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Archaeological Desk-Based Assessment

Land East of Church Lane, Lydden

Iceni Projects Limited on behalf of
Quinn Estates Limited

ICENI PROJECTS LIMITED
ON BEHALF OF QUINN
ESTATES LIMITED

August 2023



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Archaeological Desk-Based
Assessment

Archaeological Desk-Based Assessment
of Proposed Development at
Land East of Church Lane, Lydden

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Non-technical Summary

This document is an Archaeological Desk-Based Assessment (DBA) which assesses the potential presence and significance of archaeological assets on the Site within a set Study Area, as well as assessing the impact of the Proposed Development on any surviving archaeology on site. Historic structures are not specifically considered within this report except where they are relevant to the archaeological interpretation of the Site.

The Proposed Development will involve redevelopment to provide 23 residential dwellings and associated landscaping. This assessment considers the potential and character of any buried heritage assets that may survive.

The potential archaeology on the Site is as follows:

- Low potential for Prehistoric remains relating to quarrying and/or throughfare activity of local significance.
- Low to Moderate potential for Roman roadside remains of local / sub-regional significance.
- Low potential for Saxon and Medieval remains, in the form of isolated finds of local / sub-regional significance.
- Low potential for post-medieval remains relating to agricultural activity of local significance.

The aim of a Desk-Based Assessment is to provide the Archaeological Advisor and Local Planning Authority (LPA) with sufficient information to determine whether or not planning consent is permissible with consideration to a) the significance of potential heritage assets surviving on site and b) how they will be affected by the proposed development. This document will also assist the LPA in determining whether intrusive archaeological investigation is required in support of the planning application, or post consent, pursuant to a planning condition.

1. Introduction

- 1.1.1 This DBA is for Land East of Church Lane, Lydden (hereafter referred to as 'the Site') (Figure 1). It has been commissioned from Icen Projects by Quinn Estates Ltd ("the applicant").
- 1.1.2 The Site, approximately 1.77 hectares in size, is currently undeveloped and with no buildings present. It is currently in use as grazing land. The development is situated to the north of Canterbury Road and to the east of Church Lane. It is bounded by residential development and farm buildings to the southeast, south and west, whilst pasture fields lie to the north and east. The centre of the Site lies at National Grid Reference 626292, 145514 and this document utilises a Study Area with a radius of 1km from this point (Figure 2).
- 1.1.3 Ground level on the Site has been recorded ranging from 69.35m OD in the southeast corner to 62.30m OD on the northeast boundary.
- 1.1.4 The Site is not located within a designated Area of Archaeological Importance, as defined by the LPA.
- 1.1.5 Paragraph 194 of the National Planning Policy Framework (NPPF) advises that:
Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 1.1.6 This document has also been undertaken in accordance with the Chartered Institute for Archaeologists (CIfA) Standards and Guidance (CIfA 2014a and b) and guidance set out in the Dover District Core Strategy 2010.
- 1.1.7 The current Dover District Core Strategy includes only one historic environment policy (DM19 Historic Parks and Gardens), which states that archaeological remains are dealt with by national and regional policy. Additionally, there are no policies that specifically refer to the Site contained within the Dover District Heritage Strategy (Kent County Council, 2013).
- 1.1.8 The Proposed Development is as follows:
"Outline proposal for the erection of up to 23 dwellings including affordable housing together with associated parking, infrastructure and open space; with all matters reserved except access."
- 1.1.9 Consultation with the Kent County Council Archaeological Advisor to Dover District Council will take place on completion of this DBA.

2. Objectives

2.1.1 The aim of a DBA is to provide the Archaeological Advisor and LPA with sufficient information to determine whether or not planning permission is justifiable with consideration to how the proposed development will affect any buried heritage assets surviving on site.

2.1.2 This document has been undertaken pursuant to the professional guidance issued within the ClfA guidelines (2014b), which sets the standard for Desk-Based Assessments as:

Desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices which satisfy the stated aims of the project, and which comply with the Code of conduct and other relevant regulations of ClfA. In a development context desk-based assessment will establish the impact of the proposed development on the significance of the historic environment (or will identify the need for further evaluation to do so) and will enable reasoned proposals and decisions to be made whether to mitigate, offset or accept without further intervention that impact.

