

The Great Grid Upgrade

Sea Link

Preliminary Environmental Information Report

Volume: 1

Part 3 Kent Onshore Scheme

Chapter 4 Cultural Heritage

Version A

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nationalgrid

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3.4 Cultural Heritage

3.4.1 Introduction

3.4.1.1 This chapter of the Preliminary Environmental Information Report (PEIR) presents information about the preliminary environmental assessment of the likely significant cultural heritage effects identified to date, that could result from the Proposed Project (as described in **Volume 1, Part 1, Chapter 4: Description of the Proposed Project**).

3.4.1.2 This chapter describes the methodology used, the datasets that have informed the preliminary assessment, baseline conditions, mitigation measures and the preliminary cultural heritage residual significant effects that could result from the Proposed Project.

3.4.1.3 The draft Order Limits, which illustrate the boundary of the Proposed Project, are illustrated on **Figure 1.1.1 Draft Order Limits** and the Kent Onshore Scheme Boundary is illustrated on **Figure 1.1.3 Kent Onshore Scheme Boundary**.

3.4.1.4 This chapter should be read in conjunction with:

- **Volume 1, Part 1, Chapter 4: Description of the Proposed Project;**
- **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology;**
- **Volume 1, Part 1, Chapter 6: Scoping Opinion and EIA Consultation;**
- **Volume 1, Part 3, Chapter 1: Evolution of the Kent Onshore Scheme;** and
- **Volume 1, Part 3, Chapter 2: Landscape and Visual.**

3.4.1.5 This chapter is supported by the following figures:

- **Volume 3, Figure 3-4.1: Heritage assets within the 500 m study area;** and
- **Volume 3, Figure 3-4.2: Designated assets within the 2 km study area along with the ZTV data.**

3.4.1.6 This chapter is supported by the following appendices:

- **Volume 2, Part 1, Appendix 1.4.A: Outline Code of Construction Practice;**
- **Volume 2, Part 1, Appendix 1.4.F: Outline Schedule of Environmental Commitments and Mitigation Measures;** and
- **Volume 2, Part 3, Appendix 3.4.A: Cultural Heritage Gazetteers.**

3.4.2 Regulatory and Planning Context

3.4.2.1 This section sets out the legislation and planning policy that is relevant to the preliminary cultural heritage assessment. A full review of compliance with relevant national and local planning policy will be provided within the Planning Statement that will be submitted as part of the application for Development Consent.

3.4.2.2 Policy generally seeks to minimise cultural heritage effects from development and to avoid significant adverse effects.

Legislation

Ancient Monuments and Archaeological Area Act 1979

- 3.4.2.3 The Ancient Monument and Archaeological Areas Act (1979) ('the Act') is the central piece of legislation for the protection of the archaeological resource (Ref 3.4.1). The first section of the Act requires the Secretary of State for National Heritage to maintain a schedule of nationally important sites. For the purpose of the Act, a monument is defined as:

"a) any building, structure or work, whether above or below the surface of the land, and any cave or excavation;

b) any site comprising the remains of any such building, structure or work or of any cave or excavation; and

c) any site comprising, or comprising the remains of, any vehicle, vessel, aircraft or other moveable structure or part thereof which neither constitutes nor forms part of any work which is a monument as defined within paragraph a) above; d) and any machinery attached to a monument shall be regarded as part of the monument if it could not be detached without being dismantled' (Section 61 (7))."

- 3.4.2.4 The Act further defines an ancient monument as: *"any Scheduled Monument; and any other monument which in the opinion of the Secretary of State is of public interest by reason of the historic, architectural, traditional, artistic or archaeological interest attaching to it' (Section 61 (12))."*

- 3.4.2.5 A set of criteria, defined as survival/condition, period, rarity, fragility/vulnerability, diversity, documentation, group value and potential, assist in the decision-making process as to whether an asset is deemed of national importance and best managed by scheduling.

The Planning (Listed Buildings and Conservation Areas Act) 1990

- 3.4.2.6 The Act sets out the principal statutory provisions which must be considered in the determination of any application affecting either listed buildings or conservation areas (Ref 3.4.2).

- 3.4.2.7 Section 66 of the Act states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

- 3.4.2.8 Section 72 of the Act establishes that special attention be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

National Policy

National Policy Statements

- 3.4.2.9 National Policy Statements (NPSs) set out the primary policy tests against which the application for a Development Consent Order (DCO) for the Proposed Project would be considered. A review of the NPS was announced in the 2020 Energy white paper: Powering our net zero future. This review was to ensure the NPSs were brought up to

date to reflect the policies set out in the white paper. The below information reflects these updates currently under consultation. Table 3.4.1 and Table 3.4.2 below provides details of the elements of NPS for Energy (EN-1) (Ref 3.4.3) and NPS for Electricity Networks Infrastructure (EN-5) (Ref 3.4.4) that are relevant to this chapter, and how and where they are covered in the PEIR or will be covered within the Environmental Statement (ES).

Table 3.4.1 NPS EN-1 requirements relevant to cultural heritage

NPS EN-1 section	Where this is covered in the PEIR
<p>5.8.8 The applicant should provide a description of the <i>significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development’s impact.</i></p>	<p>An initial assessment of assets potentially affected by the Proposed Project has been undertaken, and how setting contributes to significance has been taken into account where appropriate (see Section 3.4.9 for initial assessment).</p> <p>The Kent Historic Environment Record (HER) was consulted as part of the PEIR process, and data collected was used in producing the initial baseline text (Section 3.4.7) and in preparing the preliminary impact assessment (Section 3.4.9).</p> <p>Stakeholder engagement has been undertaken with organisations including Historic England and Kent County Council (see Section 3.4.3).</p>
<p>5.8.9 <i>Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.</i></p>	<p>A desk-based assessment will be carried out and the results of this included in the ES. The scope of further evaluation will be agreed with consultees and the results will be included in the ES. The evaluation trenching will be informed by geophysical survey and the results of other remote sensing such as aerial photography and Light Detection and Ranging (LiDAR) survey.</p> <p>Visualisations will be produced to assist in the setting assessment where appropriate.</p>
<p>5.8.11-14 <i>Concerns decision making by the IPC in relation to heritage assets. It states that in</i></p>	<p>A preliminary assessment of effect on heritage assets, and</p>

NPS EN-1 section	Where this is covered in the PEIR
<p><i>determining applications great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Any harm or loss should require clear and convincing justification; substantial harm to or loss of a Grade II listed building, park or garden should be exceptional; substantial harm to or loss of designated heritage assets of the highest significance, should be wholly exceptional.</i></p>	<p>their setting has been undertaken. The preliminary assessment is based on the significance of the asset, as described in the baseline section of this chapter (Section 3.4.7). A full desk-based assessment will be carried out to support the ES, which will allow the Planning Inspectorate (PINS) to understand the degree of any loss or harm to assets.</p>
<p><i>5.8.15-18 Describes the balance to be made in the planning process: Any harm should be weighed against the wider benefits of the application, although the stringency of the test is scaled in relation to the degree of harm to the heritage significance of the asset and whether or not the asset is designated.</i></p>	<p>The results of this will be concluded as part of the heritage impacts assessment in the ES.</p> <p>The initial assessment is covered in the ‘Preliminary Assessment of Effects’ Section 3.4.9, while outline mitigation is covered in the ‘Mitigation’ Section 3.4.8.</p>
<p><i>5.8.19-22 States that the IPC should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.</i></p>	<p>A robust mitigation strategy will be discussed and agreed with stakeholders including Historic England and Kent County Councils part of the ES.</p> <p>Initial mitigation measures are covered in the ‘Mitigation’ Section 3.4.8.</p>
<p>The draft EN-1 specifically states that the applicant will be responsible for undertaking studies to assess the impacts of noise, vibration, light and indirect impacts on heritage assets.</p>	<p>The ES will include, where relevant to the Proposed Project, chapters to assess matters such as hydrology, air quality, noise, vibration and light. Where relevant these assessments will be referenced within the cultural heritage chapter and potential impacts to heritage assets included within the overall assessment of impact.</p>
<p>The draft EN-1 removes the presumption in favour of the conservation of designated assets. It also states that the Secretary of State should refuse consent unless it can be demonstrated</p>	<p>There are no scheduled monuments or designated heritage assets within the draft Order Limits. The Proposed</p>

NPS EN-1 section	Where this is covered in the PEIR
<p>that the substantial harm to or loss of significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:</p> <ul style="list-style-type: none"> • the nature of the heritage asset prevents all reasonable uses of the site; • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; • conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and • the harm or loss is outweighed by the benefit of bringing the site back into use. 	<p>Project design will ensure that no designated asset will be removed or rendered unviable. Any substantial harm to, or loss of an asset will be clearly set out in the ES.</p>
<p>While the current EN-1 acknowledges that impacts to non-designated assets should be considered by the IPC, the draft EN-1 explicitly states that the effect of an application on the significance of non-designated assets should be considered in determining the application.</p>	<p>Non-designated heritage assets are to be identified within the cultural heritage baseline of the ES, and their significance assessed including any contribution from setting. The cultural heritage chapter will identify potential likely significant effects on the significance of non-designated assets arising from the Proposed Project.</p>

