

South Brooks Solar Farm

Preliminary Environmental Information

Volume 2: Environmental Summary

Chapter 8: Cultural Heritage

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8 Cultural Heritage

8.1 What is ‘cultural heritage’

8.1.1 Cultural heritage refers to the legacy of physical artifacts and intangible attributes (non-material aspects of human culture such as beliefs, traditions, knowledge, and social practices) of a group or society that are inherited from past generations, maintained in the present, and bestowed for the benefit of future generations. It is often referred to as the historic environment and includes both designated (protected by law) and undesignated assets. This chapter covers both archaeology (below-ground remains and above ground earthworks) and built heritage (upstanding ruins, structures and buildings).

8.2 Key Terms

Table 8-1 Summary of key technical terms

Term	Definition
Archaeology/archaeological remains	Below-ground remains and above-ground earthworks associated with past human activity.
Archaeological interest	A heritage asset that holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
Architectural interest	The art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types.
Built heritage	Upstanding ruins, standing structures and buildings and designed landscapes associated with past human activity.
Designated heritage asset	A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
Geophysical survey	Method of non-intrusive investigation involving the use of magnetometers to identify fluctuations in the earth’s magnetic field which might indicate the presence of archaeological remains. Burnt remains and metals are best identified through this method of survey.
Heritage asset (or ‘asset’)	An item of heritage interest, for example an historic building or an archaeological find.

Term	Definition
Historic Environment Record (HER)	A database maintained by individual counties or local authorities, containing records of archaeological sites, historic buildings and other aspects.
Historic interest	What is already known about past lives and events that may be illustrated by or associated with a heritage asset. Heritage assets with historic interest provide a material record of our nation’s history as well as meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.
Importance	A measure of the degree to which the heritage significance of that asset is sought to be protected.
Non-designated heritage asset	A heritage asset (including locally listed assets) which has no statutory designation, although this does not mean that the heritage asset in question does not have value or importance and is not a material planning consideration.
Mitigation	Measures which have the purpose of avoiding, reducing or compensating for adverse environmental impacts. It may also include measures to create environmental benefits.
Receptor	A component of the natural or built environment—such as human beings, water, air, soil, or biodiversity—that is potentially affected by a proposed project’s impacts.
Sensory changes	Changes to the way a heritage asset is experienced through sensory perception, including sight, sound and smell.
Significance of a heritage asset	The value or interest that applies to all heritage assets and relating to the ways in which the historic environment is valued both by specialists and the public. The significance of a heritage asset will derive from factors including fabric, setting, rarity, completeness, historic and cultural associations, community, research and place-making potential. Significance is assessed in relation to the criteria in Historic England Advice Note 12 ⁵² (i.e. in

⁵² Historic England (2019), Statements of Heritage Significance: Analysing Significance in Heritage Assets, available to view at <https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/heag279-statements-heritage-significance/>

Term	Definition
	<i>archaeological, architectural, artistic, or historic terms).</i>

8.3 Summary of Points Raised in EIA Scoping Opinion and Project Response

8.3.1 Comments provided by the Planning Inspectorate (PINS) relating to areas to be considered (scoped in) to the Cultural Heritage assessment are summarised in Table 8-2. It should be noted that at EIA scoping stage, the initial assessment was presented as two separate chapters, built heritage and buried heritage.

Table 8-2: PINS Scoping Opinion on Cultural Heritage

Summary of PINS Scoping Opinion	Discipline Feedback	Next Steps
The assessment needs to include the complete proposed grid connection corridor, and a plan showing the location of heritage assets in relation to the site boundary and study area.	Plans will be submitted at appropriate scales showing the location of each asset in relation to the Project as supporting documents to the ES. Confirmed traffic routes will be taken into account in the assessment.	Full plans including designated and non-designated heritage assets will be compiled and submitted. The assessment will include confirmed traffic routes once these have been provided.
The Inspectorate agrees that the proposed scoping out of individual findspots on the basis that the artefacts have been removed and as the baseline will nevertheless take account of the findspot within the baseline is acceptable.	None	The approach will be followed in the assessment.
The ES should justify an appropriate study area based on the Zone of Theoretical Visibility (ZTV) and illustrate the extents on an appropriate figure.	Historic England will be consulted to agree an appropriate study area which is based on the Zone of Theoretical Visibility (ZTV) and the results of site visits	Historic England will be consulted prior to commencement of the ES to confirm an agreed study area.

Summary of PINS Scoping Opinion	Discipline Feedback	Next Steps
<p>The list of heritage assets proposed to be scoped into the assessment should be reviewed to include assets that could be affected by the cable search area and interconnecting cables, including agreement on the assets to be assessed with consultation bodies.</p>	<p>which ground truth the ZTV data. The extent(s) of the study area(s) will be illustrated on appropriate figures submitted as supporting documents to the ES.</p> <p>The Applicant will ensure that assets that could be affected by the cable search area and interconnecting cables are included within the baseline data collection and, if appropriate, within the assessment presented in the ES. Consultation on the baseline data collection methodology will be undertaken with relevant bodies to ensure that the methods proposed are appropriate for the cable search area. Agreement on the assets to be assessed will be sought with relevant bodies.</p>	<p>Complete grid connection corridor will be included in assessment presented in the ES. Consultation will be undertaken with relevant bodies to confirm the methodology and assets to be assessed.</p>
<p>The Applicant may wish to review the structure in light of the addition of the cable search area to determine the best structure for both these assessments.</p>	<p>The Applicant notes the Inspectorate's comments and will review the structure in light of the addition of the cable search area in order to determine the best structure for both these assessments.</p>	<p>The assessment presented in the ES will include both archaeology and built heritage within a single chapter to aid understanding of the Project and avoid unnecessary duplication.</p>
<p>The ES should be accompanied by clearly labelled figures to allow identification of the</p>	<p>The Applicant will ensure that the ES is accompanied by clearly labelled figures to allow identification of the location and extent of all</p>	<p>Full plans including designated and non-designated heritage assets will be compiled and submitted.</p>

Summary of PINS Scoping Opinion	Discipline Feedback	Next Steps
<p>location and extent of all the heritage assets in relation to the Project referred to in the text.</p>	<p>the heritage assets in relation to the Project referred to in the text.</p>	
<p>Receptor sensitivity, impact magnitude and significance are not defined, and it is not explained how they would be determined in section 9.6 of the Scoping Report. The ES should set out the criteria for determining receptor sensitivity and impact magnitude and how these would combine to determine the significance of effect.</p>	<p>The Applicant will ensure that the criteria for determining receptor sensitivity and impact magnitude and how these would combine to determine the significance of effect is set out in the ES.</p>	<p>These criteria have been included in this chapter and will also be included in the ES Chapter.</p>
<p>Scoping Report paragraph 2.1.4 notes the potential for both underground and overground installation options for the grid connection corridor to the Dungeness substation. Where these options remain, below ground and settings impacts should be scoped into the assessment, where significant effects are likely to occur.</p>	<p>The Applicant will ensure that below ground and settings impacts to heritage assets arising from the grid connection corridor (either underground or overground) are scoped into the assessment presented in the ES.</p>	<p>Complete grid connection corridor will be included in assessment presented in the ES.</p>
<p>The Scoping Report does not discuss potential effects from changes in hydrology to archaeological assets. The ES should assess the LSE from potential</p>	<p>The Applicant will assess the likely significant effects from potential changes to water levels, flow and water quality to buried heritage assets where they are likely to</p>	<p>The ES will include assessment of potential impacts arising from potential changes to water levels, flow and water quality to buried heritage assets.</p>

Summary of PINS Scoping Opinion	Discipline Feedback	Next Steps
<p>changes to water levels, flow and water quality to buried heritage assets where they are likely to occur. The Applicant should seek agreement on the approach to assessment with the relevant consultation bodies.</p>	<p>occur and will seek agreement on the approach to assessment with the relevant consultation bodies.</p>	<p>Relevant bodies will be consulted on the approach to this assessment.</p>
<p>The ES should assess potential effects to the archaeological element of Scheduled Monument NHLE 1415588: Phoenix Caisson off Littlestone-on-Sea where they are likely to be significant.</p>	<p>This asset will be assessed in terms of both the built heritage aspects and archaeological aspects.</p>	<p>This approach will be followed in the combined archaeology and built heritage assessment.</p>
<p>The definition of ‘built heritage’ in Scoping Report paragraph 10.1.3 includes historic landscapes. The ES should define how this criterion has been accounted for in the assessment, noting the responses from consultation bodies that the exposed nature of the landscape forms a key component to the setting of some heritage assets. The approach to the assessment should be agreed with relevant consultation bodies.</p>	<p>The Applicant will ensure that the ES defines how this criterion has been accounted for in the assessment and will seek agreement with the relevant consultation bodies as to the approach to the assessment.</p>	<p>This approach will be followed in the combined archaeology and built heritage assessment.</p>

8.3.2 In addition to the PINS Scoping Opinion, engagement has been and continues to be undertaken with relevant stakeholders. A summary of ongoing consultation with statutory consultees in relation to Cultural Heritage is provided in Table 8-3.

Table 8-3: Summary of Ongoing Comments and Feedback with Consultees

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
<p>Recommended that when the HER data is ordered the shape files for the ASE 5th continent modelling of past landscapes are requested. Use key sources Romney Marsh Research Trust Oxford Monographs, works by Jill Eddison, The Sea and the Marsh: The Medieval Cinque Port of New Romney, PCA Monograph 10. Suggest including two pieces of work not yet on HER: RPS and Archaeology South-East at New Romney, and Tudor wreck at Dungeness.</p>	<p>Kent County Council - Principal Archaeological Officer⁵³</p>	<p>These data have been ordered and will be included in the assessment presented in the ES. Suggested key sources will also be included in the assessment, along with two suggested pieces of work not yet included in the HER.</p>	<p>Preparation of the Cultural Heritage ES Chapter, which will present further details on the requested sources and projects, to be submitted in support of the DCO application</p>
<p>1km buffer from the application site boundary as indicated on the plan provided is appropriate. Guidance in Sussex Archaeological Standards (2019) to be followed. Recommend getting specialist advice from external individual(s) who understand the complex geology before progressing. Consideration of the</p>	<p>East Sussex County Council – County Archaeologists^{t54}</p>	<p>The Applicant welcomes the agreement regarding the appropriateness of the 1km study area. The assessment will follow the guidance in Sussex Archaeological Standards (2019). Consultation with external individual(s) will be undertaken if possible. Visit to Records Office will be undertaken to</p>	<p>Preparation of the Cultural Heritage ES Chapter, which will present further details on geology, geomorphology, and include suggested mapping, to</p>

⁵³ Pers comm, 28/06/2025

⁵⁴ Pers comm, 08/08/2025

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
<p>geomorphology should also be allowed for. Visit the Records Office as they hold some 18th & 19th century maps covering parts of the study area.</p>		<p>inform the ES Chapter.</p>	<p>be submitted in support of the DCO application</p>
<p>No objection to scoping out physical impacts to designated heritage (notwithstanding aspects of the development that are yet to be confirmed), concerns regarding ‘scoping out’ of impacts to the significance of all designated heritage assets as contributed by settings; Historic England considers that there is potential for significant effects.</p> <p>The Scoping Report hasn’t taken sufficient account of topographic context of Romney Marshes and how long-views and interrelationships in this area can contribute to the significance of many of the sites. Changes in hydrological patterns may lead to detrimental impacts to heritage assets currently preserved in waterlogged context.</p>	<p>Historic England⁵⁵</p>	<p>The Applicant welcomes the agreement that physical impacts to designated heritage assets can be scoped out of further assessment. The setting of all heritage assets within the study area has been considered within the Stage 1 setting assessment and the Applicant will continue to liaise with Historic England regarding which assets may experience significant effects. The Stage 1 setting assessment has included consideration of how long views and interrelationships contribute to significance when identifying assets that may experience significant effects. Geoarchaeological deposit modelling is proposed to identify</p>	<p>Preparation of the Cultural Heritage ES Chapter, which will present further details on settings assessment and geoarchaeological deposit modelling, to be submitted in support of the DCO application</p>

