



Historic England

Mr Matthew Durling  
Ashford Borough Council  
Civic Centre  
Tannery Lane  
Ashford  
TN23 1PL

Our ref: P01529354

11 March 2024

Dear Mr Durling

**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 31 January 2024 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Thank you for re-consulting Historic England on the proposed solar farm on land south of the A20 close to Aldington.

**Significance**

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.



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The church tower is set at the highest point of the village which is key to understanding the historic significance of its setting. The tall flint and stone structure commands presence in long views towards the small settlement, most notably, views approaching the settlement from the north along Roman Road. Here the falling land emphasises the tower's height as the most prominent building in the landscape.

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. The group value of the two assets is also found in their historic association between the Archbishop of Canterbury's former hunting lodge and the wider fields which may have formed part of this historic ecclesiastical manor.

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 it. The fields contribute to historic significance of the settlement by tying the rural place of worship to the fields and homes of the agricultural community who both built and worshipped in the church.

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.

### **Impact**

Our letter from 5 September 2022 concluded that we could not assess the development's potential for harm to heritage significance because the supporting information was not complete and visual information played down the impact and prominence of the solar farm.

Amended information has been submitted, which includes additional rendered verified views of view 7 (footpath west of Aldington), views 14 and 15 (from the Bronze Age Cemetery on Barrowhill), view 16 (east of St Martin's Church), and view 17 (from Roman Road).

View 8 is of most concern as the wireline drawing shows that the panels will be experienced either side of the tower north of Roman Road in views which include the church tower. In this view, the panels have the potential to harm the significance of the church's setting by drawing the eye away from the tower as focal point in this historic landscape. The functional appearance of the panels has the potential to distract from an appreciation of the group value of the assets and their important historic associations with the landscape both as former buildings in the Archbishop of Canterbury's manor and as buildings characteristic of the farming landscape. However, without a verified rendered view, the magnitude of harm cannot be fully assessed.



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Impacts on the setting of the church in view 7 are also of concern. Submitted information confirms that the panels will be visible in views approaching the church from the west along the footpath.

Whilst there is some distance between the development site and the church, view 7 is dominated by the magnificent fifteenth century tower which is set on high ground and framed by open fields. We also believe the panels could harm the longstanding visual tie between the agricultural settlement and the rural landscape by obscuring some of the fields which contribute to the setting's significance.

Facing south, the degree to which this important visual tie could be impacted, would be increased by the panel's reflectivity, which would be more noticeable because they face south.

In relation to the scheduled monuments, the updated photomontage and wireline drawings provided for views 14 and 15 show there is very little impact on the significance of setting and long views of the scheduled Bronze Age Cemetery on Barrowhill to the east of the site.

## **Policy**

Section 16 of the National Planning Policy Framework (NPPF), Conserving and Enhancing the Historic Environment, sets out policies for decisions governing change in the historic environment.

Paragraph 200 of the framework sets out the expectation for supporting information, noting that "local planning authorities should require an applicant 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 201 notes that "local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

The significance of listed buildings can be harmed or lost by alteration to them or development in their setting. The NPPF states that clear and convincing justification should be made for any such harm and that 'great weight' should be given to the conservation of listed buildings irrespective of the level of harm caused (paragraphs 205 and 206).

Paragraph 205 states: "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the



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asset's conservation (and the more important the asset, the greater the weight should be).”

In addition to this, paragraph 208 requires that “where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

This weight and the justification for harm should be especially convincing where harm to buildings of a high grade of listing is concerned, as is the case here for the two assets discussed.

### **Position**

In its current iteration, we would consider the harm of the development to be ‘less than substantial’ in terms of the NPPF. However, we cannot yet be precise about where the harm falls within the spectrum of less than substantial.

This is because, without additional rendered views, we cannot fully assess the level of harm. We request that a wider view is taken from the field immediately east of the church (north-east of the current view 8) as this would better reveal the potential impact of the panels on both the church and Court Lodge Farm. We also request that a verified rendered view is supplied for view 8. Until this work is carried out, we do not think the application meets paragraph 200 of the NPPF.

Once this work is carried out, we would be pleased to review the supporting information and provide an updated position on this application.

We also note, that in our view, the solar farm development would fail to enhance or better reveal the significance of these heritage assets (in terms of paragraph 205 of the NPPF).

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds. We recommend that further work is needed to meet the requirements of paragraphs 196 and 200 of the NPPF as per the suggestions in this advice. Until this work is complete, Historic England is unable to complete our assessment of this proposal. If it would be helpful to assess our advice with the applicant and the Local Authority Senior Conservation Officer, we could be happy to do so.

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

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



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Your Sincerely,

Jessica Jenkinson  
Inspector of Historic Buildings and Areas (Kent)



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