



SOUTH EAST OFFICE

Mrs F Runacre
Thanet District Council
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Our ref: P00510748

Dear Mrs Runacre

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015**

**LAND TO THE NORTH OF KINGS END FARM, RICHBOROUGH, SANDWICH,
CT13 9JH
Application No 16/00524**

Thank you for your letter of 13 May 2016 notifying Historic England of the above application.

Summary

We think that the proposed development would cause harm to the ability to appreciate the heritage significance of the Richborough Fort scheduled monument. This would not amount to substantial harm in the terms of the NPPF; however any harm or loss should require clear and convincing justification. For a clear and convincing justification for the harm to be made it would be necessary to show that other less harmful designs and locations are not possible and that the unavoidable harm is outweighed by the public benefits of the scheme.

The application is the second one in this area this year. In our view, the cumulative effect of two masts should be taken into account in assessing this application. The construction of two similar facilities providing similar services in the same area seems likely to be unnecessarily harmful. We recommend that consideration should be given to rationalising the two proposed developments.

We recommend that the Council should weigh the harm that this scheme will cause against any public benefits that the scheme might bring, as required by paragraph 134 of the National Planning Policy Framework.

Historic England Advice

Our advice relates principally to the effect of the proposed development of Richborough Fort scheduled monument, which is the closest of the highly graded



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heritage assets.

The significance of Richborough Fort

Richborough was the site at which the Roman invasion force landed in AD 43. The invasion camp was used for a period of less than ten years before being levelled to make way for the construction of a military and naval supply base. This helped store and distribute the supplies needed by the Roman forces during their rapid conquest of southern Britain. The supply base developed into a heavily defended fort, town and harbour during the first to third centuries AD. The fort is of a type known as a Saxon Shore Fort, constructed to provide protection against the sea-borne Saxon raiders who threatened the south-east coast. Its most distinctive features are its massive defensive stone walls and defensive ditches. The town and port is featured on many contemporary road maps and itineraries. Watling Street, the main Roman road from London and Canterbury, begins outside the gate of Richborough Fort.

The fort fell into disuse during the later fifth and sixth centuries AD but in later years, a small chapel of pilgrimage was constructed and dedicated to St Augustine, who is believed to have landed at nearby Ebbsfleet in c.597 AD and is credited with reintroducing Christianity into pagan Saxon England.

Richborough Fort illustrates the strategic importance of the promontory on which it stands. The promontory originally took the form of a small island situated near the south eastern end of the Wantsum Channel, a broad stretch of sea which separated the Isle of Thanet from the Kent mainland until at least the Late Roman period. It lay alongside a natural harbour providing a convenient landing place only about 45km from mainland Europe. The use of the promontory throughout the Roman period reflects its strategic importance to attacking and occupying forces. The flat plain of the former Wantsum marshes can, with the aid of the interpretation provided on site, be understood as remains of the Wantsum channel. The scale of the walls helps visitors to appreciate the importance of the place in Roman Britain and the relative isolation and enclosure facilitates evocation of the antiquity of the place.

The effects of the proposed development

The proposed development comprises a guyed communications mast supporting a range of dish antenna equipment, set within a fenced compound. The proposed communications mast is a three-sided steel lattice construction, 305m in height. Guys will extend from eight levels anchored at nine stay blocks at ground level. Static red aviation lighting will be installed at 51m intervals along the mast at six levels, with two lights per level. Anti-twist frames, providing a walkway for access and maintenance and fixing points for guys, protrude in three directions. There are six dish antenna proposed at various heights and orientations. The mast base is set on a concrete foundation within a fenced compound containing equipment cabinets and a generator and enclosed by a 2.4m high palisade security fence.



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The development is intended to provide the infrastructure for high-speed telecommunications between financial companies in London and Frankfurt. The application site is located on the direct geometric line of sight between the two centres. It could also act as a hub for a range of other telecoms functions.

The effect on the heritage significance of Richborough Fort

The proposed mast will be clearly visible from the fort, and will be seen in conjunction with the monument in views looking north. It might appear to be slender and lightweight but it would be a substantial new presence that is both nearer and much taller than the existing developments within the setting of the fort.

We disagree with the Non-Technical Summary and Heritage Assessment about the degree of impact on the heritage significance of the fort. We contend that the effect would be moderate adverse as we think that in long views from the fort, its relationships to the Wantsum marshes and the rising edge of the Thanet plateau help promote understanding of the history of the fort and the wider area.