The ClfA standard (2014b) also provides the following definition / guidance that a Desk-Based assessment is:

A programme of study of the historic environment within a specified area or site on land, the inter-tidal zone or underwater that addresses agreed research and/or conservation objectives. It consists of an analysis of existing written, graphic, photographic and electronic information in order to identify the likely heritage assets, their interests and significance and the character of the study area, including appropriate consideration of the settings of heritage assets and, in England, the nature, extent and quality of the known or potential archaeological, historic, architectural and artistic interest. Significance is to be judged in a local, regional, national or international context as appropriate.

2.1.3 The aim of this DBA is to:

- Identify the presence of any known or potential buried heritage assets that may be affected by the proposals,
- Describe the significance of such assets, as required by the NPPF and,
- Assess the likely impacts upon the significance of the assets arising from the Proposed Development.

3. Methodology and Sources Consulted

Archaeological Potential

3.1.1 The **potential** for surviving archaeology of various periods is defined within this report as either:

High: The available evidence suggests a high likelihood for past activity within the Site and a strong potential for archaeological evidence to survive intact or reasonably intact.

Moderate: The available evidence suggests a reasonable likelihood for past activity within the site and a potential that archaeological evidence may survive although the nature and extent of survival is not thought to be significant.

Low: The available evidence suggests archaeological evidence of significant activity is unlikely to survive within the site, although some minor land-use may have occurred.

Uncertain: Insufficient information to assess.

Archaeological Significance

3.1.2 The **significance** value of potential archaeology is defined in this report as follows:

International / National (very high): The highest status of asset and indicative of national importance.

e.g. World Heritage Sites (WHS), Scheduled Ancient Monuments (SAMs), Grade I and II* Listed Buildings (LBs), Grade I and II* Registered Parks and Gardens (RPGs), Protected Wrecks, Heritage assets of national importance, well preserved historic landscapes with exceptional coherence, time depth, or other critical factor(s).

National / Regional / County (high): Archaeological sites that may be designated or undesignated, may contain well preserved or in situ structures, buildings of historical significance, historic landscapes with a reasonably defined extent, or reasonable evidence of occupation/settlement or activities (ritual, industrial etc.).

e.g. Grade II RPGs, Conservation Areas (CAs), Designated historic battlefields, Grade II LBs, burial grounds, protected heritage landscapes such as Ancient Woodland, heritage assets of regional or county importance.

Sub-regional / District (moderate): Designated or undesignated archaeological sites with reasonable evidence of human activity. Assets may be of limited historic value but may contribute to district or local knowledge and/or research objectives. May contain structures or

buildings of potential historic merit.

e.g. Historic village settlements, associated historic field systems and boundaries, historic road systems.

Local Area / Parish (Low): Heritage assets with a local level cultural or education value only

e.g. Historic field systems and boundaries, agricultural features such as ridge and furrow, ephemeral archaeological evidence, artefacts of poor contextual stratigraphy.

Negligible: Historic assets with very little or no surviving archaeological interest or stratigraphic integrity. Buildings and landscapes of no historical significance.

e.g. Destroyed objects, buildings of no architectural merit, relatively modern landscape features or disturbances such as quarries, field boundaries, drains etc.

Unknown: Insufficient information exists to assess the importance. Significance of below ground archaeological remains is often unknown until their nature and extent has been sufficiently determined through archaeological fieldwork.

3.1.3 Potential and significance values are based on guidance in the following documents:

- ClfA, 2017, Standards and Guidance for Historic Environment Desk-Based Assessment.
- Historic England, 2017, Good Practice Advice in Planning Note 3;
- Historic England, 2017, Conservation Principles: Policy and Guidance for the Sustainable Management of the Historic Environment
- Historic England 2022, Planning and Archaeology: Historic England Advice Note 17

Sources

3.1.4 The following sources were consulted in the production of this assessment:

- **Historic Environment Record (HER) Data** detailing the results of previous archaeological investigations on Site and in the surrounding Study Area. Kent County Council HER Data was obtained on 06/04/2022 and the data is the copyright of Kent County Council.
- **Historic England** - Information on statutory designated assets data including the National Heritage List for England (NHLE), World Heritage Sites, Scheduled Monuments, Listed buildings, and any identified Heritage at Risk.
- **Landmark** - Ordnance Survey (OS) maps from their historic first edition through to modern OS mapping. Earlier historic maps were also consulted where available.
- **British Geological Survey (BGS)** - Solid and Drift geology digital mapping and geological borehole data where applicable.