⁵⁵ Pers comm, 10/09/2025

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
<p>Agree that physical effects on designated heritage assets during construction, operation and decommissioning can be scoped out. More consideration should be given to: identifying the significance of longer views and interrelationships between assets; the contribution that the flat and open landscape character of the marshes makes to the significance of heritage assets; to the potential for impacts to designated heritage assets beyond the nominal 5km study area; and the cumulative effects of neighbouring developments.</p> <p>The topography of the area is such that there are long sightlines which will likely extend beyond the 5km radius. We advise that the ZTV is used to inform the study area and assessment is made on highly graded assets within that area on whether they should be scoped in or out, noting that some asset types may be more susceptible to change than others.</p>		<p>areas of potential waterlogged deposits to inform the assessment. The Applicant welcomes the agreement that physical effects on designated heritage assets during construction, operation and decommissioning can be scoped out of further assessment. The ZTV has been reviewed and is contained within the suggested 5km study area for designated assets. Long views, potential interrelationships between assets, the contribution of the flat and open landscape character to significance of heritage assets, and cumulative effects of neighbouring developments will be considered in the Cultural Heritage ES Chapter.</p>	

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
<p>Many assets are in locations where the setting is influenced by the flat and far-reaching open landscape. There is no visual material to justify that setting will not be affected, and the wider exposed landscape setting forms a key component to a number of assets.</p>	<p>Folkstone and Hythe Council⁵⁶</p>	<p>The ZTV and Stage 1 settings assessment will be used to demonstrate where impacts are possible, and the exposed local landscape will be considered within the ES Chapter.</p>	<p>N/A</p>

8.3.3 **Appendix 1-2: Key Policy and Legislation** provides details on the legislation, policy and guidance that has informed the approach to the cultural heritage assessment.

8.4 Ongoing Cultural Heritage Work

Study Area

8.4.1 Two (overlapping) study areas have been employed for this preliminary assessment:

- A 1km study area surrounding the Site, within which:

8.4.2 the archaeological and historical development of the Site and surrounding area has been considered;

- a preliminary assessment of potential impacts by the Project to the physical remains and settings of non-designated archaeological heritage assets within and beyond the Site has been made; and
- a preliminary assessment of potential impacts by the Project to the physical remains of designated archaeological heritage assets within and beyond the Site has been made.
- A 5km study area surrounding the Site, within which:

⁵⁶ Feedback from Scoping Opinion, January 2026

- a preliminary assessment of potential impacts by the Project to the settings of designated archaeological heritage assets within and beyond the Site has been made.

Collection of Cultural Heritage data

Current Cultural Heritage Results

- 8.4.3 A geophysical (magnetometer) survey was carried out within the within Parcels A - E between September to December 2025. The survey recorded anomalies mostly indicative of medieval and post-medieval agricultural and industrial activity including boundary removal, land drainage, modern ploughing regimes, quarries, buried services, possible bomb craters and demolished buildings. Such results are commonly seen in geophysical survey.
- 8.4.4 Probable archaeological activity has been recorded at five locations, with perhaps the area of highest potential being focussed on an approximately 200-hectare area corresponding closely to the location of the Wainway tidal channel within South Brooks A. This focus of archaeological activity includes numerous enclosures indicative of former field systems, areas of habitation, trackways and possible salterns, suggestive of multiple phases of occupation. The second and third locations are recorded within the southeast of South Brooks B comprising of rectilinear and irregular shaped enclosures. The fourth and fifth locations are recorded within the north of South Brooks C, corresponding with two possible medieval salt working mounds recorded as earthworks in which one contains possible salterns.
- 8.4.5 Three areas of possible archaeological activity have also been identified mostly comprising possible enclosures and ditches. Numerous disparate linear anomalies and an area of high magnitude discrete anomalies of uncertain origin have been recorded within the Site, all of which are assessed as most likely to be of recent agricultural or modern origin. However, an archaeological origin, including possible saltworking, for any of these anomalies cannot be discounted.
- 8.4.6 Following scoping, an archaeology and built heritage desk-based assessment has been carried out, also informed by a supplementary Stage 1 settings assessment. These documents have been provided as an appendix to Volume 2.
- 8.4.7 The locations of listed buildings within the Site and study area are shown on **Figures 8-1 to 8-5**. Conservation Areas and Scheduled Monuments within the Site and study area are shown on **Figures 8-6**. Non-designated asset locations within the Site and study area are shown on **Figures 8-7 to Figure 8-18**.
- 8.4.8 Designated heritage assets are referenced in this chapter by National Heritage List for England list entry number. Non-designated archaeological assets are

referenced by HER Preferred Reference or the National Record of the Historic Environment reference. Any newly discovered archaeological heritage assets are assigned a number prefixed 'HA' for Heritage Asset. A single asset number can refer to a group of related features, which may be recorded separately in the HER and other data sources.

Assessment of Importance

- 8.4.9 The importance of a heritage asset is the overall value assigned to it reflecting its statutory designation or, in the case of non-designated assets, the professional judgement of the assessor. Historic England guidance also refers to an asset's 'level of significance' (GPA2⁵⁷, paragraph 10), which in this usage has the same meaning as importance.
- 8.4.10 Any feature which does not merit consideration in planning decisions due to its significance may be said to have negligible importance. It is the role of the professional judgements made by the assessor to identify any archaeological remains within the Site that are considered to be of negligible importance, to justify no further works.

Table 8-4 Criteria for Assessing the Importance of Archaeological Heritage Assets, adapted from DMRB LA 106 - Cultural heritage assessment⁵⁸

Importance	Description of receptors
Very High	World Heritage Properties; assets of acknowledged international importance; assets that can contribute significantly to acknowledged international research objectives; Historic landscapes of international value (designated or not) and extremely well-preserved historic landscapes with exceptional coherence, time depth or other critical factor(s).
High	Scheduled Monuments and non-designated assets of schedulable quality and importance; Grade I and II* Listed Buildings and Grade II Listed Buildings or Registered Parks and Gardens that can be shown to have exceptional qualities in their fabric or associations; Conservation Areas with exceptional qualities; non-designated

⁵⁷ <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/>

⁵⁸ Highways England, 2020

Importance	Description of receptors
	structures of clear national importance; designated and non-designated historic landscapes of historic interest; assets that can contribute significantly to acknowledged national research objectives.
Medium	Grade II Listed Buildings and Registered Parks and Gardens; Non-designated assets that contribute to regional research objectives; Locally listed buildings and other historic unlisted buildings that have exceptional qualities; Conservation Areas.
Low	Non-designated assets of local importance including those compromised by poor preservation; assets of limited value but with the potential to contribute to local research objectives; robust non-designated historic landscapes.
Negligible	Assets with very little surviving archaeological interest; buildings of little architectural or historic note; landscapes with little historic interest.

Future Cultural Heritage

Collection of Future Cultural Heritage Data

8.4.11 The following additional sources have been and will continue to be used to inform the understanding of the cultural heritage resource within the study area:

- Geophysical survey;
- Walkover survey (site visit);
- British Geological Survey⁵⁹ geological mapping and borehole data will be supplemented with information from proposed ground investigation test pits and boreholes to produce a geoarchaeological deposit model for the Site;

⁵⁹ <https://www.bgs.ac.uk/map-viewers/bgs-geology-viewer/>

- Relevant volumes of the Southern Rivers Palaeolithic Project⁶⁰ and the English Rivers Palaeolithic Project⁶¹;
- Aerial photographs held by Historic England Archives (Swindon), Kent and East Sussex HERs, and Cambridge University Collection of Aerial Photography;
- Satellite imagery available to view on Google Earth Pro and Bing Maps;
- Maps and other relevant primary and secondary sources held in the Kent and East Sussex Archives;
- Portable Antiquities Scheme (PAS) data⁶²;
- Locally listed heritage assets;
- Kent Historic Landscape Characterisation and East Sussex Landscape Character Assessment;
- South-East Research Framework Resource Assessment and Research Agenda⁶³;
- Place and field name data;
- Relevant Victoria County Histories⁶⁴;
- Relevant antiquarian writings; and
- Other relevant published and unpublished archaeological reports and local histories.

8.5 Important Receptors Identified

- 8.5.1 The archaeological and built heritage desk-based assessment identified no designated heritage assets within the Site boundary and 219 designated assets located within the wider study area.
- 8.5.2 The assessment identified 172 non-designated archaeological assets within the Site boundary, and 1026 non-designated heritage assets in the wider study area.

⁶⁰ https://journal.lithics.org/wp-content/uploads/lithics_12_1991_Wym_21-23.pdf

⁶¹ <https://archaeologydataservice.ac.uk/data-catalogue/resource/02143e2ba435f22316965e7181854fe443e651fac0078fe81a343d8fff1af58f>

⁶² <https://finds.org.uk/>

⁶³ <https://www.kent.gov.uk/leisure-and-community/history-and-heritage/south-east-research-framework>

⁶⁴ <https://www.history.ac.uk/research/victoria-county-history>

- 8.5.3 There are no designated heritage assets and 18 non-designated heritage assets located within the grid connection corridor.
- 8.5.4 The assessment also identified a medium to high potential for remains of medieval and post-medieval to be encountered throughout the Site. It has also identified a medium potential for remains dating to the Bronze Age, Roman, Early Medieval and Modern Periods, a low to medium potential for Iron Age remains and a negligible to low potential for remains dating to the Palaeolithic to Neolithic periods.
- 8.5.5 Direct impacts upon known or previously unknown buried archaeological remains have the potential to occur during construction as a result of intrusive groundworks causing damage, destruction or removal of older archaeological assets. Activities which may have an impact upon buried archaeological remains include construction enabling works, any areas of bulk excavation and topsoil stripping associated with the construction of the BESS and substation or installation of the grid connection corridor, piling associated with the installation of solar panel mounts (albeit this would be minimal given the low impact nature of solar panel piles), site compound establishment and establishment and excavations for access roads, utilities and landscaping.
- 8.5.6 The archaeological and built heritage desk-based assessment has identified heritage assets which are located within the Site and therefore have the potential to be impacted by the Project.
- 8.5.7 The following heritage assets located within the study area where likely settings impacts are expected:
- Church of All Saints (grade I listed building, 1068932, 940m south west of South Brooks D);
 - Scotney (grade II listed building, 1068911, 120m south east of South Brooks A);
 - Jack's Court Farmhouse (grade II listed building, 1068913, 130m west of South Brooks D); and
 - Manor Farmhouse (grade II listed building, 1068939, 220m south east of South Brooks E).
- 8.5.8 Opportunities for enhancement of archaeology and heritage are possible where assets coincide with research interests outlined in the South East Regional Research Framework. Such assets are listed below.

