listed buildings*

Stonegreen Hall (NHLE 1233498)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)
Stonelees (NHLE 1233761)	Indirect: Change to the significance of the asset through changes to its setting	Slight/Moderate Adverse Temporary	None applicable	Slight/Moderate Adverse Temporary (Not significant)
Evegate Manor (NHLE 1362798)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)

Grade II listed buildings

Stonegreen Cottage (NHLE 1233284)	Indirect: Change to the significance of the asset	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
-----------------------------------	---	----------------------------------	-----------------	--

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
	through changes to its setting			
Goodwin Farmhouse (NHLE 1300136)	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
Evegate Mill (NHLE 1071180)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)
Evegate Millhouse (NHLE 1185369)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)
Stable/ Outbuilding about 20 yards North-west of Evegate Mill House (NHLE 1185387)	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
The Old Cottage (NHLE 1071249)	Indirect: Change to the significance of the asset	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
	through changes to its setting			
Goldwell (NHLE 1184459)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)
Stable/ Outhouse about 10m north of Goldwell (NHLE 1362780)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)
Barn and 2 stable ranges attached, about 20 metres north of Bank Farmhouse (NHLE 1071248)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)
Bank Farmhouse and walls attached (NHLE 1362752)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
Quested's Cottage (NHLE 1184383)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)
Symnells and Walled Forecourt (NHLE 1184484)	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)
Church House (NHLE 1362794)	Indirect: Change to the significance of the asset through changes to its setting	Neutral Adverse Temporary	None applicable	Neutral Temporary (Not significant)

Grade II Registered Park and Garden

Hatch Park (NHLE 1001291)	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
---------------------------	--	----------------------------------	-----------------	--

Conservation Areas

Smeeth	Indirect: Change to the significance of the asset	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
--------	---	----------------------------------	-----------------	--

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
	through changes to its setting			
Mersham	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
Bilsington	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
Aldington Clap Hill	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
Aldington Church	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)
<i>Non-designated Heritage Assets (HER)</i>				
Aldington Mount (TR 03 NE 6)	Indirect: Change to the significance of the asset	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
	through changes to its setting			
Little Gains Farm (MKE83194)	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
Handen Farm (MKE88354)	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
Littlestock Farm (MKE88358)	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
Farmstead North Of Little Stock (MKE89064)	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
Stone Street Farm (MKE88359)	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)

Receptor	Description of Impact	Significance of Effect without additional mitigation	Additional Mitigation/ Enhancement measure	Residual effect after mitigation
Goldwell Manor Farm (MKE88362)	Indirect: Change to the significance of the asset through changes to its setting	Neutral/Slight Adverse Temporary	None applicable	Neutral/Slight Adverse Temporary (Not significant)
Historic Landscape	Indirect: Change to the significance of the asset through changes to its setting	Slight Adverse Temporary	None applicable	Slight Adverse Temporary (Not significant)

Decommissioning

Historic Landscape Character and off-site Heritage Assets	Indirect: Change to the significance of the asset through changes to its setting	Slight; Adverse / Temporary (Not significant)	None applicable	Slight; Adverse / Temporary (Not significant)
---	--	---	-----------------	---

7.11 Climate Change

- 7.11.1 It is unlikely that the effects of development identified on heritage receptors would change markedly as a result of climate change. Nevertheless, it should be considered that climate change is a very real and serious threat to archaeological monuments; and extremes of climate exacerbate the processes of erosion seen on, for example, barrows in exposed positions. Climate change can also exacerbate the processes of erosion through either waterlogging impacting the integrity of below ground features or through dewatering which can also impact the integrity of archaeological features. There are also implications for the setting of built heritage assets, the special interest of parks and gardens and the character of conservation areas, through changes to traditional flora caused by climate change, which could threaten, for example existing native tree-cover.
- 7.11.2 The implications for the assessed significance of effect on heritage assets can be mitigated through the measures highlighted above. For example, archaeological recording during excavation prior to impact of assets can offset future climate change effects, through preservation by record. Where archaeological assets are preserved through design good drainage design can offset the effects of climate change reducing waterlogging and drying out of archaeological strata. Regarding above ground assets, the effect of climate change can be mitigated by soil management and asset management methodology to protect against high winds through either robust screening (hedgerows and tree plantation) and limiting contact from humans and animals. The lifespan of the solar farm allows for some degree of protection of formerly exposed above ground assets.