- **LPA Local Plan** and other information on historic environment policies, conservation areas and locally listed buildings where published online.
- **Archaeological Data Service (ADS)** - A comprehensive archive of published and unpublished fieldwork reports.
- **Volumes of the Victoria County History (VCH)** - An ongoing history project with the aim of creating an encyclopaedic history of each of the historic counties of England.
- **LIDAR** – Site topography was examined at <https://environment.data.gov.uk/>
- **Aerial Photography** – Historic and modern aerial photography was examined using the Historic England Aerial Photo Explorer (<https://historicengland.org.uk/images-books/archive/collections/aerial-photos/>). Cropmark data was also obtained from Kent County Council.
- **Site Reports** – Reports on past archaeological investigations within the Study Area.
- **Details of the Proposed Development** - Existing and proposed site plan, topographical survey, flood risk assessment, existing site services and utilities report.

4. Geological, Topographical, Archaeological and Historical Background

- 4.1.1 To assess the archaeological potential within the area of the Proposed Development, HER Data has been obtained from the Kent Historic Environment Record (HER) within a 1km Study Area of the Site.
- 4.1.2 The Study Area and HER data have been examined to locate known archaeological sites and thus predict and inform the likely archaeological survival on Site. All references to archaeological interventions, findspots and monuments on Figure 2 and Figure 3 will be contained within parenthesis throughout the document. Many entries from the HER data record result from chance discoveries. Other information and sources including documentary, cartographic, unpublished grey literature reports and internet resources have also been used to supplement this data. These sources are detailed further in Section 3.
- 4.1.3 Historic structures are not specifically considered within this assessment except where they are relevant to the archaeological interpretation of the Site. A separate heritage statement has been produced by Icen Projects for the Site.

Geology

- 4.1.4 The BGS identifies the underlying geology to be Lewis Nodular Chalk Formation, with superficial deposits of Head present across the centre of the site from southwest - northeast, comprising silt and gravels.
- 4.1.5 A geotechnical investigation undertaken on the Site identified the ground profile to be consistent with the published geology, comprising Topsoil, with Head deposits located in the centre of the Site, underlain by Lewis Nodular Chalk Formation (Idiom, 2019). Ground conditions have been summarised in Table 1 below.

Strata	Description	Estimated Thickness
Topsoil	Modern	0.10m – 0.50m
Head Deposits	Soft to soft, brown slightly gravelly sandy clay with gravels of flint as well as pale grey slightly clayey gravelly sand with gravels of flint and chalk	0.30m – 3.60m
Chalk	Medium Strong Slightly Weathered.	Base not Proven

Table 1 Ground Conditions Summary (IDOM, 2019)

Topography

- 4.1.6 The Site is somewhat dished-shaped, forming a valley running north – south, with a steep rise in topography on the eastern portion and a shallower rise on the western section.

Palaeolithic Period to Iron Age (Before AD 43)