Saltworking

- 8.5.9 Non-designated heritage assets within the Site relating to or potentially relating to saltworking (HER MKE3775, HER MKE3776, HER MKE3779 and elements of HA9, all located within South Brooks C) have archaeological interest and evidential value and historic interest for the information they will contain regarding previous saltworking activity.
- 8.5.10 These assets are likely related to medieval and post-medieval saltworking at the Belgar Estate. Such activity can be traced through documents and mapping dating to the 11th century onwards. The earthworks themselves are also of substantial size and form a very notable component of the topography of South Brooks C. For these reasons, it is believed that these assets may have considerable significance within the Folkestone and Hythe District Heritage Strategy⁶⁵. They are considered to be of Medium importance as they are items on the South East Regional Research Framework⁶⁶

Early medieval - medieval parish boundaries and field systems

- 8.5.11 Non-designated heritage asset HER MKE3789, a rectilinear field system located within South Brooks A which may be associated with Midley Deserted Medieval Village (HER MKE3783, 470m north of South Brooks A), may be of up to High importance and likely of outstanding or considerable significance in the Folkestone and Hythe District Heritage Strategy. This is due to the asset's association with Midley Deserted Medieval Village, which is in turn is likely associated with Scheduled Monument NHLE 1012338, Abandoned Medieval Church and Graveyard, Midley (490m north of South Brooks A).
- 8.5.12 Non-designated heritage assets within the Site relating to early medieval to medieval parish boundaries (HA15 within South Brooks B, HA17 – HA23 located within South Brooks A, and HA24 located within South Brooks B) are of Low importance as they are not items on the South East Regional Research Framework. The significance of these assets derives from their evidential and historical interest. These assets likely have no more than moderate significance within the Folkestone and Hythe District Heritage Strategy.

Post-medieval vernacular buildings and agricultural remains

- 8.5.13 Assets of this type within the Site which are items on the South East Regional Research Framework⁶⁷ are of Medium importance. They are:

⁶⁵ <https://www.folkestone-hythe.gov.uk/downloads/file/6045/heritage-strategy>

⁶⁶ Allen, Bird and Croxford 2019, 41; Thomas 2019, 40; Weekes 2019, 42

⁶⁷ Barber 2019, 53, 59 and 60

- Extant or demolished post-medieval farmsteads or buildings (HER MKE88136, HER MKE88140, HER MKE88177 within South Brooks A, HA5 within South Brooks B, HA14 within South Brooks A, HA16 and HA32 within South Brooks D);
- Extant or demolished sheepfolds or sheep houses (HER MKE88180 within South Brooks A, HER MKE43536 within South Brooks B, HER MKE88311, HER MKE43534 within South Brooks C and HA1 within South Brooks A);
- Now-lost field boundaries (HA12 and HA13 within South Brooks A); and
- HA11 (within South Brooks A), the likely routes of historic watercourses.

8.5.14 The significance of these assets derives from their evidential and historical value; those containing built heritage elements are also of aesthetic value. These assets likely have no more than moderate significance within the Folkestone and Hythe District Heritage Strategy.

Military assets and coastal defence

8.5.15 As an asset protected under the Protection of Military Remains Act 1986 and an asset type identified as an item on the South East Regional Research Framework⁶⁸, a crash site of Hawker Hurricane I (MKE90401) and a crash site of a Messerschmitt BF109E-1 (MKE90402) are of Medium importance and likely of at least moderate significance within the Folkestone and Hythe District Heritage Strategy.

8.5.16 Assets of this type within the Site which are items on the South East Regional Research Framework⁶⁹ are of Medium importance. They are:

- Sites of anti-aircraft defences (HER MKE3790 within South Brooks A, HER MKE123313 within South Brooks B, HER MKE123314, HER MKE123317 within South Brooks C, HER MKE8760 within South Brooks E);
- Sites of pillboxes (HER MKE39520 within South Brooks B and HER MKE39519 within South Brooks C);
- HER MKE44382 (within South Brooks A), Lydd Camp/Airfield 121;
- HER MKE3795 (within South Brooks A), earthworks likely associated with a World War II structure;
- HER MKE111022 (along the southern boundary of South Brooks D), the route of the Pipeline Under the Ocean ('PLUTO');

⁶⁸ Smith 2019, 44

⁶⁹ Smith 2019, 43 and 44

- HA4 (within the grid connection corridor 1.3km west of South Brooks E), Lydd Camp infrastructure; and MKE16468 (within the grid connection corridor 700m west of South Brooks E), firing range at Lydd Camp.

8.5.17 The significance of these assets derives from their evidential and historical interest. These assets likely have up to high significance within the Folkestone and Hythe District Heritage Strategy.

Transport

Non-designated heritage asset within the Site relating to transport (HER MKE3771, within South Brooks C) derives heritage significance from its evidential and historical interest. This asset is likely to have no more than moderate significance within the Folkestone and Hythe District Heritage Strategy and is considered to be of Medium importance as it is an item on the South East Regional Research Framework⁷⁰.

⁷⁰ Barber 2019, 57

Table 8-5: Known Heritage Assets located within the Site

Area	Period					
	Prehistoric and Roman	Early medieval	Medieval	Post-medieval	Modern	Unknown
South Brooks A		HA15, the probable below-ground remains associated with the Old Romney – Lydd parish boundary. HA19, the Midley - Lydd parish boundary. HA20, the Old Romney - Lydd parish boundary (also runs through or borders South Brooks B).	HER MKE3789, a rectilinear field system which may be associated with Midley Deserted Medieval Village (HER MKE3783). HA17, Midley – Ivychurch parish boundary. HA18, Midley - Old Romney parish boundary. HA21, Midley – Broomhill parish boundary. HA22, Old Romney – Broomhill parish boundary.	HER MKE88136, the farmstead of Lower Agney (containing both archaeological and built heritage elements). HER MKE88140, the farmstead of Little Scotney (containing both archaeological and built heritage elements). HER MKE88177, the farmstead of Newland (containing both archaeological and built heritage elements). HER MKE88180, the site of a sheepfold. HER MKE3796, a curvilinear earthwork.	DKE22374/MKE90401, the crash site of a Hawker Hurricane I (Protected Military Remains) HER MKE3790, the site of a heavy anti-aircraft battery HER MKE3795, earthworks likely associated with a World War II structure.	HER MKE3791, five small mounds HER MKE91231 and HER MKE91231, cropmarks of ring ditches. HA10, LiDAR anomalies. HA11, the likely routes of historic watercourses. HA31, earthworks possibly related to drainage or ridge and furrow agriculture.

Area	Period					
	Prehistoric and Roman	Early medieval	Medieval	Post-medieval	Modern	Unknown
		HA24, the Lydd - New Romney parish boundary (also runs through or borders South Brooks B).	HA23, Lydd – Broomhill parish boundary Potential rectilinear field system, areas of habitation, trackways, and possible salterns, which are likely to be of Medieval or Post-Medieval origin found by geophysical survey.	HER MKE44382, Lydd Camp/Airfield 121. HA1, the sites of sheepfolds and sheep washes. HA2, the sites of ponds. HA3, the routes of mid-19th century footpaths. HA6, the sites of boundary stones. HA7, the site of a well. HA8, the routes of late 19th century footpaths. HA12 and HA13, the courses of now-lost 19th century field boundaries. HA14, the sites of two 19th century enclosures, one containing buildings.		

Area	Period					
	Prehistoric and Roman	Early medieval	Medieval	Post-medieval	Modern	Unknown
				Potential rectilinear field system, areas of habitation, trackways, and possible salterns, which are likely to be of Medieval or Post-Medieval origin found by geophysical survey.		
South Brooks B	HER MKE68828 , the findspot of an Iron Age ceramic vessel. HER MKE68018 , the findspot of a Roman coin.	HER MKE120509, the findspot of a pin. HER MKE67709, the findspot of a coin.	85 findspots of coins, seals, clothes fastenings, keys, rings, horse tack, weaving accessories, ceramic vessels, a crucifix, a knife and unidentified objects.	HER MKE43536, the site of a shepherd's hut. HER MKE113695, HER MKE120391, HER MKE120424, HER MKE120445, HER MKE68019, HER MKE68024, HER MKE69139 and HER MKE69137, the findspots of coins, silver shoes, tags, buttons, buckles and fastenings.	HER MKE39520, the site of a pillbox. HER MKE123313, the site of a light anti-aircraft battery.	Rectilinear and irregular shaped enclosures found by geophysical survey.

Area	Period					
	Prehistoric and Roman	Early medieval	Medieval	Post-medieval	Modern	Unknown
				<p>HA5, the site of a small house and garden. HA12 and HA13, the courses of now-lost 19th century field boundaries.</p>		
South Brooks C			<p>HER MKE3775, HER MKE3776, HER MKE3779 and elements of HA9, earthworks likely relating to saltworking. Potential archaeological activity relating to Medieval salt working mounds found by geophysical survey.</p>	<p>HER MKE3771, the disused Lydd branch railway, HER MKE88311 and HER MKE43534, the site of a sheepfold and a shepherd's hut HER MKE96790, HER MKE96791, HER MKE96792 and HER MKE96798, the findspots of buckles and a medal. HA1, the sites of sheepfolds and sheep washes.</p>	<p>HER MKE39519, the site of a pillbox. HER MKE123314 and HER MKE123317, the sites of light anti-aircraft batteries. HER MKE124134, the site of stack stands.</p>	<p>HA10, LiDAR anomalies.</p>

Area	Period					
	Prehistoric and Roman	Early medieval	Medieval	Post-medieval	Modern	Unknown
				HA2, the sites of ponds. HA3, the routes of mid-19th century footpaths. HA7, the site of a well Elements of HA9, a now-lost early 19 th century field boundary. HA12 and HA13, the courses of now-lost 19th century field boundaries.		
South Brooks D				HA12 and HA13, the courses of now-lost 19th century field boundaries. HA16, the site of a small unlabelled structure.	HER MKE111022, the route of the Pipeline Under the Ocean ('PLUTO'). HA32, possible sites of 18th century buildings and ponds.	HA10, LiDAR anomalies.
South Brooks E		HER MKE67740,	Twelve findspots of seals, coins, a thimble and a	HA1, the sites of sheepfolds and sheep washes.	HER MKE8760, the site of a light anti-aircraft battery.	HER MKE96789, the findspot of an

Area	Period					
	Prehistoric and Roman	Early medieval	Medieval	Post-medieval	Modern	Unknown
		the findspot of a coin.	buckle (HER MKE67741, HER MKE67742, HER MKE96784, HER MKE67590, HER MKE67591, HER MKE67595 - HER MKE67595 and HER MKE96800).	HA2, the sites of ponds. HA3, the routes of mid-19th century footpaths. HA8, the routes of late 19th century footpaths. HA12 and HA13, the courses of now-lost 19th century field boundaries.	HER MKE130399, a light anti-aircraft battery.	unidentified lead object.
Grid connection corridor	HER MKE108513, the findspot of a Bronze Age ceramic vessel. HER MKE108510 - HER MKE10851		HER MKE108507 – HER MKE108509, the findspots of ceramic vessels. HER MKE78563 field system. HER MKE120528 copper alloy candle holder.	HA4, Lydd Camp infrastructure HER MEW8432 Wainway sewer.	HE51593 World War II firing ranges. HER MKE16468, a firing range at Lydd Camp. HER MKE111022, route of WWII pipeline under the ocean (PLUTO). HER MKE90402, crash site of Messerschmitt BF109E-1.	

