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Ask for: Simon Mason
Your Ref: 17/506492
17/506551
Our Ref:
Date: 15th January 2018

Dear Andrew

Re 17/506492/ENVSCR & 17/506551/EIASCO - Land South and East of Sittingbourne, Kent

Request for EIA Screening and Scoping Opinion: for a mixed-use development including up to 11,250 residential dwellings, commercial space (circa 120,000 sqm), new infrastructure to create new junctions onto the M2 and A2 joined by a new relief road, new retail and health facilities, leisure facilities, educational facilities and community facilities at land to the south and east of Sittingbourne.

Thank you for consulting on the scoping report for the land south and east of Sittingbourne being referred to as Highsted Park.

There has been very limited time to review this extremely large proposal thoroughly given the timescale and submission during Christmas period. I note that we did some discussions with an archaeological consultant at an early stage for this or a similar proposal in 2006 concerning the assessment of the area. Following an early meeting we understand that a programme of assessment and survey including wide-scale geophysics was being progressed but we did not receive any results of this work at that time.

We note that archaeology and cultural heritage is scoped in as a key issue to be covered in the proposed EIA and we welcome that. The proposed scope is set out briefly in section 10 of the report. Given the substantial scale of development and the potential scale of impacts on the historic environment we are of the view that the EIA approach is appropriate.

Heritage – key issues

The proposal covers a very substantial part of the landscape south and east of Sittingbourne from the A2 corridor in the north, south in to the Chalk North Downs. The landscape around Sittingbourne is known to be of high archaeological value, the A2 corridor follows the original

main Roman road between the coast and London and we are aware of considerable Roman and later activity alongside it and in the farmlands south and north. The area is also rich in prehistoric activity dating from the Late Palaeolithic deposits known to survive in Brickearth deposits within the proposal site through to Bronze Age and Iron Age remains. The Kent HER provides an indication of the presence and distribution of archaeology in this area but would tend to also illustrate the bias arising from the location of previous development and investigation in the northern areas of the proposal site. Recent investigations and discoveries are starting to reveal evidence of early use of the downland areas.

Particular highlights include:

- Roman road – Watling Street – running within fields south of the present A2 around Hempstead. Roman activity alongside
- Palaeolithic and Mesolithic artefacts found in the upper gravels and lower brickearth deposits in the northern areas of the proposal site. A regionally important geological deposit – Limons a Doublet - survives in the Brickearth in the area;
- Later prehistoric activity has been found in several areas in or close to the northern parts of the site;
- Iron Age and Roman burial sites are known near to and within the proposal site;
- Prehistoric sites including a possible tumulus are reported from woodlands in or close to the site;
- Medieval landscape features are likely to survive as archaeology throughout the area;

The landscape itself includes a pattern of settlement, routes, farmland and enclosures, woodland, industry and individual historic features that have developed from at least medieval times and possibly earlier. The manors of Cromers and Pitstock (later Woodstock) both have a rich medieval history with the formal parkland landscape around Woodstock being particularly rich and sensitive.

As explained in para 10.1 the site is located close to a number of designated heritage assets including the Conservation Area at Rodmersham Green. It is also important to note that the Conservation Area to the north at Tonge lies close to the northern part of the proposal site, as does a Scheduled Monument at Tonge Castle.

Place-shaping

The NPPF recognises the important role that the historic environment and heritage assets can play in the making of new places. It is important that the development of a place on this scale in particular takes account of its historic environment ensuring that the new place is grounded in the past, takes advantage of its distinct historic character and conserves and makes best use of its heritage assets – those that are undesignated as well as those that are protected through designation.

It is important that the historic environment and landscape studies for this development proposal clearly identifies the heritage of the area and examines its potential positive contribution to place making. Any forthcoming master-planning of the area should clearly demonstrate how the heritage of the site and its surroundings has meaningfully contributed to the development proposals.

Potential Impacts

We note the impacts considered in 10.4-10.6. It is also important that the setting of undesignated heritage assets is considered and that off site impacts such as the introduction of additional traffic through historic villages, country lanes and areas such as Tonge are included.

The assessment should also consider potential benefits which may include opportunities for beneficial use and restoration of heritage assets, community archaeology and interpretation.

Assessment Methodology

It is important that the scope of the initial Desk Based Assessment and sources of information is discussed in detail with ourselves, Historic England and the Conservation Officers at Swale Borough Council at an early stage. The sources proposed in 10.7 are limited / general and study should include as an initial step a review of archive material that may be available in local, county and national archives.

We welcome the proposal for a walkover of the site which should be comprehensive, note landform and landscape features as well as heritage assets. It is important that the effects on undesignated, as well as designated, heritage assets is considered. We would be happy to be involved in an initial walk through the landscape with the applicant's consultant if that would be helpful.

It is likely, given the richness of the landscape for archaeology and the potential bias in the archaeological record arising from the focus of past investigation and survey, that archaeological field evaluation will be needed to inform the planning application. We recall from discussions in 2006 that a programme of geophysical survey was being carried out for this development and therefore it may be that the results of that survey could be incorporated into the present study. Clarification on that survey would be welcome as results have not been provided to the County Archaeologist.

The assessment should include a thorough analysis of the historic landscape and historic landscape features and the potential effects of the development, both at landscape scale and on individual features and components.

The work for the EIA should take account of the **Guiding Principles for Cultural Heritage in Environmental Impact Assessment (EIA)** published by Kent County Council through our Planarch project in 2006. I have attached a copy of these.

I hope that the above is helpful and am happy to discuss further.

Yours sincerely

Simon Mason
Principal Archaeological Officer