- 4.1.7 The prehistoric is a broad period comprising the Palaeolithic (c.500,000 – 10,000BC), Mesolithic (c.10,000 – 4,000BC), Neolithic (c.4,000 – 2,500BC), Bronze Age (c.2,500 – 700BC), and Iron Age (c.700BC – 43AD). Continuous human occupation of Britain began as the climate improved at the end of the last Ice Age, with nomadic hunter gatherer societies exploiting wild plants and animals. Farming was first introduced from the continent to Britain around 4000BC and was accompanied by changes in pottery, burial customs, new types of monuments and a sedentary population. The arrival of metalworking in the Bronze Age saw a gradual shift in burial practices, an increase in permanent occupational evidence, distinctive field systems and ceremonial landscape monuments. During the Iron Age, elaborate hillfort type structures are constructed, with evidence of ritual offerings and fine iron metalwork suggestive of a warrior aristocracy and the emergence of extensive tribal territories.
- 4.1.8 The KHER data records a number of locations with evidence for prehistoric artefacts and occupational activity within the Study Area.
- 4.1.9 Evaluation trenching on land adjacent to the former Hope Inn, 144 Canterbury Road, c.30m east of the Site recorded an undated ditch, with two worked flints within the fill (EKE12897). Further flints were recorded across the Site, although no further archaeological work appears to have been undertaken.
- 4.1.10 At 114 Canterbury Road, c.225m east of the Site, two pits were found during archaeological interventions (EKE11036, EKE11037, MKE771). One of the pits contained over a hundred potsherds, with a broad Early to Mid-Iron Age date range. The second pit was much larger and was potentially a quarry pit, with the uppermost fill containing burnt daub fragments, small animal bone fragments, burnt flint and a number of later prehistoric pottery sherds. Additionally, five struck flints, including three blade flakes, of probable Neolithic or Late Neolithic or Early Bronze Age date were recorded, which were most likely residual.
- 4.1.11 A Watching Brief undertaken at Lydden Hill, c.425m northwest of the Site recorded a sparse scatter of prehistoric flints (MKE1808, EKE5878). The light scatter of struck flints are broadly datable to the Neolithic or Bronze Age period and indicate casual prehistoric activity in the area but no other archaeological remains were revealed.
- 4.1.12 Cropmark data observed in aerial and satellite imagery of the fields around the Site records two undated enclosures, one to the northwest on the edge of the Study Area, north of Lydden Hill (MKE5757) with the other located south of Bosney Banks, c.600m southeast of the Site. (MKE5746)
- 4.1.13 Although the number of field investigations and surveys undertaken within the Study Area is somewhat limited in number, the lack of substantial archaeological evidence from the period in

close proximity to the Site suggests it was situated away from any major areas of activity or occupation during prehistory. Evidence of prehistoric activity, where present within the Study Area, is comprised of a small number of cut features, undated enclosures and isolated artefacts.

Roman Period (AD 43 – 410)

- 4.1.14 The Roman invasion in AD43 brought an end to the prehistoric period in Britain.
- 4.1.15 The closest Roman Road to the Site, Watling Street (MKE40), follows the alignment of the modern A2, then heads down Lydden Hill and is projected to run c.40m to the south of the Site, along Canterbury Road (MKE4004). The road linked London to Canterbury and onward to the port at Richborough, with a subsidiary branch linking to Dover which passed through heavily forested countryside.
- 4.1.16 Two undated pits were recorded during a Watching Brief at 50 Canterbury Road, c.800m east of the Site (EKE9083, MKE2117). The close proximity of the Roman Road suggests a Roman date for the two features, but the only find recorded was an undated piece of burnt flint.
- 4.1.17 No other Roman remains are recorded on the KHER within the Study Area. The closest known Roman settlement was identified during roadworks to the east of the Study Area near the end of Dumbrill Hill, c.4km from the Site. The probable route of the Roman Road is evidence for the presence of Roman activity in the wider landscape. However, the lack of any other known sites, features or findspots within the Study Area most likely indicates that the Site was situated far enough away from the road and main areas of settlement during this period, to hold considerable potential for Roman archaeology.

Early Medieval and Medieval Period (AD 410 – 1485)

- 4.1.18 The Roman route between Canterbury and Dover was established in the landscape in the later and post-Roman period, becoming the main link to Canterbury, with the Richborough branch becoming a very minor stretch. After the conquest, Watling Street became one of the principal routes in the country linking England with the continent and was Kent's only primary route.
- 4.1.19 Two probable Anglo-Saxon inhumations, one accompanied by a dagger, were found in Lydden in 1760, c.500m southwest of the Site (MKE5706).
- 4.1.20 A medieval bronze belt hook found, speculatively dated to the 14th or 15th Century was found by chance, c.150m south of the Site (MKE5727).
- 4.1.21 There is no known evidence suggesting significant occupational activity dating to the medieval period within the KHER data obtained for the Study Area. Although the number of field investigations and surveys undertaken in the Study Area are very limited, the lack of any known evidence from the period suggests that the Site was situated away from any major areas of activity or occupation during this time.