Area	Period					
	Prehistoric and Roman	Early medieval	Medieval	Post-medieval	Modern	Unknown
	2, the findspots of Roman ceramic vessels. HER MKE10823 3 Roman copper alloy coin.		HER MKE96787 copper alloy buckle. HER MKE68304 copper alloy brooch.			

Considering Archaeology in Design

- 8.5.18 Results from the geophysical survey have influenced the design of the Project. An area of saltern earthworks identified within South Brooks C during the baseline assessment resulted in the extent of proposed solar panels in this area being reduced to avoid direct impacts to this non-designated asset. The presence of an aircraft crash site identified within South Brooks A during the baseline assessment has also meant that areas proposed for solar panels within this area have been designed to avoid direct impacts on the non-designated remains.
- 8.5.19 Any required mitigation will also feed into the design process where possible, with micro-siting of solar panels possible within areas with archaeological remains.

8.6 Preliminary Assessment of Likely Significant Effects

Approach

- 8.6.1 The importance of a heritage asset is a measure of the degree to which the heritage significance of that asset is sought to be protected.
- 8.6.2 The magnitude of impact assessment reflects the scale of change which would be caused by the Project and the effect this would have on ability to interpret its heritage significance and to appreciate the heritage asset. Impacts can result either from physical changes to the fabric of a heritage asset or through sensory changes within its setting.
- 8.6.3 The assessment of the significance of effect is based on a combination of the importance of the asset (receptor) and the magnitude of impact upon that asset's significance. The significance of effect matrix provides a guide to decision-making but is not a substitute for professional judgement and interpretation, particularly where the importance or impact magnitude levels are not clear or are borderline between categories. The significance of effect may be described on a continuous scale from 'No effect' to 'Major'.

Preliminary Assessment

- 8.6.4 A summary of the preliminary assessment of likely significant effects on cultural heritage associated with the Project is provided in Table 8-6 below. In summary, once the recommended mitigation measures are applied, it is not anticipated that the Project will conflict with legislation or national or local planning policies with respect to the historic environment. Furthermore, any likely development impacts are not considered sufficiently significant to warrant a refusal of development consent on archaeological grounds.

Table 8-6 Potential likely significant Cultural Heritage Effects

Phase	Activity	Receptor	Preliminary Assessment	Potential likely significant effect	Next Steps
Construction	Intrusive groundwork activities associated with construction, enabling works.	49 known non-designated assets of up to Medium importance located within the site parcels.	Without appropriate mitigation measures, direct impacts upon known or previously unknown buried archaeological remains have the potential to occur during construction as a result of intrusive groundworks causing damage to archaeological assets. Activities which may have an impact upon buried archaeological remains include construction enabling works, any areas of bulk excavation and topsoil stripping associated with the construction of the BESS and substation or installation of the grid connection corridor, piling associated with the installation of solar panel mounts (albeit this would be minimal given the low	Loss of known or previously unknown buried archaeological remains may be significant, but with staged archaeological evaluation and mitigation this impact can be reduced.	Trial trenching is likely to be required to inform the need for and nature of any further mitigation, subject to confirmation with Historic England.

Phase	Activity	Receptor	Preliminary Assessment	Potential likely significant effect	Next Steps
			<p>impact nature of solar panel piles), site compound establishment and excavations for access roads, utilities and landscaping.</p>		
<p>Construction, operation, and decommissioning</p>	<p>Construction, operational and decommissioning activities in proximity to the asset, as well as the operational phase.</p>	<p>Scotney (grade II listed building, 1068911, of Medium importance).</p>	<p>This asset lies c.120m from South Brooks A and therefore the Site may form part of the setting of the asset. Impact to this assets setting would represent the loss of the last remaining parcel of agricultural land around the asset, severing its remaining connection to the historic land use that would have enveloped the asset in the past. Impacts to the attributes of its setting which contribute to its significance may occur during the construction or operation phases of the Project</p>	<p>As a grade II listed building, this asset is of Medium importance and could be subject to potential magnitude of impact up to Moderate. There is the potential for significant effects upon the receptor.</p>	<p>Further assessment to be undertaken as part of the ES Chapter, subject to confirmation with Historic England.</p>

Phase	Activity	Receptor	Preliminary Assessment	Potential likely significant effect	Next Steps
Construction, operation and decommissioning	Construction, operational and decommissioning activities in proximity to the asset, as well as the operational phase.	Jack's Court Farmhouse (grade II listed building, 1068913, of Medium importance).	<p>without appropriate mitigation measures.</p> <p>This asset lies c.135m from South Brooks D and therefore the Site may form part of the setting of the asset. Although the asset is listed as a farmhouse its appearance and surroundings including formal gardens indicate it may be a manor house. Further detailed assessment is required to understand the function of the asset and the contribution agricultural land located within the Site makes to its significance. Impacts to the attributes of its setting which contribute to its significance may occur during the construction or operation phases of the Project</p>	As a grade II listed building, this asset is of Medium importance and could be subject to potential magnitude of impact up to Moderate. There is the potential for significant effects upon the receptor.	Further assessment to be undertaken as part of the ES Chapter, subject to confirmation with Historic England. Additional vegetation screening or enhancement of existing hedgerows would help to mitigate any impacts.

Phase	Activity	Receptor	Preliminary Assessment	Potential likely significant effect	Next Steps
			without appropriate mitigation measures.		
Construction, operation and decommissioning	Construction activities in proximity to the asset, as well as the operational phase.	Church of All Saints (grade I listed building, 1068932, of High importance).	Although this asset lies 1.18km from South Brooks E, potential long views over South Brooks E mean that the Site may form part of the setting of the asset. The assets short range setting from the ground level is of the settlement surrounding it, however long-range views from the surrounding agricultural land towards the assets tower also contribute to its significance. This relationship with the historical agricultural landscape which saw the draining of the marsh to create useable agricultural land forms a part of the story of Romney Marsh and why the church is located here.	As a grade I listed building, this asset is of High importance and could be subject to potential magnitude of impact up to Major. However, it should be noted that South Brooks E is planned to comprise ecological mitigation and below ground cabling, and so it is likely that the impact will be lower. There is the potential for significant effects upon the receptor.	Further assessment to be undertaken as part of the ES Chapter, subject to confirmation with Historic England.

Phase	Activity	Receptor	Preliminary Assessment	Potential likely significant effect	Next Steps
Construction, operation	Construction activities in proximity to the asset, as well as the operational phase.	Manor Farmhouse (grade II listed building, 1068939, of Medium importance).	This asset lies c 230m from South Brooks E and therefore the Site may form part of the setting of the asset. Impacts to the attributes of its setting which contribute to its significance may occur during the construction or operation phases of the Project without appropriate mitigation measures.	As a grade II listed building, this asset is of Medium importance and could be subject to potential magnitude of impact up to Moderate. However, it should be noted that South Brooks E is planned to comprise ecological mitigation and below ground cabling, and so it is likely that the impact will be lower. There is the potential for significant effects upon the receptor.	Further assessment to be undertaken as part of the ES Chapter, subject to confirmation with Historic England.

Phase	Activity	Receptor	Preliminary Assessment	Potential likely significant effect	Next Steps
Construction, operation and decommissioning	Construction activities in proximity to the asset, as well as the operational phase.	Potential waterlogged remains (of unknown importance).	Changes in hydrological patterns may lead to detrimental impacts to heritage assets currently preserved in waterlogged context without appropriate mitigation measures.	Loss of any buried archaeological remains in waterlogged contexts may be significant, but with staged archaeological evaluation and mitigation this impact can be reduced. There is the potential for significant effects upon the receptor.	Trial trenching is likely to be required to inform the need for and nature of any further mitigation. This could be completed pre-determination and incorporated into the results of the EIA, informing the ES Chapter. Consultation with the East Sussex County Council County Archaeologist and Kent County Council Principal Archaeological Officer will be required to define the scope of this evaluation, and to be kept informed on the progress of such work.

Drawing number

Figure 4.1

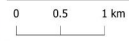
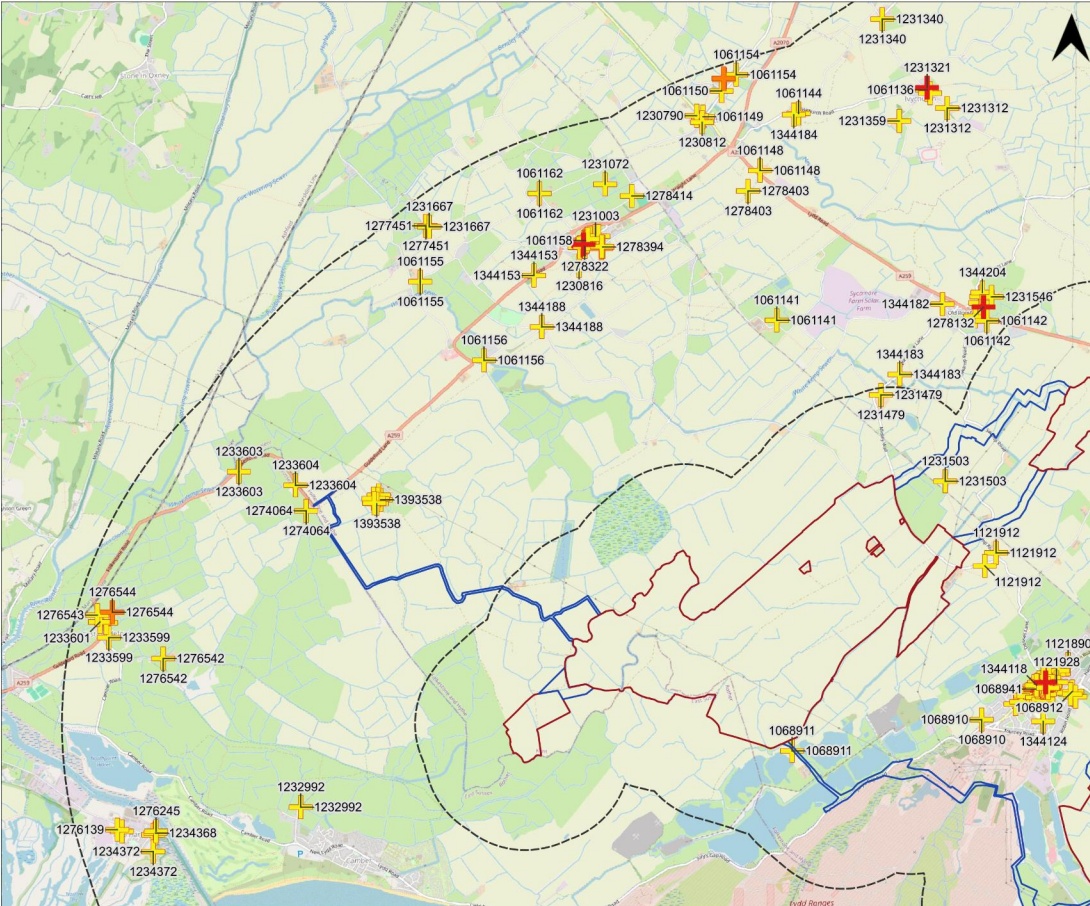
Project/Location
South Brooks Solar Farm

