



Topic Paper:
Historic Environment

Regulation 18 Consultation on the Draft Local Plan
December **2020**



Dover District **Local Plan**
Supporting document



1. Introduction

- 1.1 In 2018 Dover District Council started work on a Local Plan Review. The new Local Plan 2040 aims to be aspirational and deliverable, with clear, unambiguous policies. It will provide a positive vision for the future and will address the housing needs and economic, social and environmental priorities of the district covering the period to 2040.
- 1.2 Preparation work has been undertaken in accordance with the requirements of the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment Directive (European Directive 2001/42/EC as transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive), the National Planning Policy Framework (NPPF) 2019, National Planning Practice Guidance and the local context and evidence base. The Planning Advisory Service (PAS) Local Plan Route Mapper Toolkit 2019 has provided useful guidance throughout.
- 1.3 In order to inform the Local Plan Review process, which includes a review of existing local plan policies, an extensive programme of stakeholder engagement has been undertaken. At the start of the review process a series of workshops was organised to gather initial thoughts on a vision, objectives and policies for the District and to re-examine the Council's land allocation process. The focus of these workshops was on a fully participative process with a wide-ranging group of invited stakeholders. One of the key overarching aspirations that came out of such early consultation exercises was a desire for a more streamlined Local Plan, with, for example, supporting text in the document kept to a minimum. As a result it was decided that much of the background evidence and other contextual information which support the policies within the Plan will be set out in a series of Topic Papers. This evidence will then be summarised succinctly in the text of the Plan itself. In this way the Local Plan 2040 will be easy to use and accessible to all users of the planning system in the district.
- 1.4 This Topic Paper is one in a series that set out the policy context and evidence base that has informed the preparation of each of the chapters of the Dover District Local Plan 2040, Regulation 18 Draft. Each Topic Paper presents the relevant national and local planning legislation, policy and guidance as well as other background information, including stakeholder engagement outcomes, monitoring of usage of existing policies, that forms the evidence base for the relevant section of the new Plan. For further information on individual pieces of evidence, links are provided to the full documents as appropriate.

1.5 The information in the Topic Papers will be updated as and when necessary and will form a key part of the Local Plan Evidence Base that will be relied on at the Local Plan Examination.

1.6 The issues covered by this Historic Environment Topic Paper are as follows:

[Background](#)

- The Historic Environment of Dover District
- Heritage Assets

[Evidence Base](#)

- Policy Context – International, National, Regional and Local
- Usage of existing Dover Development Plan Policies
- Stakeholder Engagement and Feedback
- Sustainability Issues

[Conclusions](#)

- Local Plan 2040 preferred policy approach

Background

2. The Historic Environment of Dover District

- 2.1 Dover District enjoys a particularly rich archaeological and historical heritage, in part due to its strategic location as a gateway to Britain, with a wealth of individual assets of national and international importance. These heritage assets have played a major role in shaping the district's development and identity.
- 2.2 The archaeological resource of this district covers an immense time span, from Palaeolithic finds of more than half a million years ago, to sites dating from the Cold War period. Much of the earliest heritage derives from the district's maritime location. The Dover Bronze Age Boat for example, discovered during the construction of the A20 between Folkestone and Dover in the early 1990s, is one of the very few entire wooden sea-going vessels from this period to have been found in England and is thought to be some 3,000 years old. In addition, the district's one Protected Wreck Site at Langdon Bay is arguably the oldest known shipwreck site in northern Europe. The importance of the site lies in the breadth of the Bronze Age metalwork found, which is unparalleled in both maritime and terrestrial archaeology and includes types of tools, weapons and ornaments made in France during the Middle Bronze Age and rarely found in Britain. The typology of the metalwork indicates a date for this boat of around 1100BC.
- 2.3 The Roman invasion of Britain is believed to have taken place at Richborough in the north of this district. The Roman road network, stretching in straight lines across the landscape, is still represented here by sections of Watling Street that link the town of Dover with Canterbury, Rochester and London. The Romans built a lighthouse, one of the best-preserved in Europe, on the heights above the town of Dover to guide ships into the harbour below, while the Anglo-Saxon church beside the lighthouse is evidence of a Saxon fortified settlement here.
- 2.4 The Anglo-Saxon period saw the construction of early churches, evidence of which still survive for example at Coldred, Wingham and Sandwich. Such early churches formed the beginnings of the parochial structure that has continued to shape this largely rural district to the present day. The commons or 'minnises' of the high clay caps of the Kent Downs are believed to have also been established in the Anglo-Saxon or early medieval period and form distinctive open areas of rough grass, bracken, or sometimes heather and gorse. Many have now been enclosed but open minnises such as at Ewell Minnis near Dover remain as important remnants of previously more widespread landscape features.
- 2.5 The Norman invasion saw the coming of the castle, and significantly for this district the nationally iconic great stone castle at Dover, the 'key' to England, built by King Henry II in the 1180s. The spectacular location above the white cliffs of Dover Castle most probably utilises the site of a previous Iron Age hillfort. During

this period villages expanded and churches were rebuilt in stone. The significant medieval town of Sandwich joined with Hythe, Romney, Lydd and Hastings to form the Cinque Ports during the late Saxon and early Norman times in order to render 'ship service' to the English Crown in return for valuable privileges. These medieval maritime towns reached the peak of their power and prestige some 200 to 300 years later, with their naval service last being called upon in 1596. Today, Sandwich is one of the best preserved medieval towns in the country.