Post-medieval to Modern Period (AD 1485 – present)

- 4.1.22 Many of the monuments recorded within the KHER Data date from the post-medieval and modern period.
- 4.1.23 The KHER data shows continuity of settlement activity within Lydden, recording a number of post-medieval listed buildings from the 17th century onwards, including inns/public houses, farmhouses and other dwellings.
- 4.1.24 One of the earliest cartographic sources depicting the Site is the Andrews Dury and Herbert's survey of 1769 (Figure 4). The Site is shown in open fields. The early arterial road network is illustrated, as well as a clustered settlement of buildings depicted along the road to the south, with St. Mary's Church potentially recorded to the north of the Site.
- 4.1.25 In 1853, the East Kent Railway Company was inaugurated and authorised to build an extension from the North Kent Line at Strood to Canterbury, with an extension to Faversham Quay, and another branch to join the Southeastern Line at Chilham. The line runs to the east of the Site.
- 4.1.26 The 1872 OS Map (Figure 5) shows little variation from the earlier Dury and Herbert's map, albeit with the Site and Study Area being illustrated in greater detail. The Site continues in open grassland. A footpath running approximately north – south is seen along the eastern edge of the Site. Court Lodge (later recorded as Lydden Court Farm) is seen adjacent to the north of the Site.
- 4.1.27 To the east of the Site, the KHER data records Stonehall Miners Settlement (MKE978). The colliery in which it is associated was opened in 1913. The original village was expanded towards the east and ran alongside the main Roman road from Dover. The houses remain to the present day but have been incorporated into the modern village of Lydden.
- 4.1.28 The 1937 – 39 OS Map (Figure 6) illustrates the Site as relatively unchanged, although the immediate surroundings demonstrate an increase in development. A footpath is illustrated abutting the eastern limits of the Site, with a possible small square structure depicted in the southeastern corner of the Site. A house and accompanying access road have also been built adjacent to the west of the Site, which is a likely a component of Lydden Court Farm.
- 4.1.29 A further small square building is illustrated in the southwestern corner of the Site on the 1956 - 57 OS Map (Figure 7). The previously mentioned footpath appears located outside the Site boundary at this time.
- 4.1.30 The Site remains unchanged after this period, albeit with the potential structures in the southwestern corner no longer recorded. The existing site plan (Figure 8) illustrates the Site as undeveloped. In summary, historic maps show that the site has remained as open grassland since the late 18th century.

Past Archaeological Investigations within the Site

- 4.1.31 No known archaeological investigations have been carried out within the Site to date.

5. Archaeological Potential and Significance

- 5.1.1 A review has been undertaken of the sources detailed in Section 4 including archaeological investigations conducted close to the proposed site and a handful of antiquarian findspots, sites with historic or cartographic references and listed buildings. These are shown on Figure 2.
- 5.1.2 The potential for archaeological evidence originating from the various periods is summarised below. HER Data is only a partial reflection of the buried archaeological record and the true archaeological potential of the area may be higher than suggested. Historic impacts are also taken into consideration when assessing potential.
- 5.1.3 There is limited evidence for prehistoric activity within the Study Area. Although previous archaeological investigations in the Study Area have been limited, and so the archaeological record of the area is not very well understood, it is nevertheless likely that the Site was not located close to any significant concentrations of settlement or activity during the prehistoric period.
- 5.1.4 Evidence from the Roman period is restricted to the projected course of a Roman road running approximately 40m south of the Site, with no other known remains within the Study Area dating to this period. Although previous archaeological investigations in the Study Area have been scant, and so the archaeological record of the area is not very well understood, it is nevertheless likely that the Site was located away from the main areas of settlement and economic activity during the Roman period.
- 5.1.5 There is some evidence for medieval activity within the Study Area. Although previous archaeological investigations in the Study Area have been limited, and so the archaeological record of the area is not very well understood, it is nevertheless likely that the Site was not located close to any significant concentrations of settlement or activity during the medieval period.
- 5.1.6 During the post-medieval and modern periods, there is extensive evidence for the expansion of farming (farmhouses, associated footpaths) and mining activity across the Study Area.
- 5.1.7 Although there are few known archaeological features from all periods (except the post-medieval period) within the Study Area, there have also been few systematic archaeological investigations in the vicinity of the Site itself. As a result, there is only low-moderate confidence that the restricted distribution of known archaeology reflects a genuine absence or scarcity of remains.
- 5.1.8 There is therefore an uncertain potential for the presence of as yet unidentified features/remains in the area, although on balance the potential and likely significance for undiscovered remains are both likely to be limited, and remains within the Site itself are likely to have been at least partially disturbed by agricultural activities on Site in the 20th century, although redeposited stray finds or the base of any deeper cut features might be present.