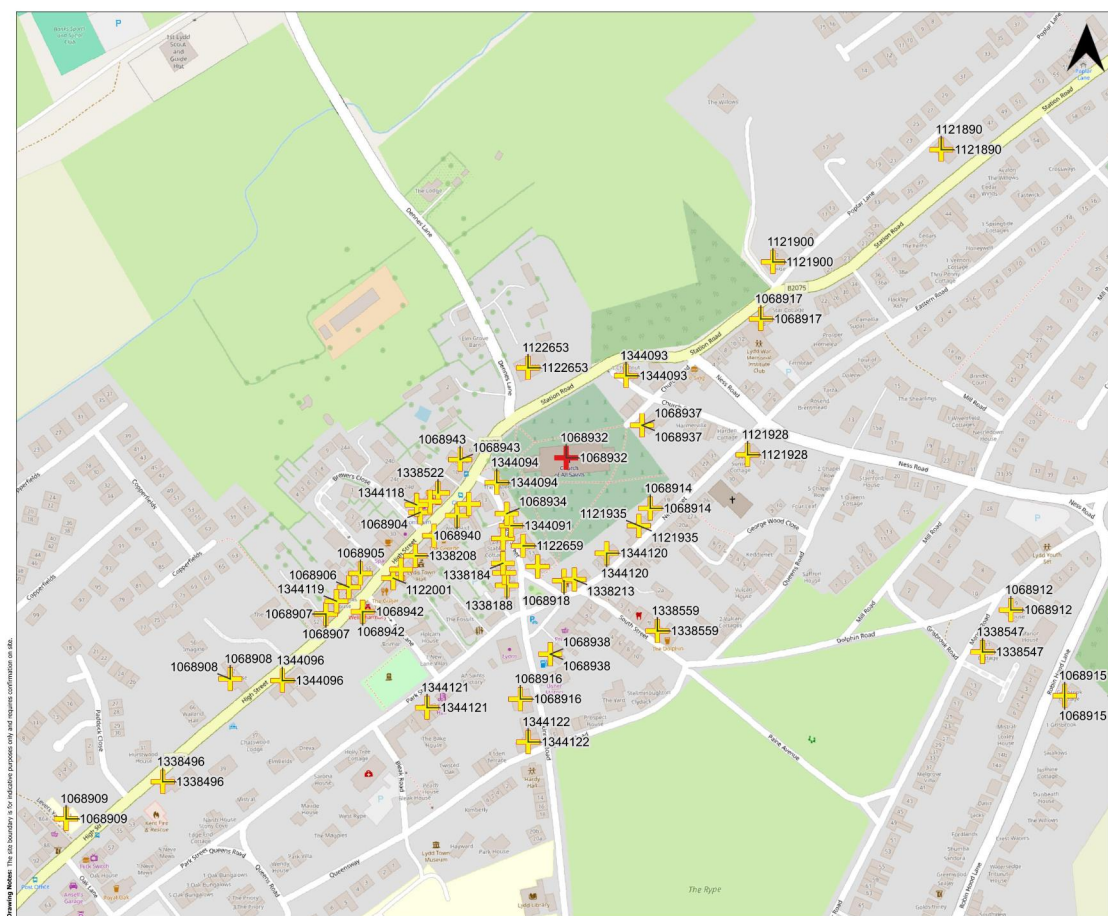
Drawing title
Listed buildings within the north western part of the Site and study area

Legend

- Site boundary
- Cable route
- Areas
- Study area
- Listed buildings
- Grade I
- Grade II*
- Grade II

Drawing Index: This site boundary is for indicative purposes only and requires confirmation on site.





Drawing number

Figure 4.4

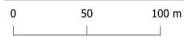
Project/Location
South Brooks Solar Farm

Drawing title
Detail of listed buildings in Lydd

Legend

- Site boundary
- Cable route
- Areas
- Study area
- Listed buildings
 - Grade I
 - Grade II*
 - Grade II

Drawing Index: This job boundary is for indicative purposes only and requires confirmation on site.

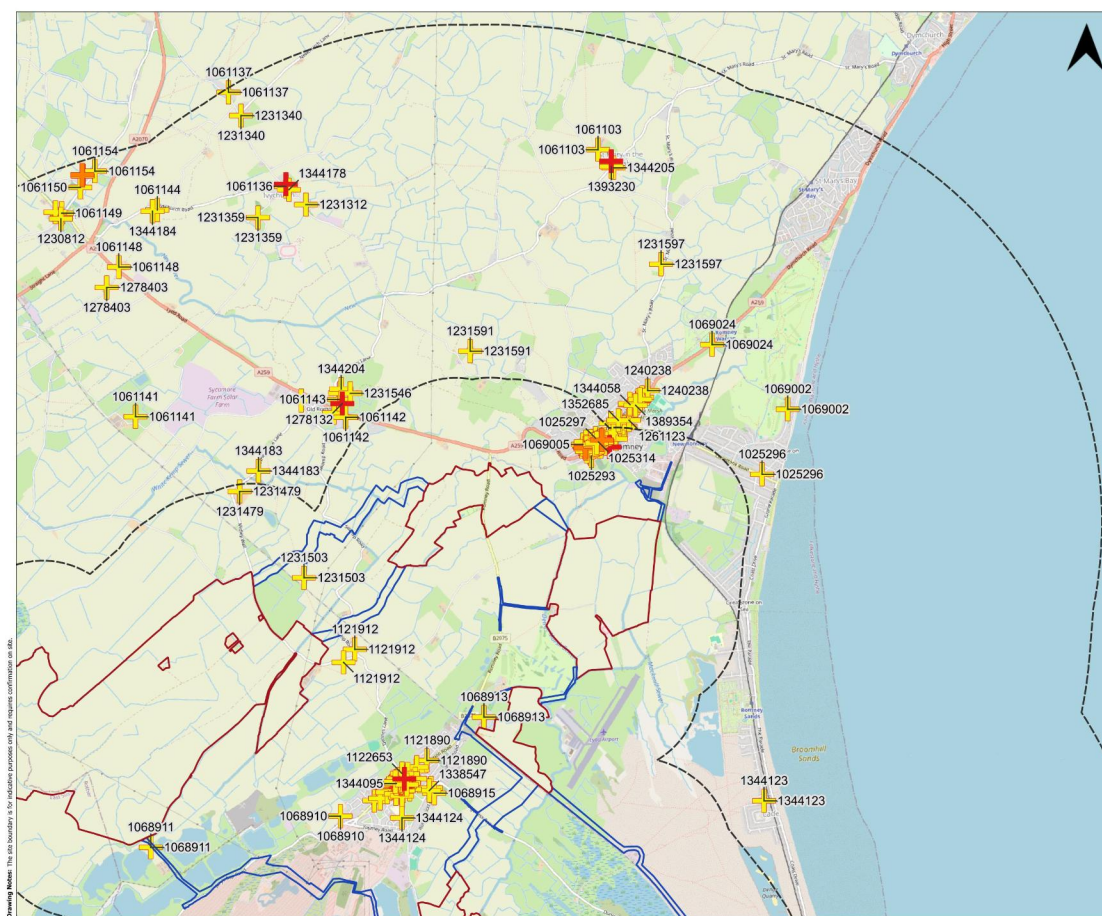


Drawing title

Listed buildings within the north eastern part of the Site and study area

Legend

- Site boundary
- Cable route
- Areas
- Study area
- Listed buildings
- Grade I
- Grade II*
- Grade II



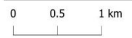
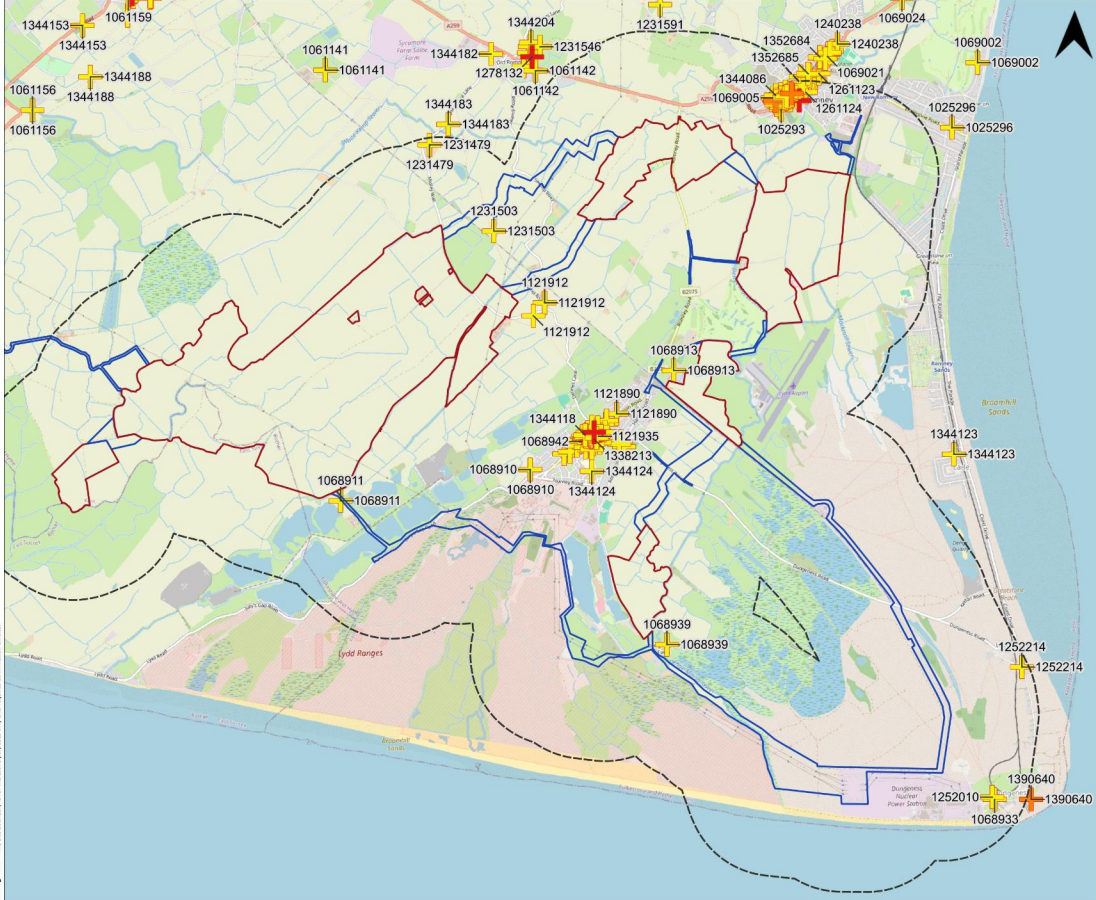
Drawing Index: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing title

Listed buildings within the south eastern part of the Site and study area

Legend

- Site boundary
- Cable route
- Areas
- Study area
- Listed buildings
- Grade I
- Grade II*
- Grade II



Drawing Index: The job boundary is for indicative purposes only and requires confirmation on site.

