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Ask for: Simon Mason
Your Ref:
Our Ref:
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BY EMAIL

Dear Emma

Land to the South West of Birchington, Kent : Scoping Request – “Outline planning application all matters reserved apart from access, for the erection of up to 1600 dwellings, creation of a new link road between Minnis Road and the A28, and the A28 and B2050 Manston Road, provision of small scale retail provision, a 2-form entry primary school and land for expansion of Birchington medical centre. New pedestrian and cycle access and the provision of open spaces, sustainable urban drainage systems, associated landscaping, infrastructure and earthworks.”.

Thank you for your letter regarding the request for a Scoping Opinion for land to the South West of Birchington in Thanet. Please note that I am also providing advice to Francesca Potter for inclusion within the Kent County Council response.

I have been involved in early discussions with the applicants and their archaeological / heritage consultants since early 2017 principally in terms of their seeking to extend the allocation site and the scope of assessment, survey and evaluation work to inform the allocation considerations.

It should be noted that although I was involved in agreeing the scope of the evaluation fieldwork and its subsequent monitoring, the present submission is the first I have seen of the results of that work and therefore my comments are based on only a brief review of the work to date.

EIA Scoping Report October 2019

I note that the scheme is for a proposed outline submission for approximately 1600 dwellings, a new link road, small scale retail provision, 2 form entry primary school and expansion of a medical centre along with access, open spaces, SUDS, landscaping and infrastructure.

I note from the accompanying letter that master planning is to be evolved through consultation and engagement taking account of the site's constraints. This is important as the prior engagement I had with the applicant had identified areas of archaeological significance where preservation was to be achieved and these were removed from the scope of evaluation at that time. When presenting parameters for approval as described in para 32 of the report it will be important to ensure that these have been developed in reflection of cultural heritage constraints and that where preservation in situ is required or retained as a future option there is the flexibility within development parameters to achieve this.

We welcome that Cultural Heritage is being included within the Environmental Topics to be considered. As well as archaeology and built heritage it is important that the topic covers historic and ancient landscapes as there are features present in the site that relate to past landscapes and the development covers a large part of the landscape south west of Birchington.

We note the key features and designations listed in Table 1 of the Scoping Report but feel that this represents a small degree of the Cultural Heritage involved in this rich archaeological landscape and does not take account of the context of the assets stated and their association with the two Scheduled Monuments. It should be noted that the assets stated are those that arise from the trial trenching that was in itself very much limited and targeted on specific issues and for example does not account for the features identified in the site through cropmarks or by the geophysical survey. For example, see figure 2 of the evaluation report in appendix.

Baseline Conditions – Archaeology

We welcome the accompanying reports of the work undertaken to date. These include as set out in para 147 a revised desk-based assessment (June 2017) which includes an initial geophysics report (dated June 2017) for one field in the south west of the site. A further geophysics survey was undertaken which has not been reported or included in the appendices. A plot of this helped to inform the evaluation trenching strategy and some illustration can be seen in the evaluation report. The evaluation took place up to May 2018 (report dated August 2018) and there is a report that has been submitted for a subsequent small area of geophysics outside the trenched area. This latter report identifies further archaeology that was not tested by the evaluation.

It is important that the baseline study for the EIA takes account of all work in combination so that a true understanding of the buried archaeological landscapes and their significance is properly understood. The present baseline description set out in para 148 is focused only on a part of the evidence and there needs to be wider and more thorough assessment of the archaeology within and outside the site, the unique nature of the archaeological heritage of Thanet, the association of features within the site to those that are nearby designated. It will be important to update the desk-based assessment with the results of more recent work and ensure that there is an overall mapping at a reasonable scale that illustrates and models all the archaeology and articulates it into the landscape form. I will be happy to meet and discuss this further with the applicant's cultural heritage consultants during the compilation of the EIA. It will be important to draw together all the current understanding at an early stage in this process so that we can review where there may be any significant gaps in our knowledge that may need to be addressed further in light of the potential development parameters.