Prehistoric

- 5.1.9 The Site has low potential to contain prehistoric remains. Evidence for this period is limited and the Site appears to be situated away from any known settlement. Any 20th century landscaping is likely to have removed any surface or shallow subsurface archaeological remains that may have otherwise been present, although redeposited stray finds or the base of any deeper cut features might be present. Such remains would be of **unknown significance**.

Roman

- 5.1.10 The Site has low to moderate potential to contain Roman remains. Evidence for this period within the Study Area is limited to the projected route of a Roman road approximately c.40m south of the Site. Roman roads can act as foci for burials, settlements, churches and economic activity within the landscape, however the Site itself appears to be situated away from any known settlement. Any 20th century activity is likely to have removed any surface or shallow subsurface archaeological remains that may have otherwise been present, although redeposited stray finds or the base of any deeper cut features might be present. Such remains would be of **local or sub-regional significance**.

Medieval

- 5.1.11 The Site has low potential to contain medieval remains. Evidence for this period is limited and the Site appears to be situated away from any known settlement. Any 20th century activity, primarily associated with agriculture, is likely to have removed any surface or shallow subsurface archaeological remains that may have otherwise been present, although redeposited stray finds or the base of any deeper cut features might be present. Such remains would be of **unknown (but likely local at most) significance**.

Post-medieval

- 5.1.12 The Site has low potential to contain post-medieval remains. Whilst there is extensive evidence for post-medieval agricultural and industrial activity within the Study Area and indicated within the Site footprint by cartographic sources, 20th century activity may have removed any surface or shallow subsurface archaeological remains that may have otherwise been present, although redeposited stray finds or the base of any deeper cut features might be present. Such remains would likely be of **local significance**.

6. Impact of Proposals

- 6.1.1 The Proposed Development (Figure 9) comprises:
“Outline proposal for the erection of up to 23 dwellings including affordable housing together with associated parking, infrastructure and open space; with all matters reserved except access.”
- 6.1.2 The Site itself appears to have remained undeveloped open land up until the present day. At the time of writing, details of the depth, type and extent of foundations required for the Proposed Development is unknown.
- 6.1.3 Any preparatory ground clearance/levelling works associated with the development are likely to disturb or remove any archaeological remains that may be present within the Site. Any additional below-ground impacts (including excavations for foundations, piling, service runs, landscaping, grubbing out of obstructions, etc) also have the potential to remove any archaeological remains present.

7. Conclusion

- 7.1.1 The primary objectives of this report were to identify the nature, extent, and significance of any archaeological heritage assets that may be impacted by the Proposed Development.
- 7.1.2 The Site is located within a potential area of Archaeological Sensitivity which, although not nationally recognised or locally designated, can be considered to be of potential importance. The Site does not fall within the boundaries of any Historic Park and Gardens, and no designated heritage assets (e.g. Scheduled Monuments, World Heritage Sites, Listed Buildings) are located within the Site boundaries.
- 7.1.3 No previous excavations have occurred on the Site.
- 7.1.4 With consideration to the archaeology recorded within the 1,000m Study Area and the nature of the site's topography, geology, and archaeological and historical background, there is a **low potential for archaeological remains from the prehistoric, medieval and post-medieval periods, with a low to moderate potential for Roman remains**
- 7.1.5 Although there are few known archaeological features from all periods (except the post-medieval period) within the Study Area, there have also been few systematic archaeological investigations in the vicinity of the Site itself, and so there is an uncertain potential for the presence of as yet unidentified features/remains dating to other periods within the Study Area. However, agricultural activities and landscaping of the Site in the 20th century are likely to have removed or disturbed any surface or shallow subsurface archaeological remains that may have otherwise been present. The only archaeological remains that may be present at the Site would be redeposited stray finds or the truncated/isolated deeper parts of any cut features; such remains would likely be of **local area / parish (low) significance**.
- 7.1.6 The Proposed Development will include below ground intrusions with potential to impact on horizontally stratified archaeological remains and cut features.