Drawing number

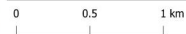
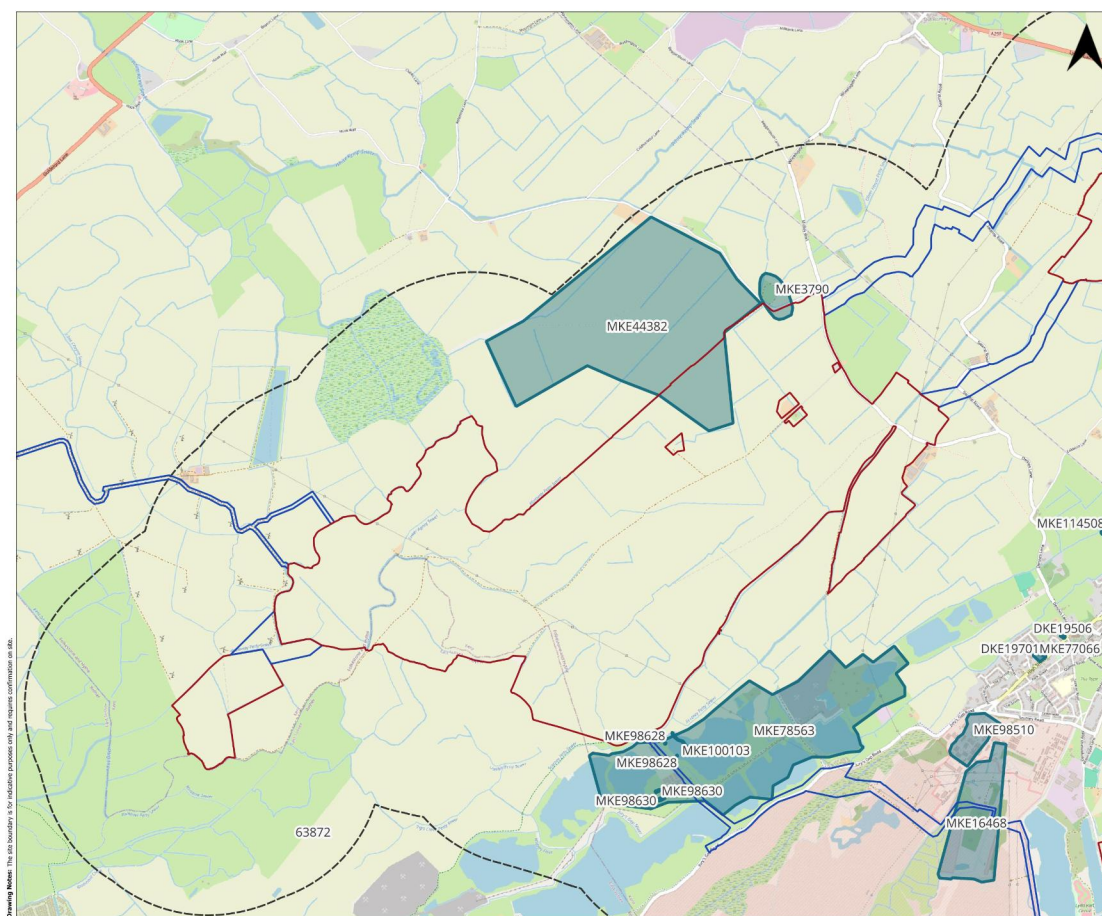
Figure 4.7

Project/Location
South Brooks Solar Farm

Drawing title
Non-designated areas within the western
area of the Site and study area

Legend

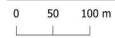
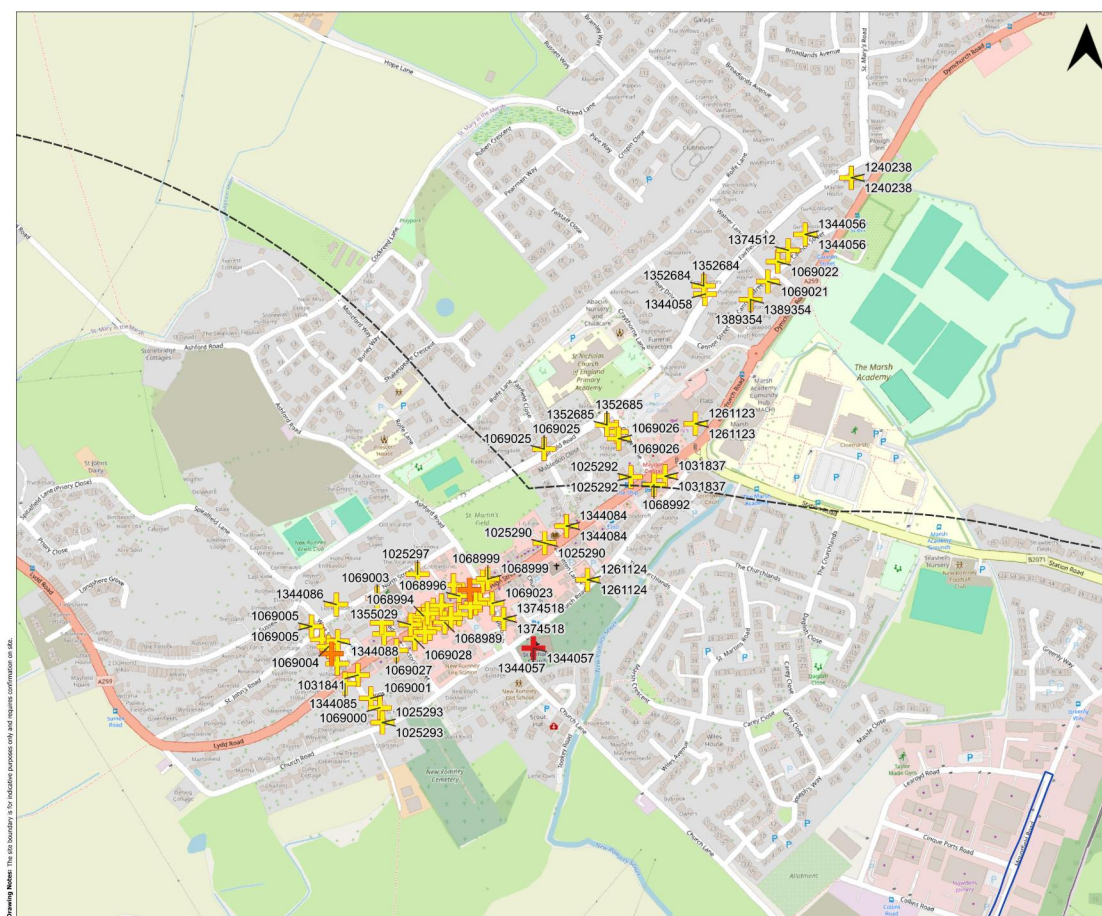
- Site boundary
- Cable route
- Areas
- Study area
- Non-designated areas



Drawing Index: The job boundary is for indicative purposes only and requires confirmation on site.

Legend

- Site boundary
- Cable route
- Areas
- Study area
- Listed buildings
 - Grade I
 - Grade II*
 - Grade II



Drawing Index: This job boundary is for indicative purposes only and requires confirmation on site.

Legend

Site boundary

Cable route

Areas

Study area

Conservation areas

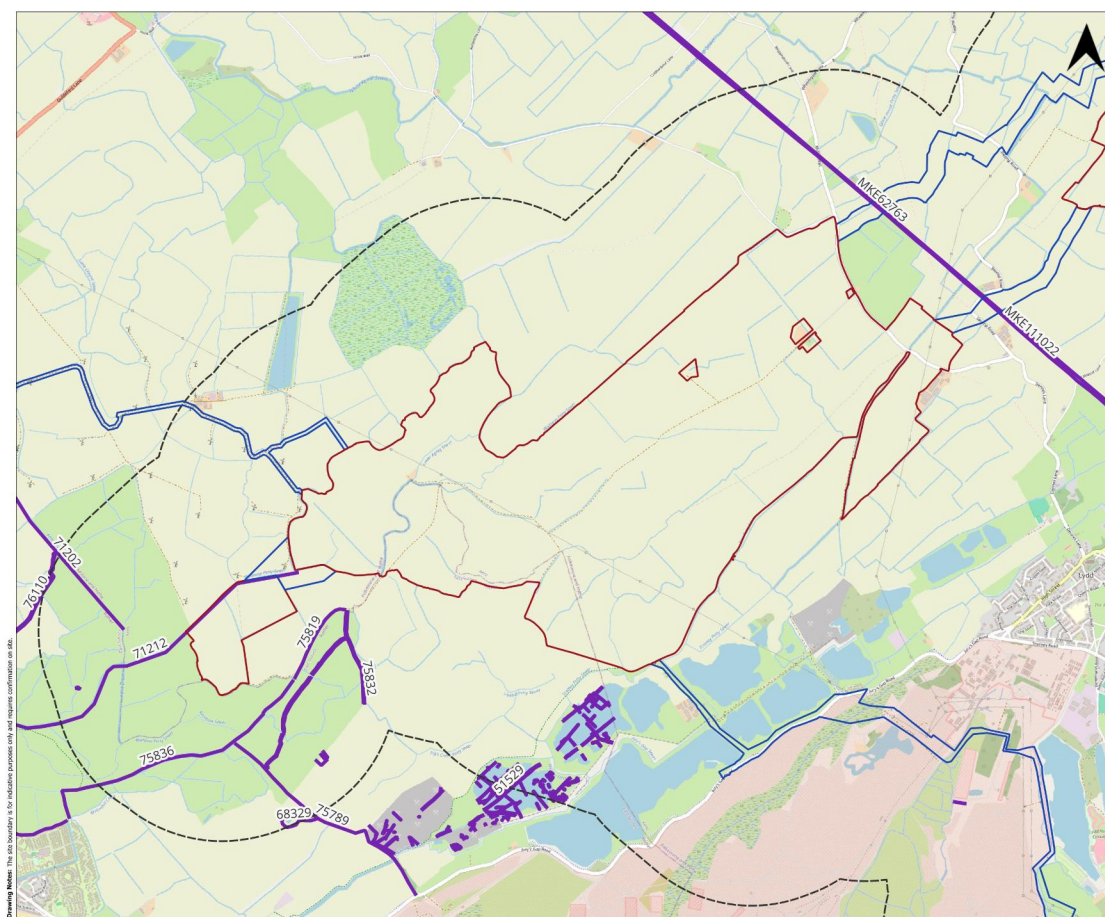
Scheduled monuments

Drawing notes: This site boundary is for indicative purposes only and requires confirmation on site.