Table 3.4.2 NPS EN-5 requirements relevant to cultural heritage

NPS EN-5 section	Where this is covered in the PEIR
<p><i>2.2.5... in formulating proposals for new electricity networks infrastructure, to “have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and ...do what [they] reasonably can to mitigate any effect which the proposals would have on the</i></p>	<p>Volume 1, Part 1, Chapter 3: Main Alternatives Considered presents the iterative process that commenced at Project inception. Environmental, engineering and economic considerations have influenced the optioneering</p>

NPS EN-5 section	Where this is covered in the PEIR
<i>natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.”</i>	<p>and design evolution process.</p> <p>The heritage value of assets, as well as the archaeological potential of the area will continue to be investigated through to the ES stage, with data collected included in the impact assessment of the ES. This will form a key element of the mitigation strategy.</p> <p>The initial assessment is covered in the ‘Preliminary Assessment of Effects’ Section 3.4.9, while outline mitigation is covered in the ‘Mitigation’ Section 3.4.8.</p>
<i>2.8.9... the environmental and archaeological consequences (undergrounding a 400kV line may mean disturbing a swathe of ground up to 40 metres across, which can disturb sensitive habitats, have an impact on soils and geology, and damage heritage assets, in many cases more than an overhead line would).</i>	<p>Potential physical impacts will be assessed fully as part of the ES, with a mitigation strategy developed in consultation with relevant heritage stakeholders. The initial assessment is covered in the ‘Preliminary Assessment of Effects’ Section 3.4.9, while outline mitigation is covered in the ‘Mitigation’ Section 3.4.8.</p>
<i>2.11.14 ... the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage sites, soil, geology, and, for a substantial time after construction, landscape and visual amenity.</i>	<p>The initial assessment is covered in the ‘Preliminary Assessment of Effects’ Section 3.4.9, while outline mitigation is covered in the ‘Mitigation’ Section 3.4.8.</p> <p>It should be noted that an overhead option would have the potential to result in great setting impacts on heritage assets.</p>
3.4.2.10	<p>There are no other new or materially different policy considerations for Cultural Heritage within the Draft EN-5 (Ref 3.4.6), when compared to the current EN-5 (Ref 3.4.4) .</p>

National Planning Policy Framework

- 3.4.2.11 The National Planning Policy Framework (NPPF) (Ref 3.4.7) has the potential to be considered important and relevant to the SoS' consideration of the Proposed Project. Table 3.4.3 below provides details of the elements of the NPPF that are relevant to this chapter, and how and where they are covered in the PEIR or will be covered within the ES.

Table 3.4.3 NPPF requirements relevant to cultural heritage

NPPF section	Where this is covered in the PEIR
<p><i>Section 16 of the NPPF deals specifically with the historic environment. Where changes are proposed, the NPPF sets out a clear framework to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance.</i></p>	<p>An initial assessment of heritage value, as well as the setting of assets, has been undertaken as part of the PEIR process (see Preliminary Assessment of Effects' Section 3.4.9). The full detailed impact assessment will form part of the ES.</p>
<p><i>The NPPF sets out the importance of being able to assess the significance of heritage assets that may be affected by a development. Significance is defined in Annex 2 of the NPPF as being the "value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic". Significance is not only derived from an asset's physical presence, but also from its setting. The setting of a heritage asset is defined in Annex 2 as "the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve".</i></p>	<p>An initial assessment of significance of heritage assets, as well as the setting of assets, has been undertaken as part of the PEIR process (Preliminary Assessment of Effects' Section 3.4.9). The full detailed impact assessment will form part of the ES.</p>
<p><i>Paragraph 194 of the NPPF states that in determining applications, 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 asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Similarly, paragraph 195 includes a requirement on local planning authorities, having assessed the particular significance of any heritage asset that may be affected by a proposal, to take this into account when considering the impact of a proposal on a heritage asset.</i></p>	<p>An initial assessment of significance, as well as the setting of assets, has been undertaken as part of the PEIR process (Preliminary Assessment of Effects' Section). The full detailed impact assessment will form part of the ES.</p>

NPPF section	Where this is covered in the PEIR
<p><i>Paragraphs 199 to 203 of the NPPF introduce the concept that heritage assets can be harmed or lost through alteration, destruction or development within their setting. This harm ranges from less than substantial through to substantial. With regard to designated assets, paragraph 199 states that great weight should be placed on its conservation, irrespective of whether any potential harm is considered to be substantial or less than substantial. The paragraph goes further to say that the more important the asset, the greater the weight should be on its conservation. In paragraph 200, a distinction is made in respect of those assets of the highest significance (e.g., scheduled monuments, Grade I and Grade II* listed buildings) where substantial harm to or loss should be wholly exceptional.</i></p>	<p>Based on the current design, there are no physical impacts predicted on designated assets. An initial assessment of likely significant effects has been undertaken as part of the PEIR process (Preliminary Assessment of Effects' Section). The methodology for establishing the significance of heritage assets and the magnitude of impacts is set out in Section 3.4.4. The full detailed impact assessment will form part of the ES.</p>
<p><i>Paragraph 201 states that in instances where development would cause substantial harm to or total loss of significance of a designated asset, consent should be refused unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss. Paragraph 202 says in instances where development would cause less than substantial harm to the significance of a designated asset, the harm should be weighed against the public benefits of the proposal to provide a balanced judgement.</i></p>	<p>Based on the current design, there are currently no situations where the Kent Onshore Scheme would result in substantial harm to a designated asset (see Preliminary Assessment of Effects' Section). The full detailed impact assessment will form part of the ES.</p>
<p><i>With regard to non-designated assets, paragraph 203 states that the effect of the application on the significance of the asset should be considered in determining the application. A balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</i></p>	<p>An initial assessment of significance, as well as the setting of assets, has been undertaken as part of the PEIR process (Preliminary Assessment of Effects' Section). The full detailed impact assessment will form part of the ES.</p>

National Planning Practice Guidance

- 3.4.2.12 The Planning Practice Guidance (PPG) (Ref 3.4.8) provides further advice and guidance that expands the policy outlined in the NPPF. It expands on terms such as 'significance' and its importance in decision making. The PPG clarifies that being able to properly assess the nature, extent and the importance of the significance of the heritage asset and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals (paragraph 008 Document Reference ID: 18a-008-20190723).

- 3.4.2.13 The PPG states that in relation to setting, a thorough assessment of the impact on setting needs to take in to account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it (paragraph 009 Document Reference ID: 18a-009-20190723). The setting of the heritage asset is also of importance and a thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which the proposed changes enhance or detract from that significance and the ability to appreciate it. The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which an asset is experienced in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.
- 3.4.2.14 Paragraph 013 of the PPG recognises that the contribution that setting makes to the significance of the heritage asset does not depend on there being public right or the ability to experience that setting. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change (Paragraph: 013 Document Reference ID: 18a-013-20190723 Revision date: 23 07 2019).
- 3.4.2.15 The PPG discusses how to assess if there is substantial harm. It states that what matters in assessing if a proposal causes substantial harm is the impact on the significance of the asset. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed (paragraph 017). Generally, harm to heritage assets can be avoided or minimised if proposals are based on a clear understanding of the heritage asset and its setting (paragraph 008 Document Reference ID: 18a-008-20190723). The NPPF indicates that the degree of harm should be considered alongside any public benefits that can be delivered by development. The PPG states that these benefits should flow from the Proposed Project and should be of a nature and scale to be of benefit to the public and not just a private benefit and would include securing the optimum viable use of an asset in support of its long-term conservation (paragraph 020 Document Reference ID: 18a-020-20190723).

Local Planning Policy

- 3.4.2.16 The Kent Onshore Scheme (refer to **Figure 1.1.3 Kent Onshore Scheme Boundary**) lies within the jurisdiction of Kent County Council. County and District planning policy and guidance which is relevant to a study of cultural heritage and has informed the assessment of preliminary effects in this chapter are as follows:
- Thanet Local Plan (Adopted 2020) (Ref 3.4.9);
 - Dover District Council Core Strategy (2010) (Ref 3.4.10); and
 - Draft Dover District Local Plan (Ref 3.4.11).
- 3.4.2.17 The Kent Onshore Scheme Boundary lies within the boundary of Thanet Local Plan (Ref 3.4.9) and Dover District Local Plan (Ref 3.4.10). Local Plan policies which are relevant to cultural heritage matters and will inform the cultural heritage assessment in the ES are detailed in Table 3.4.4 and Table 3.4.5.

