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6 May 2021

SENT BY EMAIL

RE: 21/501909/EIASCO – Land North of Marden Maidstone Road Marden

Thank you for consulting us on the EIA Scoping Opinion for the proposed development of up to 2000 dwellings in addition to a care home, new primary school, nursery, retail and employment provision together with community facilities, open space and infrastructure improvements and associated works.

This major development site is located within the post medieval agrarian landscape of mid Kent with many historic field boundaries, routeways and farm outbuildings. There are some indications of prehistoric and later activity, especially industrial activity, in the general area. The site does not contain many HER sites but this lack of HER data may reflect the limited nature of formal archaeological investigations rather than a lack of buried archaeology.

On the basis of current information, I can provide a broad summary of some key heritage sites with the development area and highlight potential for as yet unknown remains:

The site is located partly on River Terrace Gravels and these have potential to contain remains associated with Early Prehistoric activity. Gravel areas would also be favourable for later prehistoric activity due to the mineral resource possibilities for industrial activity and well-drained soils. There is a possible iron working site in NW area, east of Copt Hall farm with a series of quarries and ponds shown on Tithe Map which could be remnants of industrial activity. Consideration of place-name evidence, "summerhill" could indicate a raised area being a focus for prehistoric settlement.

There is little clear indication of Romano-British or Early Medieval activity within this development site although there is still some potential for as yet unidentified remains within such a large area. There is considerable potential for Medieval and Post Medieval agrarian heritage and the Tithe Map indicates some 19th century farm holdings, some of which may

have Medieval or Post Medieval origins. For example, Summerhill Cottages located on the east side was originally a farm complex, identifiable on the Tithe Map, but some of the larger buildings are no longer upstanding. North of development site Summerhill Farm contains designated buildings of 17th century date but could be an earlier farm complex. There seems to be the site of another small holding or barn north west of Bridgeurst Wood at curve of a track within the development site. Church Farm House Maidstone Road is a 16th century or earlier farm complex within southern part of site.

The proposed development site also has considerable potential to contain 20th century military remains. The pipeline PLUTO possibly extends across site and there may be associated structures such as ROC posts and underground structures. In addition, there are several plane crashes recorded to the north and sometimes these locations are approximate. It is possible that some of these plane crashes actually occurred in the development site. Plane crash sites are protected sites and need sensitive and careful consideration.

This site encompasses a broadly intact historic landscape with potential prehistoric remnants which has not been subject to much modern day development. Visible today are several field boundaries of hedgerows and shaws interspersed with lanes and footpaths, small holdings and activity sites. Some of the surviving historic farms are still surrounded by their associated farmland, connected by traditional routeways and bearing historic names. It may be that some of these landscape features have an archaeological landscape dimension and part of ancient field systems, as well as being part of local folklore.

As briefly set out above, the archaeological resource within and around the development site is multi-period and is of varied significance. It is essential that the impact of this major development on this resource is fully understood. Reasonable, robust and sound evidence-base on the historic environment is crucial to ensure the planning decisions are fully informed and that the requirements of NPPF for the historic environment are appropriately addressed.

I welcome the scoping in of Archaeology and Cultural Heritage (section 4.7 Scoping Report). I welcome the proposal to consult the HER and conduct a field visit and walkover survey and for an assessment of the suitability of any further survey techniques as part of the information gathering. However, I suggest more widespread consultation would be advisable including referencing Historic England's Farmstead Survey, the revised DMRB, LiDAR, documentary research, particularly Tithe and OS maps etc.

There also needs to be a clear assessment of archaeological landscapes, such as ancient field systems, prehistoric industrial remains, prehistoric and historic agrarian and social landscapes, including routeways, woodland management features etc. In this particular case there are suggestions of industrial activity in the north west area with perhaps some remnant ponds/former quarries. This is on a landscape scale, not necessarily just isolated features and finds.

As part of the EIA, I recommend some key heritage assessments are undertaken and used to guide the master-planning process. These assessments should include:

- Archaeological deskbased assessment integrated with assessment of landscape;
- Prehistoric and Historic archaeological landscape assessment with a focus on the agrarian heritage;
- Geo-archaeological and Palaeolithic specialist assessment (KCC can provide brief);

- 20th century military specialist assessment with a focus on plotting the route of PLUTO; identifying potential plane crash sites; identifying possible associated structures;
- Impact assessment and statement of significance of the key heritage assets (both designated and non-designated heritage assets).

In summary, the major development contains a multi-period archaeological resource of varied nature and range and significance. I welcome the scoping in of Archaeology and Cultural Heritage and the proposed assessments. However, I recommend the additional assessments above are undertaken to ensure evidence-base is sound and can provide reasonable and meaningful information for the planning decision process.

I would be pleased to discuss the above further.

Yours sincerely

Wendy Rogers

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