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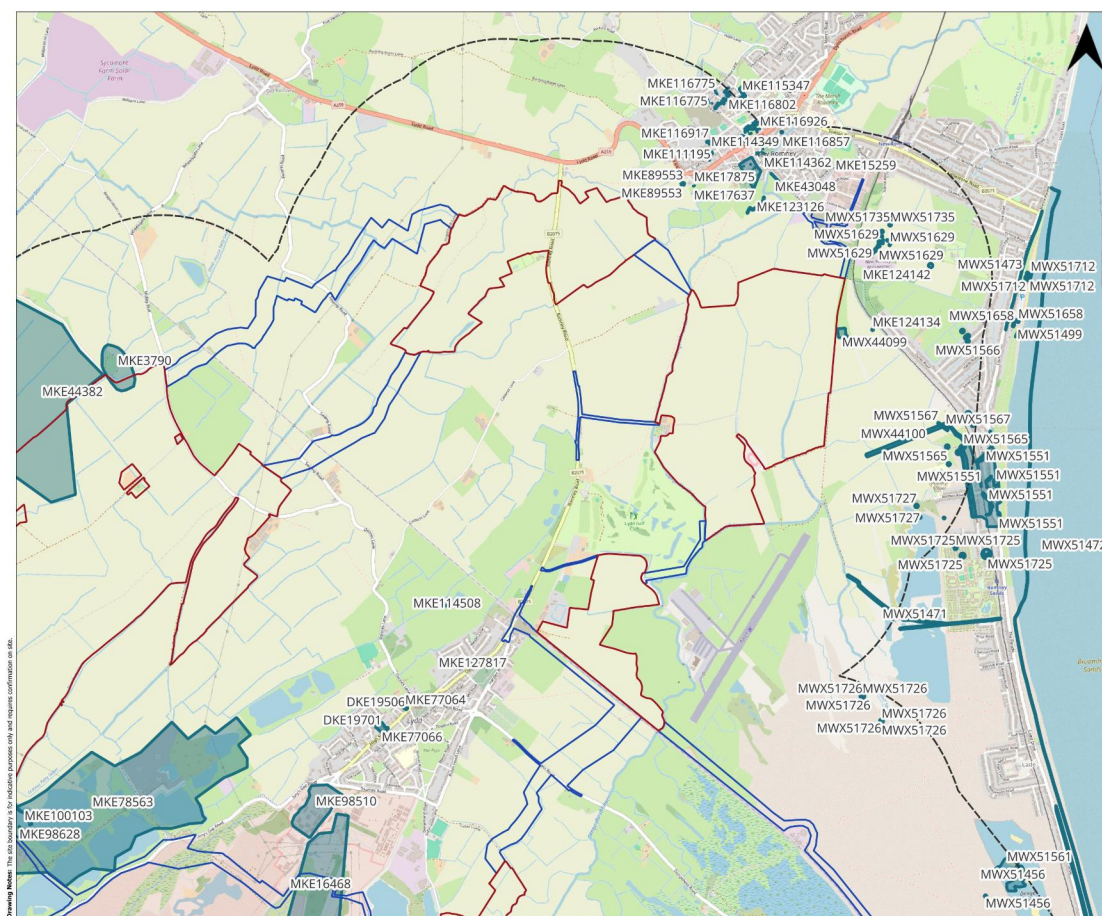
- Site boundary
- Cable route
- Areas
- Study area
- Non-designated linears



Drawing Index: The job boundary is for indicative purposes only and requires confirmation on site.

Legend

- Site boundary
- Cable route
- Areas
- Study area
- Non-designated areas



Drawing Index: This job boundary is for indication purposes only and requires confirmation on site.

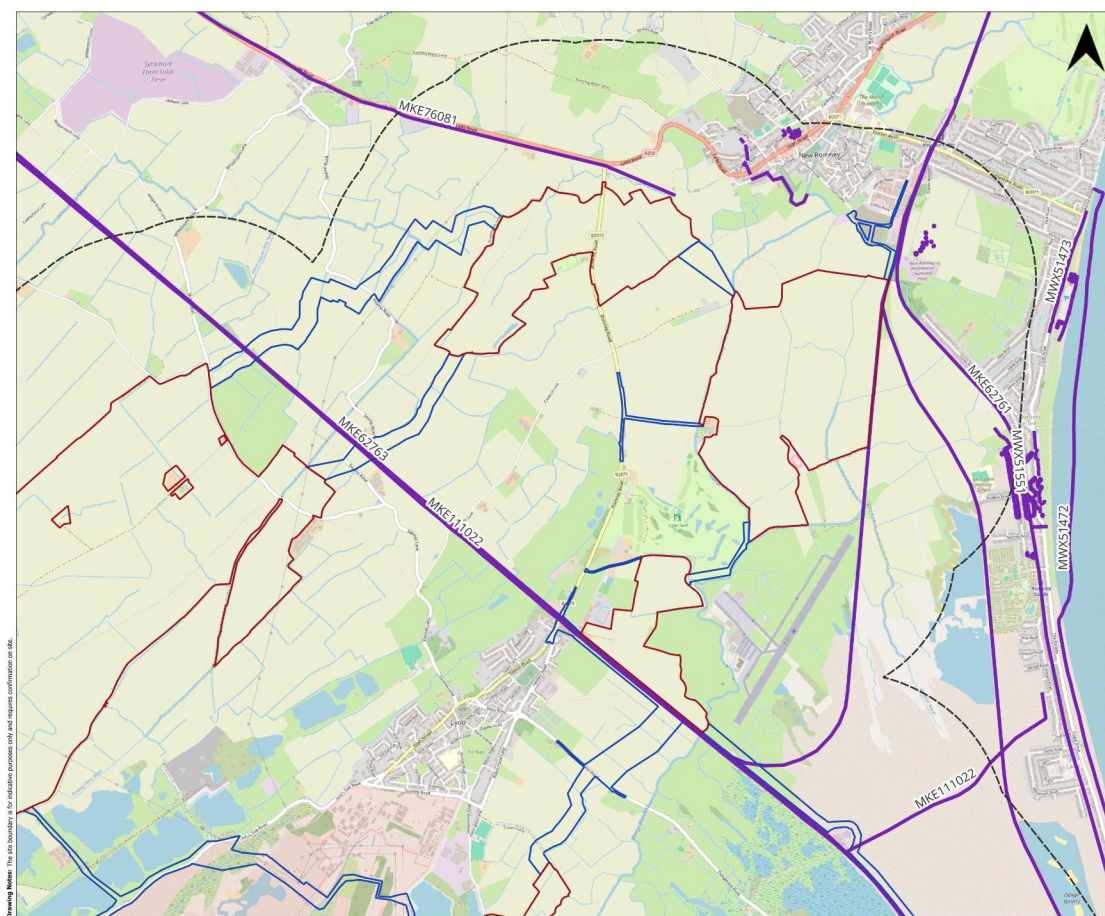


Drawing title

Non-designated liners within the north eastern area of the Site and study area

Legend

- Site boundary
- Cable route
- Areas
- Study area
- Non-designated liners



Drawing Index: This job boundary is for indicative purposes only and requires confirmation on site.

Legend

- Site boundary
- Cable route
- Areas
- Study area
- Non-designated linears

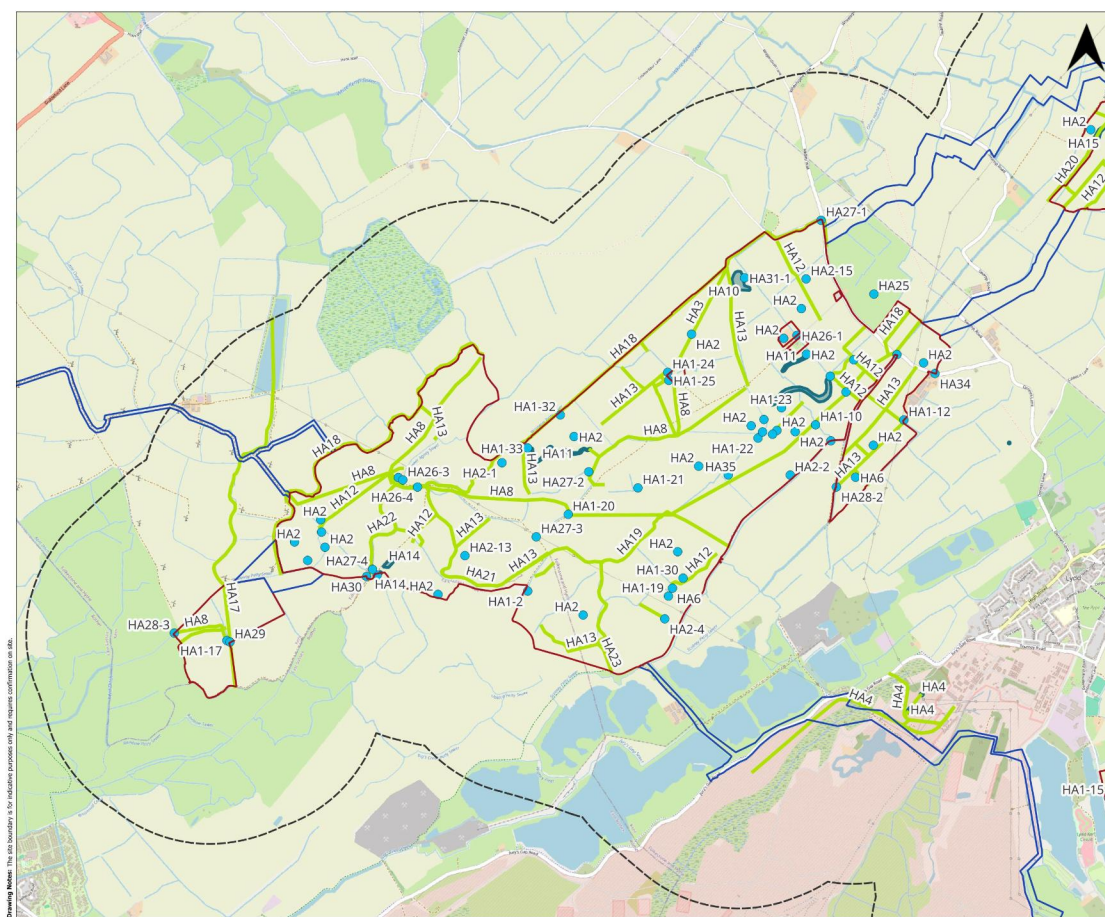


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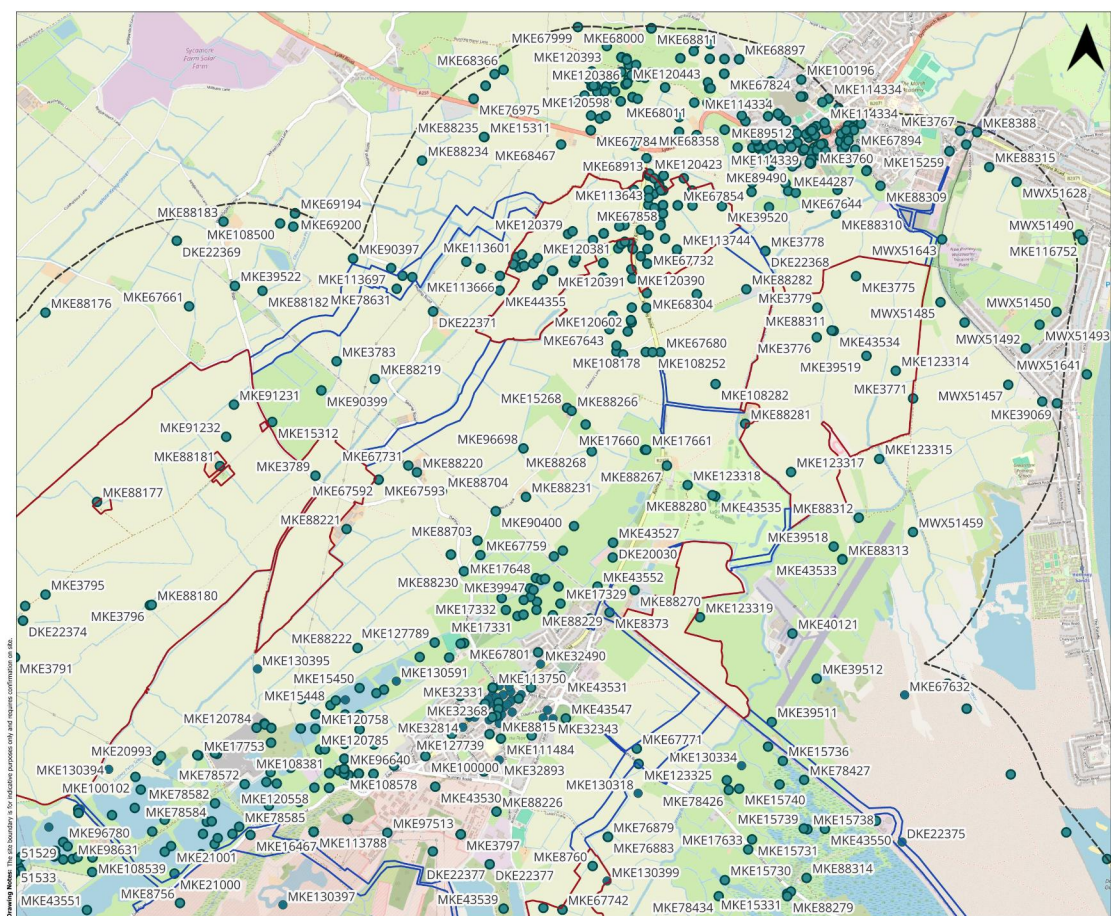
- Site boundary
- Cable route
- Areas
- Study area
- Points
- Lines
- Areas