Table 3.4.4 Local Planning Policies relevant to cultural heritage – Thanet Local Plan

Thanet Local Plan – Policy	Where this is covered in the PEIR
<p>SP36: Conservation and Enhancement of Thanet's Historic Environment</p> <p>This overarching policy notes the Council's commitment to support, value, and have regard for the historic environment through protecting sites, offering guidance relating to heritage, and supporting development where appropriate.</p>	<p>An initial assessment of significance, as well as the setting of assets, has been undertaken as part of the PEIR process (Preliminary Assessment of Effects' Section 3.4.9). The full detailed impact assessment will form part of the ES and will be informed through fieldwork and desk-based assessment.</p>
<p>HE01: Archaeology</p> <p>The policy recognises the need to protect and enhance the archaeological record through research and developer lead archaeology. It also notes the need to undertake adequate levels of heritage assessment and for works to be completed by a suitably qualified individual.</p>	<p>An initial assessment of significance, as well as the setting of assets, has been undertaken as part of the PEIR process (Preliminary Assessment of Effects' Section 3.4.9). The full detailed impact assessment will form part of the ES and will be informed through fieldwork and desk-based assessment.</p>
<p>HE02: Development in Conservation Areas</p> <p>The policy deals with the development within, and around, Conservation Areas.</p>	<p>There are no impacts on Conservation Areas predicted at the preliminary assessment stage, although potential impacts on Conservation Areas will continue to be considered as part of the assessment at the ES stage.</p>
<p>HE03: Heritage Assets</p> <p>The policy considers the need to preserve and enhance heritage assets, both designated and non-designated, where possible.</p>	<p>An initial assessment of significance, as well as the setting of assets, has been undertaken as part of the PEIR process (Preliminary Assessment of Effects' Section 3.4.9). The full detailed impact assessment will form part of the ES and will be informed through fieldwork and desk-based assessment. Where possible assets will be</p>

Thanet Local Plan – Policy	Where this is covered in the PEIR
HE04: Historic Parks and Gardens The policy sets out that proposals that affect historic parks and gardens will be assessed by reference to the scale of harm, both direct and indirect, or loss to the significance of the park or garden	preserved ' <i>in situ</i> ' while options to enhance assets will be examined as part of the ES. There are no Historic Parks and Gardens within the study area.
HE05: Works to a Heritage Asset to Address Climate Change This policy covers the need to improve the environmental performance of heritage assets.	No works to heritage assets to address climate change are planned as part of the Kent Onshore Scheme. Therefore, this policy is not applicable.

Table 3.4.5 Local Planning Policies relevant to cultural heritage – Dover District Local Plan

Draft Dover District Local Plan– Policy	Where this is covered in the PEIR
Strategic Policy 18: Protecting the District's Historic Environment Recognises that the heritage assets of the District are an irreplaceable resource and therefore should be conserved and enhanced in a manner appropriate to their significance.	Potential impacts, both direct and indirect, on designated and non-designated heritage assets are considered as part of the preliminary assessment. The initial assessment is covered in the 'Preliminary Assessment of Effects' Section 3.4.9. The full detailed impact assessment will form part of the ES and will be informed by fieldwork and desk-based assessment.
DM Policy 44: Designated and Non-designated Heritage Assets Overarching policy dealing with the protection of designated and non-designated assets, and potential impacts arising from development.	Potential impacts, both direct and indirect, on designated and non-designated assets are considered as part of the preliminary assessment. The initial assessment is covered in the 'Preliminary Assessment of Effects' Section 3.4.9. The full detailed impact assessment will form part of the ES and

Draft Dover District Local Plan– Policy	Where this is covered in the PEIR
<p>DM Policy 45: Conservation Areas The policy relates to development in and around Conservation Areas.</p>	<p>will be informed through fieldwork and desk-based assessment.</p> <p>There are no impacts on Conservation Areas predicted at the preliminary assessment stage, although potential impacts on Conservation Areas will continue to form part of the assessment at the ES stage.</p>
<p>DM Policy 46: Archaeology This overarching policy considers the need for the protection of designated and non-designated archaeological remains, and the management of potential impacts resulting from development.</p>	<p>Potential impacts, both direct and indirect, on designated and non-designated assets are considered as part of the preliminary assessment. The initial assessment is covered in the ‘Preliminary Assessment of Effects’ Section 3.4.9. The full detailed impact assessment will form part of the ES and will be informed through fieldwork and desk-based assessment.</p>
<p>DM Policy 47: Dover Western Heights</p>	<p>This policy is not applicable to the current assessment due to the distance of the Western Heights area from the Kent Onshore Scheme Boundary (the Western Heights area being approximately 22 km to the south).</p>
<p>DM Policy 48: Historic Parks and Gardens The policy covers the protection and enhancement of the character, fabric, features, and setting/views into and from Historic Parks and Gardens on the national list as well as those on the Kent Gardens Compendium.</p>	<p>There are no Historic Parks and Gardens within the study area.</p>

3.4.2.18 Additional planning guidance documents relevant to cultural heritage matters includes the Kent Heritage Conservation Strategy produced by Kent County Council (Ref 3.4.12). This includes five ‘Strategic Aims’ that focus on the management of the historic environment through working with developers and other partners to promote, conserve, and protect heritage assets (Strategic Aims 1-3), as well as become financially self-sustaining and help target the climate crisis (Strategic Aims 4 and 5).

3.4.3 Scoping Opinion and Consultation

Scoping

- 3.4.3.1 A Scoping Report (Ref 3.4.13) for the Proposed Project was issued to the Planning Inspectorate (PINS) on 24 October 2022 and a Scoping Opinion (Ref 3.4.14) was received from the Secretary of State (SoS) on 1 December 2022. Table 3.4.6 sets out the comments raised in the Scoping Opinion and how these have been addressed in this PEIR or will be addressed within the ES. The Scoping Opinion takes account of responses from prescribed consultees as appropriate.

Table 3.4.6 Comments raised in the Scoping Opinion

ID	Inspectorate's comments	Response
4.3.1	<p><i>[Physical impacts on non-designated assets (construction, maintenance and decommissioning)]</i></p> <p>The ES should clearly state the approach to non-designated assets encountered during construction, such as whether preservation in-situ is proposed, and confirm where non-designated assets have been preserved in situ. The ES should consider the potential for effects on non-designated assets during the maintenance and decommissioning stage, where likely significant effects could occur.</p>	<p>A programme of investigations, commencing with geophysical survey to be followed by evaluation trenching, will aim to identify previously unrecorded heritage assets and explore the potential to mitigate impacts through design (i.e., avoiding non-designated assets). Where assets cannot be avoided, a robust mitigation strategy will be developed in consultation with heritage stakeholders. This is likely to include, but not be limited to, archaeological excavation and recording.</p>
4.3.2	<p><i>[Temporary impacts on the setting of heritage assets resulting from plant/machinery (maintenance and decommissioning)]</i></p> <p>The Inspectorate agrees that significant setting effects on heritage assets arising from the presence of plant and machinery during the maintenance phase are unlikely. The ES should explain the likely number of machinery/plant required for decommissioning or the likely duration of decommissioning activities to demonstrate why such effects would not be significant.</p>	<p>Noted. This will be addressed in the ES when detailed information is available.</p>
4.3.3	<p><i>[Temporary impacts on the setting of heritage assets from construction]</i></p>	<p>Noted. This will be addressed in the ES when detailed information is available.</p>

ID	Inspectorate's comments	Response
	<p><i>compounds introducing light and noise pollution (decommissioning)]</i></p> <p>The Inspectorate agrees that significant setting effects on heritage assets arising from light and noise are unlikely. The ES should outline the mitigation measures required for decommissioning and the likely duration of decommissioning activities to demonstrate why such effects would not be significant.</p>	
4.3.4	<p><i>[Sources of construction impacts - groundwater, and assessment methodology]</i></p> <p>See also comments 3.3.6 and 3.3.7 above made in respect to the Suffolk Onshore Scheme, which equally apply to the Kent Onshore Scheme.</p> <p>[3.3.6 Sources of construction impacts - Groundwater - The ES should consider and assess effects to archaeological receptors resulting from impacts to groundwater levels from the Proposed Development, where likely significant effects could occur. The ES should include suitable cross-references between the Cultural Heritage and the Geology and Hydrogeology aspect chapter]</p> <p>[3.3.7 Proposed assessment methodology - The Inspectorate notes that the need for any additional survey work will be determined following the desk-based assessment (DBA). Investigative works should be accompanied by a Written Scheme of Investigation (WSI), it is recommended that a draft WSI by provided with the ES. The Applicant is advised to seek to agree the scope of the site investigations and WSI with relevant consultation bodies, including the Local Authority and Historic England.]</p>	<p>Ongoing consultation is being undertaken with stakeholders including Historic England, and discussions will be held with the authors of other assessments (Geology and Hydrogeology) as part of the baseline process to be undertaken at the ES stage, with potential effects assessed. This will also include discussions with the HE Science Advisor regarding issues such as the effects of changes in groundwater.</p> <p>The preparation of a draft WSI covering further archaeological works required will be undertaken as part of the ES process. The draft WSI will be prepared in consultation with heritage stakeholders including Historic England and Kent County Council.</p>
4.3.5	<p><i>[Heritage receptors – schedule monument]</i></p> <p>The ES should consider likely effects on the setting of the scheduled monument 'A Saxon Shore fort, Roman port and associated remains at Richborough'</p>	<p>A number of viewpoints have been agreed around the Richborough Fort complex through consultation with Historic England and Kent County Council to assess the impact of the Proposed</p>

ID	Inspectorate's comments	Response
	(1014642), where likely significant effects could occur. Although this scheduled monument is located beyond the 2km study area, the Inspectorate notes the settings assessment will be informed by the ZTV and the statement that some assets beyond the ZTV and 2km study area may also be considered. Cross-referencing to relevant information in the LVIA aspect chapter and/or supporting appendices should be included.	Project on the setting of the monument, as well as key views such as that from the monument to the potential Roman port on the north side of the Wantsum Channel. The ES will be informed by these viewpoints and impacts to the asset will be fully considered in the ES.
4.3.6	<i>[Impacts scoped in]</i> Table 3.4.6 does not include all of the impacts identified as scoped in within Tables 3.4.1, namely temporary impacts on the settings of designated assets during construction. For the avoidance of doubt, the ES should include an assessment of these effects.	Noted. This will be addressed in the ES when detailed information is available.
4.3.7	<i>[Wantsum Sea Channel]</i> Kent County Council (at Appendix 2 to this Opinion) have identified Wantsum Sea Channel as a heritage asset that should be included in the assessment but is not identified in Scoping Report Chapter 3.4 or in Appendix 3.4.A. The Applicant should seek to agree the heritage receptors to be included within the heritage assessment with relevant consultation bodies and include an assessment on this receptor where significant effects are likely to occur.	The Wantsum Channel, as well as associated features such as drainage works and defences, will be fully assessed in the ES, with an initial assessment included in the 'Preliminary Assessment of Effects' Section 3.4.9 of this chapter. Ongoing consultation is being undertaken with Kent County Council and Historic England as part of the assessment process.