- 2.6 The historic environment of Dover town itself embodies evidence from the medieval period. The earliest parts of the Maison Dieu (House of God), the oldest and most prominent public historic building in Dover town centre, date from around 1203 when it was founded for use by pilgrims journeying from continental Europe to Canterbury Cathedral to visit the shrine of Thomas Becket. Maison Dieu has been in some form of community or civic use over its entire 800-year history.
- 2.7 The Tudor period saw the construction of the three Castles of Deal, Walmer and Sandown as part of an outstanding group of defensive works built during this period. Deal Castle at the centre of the line is the most powerful of Henry VIII's coastal fortifications. Today the castles are an important part of the identity of the towns of Deal and Walmer, and a reminder of the strategic importance of this stretch of coastline and the naval anchorage that lies off it. Although they were built primarily as a response to the threat of invasion during Henry's reign, the castles proved to be strategically important during the English Civil War, Napoleonic wars and later in the nineteenth century.
- 2.8 Inland, the character of the district's landscape was well established by the Tudor period. Nucleated villages, clustered around flint and brick churches and greens, as well as linear settlements along river valleys and routeways and spring line settlements at the base of the Kent Downs escarpment were a feature of the landscape, as evidenced by the current Historical Environment Record for the district. Land was cultivated and grazed and the many isolated farmsteads that exist today bear testimony to this agricultural history.
- 2.9 Along the White Cliffs Heritage Coast, facing as it did potential attack from mainland Europe, there is a rich heritage of defence structures. In order to better protect the northern approach to Dover Castle, Fort Burgoyne was erected in the 1860s. The first recorded permanent fortifications to be established on the Western Heights on the cliffs to the west of the town of Dover date from the late 1770s and comprised earthworks designed to protect infantry and artillery on the hill. These earthworks marked the start of the fortification of this hilltop which saw the construction during the Napoleonic period of two major redoubts, the Citadel and the Drop Redoubt, augmented with a series of defensive lines and bastions, and, in response to the need to move troops rapidly from the heights to the town and harbour below, the construction of the Grand Shaft between 1805 and 1807. This unusual and impressive structure takes the form of three independent staircases spiralling around a central brick-built shaft some 43 metres deep.

- 2.10 Given its strategic location, the heritage of Dover District includes many concrete and brick remains of anti-invasion structures from the two World Wars, particularly along the coast, including at St Margarets Bay, and Kingsdown. The Napoleonic tunnels at Dover were brought back into service in the Second World War, and from 1939 housed the command centre that controlled naval operations in the Channel, including the evacuation of British troops from Dunkirk, as well as being used as both a hospital and a large combined headquarters, responsible for guarding the Straits of Dover and involved in preparing for the 1944 invasion of Europe. Later, during the Cold War, this network of tunnels was transformed into the secret location for one of Britain's regional seats of government, with the role of organising national life in the event of a nuclear attack.
- 2.11 Dover District also enjoys a strong, internationally recognised, cultural heritage. The landscape has been influential to many people, places and events of artistic and cultural importance. These include the white cliffs and coastline which have left an indelible mark on British culture, including in Shakespeare's play King Lear, the paintings of JMW Turner, Matthew Arnold's poem Dover Beach and Vera Lynne's famous wartime song. The village of Kingston was home to world renowned sculptor Henry Moore between 1935 and 1940, while both Noel Coward and Ian Fleming made their home at St Margarets at Cliffe during the 1940s and 50s.

Heritage Assets

- 2.12 The Kent Historic Environment record lists over 12,000 historic buildings and archaeological discoveries across Dover District. Designated heritage assets, as set out in subsequent paragraphs, are those protected by law.

Scheduled Monuments

- 2.13 The district is home to **50 Scheduled Monuments**. These include monuments from throughout history and include bowl barrows of the late Neolithic period, found at a number of sites in the district, iron age occupation sites, including at Worth where the remains of a Romano-Celtic temple are also found, Anglo-Saxon cemeteries at Eastry and Great Mongeham, and the medieval town walls of Sandwich. More recent heritage is also represented by for example the Fairbairn Jib Crane at Wellington Dock at Dover dating from 1868 and a pair of acoustic mirrors on the cliffs at Fan Bay dating from World War I, when they were used for the detection of incoming aircraft.

Listed Buildings

- 2.14 There are **1,926 listed buildings** in Dover District. Of these 37 are Grade I, 105 rated Grade II* and 1,784 are Grade II status.

