



## LONDON AND SOUTH EAST OFFICE

Representations of the Historic Buildings and Monuments Commission for  
England (Historic England)

Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination  
Procedure) Rules 2010 – Rule 8

Application by EPL 001 Limited

For an Order Granting Development Consent for Stonestreet Green Solar

APPLICATION REF: EN010135

INTERESTED PARTY REFERENCE: SGSP-SP105

OUR REFERENCE: PL00792922

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*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*



Historic England

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## 1.0 Summary

- 1.1 Historic England's written representation relates to previous correspondence regarding this project application, submitted as our Planning Inspectorate and Relevant Representation Form (Dated 12 September 2024 Ref: PL00792922). Our Interested Party Reference number is SGSP-SP105. We identified that this development has the potential to impact upon the historic environment. Overall, we consider this harm to be on the lower end of less than substantial harm.
- 1.2 In all cases regarding designated heritage assets considered here, the harm to significance arises from changes within the setting of the heritage assets. We have identified two grade I listed buildings and one grade II\* listed building which may be harmed by the proposed development. We also think that there is the potential for harm to various Bronze Age Barrow scheduled monuments on the North Downs and to the east of the Site through intrusive development within the historic rural, ritualised landscape.
- 1.3 We will not be commenting on Grade II listed buildings, conservation areas and non-designated built heritage assets and archaeological sites; deferring instead to Ashford Borough Council and the archaeological staff at Kent County Council and their expert and specialist advisers.

## 2.0 Introduction

- 2.1 The Historic Buildings and Monuments Commission for England, known as Historic England, is the Government's adviser on all aspects of the historic environment in England – including historic buildings and areas, archaeology and historic landscape – and have a duty to promote public understanding and enjoyment. Historic England are an executive Non-Departmental Public body sponsored by the Department for Culture, Media and Sport (DCMS) and we answer to Parliament through the Secretary of State for Culture, Media and Sport.
- 2.2 Our remit in conservation matters intersects with the policy responsibilities of a number of other government departments for example, the Ministry of Housing, Communities and Local Government. The National Heritage Act (2002) also



gave Historic England responsibility for maritime archaeology in the English area of the UK Territorial Sea.

### 3.0 Comments in Relation to Designated Heritage Assets

- 3.1 We are aware that the proposed development lies within a sensitive area for the historic environment, in the setting of a range of high value heritage receptors. As there are no designated heritage assets within the application site itself, the effects of the proposal relate to the setting of the assets. Setting is the surroundings in which a heritage asset is experienced and Historic England's remit relates to how change might affect the ability to understand the significance that assets derive from their setting.
- 3.2 Historic England's focus in this representation is to advise on impacts to highly graded designated heritage assets within the study areas. Our consideration was therefore focused on the 18 grade I listed buildings, 11 grade II\* listed buildings, and 30 Scheduled Monuments, within 5km of the Site.
- 3.3 We previously stated in our responses at Scoping and PEIR stages that we are therefore keen to ensure the avoidance of significant impacts to the numerous highly graded designated heritage assets in the vicinity. In this respect we were pleased to see that the Environmental Statement included specific Cultural Heritage and Landscape and Views Chapters (ES Volume Chapters 7 and 10) in addition to visualisations and photomontages.
- 3.4 We acknowledge that due to the level of intervening topography and screening, no impact in relation to many of these designated assets is anticipated and we accept that for this reason many of them have not been assessed in further detail in Chapter 7, Cultural Heritage of the Environmental Statement.
- 3.5 However, we have identified harm to the significance of the following highly graded designated heritage assets:
- 3.6 The Church of St Martin, Aldington (Grade I: 1071208). The church is set on a small hill with an architecturally exceptional medieval tower that acts as a landmark in the landscape. Fields within the application site add to historic value by positioning the church at the heart of the agrarian community who built and worshipped there, and this appreciation would be altered in a key view of



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the church from the west by the presence of solar panels (as evidenced in View 1AH, Chapter 7 Appendix 7.2: Heritage Statement, Annex 2: Heritage Visualisations). The fields (and footpath between the church and settlement at Aldington) also act as an important land buffer showing the historic separation between church and village. This landscape separation would be eroded to a small extent by the proposed development. Harm caused by intrusion within these views would remain despite the proposed vegetation screening, as the historic, open character of the landscape would still be impeded; however the proposed screening does decrease the level of harm to significance by maintaining a more agrarian character. In policy terms, the proposal would result in a low level of less than substantial harm to the church's significance because of change within its setting.

- 3.7 The Church of St John Baptist, Mersham (Grade I: 1276693). The proposed panels would be visible in views from the northern edge of the Aldington Clap Hill Conservation Area towards the asset (Plate 11 of Chapter 7 Appendix 7.2: Heritage Statement, Annex 1: Plates). The church is situated on rising ground to the north of the site, whilst screened by some trees, the fields provide a countryside setting for the church which contributes to its significance as a rural place of worship and focal point in the landscape. This would be eroded to a small degree by the proposed development. We judge harm to this asset at the lower end of less than substantial.
- 3.8 Stonelees House, a medieval hall (Grade II\*: 1233761). At the south-west corner of the site, the panels would cover fields which historically formed the Stonelees estate. Intervisibility from the upper levels of the Hall is also possible (Plate 3 of Chapter 7 Appendix 7.2: Heritage Statement, Annex 1: Plates). Current and we have identified harm to the building's significance (namely because of the historic association) at the lower end of less than substantial harm. Our assessment of the level of harm takes into account the proposed vegetation screening.
- 3.9 In relation to the scheduled monuments that comprise the 'North Downs Asset Group' and the 'Barrow Cemetery to the south-west of Barrowhill' (NHLE 1475132), we currently consider that the proposed development contributes to the setting of the scheduled monuments in this area in a generalised way; i.e. that the maintenance of a rural landscape which retains long-views is beneficial for our understanding and appreciation of these sites overall. This is particularly





true for the scheduled (and unscheduled) Bronze Age barrows which are scattered across the landscape, creating a wider ritual space. However, we acknowledge that the contribution of this site to the significance of these monuments would, in any instance, be low, and we are therefore of the opinion that the development would have a low level of harm (i.e. less than significant) on heritage assets.

3.10 We expect that Ashford Borough Council and the archaeological staff at Kent County Council will provide lead advice on the impact to all grade II listed buildings, registered parks and gardens and conservation areas within their districts (in addition to their advice on the impact to the highly graded assets). We also expect that they will be the lead advisers for effects on non-designated heritage, including unlisted buildings and structures in and around the development site and archaeological remains.

3.11 In policy terms any resulting harm would in our view be on the lower end of less than substantial. The ExA would therefore need to have regard to policies in NPS EN-1, in particular paragraphs 5.9.23, 25, 28, 32 and 36, in coming to a decision.

3.12 Given the policy considerations the ExA would therefore need to consider whether or not they have sufficient information to conclude that the provisions of the legislation and policy have been met. The ExA should also consider whether the benefits of the proposals outweigh the harm and if the impact can be justified in terms of the wider policy tests of the policy statement.

#### **4.0 Statement of Common Ground**

4.1 We are currently engaged in discussions regarding a Statement of Common Ground with the applicants. This Statement is currently provisional, and is likely to be subject to changes which will ensure the document reflects the agreed positions of the parties.



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