3.4.3.2 The scope of the Cultural Heritage assessment remains as established in the Scoping Report.

Consultation and Project Engagement

3.4.3.3 Consultation has been undertaken with heritage stakeholders (including Historic England and Kent County Council) in the form of thematic group meetings as well as separate discussions to agree the archaeological scope of works associated with geotechnical Ground Investigation (GI) works linked to the engineering component of the Kent Onshore Scheme.

3.4.3.4 Initial consultation with the Kent County Archaeologist was undertaken to agree the locations of GI works, as well as agree the level of monitoring required. This was followed by further discussions regarding undertaking a level of monitoring of boreholes by a palaeo-archaeologist to help inform deposit modelling.

- 3.4.3.5 A joint site visit was also undertaken in January 2023 with both Historic England and the Kent County Archaeologist to discuss the Kent Onshore Scheme. This included visits to the landfall area, the area where the draft Order Limits will cross the A256/the Ebbsfleet Lane area, and the site of Richborough Castle (1363256/1014642). The meeting discussed the potential for physical impacts on buried remains, and the discovery of a possible early Roman landing site on the western side of Ebbsfleet Lane was noted by the County Archaeologist. As a result of this, it was agreed that the whole western field would be subject to geophysical survey in an attempt to define the limits of the Roman site and inform potential mitigation measures required to avoid physical impacts on the remains through design.
- 3.4.3.6 The meeting also included a discussion regarding potential impacts on the setting of heritage assets. This was followed up by email discussion in which it was agreed with Historic England and Kent County Council that the only designated asset where full visualisations would be required would be Richborough Castle and associated settlement. It was agreed that visualisations would be produced from a number of locations in and around the Roman Fort, as well as from near the amphitheatre site to the southwest. These will include views towards the Proposed Minster Converter Station as the fort may have been designed to have views to the potential Roman port on the north side of the Wantsum Channel.
- 3.4.3.7 Consultation with both, Kent County Council and Historic England continued with thematic group meetings designed to provide updates regarding progress on the Kent Onshore Scheme design, as well as on going works including the planned geophysical survey.

3.4.4 Approach and Methodology

- 3.4.4.1 **Part 1, Chapter 5, PEIR Approach and Methodology** sets out the overarching approach which has been used in developing the preliminary environmental information. This section describes the technical methods used to determine the baseline conditions, sensitivity of the receptors and magnitude of effects and sets out the significance criteria that have been used for the preliminary cultural heritage assessment.

Guidance Specific to the Cultural Heritage Assessment

- 3.4.4.2 The preliminary cultural heritage assessment has been carried out in accordance with various good practice guidance documents relevant to heritage.
- 3.4.4.3 Historic England has published a series of Good Practice Advice (GPA) of which those of most relevance to this appraisal are GPA2 – Managing Significance in Decision-taking (Ref 3.4.15) and GPA3 – The Setting of Heritage Assets (2nd Edition) (Ref 3.4.16).
- 3.4.4.4 GPA2 emphasises the importance of having a knowledge and understanding of the significance of heritage assets likely to be affected by the development and that the “*first step for all applicants is to understand the significance of any affected heritage asset and, if relevant the contribution of its setting to its significance*” (paragraph 4). Early knowledge of this information is also useful to a local planning authority in pre-application engagement with an applicant and ultimately in decision making (paragraph 7).

- 3.4.4.5 GPA3 provides advice on the setting of heritage assets. Setting is as defined in the NPPF and comprises the surroundings in which a heritage asset is experienced. Elements of a setting can make positive or negative contributions to the significance of an asset and affect the ways in which it is experienced. Historic England state that setting does not have a boundary and what comprises an asset's setting may change as the asset and its surrounding evolve. Setting can be extensive and particularly in urban areas or extensive landscapes can overlap with other assets. The contribution of setting to the significance of an asset is often expressed by reference to views and the GPA in paragraph 11 17lexibiles those views such as those that were designed or those that were intended, that contribute to understanding the significance of assets.
- 3.4.4.6 Historic England have also produced a number of 'Historic England Advice Notes' (HEANs) covering various planning topics. Most relevant are HEAN2 – Making Changes to Heritage Assets (Ref 3.4.17), and HEAN 12 – Statements of Heritage Significance (Ref 3.4.18).
- 3.4.4.7 The baseline study has been undertaken in accordance with guidance published by the Chartered Institute for Archaeologists (CifA), specifically the standard and guidance for historic environment desk-based assessment (Ref 3.4.19).
- 3.4.4.8 Consultation with relevant stakeholders will continue as required post submission of the PEIR.

Baseline Data Gathering and Forecasting Methods

- 3.4.4.9 The main datasets that have been utilised for the Cultural Heritage Assessment to date are the Historic England National Heritage List for England for designated assets, and the Kent HER for non-designated assets. Designated heritage assets are referenced with their National Heritage List for England reference number, and each asset has been cross-referenced to the gazetteer in **Volume 2, Part 3, Appendix 3.4.A: Cultural Heritage Gazetteers**, and their location is shown on **Figure 3-4-1: Heritage assets within the 500 m study area**. Non-designated assets are referenced using the Kent HER unique identifier number. These are pre-fixed with (MKE or MWX). Each non-designated asset has been cross-referenced to the gazetteer in **Volume 2, Part 3, Appendix 3.4.A: Cultural Heritage Gazetteers**, the locations of non-designated assets in relation to the Proposed Project are shown on **Figure 3-4-1: Heritage assets within the 500 m study area**.
- 3.4.4.10 The ES will be further informed by results of other data gathering exercises that are currently being undertaken or are proposed before the submission of the ES. These include a review of aerial photographs and LiDAR data, geophysical survey, archaeological walkover survey, documentary research (including a map regression exercise), and archaeological monitoring of Ground Investigation works. Site works to date have been limited due to land access being unavailable.

Assessment Criteria

Sensitivity

- 3.4.4.11 The sensitivity (value) of a heritage asset (its heritage value) is guided by its designated status but is derived also from its heritage interest which may be archaeological, architectural, artistic or historic (Ref 3.4.20). Each identified heritage asset can be assigned a value in accordance with the criteria set out in Table 3.4.7 which is based on the distinctions presented in NPPF (Ref 3.4.8). Using professional judgement and

the results of consultation with relevant stakeholders, heritage assets are also assessed on an individual basis and regional variations and individual qualities are taken into account where applicable. This includes aspects such as the regional scarcity of specific asset type, of whether assets can be considered to be of schedulable quality due to them being of national importance.

Table 3.4.7 Criteria for assessing the sensitivity (value) of heritage assets

Sensitivity (Value)	Asset categories
High	<p>World Heritage Sites. Scheduled Monuments. Grade I and II* listed buildings. Registered battlefields. Grade I and II* registered parks and gardens. Conservation areas of demonstrable high value. Non-designated heritage assets (archaeological sites, historic buildings, monuments, parks, gardens or landscapes) that can be shown to have demonstrable national or international importance. Well preserved historic landscape character areas, exhibiting considerable coherence, time-depth or other critical factor(s).</p>
Medium	<p>Grade II listed buildings. Conservation areas. Grade II registered parks and gardens. Non-designated heritage assets (archaeological sites, historic buildings, monuments, park, gardens or landscapes) that can be shown to have demonstrable regional importance. Averagely preserved historic landscape character areas, exhibiting reasonable coherence, time-depth or other critical factor(s). Historic townscapes with historic integrity in that the assets that constitute their make-up are clearly legible.</p>
Low	<p>Locally listed buildings Non-designated heritage assets (archaeological sites, historic buildings, monuments, park, gardens or landscapes) that can be shown to have demonstrable local importance.</p>

Sensitivity (Value)

Asset categories

	Historic landscape character areas whose value is limited by poor preservation and/ or poor survival of contextual associations.
	Assets identified on national or regional databases, but which have no archaeological, architectural, artistic or historic value.
Negligible	Assets whose values are compromised by poor preservation or survival of contextual associations to justify inclusion into a higher grade. Landscape with no or little significant historical merit.

Magnitude

- 3.4.4.12 Having identified the sensitivity (value) of the heritage asset, the next stage in the assessment is to identify the level and degree of impact to an asset arising from the Proposed Project. Impacts may arise during construction or operation, as well as from the maintenance and decommissioning phases, and can be temporary or permanent. Impacts can occur to the physical fabric of the asset or affect its setting.
- 3.4.4.13 The level and degree of impact (its magnitude) is assigned with reference to a four-point scale as set out in Table 3.4.8. In respect to cultural heritage, an assessment of the magnitude of impact is made in consideration of any Proposed Project mitigation measures (including embedded measures, control and management measures) If no impact on value is identified, no impact rating is given, and no resulting effect reported.