Conservation Areas

- 2.15 There are **57 Conservation Areas** in Dover District, including the very first Conservation Area to be designated in Kent at Middle Street Deal. The majority of Conservation Areas are in the rural area of the district. Of the 39 rural Conservation Areas, the majority focus on village centres. Three include historic estates (Denton, Northbourne and Tilmanstone), one is entirely focused on an historic estate (Preston Court), one is centred on a former castle and church (Coldred Church Area) and one Conservation Area covers a coastal landscape and settlement (St Margaret's Bay). The 18 town or suburban Conservation Areas include the seafront areas of Deal Middle Area, Dover Waterloo Crescent and Walmer Seafront. Former military areas at Dover Western Heights and Walmer South Barracks and the area of and around Dover Castle are also within Conservation Areas. Four Conservation Areas are currently afforded additional protection in part through Article 4 (2) Directions – Kingsdown, Deal Middle Street, Deal North Street and Sandwich Walled Town. There are currently 7 Conservation Area Appraisals in operation in the district, four of which are in Deal: Upper Deal, Victoria Road and Wellington Road, Deal, Nelson Street, Dover, Deal Middle Street, Dover Town Centre, Deal South Barracks and Kingsdown.
- 2.16 The Dover Heritage Strategy (2013) concluded that the Conservation Areas of Dover District, covering amongst other things the historically important towns of Sandwich, Dover and Deal, the great fortifications of the Western Heights, Dover Castle, and Deal Castle and the rural villages and estates of the District represent an asset of outstanding significance.

Historic Parks and Gardens

- 2.17 Dover District has **six historic parks and gardens** on the register of Parks and Gardens of Specific Historic interest produced by Historic England. These are Goodnestone Park, Kearsney Court, Northbourne Court, The Salutation, Sandwich, Waldershare Park and Walmer Castle. In addition KCC has identified Betteshanger House, Fredville Park at Nonington and Knowlton Court at Nonington in its Kent Gardens Compendium.
- 2.18 These parks or gardens are all privately owned, with the exception of Walmer Castle which is Crown Property managed by English Heritage, and the Russell Gardens section of Kearsney Court which is owned by the District Council. Russell Gardens is open all year round, while Goodnestone Gardens, Walmer Castle Park and the Salutation are also generally open to visitors.

Protected Wreck Site

- 2.19 The heritage of Dover District includes one protected wreck site. The Langdon Bay site is of international significance as arguably the oldest known shipwreck site in northern Europe, dating from around 1100BC. The importance of the site lies in the extent of the Bronze Age metalwork found which is unparalleled in both maritime and terrestrial archaeology and which includes types of tools, weapons

and ornaments made in France during the Middle Bronze Age and rarely found in Britain. More than 350 objects have been recovered from the site in a number of specialist archaeological excavations and are in the care of the British Museum.

Archaeology

- 2.20 As the closest point to the continent, Dover has been central to the transmission of ideas, goods and people between continental Europe and England since at least the Bronze Age. This has led to a diverse archaeological record that includes numerous nationally significant archaeological sites.
- 2.21 Dover's archaeological resource includes both designated and non-designated heritage assets. These include Scheduled Monuments which are primarily archaeological sites and monuments. Other designated assets will also have an archaeological component. Non-designated archaeological sites are often less visible than designated sites but nonetheless play an important role, contributing to the character and distinctiveness of the District and providing a focus for conservation and access projects, interpretation, education and research. Some are of equal importance to designated heritage assets, designation often being a management tool rather than a statement of significance.
- 2.22 A number of the archaeological assets of the District are iconic, including Richborough Castle and the Roman Pharos in Dover Castle, Dover Castle itself and the immense fortifications of the Western Heights. Others are less well known but nonetheless play an important role in the contributing to the historic character of the District, being physical connections with the past lives of Dover's communities. Many of the district's archaeological remains are also remarkably well preserved, particularly in former marshy areas of the northern part of the District and along the River Dour.
- 2.23 Dover's archaeological resource can be found in both rural and urban contexts. Aerial photographic survey carried out over many decades has revealed a wealth of buried archaeological sites in rural areas, now visible as cropmarks and earthworks. These can be seen particularly clearly on the chalk downs where prehistoric settlements and ring-ditches, Roman farmsteads and villas and medieval salt mounds and windmill sites have all been identified and recorded. Combined with more modern techniques such as LIDAR and survey methods such as fieldwalking and historic landscape characterisation these discoveries have led to a better understanding of how Dover's landscape has evolved over time and how it has taken on its current form.
- 2.24 Dover District's urban archaeology is particularly rich. Archaeological excavation in the town of Dover has revealed nationally important archaeological remains and continuous settlement from the Roman period to the present day. The archaeological discoveries at Dover have recently been modelled as part of the development of an Urban Archaeological Database which includes the story of the development of the town through an Archaeological Characterisation. This

will form the basis of an Archaeological Plan for the town which will be available before the Regulation 19 submission version of the Plan in late 2021.

