



SOUTH EAST OFFICE

Mrs . Runacre
Dover District Council
Honeywood Close, White Cliffs Business Park
Whitfield
DOVER
Kent
CT16 3PJ

Direct Dial: 01483 252032

Our ref: P00496554

Dear Mrs Runacre

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

**SITE AT FORMER RICHBOROUGH POWER STATION, RAMSGATE ROAD,
SANDWICH, CT13 9NL
Application No 16/00044**

Thank you for your letter of 22 January 2016 notifying Historic England of the above application.

Summary

We think that the proposed development would cause significant harm to the ability to appreciate the heritage significance of the Richborough Fort scheduled monument, though this is not substantial harm in the terms of the NPPF. 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. Therefore, 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

Significance

The proposed development site is close to, and inter-visible with, the Roman site at Richborough, which is a scheduled monument. Richbrough 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



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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.

Impact

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 existing developments within the setting 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, which would harm the heritage significance of the fort.

We note that Richborough fort is an important visitor attraction managed by English Heritage. 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 the development would cause some harm to public benefit.

In long views from the fort, its relationships to the former Wantsum channel and the rising edge of the Thanet plateau (which 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



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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.

Policy

Under the 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 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 there would be significant harm to the ability to appreciate the heritage significance of Richborough Fort and harm to the public benefit that it provides as a heritage attraction, though this is not substantial harm in the terms of the NPPF. 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. We acknowledge that there might be public benefits of such a scheme but we do not have the expertise to judge them.

Recommendation

We recommend that the Council should weigh the significant degree of harm that this scheme will cause to the Richborough Fort scheduled monument, and any other harmful effects, against any public benefits that the scheme might bring, as required by paragraph 134 of the NPPF.

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

Paul Roberts MCIfA

Inspector of Ancient Monuments

E-mail: Paul.roberts@HistoricEngland.org.uk

cc Wendy Rogers, Heritage Conservation Team, Kent County Council



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