Table 3.4.8 Factors influencing the assessment of magnitude of impacts

Impact rating	Description of impact
Large	Changes such that the heritage value of the asset is totally altered or destroyed. Comprehensive change to elements of setting that would result in harm to the asset and our ability to understand and appreciate its heritage significance.
Medium	Change such that the heritage value of the asset is significantly altered or modified. Changes such that the setting of the asset is noticeably different, affecting significance and resulting in changes in our ability to understand and appreciate the heritage value of the asset.
Small	Changes such that the heritage value of the asset is slightly affected.

	Changes to the setting that have a slight impact on significance resulting in changes in our ability to understand and appreciate the heritage value of the asset.
Negligible	Changes to the asset that hardly affect heritage value. Changes to the setting of an asset that have little effect on significance and no real change in our ability to understand and appreciate the heritage value of the asset

Significance of effects

- 3.4.4.14 As set out in **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology** the general approach taken to determining the significance of effect in this preliminary assessment is only to state whether effects are likely or unlikely to be significant, rather than assigning significance levels.
- 3.4.4.15 Assessment of the significance of effect to known heritage assets takes into account the significance of the physical fabric as well as the contribution made by its setting. This is weighed against the impact on that significance, taking into account the scale that the identified impact matters when placing it within its national, regional or local context.
- 3.4.4.16 Assessment of the archaeological resources potential draws on three factors:
- An assessment of the potential for the survival of archaeological deposits within the site based on an evaluation of previous ground disturbance;
 - An assessment for the potential for archaeological deposits to exist within the site based on the results of the baseline study; and
 - An assessment of the significance of known and potential archaeological assets within the site, as well as within the defined study area.
- 3.4.4.17 The level of disturbance to buried archaeological remains caused by previous development has been assessed based on available data listed above, with particular attention paid to previous archaeological evaluations and excavations in the study area.
- 3.4.4.18 The potential for an area to contain archaeological remains is rated ‘high’, ‘medium’, ‘low’, ‘negligible’, or ‘unknown’. This rating is based on an understanding of the archaeological resource as a whole and its national, regional and local context. This includes the number, proximity and significance of known and predicted archaeological/historical sites or find spots within the Order Limits and its surrounding study area.
- 3.4.4.19 An assessment to classify the effect on heritage assets, having taken into consideration mitigation measures, is determined using the matrix at Table 3.4.9, which takes account of the value of the asset (Table 3.4.7) and the magnitude of impact (Table 3.4.8). Effects can be neutral, adverse or beneficial.

Table 3.4.9 Criteria for assessing the significance of heritage assets

Heritage sensitivity (value)	Magnitude of impact			
	Large	Medium	Small	Negligible
High	Major	Major	Moderate	Minor
Medium	Major	Moderate	Minor	Minor
Low	Moderate	Minor	Minor	Negligible
Negligible	Neutral	Neutral	Neutral	Neutral

3.4.4.20 The chapter reports on the significance of effect in accordance with **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology**. Major and moderate effects are considered to be significant. Within the NPPF, impacts affecting the value of heritage assets are considered in terms of harm and there is a requirement to determine whether the level of harm amounts to ‘substantial harm’ or ‘less than substantial harm’. There is no direct correlation between the significance of effect as reported in this preliminary assessment and the level of harm caused to heritage significance. A major (significant) effect on a heritage asset would, however, more often be the basis by which to determine that the level of harm to the significance of the asset would be substantial. A moderate (significant) effect is unlikely to meet the test of substantial harm and would therefore more often be the basis by which to determine that the level of harm to the significance of the asset would be less than substantial. A minor or negligible (not significant) effect would still amount to a less than substantial harm and would therefore still trigger the statutory presumptions against development within Section 66 of the Listed Buildings Act 1990; however, a neutral effect is classified as no harm. In all cases determining the level of harm to the significance of the asset arising from development is one of professional judgement.

Assumptions and Limitations

- 3.4.4.21 The preliminary assessment reported in this chapter has relied upon data and records provided by third parties, and therefore it has been assumed that this information is accurate and up to date at the time of reporting.
- 3.4.4.22 The assessment has been undertaken using the available design information for the Proposed Project and the maximum likely extents of land required for its construction, operation and maintenance (see Section 3.4.5).
- 3.4.4.23 Only limited areas of the draft Order Limits had been subject to archaeological walkover survey at the time of writing. Likewise, geophysical survey has not been undertaken but this is due to commence in Autumn 2023.

3.4.5 Basis of Assessment

3.4.5.1 This section sets out the assumptions that have been made in respect of design flexibility maintained within the Proposed Project and the consideration that has been given to alternative scenarios and the sensitivity of the preliminary assessment to changes in the construction commencement year.

- 3.4.5.2 Details of the available flexibility and assessment scenarios are presented in **Volume 1, Part 1, Chapter 4: Description of the Proposed Project** and **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology**.

Flexibility Assumptions

- 3.4.5.3 The main preliminary assessments have been undertaken based on the description of the Proposed Project provided in **Volume 1, Part 1, Chapter 4: Description of the Proposed Project**. To take account of the flexibility allowed in the Proposed Project, consideration has been given to the potential for preliminary effects to be of greater or different significance should any of the permanent or temporary infrastructure elements be moved within the Limits of Deviation (LoD) or draft order Limits.
- 3.4.5.4 The assumptions made regarding the use of flexibility for the assessment, and any alternatives assumptions are set out in Table 3.4.10 below. Should the flexibility assumptions alter the results of the preliminary assessment of effects, this has been noted within the preliminary assessment section (see Section 3.4.9).

Table 3.4.10 Flexibility Assumptions

Element of flexibility	Proposed Project assumption for initial preliminary assessment	Flexibility assumption considered
Lateral LoD HVDC cables	HVDC cables laid anywhere within the lateral LoD.	The maximum flexibility has been assessed under the preliminary assessment.
Lateral LoD Minster Converter Station and Substation	Minster converter station and substation to be constructed anywhere within the area suggested for the converter station and substation within the lateral LoD footprint.	The maximum flexibility has been assessed under the preliminary assessment.
Vertical LoD Minster Converter Station and Substation	26 m maximum vertical LoD for the proposed Minster Converter Station and 18 m maximum vertical LoD for the substation as explained in Volume 1, Part 1, Chapter 4: Description of the Proposed Project	The maximum flexibility has been assessed under the preliminary assessment.
Lateral LoD overhead line	Overhead line options built within the lateral LoD as shown in Figure 1.4.1 Lateral Limits of Deviation .	The maximum flexibility has been assessed under the preliminary assessment.
Vertical LoD overhead line	Assessed at the height shown in Volume 1, Part 1, Chapter 4: Description of the Proposed Project for the three HVAC options.	The assessment has considered the possible effects of pylons being 6 m above the heights shown in Volume 1, Part 1, Chapter 4: Description of the Proposed Project for each of the three HVAC options.

Consideration of Scenarios and Options

- 3.4.5.5 Two alternative scenarios have been considered within each of the technical assessment chapters in Part 3. These are:
- The use of either low height or standard height pylons for the HVAC connection. Within this scenario there are three options as explained in **Volume 1, Part 1, Chapter 4: Description of the Proposed Project**; and
 - Permanent access to Minster Converter Station and Substation is either taken off A256 (through bellmouth BM02) or off Jutes Lane through bellmouth BM03 but with bellmouth BM02 being retained for any abnormal indivisible load (AIL) movements during maintenance and operation as explained in **Volume 1, Part 1, Chapter 4: Description of the Proposed Project**.
- 3.4.5.6 Table 3.4.11 details where these scenarios are relevant to the preliminary cultural heritage assessment and how they have been assessed and reported in Section 3.4.9, preliminary assessment of effects. Should the consideration of the above scenarios and options alter the results of the preliminary assessment of effects, this has been noted within the preliminary assessment section (see Section 3.4.9).

Table 3.4.11 Consideration of Scenarios

Assessment scenario	How it has been considered within the preliminary assessment scenario
Pylon types	The potential impacts to cultural heritage resulting from pylons are considered to be largely on the setting of assets rather than physical due to the limited footprint of pylons. Variations in height and shape of pylons have been considered to see how the type of pylon used might increase/reduce potential impacts on setting. This has been considered as part of the preliminary assessment.
Permanent access to Minster Converter Station and Substation	The potential impacts to cultural heritage resulting from permanent access are considered to be largely physical as it is assumed the road will have a limited visual impact on the landscape and therefore have a limited impact on the setting of heritage assets. This has been considered as part of the preliminary assessment.

Sensitivity Test

- 3.4.5.7 It is likely that under the terms of the draft DCO, construction could commence in any year up to five years from the granting of the DCO which is assumed to be 2026. Consideration has been given to whether the preliminary effects reported would be any different if the works were to commence in any year up to year five. Where there is a difference, this is reported in Section 3.4.9, preliminary assessment of effects.

3.4.6 Study Area

- 3.4.6.1 The study area is the area within which cultural heritage assets may experience effects as a result of the Kent Onshore Scheme during construction, maintenance, operation

and decommissioning. Effects to heritage assets may arise as a result of physical impacts to their fabric or through changes to their setting.