- 2.25 Sandwich is one of the best-preserved medieval towns in the country and beneath its outstanding built heritage are archaeological remains of similar complexity. Deal, being a more recent town than Sandwich or Dover, has less archaeological complexity but there are likely to be important remains relating to the development of the town in the 16th century and to the relationship between the settlement and the castle and navy yard.
- 2.26 Individual archaeological sites have their own particular vulnerabilities but the archaeological resource of the district will generally be vulnerable to natural processes such as erosion and climate change, rural activities such as ploughing and other agricultural techniques, construction and development, including utilities, services and infrastructure works, change of use and general neglect. All of these serve to degrade the archaeological resource and reduce its significance and potential for enhancing life in the district by helping to create a sense of place and to bring economic benefits through tourism, whether arising directly from people visiting the monuments or indirectly by increasing the attractiveness of places containing archaeological sites.

Assets at Risk

- 2.27 The Historic England at Risk Register 2019 lists 13 heritage assets at risk in Dover District. Five of these are categorised as being in 'Very Bad' condition – the Conservation Areas of London Road, Dover, Mongeham Road, Great Mongeham and Western Heights, together with the remains of the Scheduled Monument of St Radegunds Abbey at Hougham Without and The Belvedere in Waldershare Park which is Listed Grade I. Three assets (the ring ditch and enclosure 200yds east of Parsonage Farm, Great Mongeham Anglo-Saxon cemetery and four ring ditches on ridge of Sutton Hill) are deemed to have 'Extensive significant problems' while the church of St Mary at Wingham, the ruins of St James Church in Dover and the Western Heights fortifications are categorised as in 'Poor' condition. Finally, Fort Burgoyne at Guston, Dover is considered to be 'Fair'.

Evidence Base

3. Policy Context

International

EVIDENCE BASE

- *World Heritage Convention* (1972) United Nations (UNESCO)
- *European Convention for the Protection of the Architectural Heritage of Europe* (1985)

- 3.1 The United Nations (UNESCO) World Heritage Convention (1972) promotes cooperation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.
- 3.2 The main purpose of the European Convention for the Protection of the Architectural Heritage of Europe (1985) is to reinforce and promote policies for the conservation and enhancement of Europe's heritage. It affirms the need for European solidarity with regard to heritage conservation and establishes the principles of European co-ordination of conservation policies, requiring that the signatories maintain an inventory of architectural heritage and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

National

EVIDENCE BASE

- *National Heritage List for England*, Historic England
- Planning (Listed Buildings and Conservation Areas) Act (1990).
- National Planning Policy Framework (2019), paragraphs 184 - 199
- *The Government's Statement on the Historic Environment for England*, HM Government (2010)
- *Heritage Statement*, Department for Digital, Culture Media and Sport (2017)
- *British Standard BS 7913, Guide to the Conservation of Historic Buildings*, BSI Group (2013)
- *Conservation Principles, Policies and Guidance*, Historic England (2008)
- *The Historic Environment in Local Plans: Good Practice Advice in Planning 1* Historic England (2015)
- *Local Heritage Listing, Advice Note 7*, Historic England (2016)
- *Statements of Heritage Significance, Advice Note 12*, Historic England (2019)
- *Energy Efficient and Traditional Homes, Advice Note 14* Historic England (2020)

- 3.3 The National Heritage List for England is the official, up to date, register of all nationally protected historic buildings and sites in England - listed buildings, scheduled monuments, protected wrecks, registered parks and gardens, and battlefields. Such designated heritage assets are protected by law.
- 3.4 Non-designated assets also play an important role in contributing to the character and distinctiveness of the District and in providing a focus for conservation and access projects, interpretation, education and research. The Kent Historic Environment Record records more than 12,000 non-designated archaeological sites and discoveries in Dover District.
- 3.5 The National Planning Policy Framework (2019) provides the basis for the drafting of planning policies for the historic environment. Paragraph 185 requires planning policies to set out a positive strategy for the conservation and enjoyment of the historic environment of the Plan area, including heritage assets most at risk through neglect, decay or other threats. Such a strategy should take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, as well as the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.
- 3.6 The NPPF recognises the desirability of new development in making a positive contribution to local character and distinctiveness. Paragraph 187 requires local planning authorities to maintain or have access to a historic environment record. In this instance this is provided by the Kent Historic Environment Record.
- 3.7 Local lists play an important role in celebrating non-designated heritage that is particularly valued by communities. The process of preparing a local heritage list allows local people, in partnership with the Council, to identify local heritage that they would wish to see recognised and protected. Such local lists once agreed by the local planning authority as having heritage significance, will merit consideration in planning matters, with the planning authority taking a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset itself. Dover does not currently have a Local List and the council will therefore prepare an advice note setting out guidance and recommended methodology, based on Historic England's Guiding Principles for Local Heritage Listing, in order to support local groups wishing to prepare Local Heritage Lists.
- 3.8 The Government's Statement on the Historic Environment for England 2010 sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in the light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