References

- ¹ HMSO (1990), Planning (Listed Buildings and Conservation Areas) Act 1990. Available at: <https://www.legislation.gov.uk/ukpga/1990/9/contents>. Accessed: January 2024.
- ² HMSO (1979), Ancient Monuments and Archaeological Areas Act 1979. Available at: <https://www.legislation.gov.uk/ukpga/1979/46>. Accessed: January 2024.
- ³ HMSO (1986), Protection of Military Remains Act 1986. Available at: <https://www.legislation.gov.uk/ukpga/1986/35/contents>. Accessed: January 2024.
- ⁴ HMSO (1997), Hedgerows Regulations 1997. Available at: <https://www.legislation.gov.uk/uksi/1997/1160/contents/made>. Accessed: January 2024.
- ⁵ Department for Levelling Up, Housing and Communities (2023), National Planning Policy Framework. Available at: <https://webarchive.nationalarchives.gov.uk/ukgwa/20230830172251/https://www.gov.uk/government/publications/national-planning-policy-framework--2>. Accessed: January 2024.
- ⁶ Department for Energy Security and Net Zero (2024), Overarching National Policy Statement for Energy (EN-1). Available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>. Accessed: January 2024.
- ⁷ Department of Energy Security and Net Zero (2024), National Policy Statement for Renewable Energy Infrastructure (EN-3). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147382/NPS_EN-3.pdf. Accessed January 2024.
- ⁸ Department of Energy Security and Net Zero (2024), National Policy Statement for Electricity Networks Infrastructure (EN-5). Available at: <https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5>. Accessed: January 2024.
- ⁹ Ashford Borough Council (2019), Local Plan 2030. Available at: <https://www.ashford.gov.uk/media/jw3nbvq1/adopted-ashford-local-plan-2030.pdf>. Accessed: January 2024.
- ¹⁰ Department for Levelling Up, Housing and Communities (2019), Planning Practice Guidance: Historic environment. Available at: <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#full-publication-update-history>. Accessed: January 2024.
- ¹¹ Historic England (2015), Managing Significance in Decision-Taking in the Historic Environment. Available at [REDACTED].
- ¹² Historic England (2018), The Setting of Heritage Assets. Available at: [REDACTED].
- ¹³ Historic England (2019), Statements of Heritage Significance: Analysing Significance in Heritage Assets. Available at: [REDACTED].

- ¹⁴ Historic England (2021), Commercial Renewable Energy Development and the Historic Environment. Available at: [REDACTED]
- ¹⁵ Chartered Institute for Archaeologists (2020), Standard and guidance for historic environment desk-based assessment. Available at: [REDACTED]
- ¹⁶ Chartered Institute for Archaeologists (2022), Code of conduct: professional ethics in archaeology. Available at: [REDACTED]
- ¹⁷ Institute of Environmental Management and Assessment (2021), Principles of Cultural Heritage Impact Assessment in the UK. Available at: [REDACTED]
- ¹⁸ Ashford Borough Council (2017), Heritage Strategy. Available at: <https://www.ashford.gov.uk/media/50edc0ta/adoptedashfordheritagestrategy.pdf>. Accessed: January 2024.
- ¹⁹ Planning Inspectorate (2018), Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope. Available at: <https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope>. Accessed: January 2024.
- ²⁰ Historic England (2024), National Heritage List for England (NHLE). Available at: [REDACTED]: January 2024.
- ²¹ Kent County Council (2024), Kent Historic Environment Record. Available at: <https://webapps.kent.gov.uk/KCC.ExploringKentsPast.Web.Sites.Public/SingleResult.aspx?uid=TKE1046>. Accessed: January 2024.
- ²² Archaeology Data Service (2014), Kent Historic Landscape Characterisation. Available at: [REDACTED] Accessed: January 2024.
- ²³ Archaeology Data Service (2024), Search data. Available at: [REDACTED] Accessed: January 2024.
- ²⁴ British Geology Survey (2022), Geology of Britain Viewer. Available at: [REDACTED]. Accessed: January 2024.