- 3.4.6.2 For the purpose of this report, a 500m buffer was applied to the Kent Onshore Scheme Boundary (see **Figure 1.1.3 Kent Onshore Scheme Boundary**), which includes the proposed cable route and other associated works including the Minster Converter Station and Substation, as well as elements such as indicative locations for construction compounds and haul roads, as the study area to capture information relating to archaeology and cultural heritage. The extent of the proposed study area is the standard for these type of projects, and considered appropriate in this case, in order to provide the necessary context for establishing the cultural heritage baseline and identifying likely impacts and effects arising from the Kent Onshore Scheme.
- 3.4.6.3 A second wider study area of 2 km, as set out at scoping based on the ZTV and Zone of Influence (ZOI), was applied to the area around the Minster Converter Station and Substation, and Over Head Line (OHL) in order to provide an initial assessment of potential setting impacts on designated assets. This review of assets was undertaken alongside a review of the ZTV produced for the Kent Onshore Scheme, as well as consultation with stakeholders (see **Figure 3-4-2: Designated assets within the 2 km study area along with the ZTV data**).

3.4.7 Baseline Conditions

- 3.4.7.1 The cultural heritage baseline described in this section has been informed by the following data sources (see **Figure 3-4-1: Heritage assets within the 500 m study area** and **Volume 2, Part 3, Appendix 3.4.A: Cultural Heritage Gazetteers** for a list of all assets within the 500m study area):
- National Heritage List for England dataset (NHLE);
 - Kent Historic Environment Record (HER);
 - Data collected as part of other schemes in the area including published data from the Kent East Access excavations (Ref 3.4.21); and
 - Other readily available online sources.
- 3.4.7.2 A review of aerial photographic and LiDAR data (including National Mapping Project data) will be undertaken, as well as geophysical survey of the draft Order Limits. This information, as well as that gathered from a review of historic mapping and walkover survey, as well as archaeological monitoring of Ground Investigation (GI) works and evaluation trenching, will form part of the detailed desk-based assessment which will form part of the ES.
- 3.4.7.3 A total of ten designated assets were recorded within the 500m study area. Nine of which are listed buildings, with the remaining asset being a scheduled monument.
- 3.4.7.4 The Scheduled Monument is Richborough (SM1014642), which consists of a Saxon shore fort, Roman port and other associated remains dating from the Iron Age through to the medieval period located in an elevated position to the south of the Kent Onshore Scheme.
- 3.4.7.5 The listed buildings are all Grade II listed, with most dating to the post-medieval period. The majority are farmhouses and associated agricultural buildings and include a small grouping on Castle Road to the south of the Kent Onshore Scheme (LB1045868; LB1070222; LB1045842), with a second small grouping at the north end of Ebbsfleet

Lane at Sevenscore House (LB1266813; LB1266833; LB1224327). The only modern listed building is a collection of military defensive structures dating to the Second World War located on the coast to the southeast of the Kent Onshore Scheme (LB1413803).

- 3.4.7.6 A total of 427 non-designated heritage assets were recorded within the study area on the Kent HER (see **Volume 2, Part 3, Appendix 3.4.A: Cultural Heritage Gazetteers**). The earliest activity found within the study area is Mesolithic flint tools found at Ebbsfleet Farm (MKE91894), the large quantity of flint found possibly indicating a working area for flint tool production. Neolithic flint tools, axes and discreet features were also recorded Ebbsfleet Farm Cottages (MKE91892), (MKE91894), (MKE91895), (MKE91896) and (MKE918998). Neolithic activity is seen elsewhere at Oaklands Nursery (MKE78368) and a horseshoe-shaped monument is recorded in Ebbsfleet (MKE91855). Changes in sea level, as well as the reclamation of the land, has altered the coastline in the study area, meaning there is potential for former coastal areas/palaeoenvironmental remains to survive buried under the current land surface. The line of the Wantsum Channel falls within the study area, and there is potential for evidence dating from the prehistoric period onwards to survive along the course of this former navigable channel.
- 3.4.7.7 Non-designated assets of Bronze Age date include chance finds of pottery and coins, settlement activity, field systems and round barrows. Bronze Age activity has been recorded at multi-period sites such as Ebbsfleet Farm Cottages (MKE91899). Extensive evidence for activity has been identified during developer-led excavations over the last 15 years, including the East Kent Access Scheme, part of which included the construction of the A256 which crosses the study area between Cliffs End and Richborough Port (Ref 3.4.21). Records dating to the Bronze Age include a well with possible wattle lining (MKE91914).
- 3.4.7.8 The majority of assets dating to the Iron Age period are chance finds of copper alloy coins, with evidence of field systems and settlement activity across the study area. Evidence from this period is focused particularly on the later phase of the period leading into the transition into the Roman period. Settlement evidence across the study area increased in this period into the Roman period, with many enclosure ditches for settlements, individual buildings, and field systems recorded. Occupation continued into the Roman period, which is particularly visible at the Scheduled Monument of Richborough (1014642).
- 3.4.7.9 The Roman period is well represented within the Kent HER non-designated assets, with the majority of assets recorded as coins of varying metals. As well as chance finds of coins, field systems, pottery and tile, roads, settlement activity and funerary activity has also been recorded within the study area. Continuity of settlement (MKE77052) is also seen again during this period at the Scheduled Monument of Richborough (1014642).
- 3.4.7.10 In addition to the data covered by the HER, consultation with the Kent County Archaeologist highlighted significant early Roman remains that had been discovered immediately north of Ebbsfleet Farm on the north bank of the former Wantsum Channel. Initial geophysical survey, and some limited test pitting, has suggested that the remains identified may be the site of an early Roman port, and possibly the location of the Caesars invasion in 54 BC.
- 3.4.7.11 Evidence of early medieval activity is limited to sporadic chance finds, settlement activity and farmsteads. Settlement activity is recorded within the scheduled Richborough Castle, sunken floored buildings (MKE91916) excavated as part of the East Kent Access Route and a possible farmstead. Other activity from the period

includes a Saxon landing site in Ebbsfleet (MKE8057) and a reputed site of St Augustine's Oak (MKE91780).

- 3.4.7.12 The majority of medieval period non-designated heritage assets within the study area are associated with agriculture, including evidence of farmsteads, farm buildings, field boundaries and ridge and furrow. Chance finds are also recorded, such as a lead weight (MKE73974) and copper alloy mace (MKE74068). Sea defences (MKE8053) and water management systems (MWX43344) have also been recorded within the study area.
- 3.4.7.13 Post medieval non-designated assets from the study area are largely made up of built heritage assets, including farms, houses and churches, many of which are designated as listed buildings. Other evidence includes agricultural buildings and practises, land division and earthworks. Earthworks recorded include the Boarded Groin land reclamation earthwork (MKE91826).
- 3.4.7.14 Assets from the modern period are overwhelmingly related to the defence of the area during World War II, with home defences such as pillboxes, coastal batteries and anti-tank and anti-aircraft defences recorded in large numbers. Buildings, or the sites of buildings, from this period also include hospitals, stores and military depots. Evidence of aerial attack in the area includes bomb craters. Modern sites not related to World War II include a light railway and other industrial activities.

Future Baseline

- 3.4.7.15 This section considers those changes to the baseline conditions described above that might occur during the time period over which the Proposed Project will be in place, or changes that might occur in the absence of the Proposed Project being constructed.
- 3.4.7.16 Changes to buried archaeological assets, as well as built heritage, which might occur during the lifespan of the Proposed Development or in the absence of the Proposed Project are minimal. They would be limited to typical taphonomic (i.e., erosion, degradation, corrosion, etc.) processes on buried archaeological assemblages, as well as buildings and structures. This would be unlikely to significantly alter the current baseline scenario.

3.4.8 Mitigation

- 3.4.8.1 As set out in **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology**, mitigation measures typically fall into one of the three categories: embedded measures; control and management measures; and mitigation measures.

Embedded Measures

- 3.4.8.2 Embedded measures have been integral in reducing the cultural heritage effects of the Proposed Project. Measures that have been incorporated are:
- Sensitive routing and siting of infrastructure and temporary works; and
 - Commitments made within **Volume 2, Part 1, Appendix 1.4.F Outline Schedule of Environmental Commitments and Mitigation Measures**.

Control and Management Measures

3.4.8.3 The following measures have been included within **Volume 2, Part 1, Appendix 1.4.A: Outline Code of Construction Practice** relevant to the control and management of impacts that could affect cultural heritage receptors:

- H01 – Locations of known archaeological interest/value, or areas where archaeological work is planned, will be signposted/fenced off to avoid unintentional damage.
- H02 – Where a previously unknown heritage asset is discovered, or a known heritage asset proves to be more significant than foreseen at the time of application, the Proposed Project Team will inform the relevant local planning authority and will agree a solution that protects the significance of the new discovery, so far as is practicable, within the Proposed Project parameters.
- H03 – Archaeological excavation, recording, and publication to be undertaken where archaeological features cannot be avoided. Scope of works to be agreed with heritage stakeholders (including the relevant County Archaeologist) prior to works commencing in the relevant area and agreed in the mitigation strategy/site specific WSI.
- H04 – Archaeological Strip, Map, and Record, to be undertaken in pre-agreed areas of archaeological potential/features. Scope of works to be agreed with heritage stakeholders (including the relevant County Archaeologist) prior to works in the relevant area commencing and agreed in the mitigation strategy/site specific WSI.
- H05 – Archaeological Watching Brief to be undertaken in pre-agreed areas of archaeological potential/features. Scope of works to be agreed with heritage stakeholders (including the relevant County Archaeologist) prior to works commencing in the relevant area and agreed in the mitigation strategy/site specific WSI.
- H06 – Palaeo-environmental modelling/profiling in areas of potential. Scope of works to be agreed with heritage stakeholders (including the relevant County Archaeologist) prior to works commencing and agreed in the mitigation strategy/site specific WSI.