- 3.9 The Heritage Statement 2017 sets out how the government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.
- 3.10 Historic England have four Good Practice Advice notes which provide help to local authorities, planning and other consultants, owners, applicants and other interested parties on following historic environment policy as set out in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide. In addition, Historic England have produced a series of 14 detailed Advice Notes (HEANs) covering various planning topics in more detail and at a more practical level. They have been prepared following public consultation and include detailed advice of how to produce local lists, the content and format of heritage statements, assessing historic significance and appropriate approaches to the issue of improving the energy efficiency of traditional homes.
- 3.11 The matter of 'retrofitting' energy efficiency measures to heritage assets is of particular interest to the preparation of the Dover Local Plan following the declaration by the District Council of a Climate Emergency in November 2019 and the commitment of the Council to the goal that the district will be carbon neutral by 2050. Historic England's advice in this regard places an emphasis on taking a whole life approach to buildings. This means prioritising existing buildings by making refurbishment and reuse worthwhile. Such a fully sustainable approach to a low carbon future will require both the retention of most of the district's older housing stock and the improvement of its energy and carbon performance. This will help it to remain useful and viable, now and in the future, by reducing building obsolescence and increasing the life spans of buildings. Energy efficiency improvements, supported by regular maintenance and repair, can make traditional homes more comfortable and compatible with modern lifestyles as well as cheaper to run. When carried out as part of a large-scale programme, the combination of energy efficiency improvements and maintenance can also reduce demand on the national energy supply system, thus improving fuel security, as well as the wider benefits of reduced carbon on climate change.
- 3.12 Because of the variability in traditional designs and construction methods however there are few 'one size fits all' energy improvement solutions appropriate for traditional homes. Such improvements require an approach that uses an understanding of a building in its context to find a balanced solution that saves energy, sustains heritage significance and maintains a comfortable, healthy indoor environment – the 'whole building approach'.
- 3.13 Energy efficiency improvements for traditional homes can impact upon their heritage significance in a variety of ways. The question of what is and what is not an acceptable change will depend on the measures proposed and their impact on a building's significance. Understanding the building and its construction history will help to ensure that suitable energy efficiency measures are selected. Where

planning permission and/or listed building consent are required, both the nature and scope of proposed measures will be weighed against the risk of harming the significance of the heritage asset.

- 3.14 Houses of traditional construction do not perform in the same way as their modern counterparts. Most modern buildings depend on impermeable barriers to control the movement of moisture and air through the building fabric. In contrast, traditional forms of building construction take up moisture from their surroundings and release it according to ambient conditions. They also tend to heat up and cool down more slowly. This ability to 'buffer' moisture and heat can help to even out fluctuations in humidity and temperature. In a well-maintained house which is adequately heated and ventilated, the daily and seasonal cycles of wetting and drying, heating and cooling, balance out. However, the equilibrium may be adversely affected when changes are made to building fabric, heating or ventilation to increase energy efficiency. This can lead to unintended consequences, including moisture accumulation, overheating, fabric damage, and ill health of householders due to poor indoor air quality. Therefore, the advice of Historic England concludes, on the matter of planning energy efficiency improvements, it is important to understand the way the house performs as an integrated environmental system.

Regional

EVIDENCE BASE

- *The Kent Historic Environment Record*, Kent County Council
- *Review of the Kent Compendium of Parks and Gardens for Dover District 2015-2017*, Kent Garden's Trust
- *The Kent Design Guide* Kent Design Initiative (2008)
- *Lighting the way to success: The EKLSP Sustainable Community Strategy* East Kent Local Strategic Partnership (2009)
- *Kent Downs AONB Management Plan 2020-2025*, Kent Downs AONB Management Unit
- *Kent Farmsteads Guidance*, Historic England and Kent Downs AONB Team (2012)

- 3.15 The Kent Historic Environment Record forms the database of heritage assets, including archaeological discoveries and activities, for the county. It includes the Dover Urban Archaeological Database and is held and administered by Kent County Council.
- 3.16 The Kent Design Guide seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas. It aims to assist designers and others achieve high standards of design and construction by promoting a common approach to the main principles which underlie Local Planning Authorities' criteria for assessing planning

applications. It also seeks to ensure that the best of Kent's places remain to enrich the environment for future generations. The guide does not seek to restrict designs for new development to any historic Kent vernacular. Rather it aims to encourage well considered and contextually sympathetic schemes that create developments where people really want to live, work and enjoy life.