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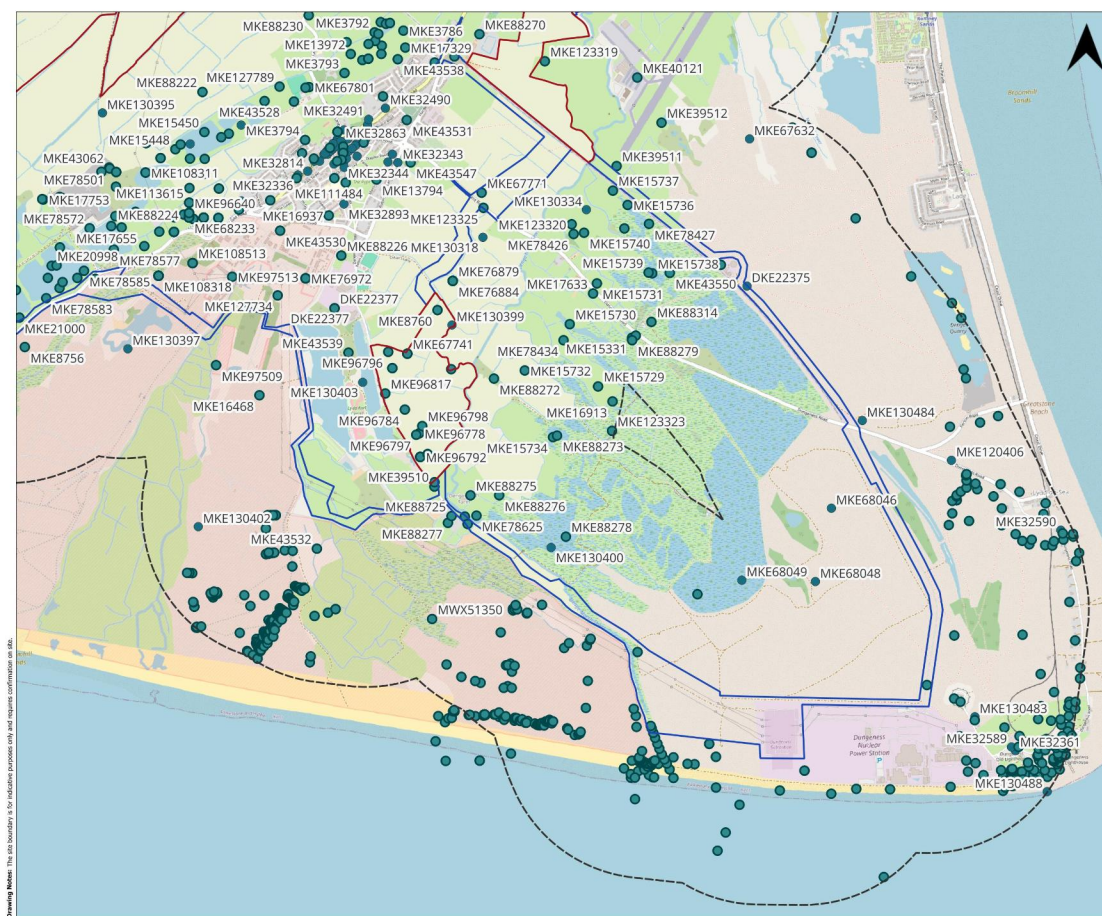
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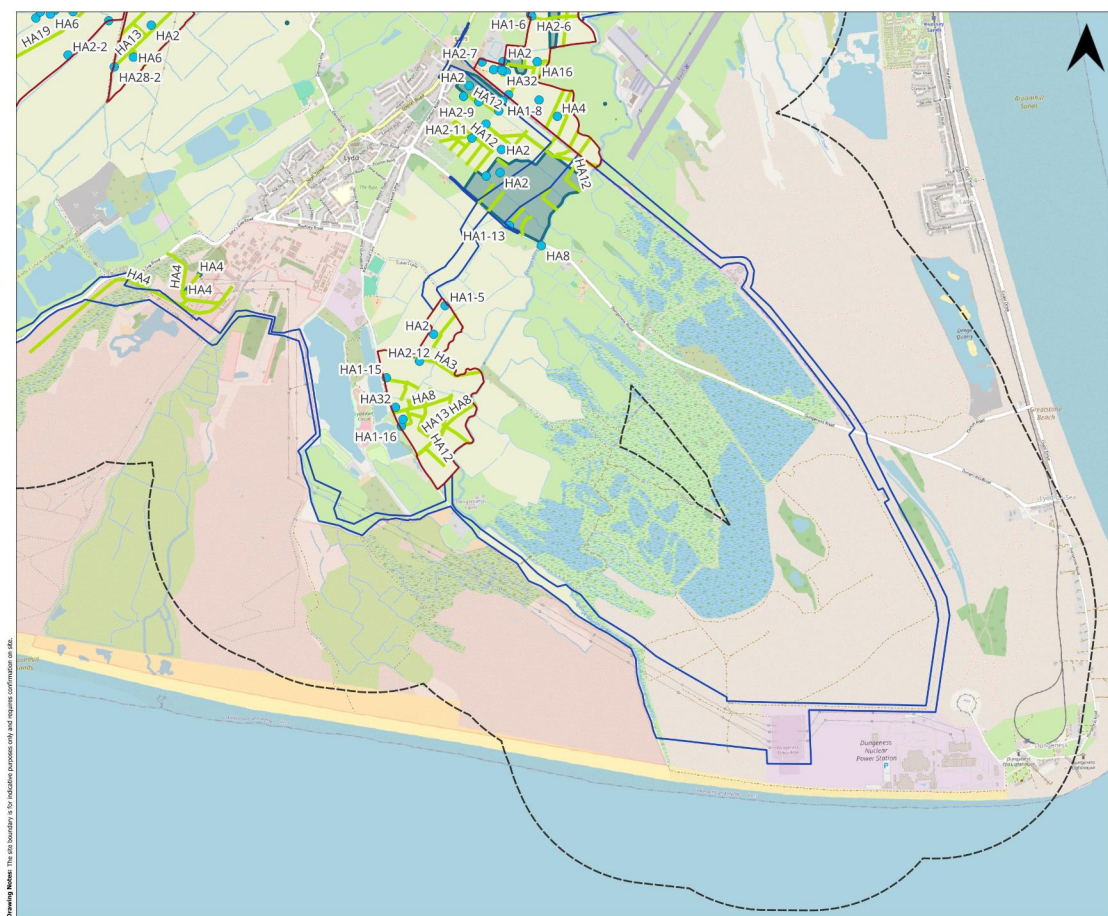
- Site boundary
- Cable route
- Areas
- Study area
- Non-designated points



Legend

- Site boundary
- Cable route
- Areas
- Study area
- Non-designated points





Drawing number

Figure 4.18

Project/Location
South Brooks Solar Farm

Drawing title
Non-designated assets identified on historic mapping and LiDAR within the south eastern area of the Site and study area






Legend

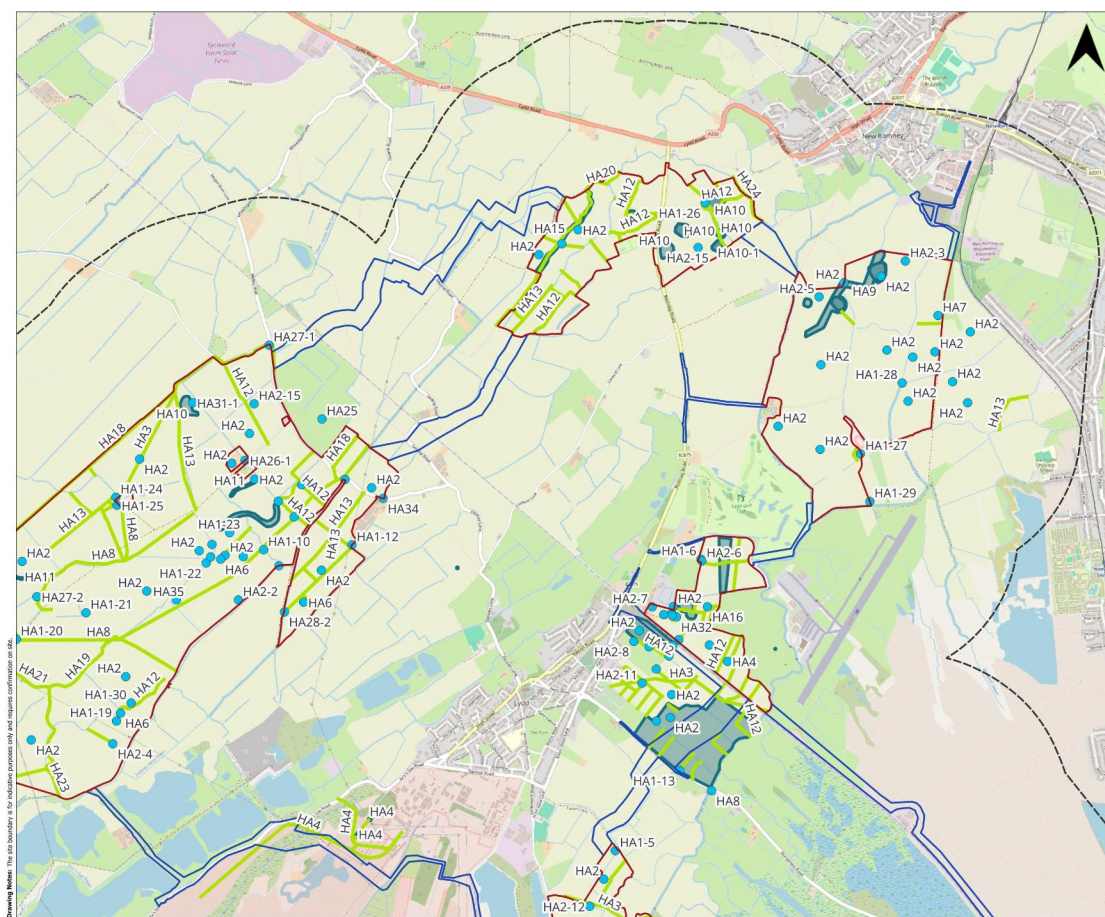
- Site boundary
- Cable route
- Areas
- Study area
- Points
- Linears
- Areas



Drawing Index: The job boundary is for indicative purposes only and requires confirmation on site.

Legend

-  Cable route
-  Areas
-  Study area
-  Points
-  Linears
-  Areas



Drawing Index: This tab boundary is for indicative purposes only and requires confirmation on site.



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