Mitigation Measures

3.4.8.4 Mitigation measures are additional topic and site-specific measures that have been applied to mitigate or offset any likely significant effects. Mitigation measures included that are relevant to cultural heritage receptors are:

- The use of planting or other screening to remove or reduce potential impacts on the setting of heritage assets (see **Figure 1.4.13 Minster 400kV Substation and Minster Converter Station Indicative Landscaping Strategy**).

3.4.9 Preliminary Assessment of Effects

Construction Phase

3.4.9.1 The preliminary assessment of the effects of the Kent Onshore Scheme described in this section considers the embedded, control and management and mitigation measures described in Section 3.4.8.

- 3.4.9.2 Potential impacts identified during the construction phase include direct physical impacts on heritage assets within the Kent Onshore Scheme boundary resulting from construction works, as well as temporary impacts to the setting of assets resulting from elements such as machinery, light and noise pollution.
- 3.4.9.3 Due to the limited data currently available relating to aspects such as traffic modelling, machinery, and lighting, the preliminary assessment is limited to direct physical impacts resulting from construction and operational phases. Temporary impacts resulting from construction will be fully considered as part of the ES.
- 3.4.9.4 It is assumed, for the purpose of this preliminary assessment, that there will be no additional permanent impacts on heritage assets during decommissioning activities. It is assumed that decommissioning will be undertaken within the same footprint used during construction and therefore any impact to buried heritage assets would have occurred, and have been mitigated, at the construction phase. An updated impact assessment will be undertaken for the ES when more detailed design information is available.
- 3.4.9.5 A total of 105 non-designated assets on the Kent HER were recorded as falling wholly or partially within the Kent Onshore Scheme and therefore have the potential to be physically impacted. These include several features near the landfall which the Kent Onshore Scheme will not impact due to the commitment to use a trenchless technique at this location as described in **Part 1, Chapter 4 Description of the Proposed Project (MWX43173; MWX43182; MWX43183; MWX43185; MWX43189; MWX43191; MWX43192; MWX43387; MKE15875; MKE39400; MKE76084; MKE89564; MKE91825)**, and as a result these have not been included in the preliminary assessment of cultural heritage effects as no impacts are predicted.
- 3.4.9.6 A total of 40 findspots, mainly coins, were also recorded within the Kent Onshore Scheme Boundary (**MKE10031-MKE10037; MKE114034; MKE15874; MKE73930-MKE73937; MKE73946-MKE73950; MKE74042; MKE74167-74176; MKE74179; MKE74181; MKE74273; MKE74278; MKE74287; MKE74288; MKE74401; MKE74416-MKE74423; MKE97070; MKE91895**). The location of these finds will be cross referenced against other information such as geophysical survey data when considering and assessing the archaeological potential of the landscape within the Kent Onshore Scheme at the ES stage. However, the find spots have not been included in the current assessment as they represent items that have been recovered and no longer remain *in situ*.
- 3.4.9.7 The operational Deal Branch Railway (**MKE56550**) will also not be impacted by the Kent Onshore Scheme. The main works linked to the Kent Onshore Scheme in this area will be an OHL, while existing line crossings will be used for other works removing the potential for physical impacts, and as such this has also been removed the current assessment.
- 3.4.9.8 The remaining non-designated assets within the Kent Onshore Scheme have been assessed individually or grouped where appropriate (i.e. where multiple assets are assumed to form part of one larger site/complex, or where different assets in a single field/location are of the same type/form/character, and the level of impact is deemed to be the same for all).
- 3.4.9.9 The preliminary cultural heritage assessment of physical effects of the Kent Onshore Scheme during the construction is presented in the following tables.

3.4.9.10 Table 3.4.12 to Table 3.4.23 presents the preliminary assessment of direct physical impacts on non-designated heritage assets resulting from the construction of the Kent Onshore Scheme.

Table 3.4.12 Preliminary assessment of direct physical impacts on non-designated assets straddling the A256 during construction

Preliminary assessment	
Receptor	Multi-period settlement site straddling the A256, and recorded through previous excavation, geophysical survey, and cropmark evidence. Assets have been grouped, and features that have been removed through excavations as part of previous schemes have been included as they are likely to continue into the current work areas (MKE8106; MKE8113; MKE8114; MKE8115; MKE8118; MKE15864; MKE21077; MKE91795; MKE91815; MKE91838; MKE91899; MKE91910; MKE91911; MKE91912; MKE97608; MKE97609; MKE97610)
Potential impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Medium: The remains are considered to have archaeological value for the information they could hold regarding settlement and land use from the prehistoric period onwards. These remains are non-designated and of a type common in the southeast and are therefore considered to be of regional significance.
Preliminary magnitude	Small: It is assumed that physical impacts resulting from the cable corridor and associated haul road will be limited to a small percentage of the total area of archaeological remains, as currently understood/mapping on the HER dataset.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Moderate Confidence, based on current design information and the understanding of the extents/value of the archaeological remains.

Table 3.4.13 Preliminary assessment of direct physical impacts during construction on non-designated assets near Ebbsfleet Farm

Preliminary assessment	
Receptor	Prehistoric (largely Bronze Age) activity to the south of Ebbsfleet Farm, and west of the A256. Some previous excavation, geophysical survey, and cropmark evidence. Assets have been grouped, and features that have been removed through excavations as part of previous schemes have been included as they are likely to continue into the current work areas (MKE78431; MKE91866; MKE97458).
Potential impact	Limited loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Medium: The remains are considered to have archaeological value for the information they could hold regarding settlement and land use from the prehistoric period onwards. These remains are non-designated and are assumed to be of regional significance.
Preliminary magnitude	Small: It is assumed that physical impacts resulting from the cable corridor and associated haul road will be limited to a small percentage of the total area of archaeological remains as currently understood.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Moderate Confidence, based on current design information and the understanding of the extents/value of the archaeological remains.

Table 3.4.14 Preliminary assessment of direct physical impacts during construction on non-designated (possible Roman port) near Ebbsfleet Farm.

Preliminary assessment	
Receptor	Roman site north of Ebbsfleet Farm and Wood (AECOM Kent 001)
Potential impact	Loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05

Preliminary assessment	
Preliminary sensitivity	High: The remains are considered to have archaeological value for the information they could hold regarding settlement and land use from the Roman period. These remains are non-designated, however, consultation with stakeholders has identified that these remains are considered to be of national significance.
Preliminary magnitude	Small: It is assumed that physical impacts resulting from the cable corridor and associated haul road will be limited to a small percentage of the total area of archaeological remains.
Preliminary likely significance of effect	Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Moderate Confidence, based on current design information and the understanding of the extents/value of the archaeological remains.

Table 3.4.15 Preliminary assessment of direct physical impacts during construction on non-designated assets at Weatherlees Hill

Preliminary assessment	
Receptor	Undated burials at Weatherlees Hill (MKE15873)
Potential impact	Limited loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Negligible: It is assumed the assets have been removed as their original presence is based on antiquarian accounts.
Preliminary magnitude	Small: Any works should be limited and only remove a limited area of the remains linked to this asset, if any remains actually survive.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 3.4.16 Preliminary assessment of direct physical impacts during construction on non-designated cropmarks

Preliminary assessment	
Receptor	Cropmark features record on historic aerial photography (MKE91810)
Potential impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The remains are considered to have some archaeological value for the information they could hold regarding settlement and land use from the prehistoric period onwards. These remains are non-designated and are assumed to be of local significance. They may also have been damaged by late 20 th century agriculture as they do not appear on later aerial photographs.
Preliminary magnitude	Small: It is assumed that physical impacts resulting from the cable corridor and associated works such as the haul road will be limited to a small percentage of the total area of archaeological remains, as currently mapped on the HER.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 3.4.17 Preliminary assessment of direct physical impacts during construction on the non-designated site of Richborough Port and sidings

Preliminary assessment	
Receptor	Former site Richborough Port and siding (MWX43282; MWX43487)
Potential impact	Limited loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The remains are considered to have some archaeological value for the information they could hold regarding settlement and land use during the 20 th century. These remains are non-designated and are assumed to be of local significance.

