



Historic England

Ms Alex Stafford  
Ashford Borough Council  
Civic Centre  
Tannery Lane  
ASHFORD  
Kent  
TN23 1PL

Direct Dial: 020 7973 3856

Our ref: P01529354

5 September 2022

Dear Ms Stafford

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND SOUTH OF M20, CHURCH LANE, ALDINGTON, KENT  
Application No. 22/00668/AS**

Thank you for your letter of 29 July 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Thank you for consulting Historic England on a proposed solar farm on land south of the M20 close to Aldington.

The proposed solar farm is located on agricultural fields at the foot of the Kent Downs. This rolling landscape characterised by large scale field enclosures and pockets of woodland, is the setting of several designated heritage assets.

Those assets include the highly prominent Church of St Martin and Court Lodge Farm to its north. This unusually fine group comprise a former chapel and hunting lodge for the Archbishop of Canterbury (now parish church and farmhouse). Both buildings derive some significance from their landscape settings which help explain their rural origins and provide an attractive backdrop which enhances their aesthetic value in key views. The exceptional heritage interest of St Martin's and Court Lodge Farm is recognised in their designations as grade I and grade II\* listed buildings.

The church and former hunting lodge are set within a wider group of medieval buildings whose origins mainly relate to farming. These buildings therefore also derive some significance from the surrounding landscape, including the site to the north. The interest of this unusual group is also acknowledged by the area's designation as Aldington Conservation Area and the listing of many of the later farm buildings within



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it.

The great time-depth of the area's occupation is also recognised in other nearby designated heritage assets, including the Bronze Age cemetery on Barrowhill, known as Barrow Cemetery to the south-west of Barrowhill, which sits within a much wider funerary landscape.

The positioning of barrows in a landscape and their visibility are highly nuanced and intimately connected to the surrounding landscape. This means assets which are some distance from the site, including the cemetery at Barrowhill, may nevertheless derive significance from the site.

When considering applications which affect the historic environment, an applicant is required to "describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance" (paragraph 194, National Planning Policy Framework).

In this case, while we acknowledge that many of the most immediate designated assets have been included in the heritage assessment, we do not believe the supporting visual information is sufficiently robust and perhaps plays down the visual impact and prominence of the proposed solar farm and thus its potential to cause harm to heritage significance.

For example, if viewpoint 8 was further to the north-east and in the field to the liturgical east of the church, we think the proposed solar farm would be more visible in filtered views of the church, Court Lodge Farm and site to the north.

Likewise, if viewpoint 7 was further to the west it would take in the powerful silhouette of the church which is highly visible on the prow of the hill as one travels along Roman Road from Aldington. As it stands, the viewpoint suggests the development would be visible but does not provide a sufficiently wide context to understand the impacts on designated heritage of the highest importance, such as the grade I Church of St Martin.

We also think the use of wireframes to show the proposed solar farm has the potential to underplay the visual impact of the development and thus its effect on the significance of designated heritage. We suggest these are revised to show verified rendered views for any viewpoint which includes heritage assets.

We also think the heritage assessment should include assets which are further from



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the site, especially because the character of the landscape means that assets which lie some distance from the site may have some invisibility with it. For us the most obvious omission is the scheduled barrow cemetery at Barrowhill, but there may be others.

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds. We recommend that further work is needed to meet the requirements of paragraph 194 of the NPPF. Until this work is complete, Historic England is unable to assess this proposal. If it would be helpful to discuss our advice with the applicant, we would be pleased to do so.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

### **Alice Brockway**

Inspector of Historic Buildings and Areas  
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cc: Wendy Rogers, KCC



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