- 3.17 The EKLSP Sustainable Community Strategy sets out the long-term vision for East Kent, covering the districts of Canterbury, Dover, Shepway and Thanet. The vision is that "By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities".
- 3.18 The Draft Kent Downs AONB Management Plan 2020-2025 is at the time of writing out for public consultation. The historic and cultural heritage of the Kent Downs is a strong thread running through the Plan acknowledging the strong time depth to the Kent Downs landscape. As part of the review of the Kent Downs AONB Management Plan the Landscape Character Assessment has been revised and updated with a closer attention to historic landscape character incorporated. Seven historic and cultural heritage principles are included:
- HCH1 The conservation and enhancement of the historic character and features of the Kent Downs landscape will be pursued and heritage-led sustainable economic activity and tourism encouraged.*
- HCH2 A wider understanding of the historic, cultural, scientific and artistic importance of the Kent Downs landscape and its historic character will be supported in part to inform the interpretation and management of the AONB.*
- HCH3 In recognition of the emerging national relationship with the Arts Council and arts and cultural regeneration efforts in Kent an arts and cultural strategy for the Kent Downs will be pursued.*
- HCH4 The preparation and use of best practice guidance, promotion of skill acquisition and sourcing suitable sustainable materials for conserving, enhancing and adapting the historic and cultural environment to climate change will be supported.*
- HCH5 Opportunities to develop contemporary and innovative artistic, historic, cultural and scientific interpretation and celebration of the landscape and people of the Kent Downs will be pursued.*
- HCH6 The application of high standards of design sympathetic to cultural heritage within the AONB, identified in guidance including the AONB Landscape Design Handbook, Kent Downs Farmstead Guidance and any relevant Village Design Statements and Neighbourhood Plans, will be pursued.*
- HCH7 The protection, conservation, and enhancement of heritage features under threat will be pursued through policies, projects and partnerships.*
- 3.19 The Kent Downs AONB Farmstead Guidance provides useful advice to applicants and local authorities across Kent on the historic character of

farmsteads, focusing on how to identify traditional farmsteads and their buildings, their landscape and settlement context and their function and layout, as well as their level of significance.

- 3.20 Significant traditional farmsteads and their buildings evidently contribute to the local character and distinctiveness of their area through their varied forms, use of materials and the way that they can be appreciated as part of their locality. Understanding the degree to which this historic character is legible or not, as a result of past change, is a critical first step. The guidance advises that some buildings or farmsteads have the potential for special significance when compared to farmsteads and their landscapes in other parts of England. This may be more difficult to determine and require specialist advice, but it will always be useful in deepening an understanding of the most significant sites and the development of schemes for them. The absence of statutory designation does not imply lack of special significance in this respect.
- 3.21 Special characteristics of farmstead heritage in different areas of the Kent Downs is provided. Dover District falls within the South Foreland area, characterised by a low density of dispersed farmsteads, sited along the road network and down their own tracks. Historically much of this area was open downland, with settlements concentrated in the fertile dry valleys. Large-scale loose courtyard farmsteads had developed in this area by the late 19th century, within the context of very largescale regular enclosed fields. 30.8% of farmsteads were larger loose courtyard types with buildings to three of four sides of the yard and 7.7% had an L-range and buildings to the third and fourth sides of the yard. 20th century change has further reinforced the larger-scale open character of this landscape, with large groups of sheds to working farms interspersed with areas of post-1950 settlement expansion. Dominant walling materials are chalk, brick and tile with some early timber frame. Predominant roofing materials are plain tile with some use of Welsh slate. Farmsteads in this area have been subject to lower levels of loss of traditional character (15.4%) compared to most other areas in the AONB. However, a low proportion of farmsteads (7.7%) retain more than 50% of their historic form. This is an area with a low survival of early buildings, 23.1% of farmsteads retaining a pre-1700 farmhouse and there being no recorded early working buildings.
- 3.22 The farmstead guidance therefore advises that opportunities to reinforce and enhance the historic character of farmsteads and link them to their surrounding landscapes are taken, boundaries are reinforced and linked to the existing hedge network and shelter belts are provided to isolated farmsteads.

Local

EVIDENCE BASE

- Dover District Council Corporate Plan 2020 – 2024
- *Dover District Heritage Strategy*, Dover District Council (2013)
- *Western Heights Masterplan SPD*, Dover District Council (2015)
- *Western Heights Combined Heritage & Landscape Appraisal*, Dover District Council and Kent County Council (2017)
- *Built Heritage Conservation Framework for Dover Western Heights*, Liv Gibbs for Dover District Council, English Heritage and Kent County Council (2012)
- *Destination White Cliffs Country: Growth strategy for tourism and the visitor economy 2020 to 2030* Dover Visitor and Tourism Strategy, Dover District Council (2020)
- *Dover Urban Archaeological Database*, Kent County Council (2020)
- *Dover Town Archaeological Plan* Kent County Council (scheduled for 2021)

3.23 The Dover District Corporate Plan 2020 – 2024 is the main strategic document of the Council, providing a framework for the delivery of its services and a clear statement of the Council’s vision and priorities. It provides the context for all other Council strategies and plans. Of the four Corporate Objectives, the third is ‘Climate Change, Environment & Assets: a cleaner sustainable environment’:

“Support the wider climate change agenda to facilitate a better environment for everyone. Support the development and protection of our environment and open spaces, making the most of our enviable landscapes, heritage and assets and making our parks destinations of activity, recreation and community”.