Preliminary assessment	
Preliminary magnitude	Small: It is assumed that physical impacts resulting from the cable corridor and associated works such as the haul road will be limited to a small percentage of the total area of archaeological remains as currently understood to exist based on historic mapping.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 3.4.18 Preliminary assessment of direct physical impacts during construction on non-designated ditches and banks in Minster Marshes

Preliminary assessment	
Receptor	Drainage ditches and banks either side of the River Stour in the Minster Marshes. The dating of most features is uncertain, but most are post-medieval with extensive alteration in the Second World War (MWX43337; MWX43342; MWX43343; MWX43344; MWX43368; MWX43369; MWX43371; MWX43373)
Potential impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Medium: The remains are considered to have some archaeological value for the information they could hold regarding settlement, land use, and drainage of the landscape from the medieval/post-medieval period onwards. These remains are non-designated and are assumed to be of regional significance.
Preliminary magnitude	Small: It is assumed that physical impacts resulting from the cable corridor and associated works such as the haul road will be limited to a small percentage/area of the total area of archaeological remains as understood to exist based on the HER mapping and aerial photography.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 3.4.19: Preliminary assessment of direct physical impacts during construction on non-designated sea defences possibly dating to the medieval period

Preliminary assessment	
Receptor	Abbots Walls, medieval sea defences (MKE76083)
Potential impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Medium: The remains are considered to have some archaeological value for the information they could hold regarding settlement, land use, and drainage of the landscape from the medieval/post-medieval period onwards. These remains are non-designated and are assumed to be of regional significance.
Preliminary magnitude	Small: It is assumed that physical impacts resulting from the cable corridor and associated works such as the haul road will be limited to a small percentage/area of the total area of archaeological remains, based on their extent as mapped on the HER.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 3.4.20: Preliminary assessment of direct physical impacts during construction on a non-designated possible Second World War stop-line

Preliminary assessment	
Receptor	Possible Second World War stop-line (MWX43372)
Potential impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The remains are considered to have some archaeological value for the information they could hold regarding the wartime defence of the area. These remains are non-designated and are assumed to be of local significance as it is not clear if these features are actually part of a stop-line.
Preliminary magnitude	Small: It is assumed that physical impacts resulting from the cable corridor and associated works such as the

Preliminary assessment	
	haul road will be limited to a small percentage/area of the total area of archaeological remains, based on their extent as mapped on the HER.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 3.4.21: Preliminary assessment of direct physical impacts during construction on a number of non-designated haystack stances

Preliminary assessment	
Receptor	Haystack stance located at a number of locations in the Minster Marshes/Ash Levels (MWX43335; MWX43359; MWX43360; MWX43376; MWX43377; MWX43381)
Potential impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The remains are considered to have some archaeological value for the information they could hold regarding agricultural land use and practices in the area, in the post-medieval period. These remains are non-designated and are assumed to be of local significance.
Preliminary magnitude	Small: It is assumed that physical impacts resulting from works such as the haul road will be limited to a small area of the features if they cannot be avoided through micro-siting.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 3.4.22: Preliminary assessment of direct physical impacts during construction on a possible non-designated bomb craters

Preliminary assessment	
Receptor	Second World War bomb craters (MWX43374)
Potential impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction

Preliminary assessment	
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The feature is considered to have some archaeological value for the information it could hold regarding wartime activity in the area. It is non-designated and assumed to be of local significance as it is a type of feature common in the area.
Preliminary magnitude	Small: It is assumed that physical impacts resulting from works such as the haul road will be limited to a small area of the features if they cannot be avoided through micro-siting.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 3.4.23: Preliminary assessment of direct physical impacts during construction on the former Wantsum Channel

Preliminary assessment	
Receptor	Wantsum Channel (AECOM Kent 002)
Potential impact	Partial loss of archaeological remains/environmental deposits during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05, H06
Preliminary sensitivity	Medium: The feature is considered to have archaeological value for the information it could hold regarding the settlement activity and the development of the landscape. Environmental deposits may also hold information relating to changes in environmental conditions. It is assumed to be of regional significance.
Preliminary magnitude	Small: It is assumed that physical impacts resulting from the cable corridor and associated works such as the haul road will be limited to a very limited area of this large feature, based on the current knowledge of the assets overall size.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted

Preliminary assessment

Confidence in prediction Moderate Confidence: Might alter based on the results of GI works and other intrusive survey data.

3.4.9.11 There is the potential for previously unrecorded archaeological remains to survive throughout the area encompassed by the Kent Onshore Scheme Boundary. Based on current knowledge (i.e., the known archaeology of the area) these are considered to be largely of local and regional sensitivity (low or medium value). A full assessment of unrecorded archaeological remains will be undertaken for the ES.

Operation and Maintenance Phase

3.4.9.12 The preliminary assessment of the operational effects of the Kent Onshore Scheme on the setting of heritage assets has also been considered, and this is presented in the following tables.

Designated assets within 2 km of the proposed above ground infrastructure were reviewed in combination with ZTV data produced for the Proposed Project (see **Figure 3-4-2: Designated assets within the 2 km study area along with the ZTV data** and **Appendix 3.4.A Cultural Heritage Gazetteer**). This review examined how the setting of an asset contributed to its heritage value and included if there were any key views of or towards the asset that contributed to its value.

3.4.9.13 Only a limited number of designated assets were recorded within the 2 km study area used for the above ground elements of the Kent Onshore Scheme. Most of these were Grade II listed buildings, and the majority were located in the historic core of Minster located to the northwest of the Converter Station. All listed buildings were scoped out of the preliminary assessment after discussions with Historic England and Kent County Council as they were found to fall outside of the ZTV, they were screened or had limited views, or their setting did not contribute to significance. These included the assets within the historic core of Minster, as well as a small number of listed buildings in Cliffsend to the northeast.

3.4.9.14 Consultation with stakeholders, including Historic England and Kent County Council, identified that there was the potential for impacts on the Roman site of Richborough Castle and associated settlement (SM1014642/LB1363256). The scheduled monument occupied a prominent position in an elevated location on the south side of the Wantsum Channel. Furthermore, it is possible that the fort was designed to be intervisible with the potential Roman port on the north side of the Wantsum Channel.

3.4.9.15 Table 3.4.24 provides the preliminary assessment of impacts on the setting of Richborough Castle (SM1014642/LB1363256).

Table 3.4.24: Preliminary assessment of impacts on the setting of Richborough Castle

Preliminary assessment	
Receptor	Richborough Castle Scheduled Monument and Grade I listed building (SM1014642/LB1363256)
Potential Impact	Impact to the setting of the monument
Proposed Project phase	Operation

Preliminary assessment	
Duration	Long term
Mitigation	See embedded measures described in Section 3.4.8
Preliminary sensitivity	High: The site is considered to have archaeological value for the information it could hold regarding Roman activity in the area, as well as architectural and historical significance linked to the well-preserved Roman Fort. It is designated asset of national importance. The fort was also constructed in a prominent location on a spur of higher ground overlooking the Wantsum Channel and was potentially designed to have views to a possible Roman port on the north side of the Wantsum Channel. As such, its setting also contributes to its value.
Preliminary magnitude	Small: While there is the potential for views of the proposed converter station from parts of the Fort and scheduled area, the views should be limited no matter where placed within the LoD as a result of the distance and tree/vegetation cover. Furthermore, the proposed converter station would not sever any potential view that may have existed between the fort and the potential Roman port at Ebbsfleet Farm or diminish the dominance of the Fort in the landscape. This includes views of the fort from the scheduled town and amphitheatre to the south.
Preliminary likely significance of effect	Not Significant
Confidence in prediction	High

3.4.10 Summary

- 3.4.10.1 The preliminary assessment of likely significant effects resulting from the Kent Onshore Scheme assessed the potential for direct physical impacts and impacts on the setting of both designated and non-designated assets resulting from the construction and operational phases of the Kent Onshore Scheme.
- 3.4.10.2 In most cases it is predicted that careful design should result in most heritage assets being avoided, or only limited areas of large archaeological sites being impacted, with standard mitigation such as archaeological excavation and recording mitigating impacts. There is the potential for a significant impact on the possible Roman port at Ebbsfleet Farm (**AECOM001**). The magnitude of any impact on this asset will be confirmed once geophysical survey has been undertaken to determine the extent of the site, and the potential for implementation of further mitigation measures has been considered.
- 3.4.10.3 While there is the potential for there to be views of the converter station from Roman Richborough Castle and associated settlement (**1014642/1363256**), these views are not expected to result in a significant impact to the monument through changes to its setting.

3.4.11 References

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- Ref 3.4.2 Planning (Listed Buildings and Conservation Areas) Act 1990. 1990 c. 9. <http://www.legislation.gov.uk/ukpga/1990/9/contents>
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- Ref 3.4.5 Department of Energy & Climate Change (2021) *Draft Overarching National Policy Statement for Energy (EN-1)*, London, TSO.
- Ref 3.4.6 Department of Energy & Climate Change (2021) *Draft National Statement for Electricity Networks Infrastructure (EN-5)*, London, TSO.
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- Ref 3.4.9 Thanet District Council (2020) *Thanet District Council Local Plan*,
- Ref 3.4.10 Dover District Council (2010) *Dover District Council Local Development Framework: Core Strategy*,
- Ref 3.4.11 Dover District Council (2022) *Dover District Local Plan to 2040*,
- Ref 3.4.12 Kent County Council (2022) *Kent Heritage Conservation Strategy*,
- Ref 3.4.13 AECOM (2022) *SCOPING REPORT, unpublished report for National Grid*.
- Ref 3.4.14 AECOM (2022) *Scoping response, unpublished report for National Grid*.
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- Ref 3.4.19 Chartered Institute for Archaeologists (2020) *Standard and Guidance for Historic Environment Desk-Based Assessment*, Reading: Chartered Institute for Archaeologists.
- Ref 3.4.20 Department for Levelling Up, Housing, and Communities (2021) *National Planning Policy Framework* [online] Available at [National Planning Policy Framework - Annex 2: Glossary - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/98281/nppf-2021.pdf) [accessed 28th June 2023].

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