Baseline Conditions – Built Heritage

We note that the baseline conditions are based on the review carried out for the desk based assessment. Our principle discussions previously focused on the relationship of the rising farmland to the south of the Gore End Farm assets and this has been set out in the DBA. The effect of the development and its mitigation on built heritage assets will be primarily a matter for Thanet District Council's Conservation team to advise on however the KCC Conservation Officer has reviewed the scoping report and briefly visited the application area. He notes that while the farmhouse is in presently good condition the barn is not in good repair and that there may be benefits that could be secured as part of the mitigation of effects for that building. The significance of the views and the relationship of the farm buildings to the farmed land should be included in any statement of significance and the effects of development and any proposed mitigations should be included in that assessment. KCC would welcome being involved in discussion on this aspect but the lead should be with Thanet District Council.

Baseline Conditions – Historic landscape

This is not considered within the scoping report section on Cultural Heritage but is an important aspect that needs to be considered. This is particularly so given the scale of development proposed. The desk study pays some reference to the later development of the landscape from historic maps however it is important that the archaeological evidence is used to illustrate the earlier landscapes that are present both in buried form but also visible as crop mark complexes in early aerial photographs and also as visible features such as footpaths and trackways through the development that are of medieval origins. It may be that these heritage elements can contribute positively towards future master planning.

Receptors – Archaeology

It is our view that further consideration is needed to be given to the significance of the archaeological receptors on the site. The character of Thanet archaeology is such that often undesignated archaeology of regional and national importance can be found. The development site includes areas of medieval settlement that are relatively unique to Thanet and some areas of the north Kent coast and have been defined as low significance in Table 6. They are parts of an emerging landscape first properly recognised on the nearby Thanet Earth development and increasingly being seen in this area on cropmark evidence. The development will include a large area of such landscape.

The study for the EIA needs to include a thorough assessment of significance based on current Historic England guidance and how that significance will be affected by the development proposals. It should be noted that there are also remains on the site that extend out from the Scheduled Monuments or are characteristic of archaeology within those designated sites. We are pleased to see reference to the HE guidance in para 166 and agree that professional judgement should be applied. We will be pleased to discuss the significance of the archaeological heritage further with the applicant's consultants and assist with their understanding of the local and regional context of the assets.

Study Area

While the 1km study area from the site's boundary is sufficient for the archaeological base line, it is important that the report's authors also consult key excavation publications or reports from the Isle of Thanet that will provide suitable context and understanding of the rich resource

available. In particular the investigation of the following sites: Thanet Way 7A, East Kent Access Road, Ramsgate Harbour Approach Road, Cliffsend Farm, Thanet Earth and the Weatherlees to Margate WWT pipeline all provide important context for the archaeology of Thanet.

Method of Assessment

I refer to my comments above concerning the updating of the baseline conditions and reviewing the works to date to establish that baseline. The archaeological works need to be brought together and considered in the context of the archaeology surrounding. The archaeology needs to be properly modelled on the site, taking account of topography and any evident gaps. The significance of the modelled archaeology needs to be thoroughly assessed both in terms of impact on individual identified assets and cumulatively on groups of assets and their landscape.

With an understanding of the significance and the ways in which that significance may be affected it is important that mitigation looks at opportunities for preservation and for enhancement where this is appropriate.

Archaeological mitigation

Given the scale of development proposed in what is a rich archaeological landscape it is inevitable that substantial areas of investigation are likely to be needed to mitigate impacts other than those where preservation in situ is appropriate and agreed. Such archaeological investigation would need to be undertaken to an appropriately high archaeological standard and make provision for publication and archiving of results. The development proposals should include consideration of what additional benefits can emerge from archaeological works including on site interpretation, enhancement of adjacent heritage assets and engagement and involvement of the local community in the archaeology.

I hope that this is sufficient for present purposes and will be happy to discuss further. As noted above we would be happy to engage further with the applicant and their consultants. It would be useful if a meeting with them included Historic England and Thanet District Council so that matters touched on with relation to the Listed Buildings and Scheduled Monuments can be considered together.

Yours sincerely

Simon Mason
Principal Archaeological Officer