3.24 The Dover District Heritage Strategy 2013 was developed and produced by the Heritage Conservation Group of Kent County Council for Dover District Council and English Heritage. This Heritage Strategy is a substantial and comprehensive body of work and as such serves as the principal evidence base for the historic environment sections of the Local Plan. It was updated in May 2020 in order to take account of the revisions in 2019 to the NPPF.

3.25 A key objective of the Dover Heritage Strategy is to promote a greater understanding of the heritage assets of the District. Assets are divided into a number of themes¹. Each theme study includes a written description of the

¹ Coastal Processes and Landscapes, Coastal Ports, Invasion and Defence, Communications, Maritime, Church, Country Houses and Estates, Settlements, Agriculture and Farmsteads, Industry, Archaeology, Built Heritage and Conservation Areas

principal heritage assets, a list of key heritage assets and a statement of significance for that theme. Also highlighted are any significance vulnerabilities or opportunities connected with either the theme as a whole or to specific assets within that theme.

3.26 To take the Strategy forward four broad objectives are identified:

- *Dover District's historic environment and its heritage assets play a proactive role in enabling and informing regeneration activities to secure better outcomes from sustainable growth.*
- *Dover District realises the tourism and visitor potential and economic benefits of its historic environment and heritage assets.*
- *Dover District's heritage assets are sustained and enhanced so as to best meet the needs of the present without compromising the ability of future generations to appreciate their significance.*
- *Public understanding of, engagement with, access to and enjoyment of Dover District's historic environment are increased.*

3.27 The Dover Western Heights Masterplan SPD provides a strategic framework for action for the Western Heights fortifications which are located along the crest of a steep chalk ridge, directly to the west of Dover town centre, overlooking the harbour. They are designated as a Scheduled Monument. A number of elements of the historic environment are Grade II listed (the Citadel's Officers' Quarters and the Grand Shaft) and the whole site is designated a Conservation Area. The fortifications represent one of the largest and most elaborate surviving examples of nineteenth century fortifications in England and evidence an exceptional record of continuous military occupation over a period of some 170 years, which is unique in scale in the UK.

3.28 Since WWII, following the departure of the military, the fortifications have fallen into disrepair, decline and invasion by scrub and woodland. Demolition and vandalism have added to the general neglect. The Scheduled Monument is currently on the Historic England 'At Risk' register. The site is currently in multiple ownerships, which are mainly divided between four public bodies - Historic England, Dover District Council, Dover Town Council and the Ministry of Justice.

3.29 The sweeping and impressive views from the ridge-top location, both landward and seaward, are a key feature, although obscured in parts by colonising woodland. The broad expanse of green slopes around the monument forms a notable backdrop to the town, making a key contribution to Dover's urban identity and providing large areas of open space. The majority of the slopes are designated as a Local Nature Reserve and a Local Wildlife Site for its unimproved chalk grassland, which is a priority habitat. Protected species are present (including bats, badgers and reptiles), or likely to be present, within the site and its structures. The landscape characteristics, ecology and heritage value of the military site are intrinsically connected.

- 3.30 A Masterplan was prepared by representatives of Dover District Council, Kent County Council, Medway Council, Historic England and the At Fort Partnership as a Supplementary Planning Document to the Dover Land Allocations Local Plan (2015). This Masterplan provides a framework for action that will promote the new vision for the Western Heights is to secure a sustainable future for the monuments and to enhance the Western Heights as a destination of national and international significance that complements Dover's other heritage attractions. In this way a sustainable future will be created by unlocking the value of its military heritage and its unique setting and widening its appeal as a strategic location for inward investment.
- 3.31 The Dover Visitor and Tourism Strategy 2020 is the framework for the development of tourism in the district over the next 10 years. The Strategy sets out a challenge for the district's tourism sector to achieve stronger economic and employment growth. The overarching objective of this Strategy *"To be a vibrant world class destination valued for this outstanding heritage, landscape and pursuits, as well as its ease of access, warmth of welcome and wealth of opportunity"*² recognises the rich historical environment of the district.
- 3.32 The Urban Archaeological Database for Dover has been a three-year project funded by Historic England and Dover District Council undertaken by Kent County Council Heritage Conservation team. This tool will allow planners, developers and archaeologists to assess more accurately the likely impact of development proposals on Dover's unique archaeological resource. Work is in progress on Phase 2 of the project to prepare an Archaeological Plan which will provide a more user-friendly introduction to, and summary of, the database for developers and planners as well as local interested community groups. This work is currently scheduled for completion by the end of 2021.

4. Usage of Existing Policies

- 4.1 Historical environment policies are poorly represented in the current planning policy framework for the district. Currently there is only one historic environment policy, DM19 Historic Parks and Gardens (Dover Core Strategy, 2010), as well as a strategic site policy for Western Heights LA11 from the Land Allocations Local Plan 2015. These policies have been seldom used.