The mast would create a new and incongruous addition to the existing scene of open, flat fields against a backdrop of sporadic masts and groups of industrial and agricultural buildings that rise little above the horizon. We think that the quality of views will be harmed by the scale of the mast, which would be much taller and closer than existing structures. Views would not be obstructed over a wide segment of the vista - wide and long views over mostly open flat countryside to the cliff in the distance would still be available to a great extent - but the presence of the mast would be difficult to ignore and is likely to be dominating in most northward views. The presence of the tower rising above the walls in views within the fort would undermine the sense of isolation and enclosure provided by the walls.

We also challenge the assertion that the introduction of the mast would not reduce a visitor's understanding and appreciation of the importance of the Fort. We are particularly concerned that the proximity and height of the proposed mast would be conspicuous in, and distracting from, views within the fort. This would undermine the sense of enclosure and isolation that is presently created by the walls. Many people visit the fort to explore and understand the place and experience its monumental character, which is a public benefit. In altering this experience, as we have described above, the development would cause some harm to public benefit.

The effects on the heritage significance of other built heritage assets

The applicant seems to have taken into account our guidance and pre-application advice about the appropriate approach to the assessment of the settings of heritage assets to some extent, and this seems to be reflected in the structure of the Heritage Assessment (e.g. most assets have a section entitled "Setting (and its contribution to significance)", which is welcome. However, the assessment of the way in which setting might contribute to the heritage significance of individual assets or groups of assets is



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superficial or absent. For example, whether long views to and from Minster Abbey contribute to its significance is not mentioned, and while there is some description of the setting of the listed buildings of Sandwich, there is no assessment of how it might contribute to the heritage significance of the group. However, these highly graded heritage assets are some distance from the proposed development and we do not think that they are very likely to be greatly harmed by it.

We don't usually comment on the effects of developments on grade II Listed Buildings and Conservation Areas, which comprise most of the heritage assets that are potentially affected, as Local Planning Authority Conservation Officers will usually be better placed to do this.

The effects on the heritage significance of archaeological remains on the development site

We note that the Planning Statement and ES Archaeology chapter concludes that the site has potential to contain deposits of geo-archaeological interest relating to the origins, evolution and silting of the Wantsum Channel but low potential for occupation remains. Geo-archaeological deposits would be impacted by the piling for the foundations of the mast and the guy block foundations. A programme of archaeological geo-archaeological works is proposed as mitigation of this potential impact.

We don't intend to comment in detail on the potential impacts on undesignated archaeological remains, as you will presumably receive advice about this from your archaeological advisors at Kent County Council.

Cumulative effects

The application is the second one within this area this year. The construction of two similar facilities providing similar services in the same area seems likely to be unnecessarily harmful. The site is also adjacent to the corridor that has been identified for the Richborough Connection Project.

Policy

In the National Planning Policy Framework (NPPF) it is a core planning principle to conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations (para.17 NPPF). When considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation. No other planning concern is given a greater sense of importance in the NPPF.

Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification (para.132 NPPF). The onus is



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therefore on you to rigorously test the necessity of any harmful works.

Any harm or loss should require clear and convincing justification. An application should demonstrate that all less harmful alternatives have been considered. If a proposal cannot be amended to avoid all harm, and the harm is less than substantial, this can be weighed against the public benefits of the proposal (para.132, NPPF).

Position

We think that the proposed development would cause harm to the ability to appreciate the heritage significance of the Richborough Fort scheduled monument. This would not amount to substantial harm in the terms of the NPPF; however any harm or loss should require clear and convincing justification. For a clear and convincing justification for the harm to be made it would be necessary to show that other less harmful designs and locations are not possible and that the unavoidable harm is outweighed by the public benefits of the scheme.

The application is the second one in this area this year. In our view, the cumulative effect of two masts should be taken into account in assessing this application. The construction of two similar facilities providing similar services in the same area seems likely to be unnecessarily harmful. We think that consideration should be given to rationalising the two proposed developments.

Recommendation

1. We recommend that consideration should be given to rationalising the two similar planning applications that are currently under consideration.
2. We recommend that the Council should weigh the harm that this scheme will cause against any public benefits that the scheme might bring, as required by paragraph 134 of the National Planning Policy Framework.

Please contact me if we can be of further assistance. We would be grateful to receive a copy of the decision notice in due course. This will help us to monitor actions related to changes to historic places.

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Yours sincerely



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