² *Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030, Executive Summary (Consultation Draft 2019)*

5. Community Engagement

Feedback from 2018 workshops

- 5.1 As part of the preparation of the Regulation 18 Draft Dover District Local Plan 2040 a number of stakeholder workshops and consultation events have been held. These have provided valuable feedback which will be fed into the preparation and drafting of policies. In 2018 three workshops were held to scope early thoughts on what the next iteration of the Local Plan should focus on. With regard to the historic environment the following responses emerged:
- A need to look at derelict buildings to see if there is enabling development that can assist with restoration;
 - Development should respect the existing historic development/grain of the settlement;
 - Sandwich and Deal should retain their attractive character and historical significance;
 - Build on links/connections to Dover Castle and 'connect' destinations together through walking/cycling/green infrastructure/public transport;
 - Address the skills deficit in heritage preservation;
 - Most historic assets are seasonal, people are there but the attractions are not open;
 - Create the district as an excellent year-round destination;
 - Small attractions are often overlooked.

6. Sustainability Issues

- 6.1 In 2017 Dover District Council commissioned LUC to carry out a Sustainability Appraisal incorporating Strategic Environmental Assessment (SEA) of the emerging Local Plan for Dover District (The Dover Local Plan 2040). This process is designed to consider and communicate the significant sustainability issues and effects of emerging Plans and Policies, including their alternatives. It informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid or at least minimise the potential for adverse effects.
- 6.2 The 2018 Scoping Report³ provides the context for, and determines the scope of, the Sustainability Appraisal/SEA of the review of the Local Plan and sets out the framework for undertaking the later stages of the SA/SEA. The Scoping Report starts by setting out the policy context of Dover Local Plan 2040, before describing the

³ *Dover District Council New Local Plan, Sustainability Appraisal Scoping Report*, LUC (February 2018)

current and likely future environmental, social and economic conditions in the District. This contextual information is used to identify the key sustainability issues and opportunities that the New Local Plan can address. The key sustainability issues and opportunities are then used to develop a framework of SA Objectives used to appraise the likely significant effects of the constituent parts of the Local Plan, including strategic policies, site allocations and development management policies.

6.3 With regard to the historic environment, the key sustainability issues facing Dover District are identified in the SA Scoping Report as follows:

- There are many sites, features and areas of historical and cultural interest in the District, a number of which are at risk, and which could be adversely affected by poorly planned development. The New Local Plan provides an opportunity to conserve and enhance the historic environment as well as improve accessibility and interpretation of it.

6.4 The likely significant effects of the constituent parts of the Local Plan will therefore be assessed against the following SA Objective:

SA 10: To conserve and enhance the special qualities, fabric, setting and accessibility of the District's historic environment.

Conclusions

7. Preferred Local Plan Policy Approach

7.1 The Historic Environment chapter will set out the Council's approach to the protection and enhancement of the District's historic environment.

7.2 A number of new policies are considered to be necessary arising from the evidence base outlined in this Topic Paper. The current planning policy framework for the District includes only one historic environment policy (for applications affecting Historic Parks and Gardens, Policy DM19), and a strategic site policy for Dover Western Heights (Policy LA11). Such an approach is at odds with the NPPF which requires local planning authorities to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. A strategic policy for protecting the rich historic environment of the district is therefore considered to be essential for the Local Plan 2040.

7.3 In considering the delivery of such an overarching strategy, policy options include separate policies for different categories of heritage assets; namely listed buildings, conservation areas, archaeological remains and scheduled ancient monuments, historic parks and gardens and protected wreck sites or one generic policy for all

heritage assets. Given the exceptional wealth and diversity of the heritage assets that Dover District enjoys, policies for different categories of heritage assets is the preferred approach, with the exception of including a standalone policy for the one protected wreck site in the district, which it was felt would be adequately covered by both the strategic policy and a policy for designated heritage assets.

- 7.4 As this district is particularly rich in heritage assets, a number of them iconic, the option of having site specific policies for significant heritage assets was also considered. Of the principal assets, there is a substantial evidence base for the Dover Western Heights fortifications and therefore a policy for this important site is considered appropriate.
- 7.5 Finally, following the Council's declaration of a climate change emergency and commitment to the delivery of a carbon neutral district by 2050, it is considered important that the Plan include clear policy to guide proposals for energy efficiency improvements to heritage assets in order to ensure that their heritage significance is sufficiently protected. Current advice from Historic England, which requires clear adoption of a 'whole building' approach, forms the basis of the preferred approach. It is considered that this best ensures that proposals are based on an understanding of the methods of construction, fabric and history of the individual building or assets, in order to deliver solutions that sustain heritage significance, save energy and maintain a healthy indoor environment for the occupiers. There is the option of a standalone policy for such retrofitting proposals or to include policy on this issue within the policy on designated and non-designated heritage assets. The preferred approach is for the latter, given that the majority of such proposals that will come forward will do so as applications for alterations to listed buildings or to non-designated heritage assets in conservation areas.