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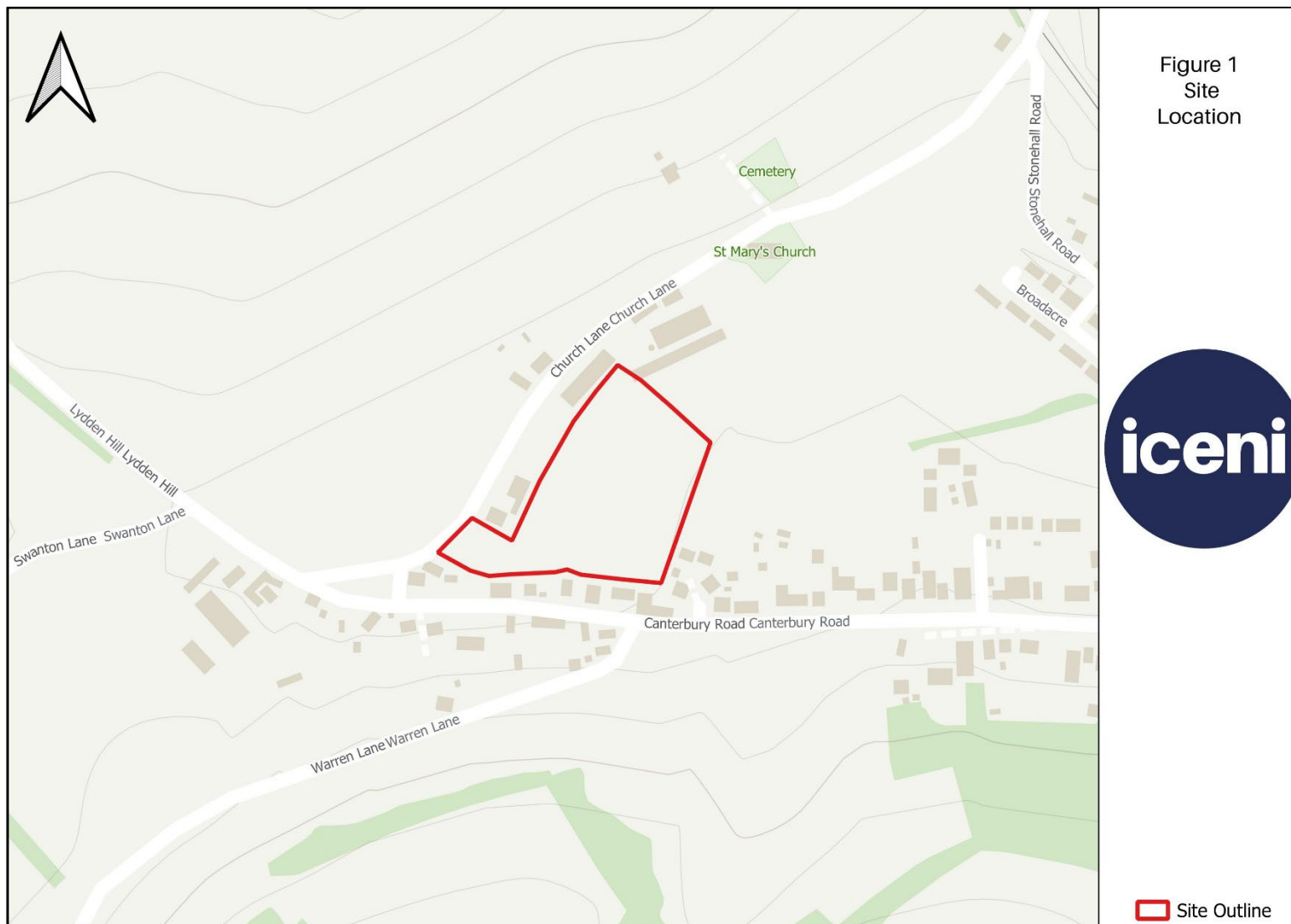
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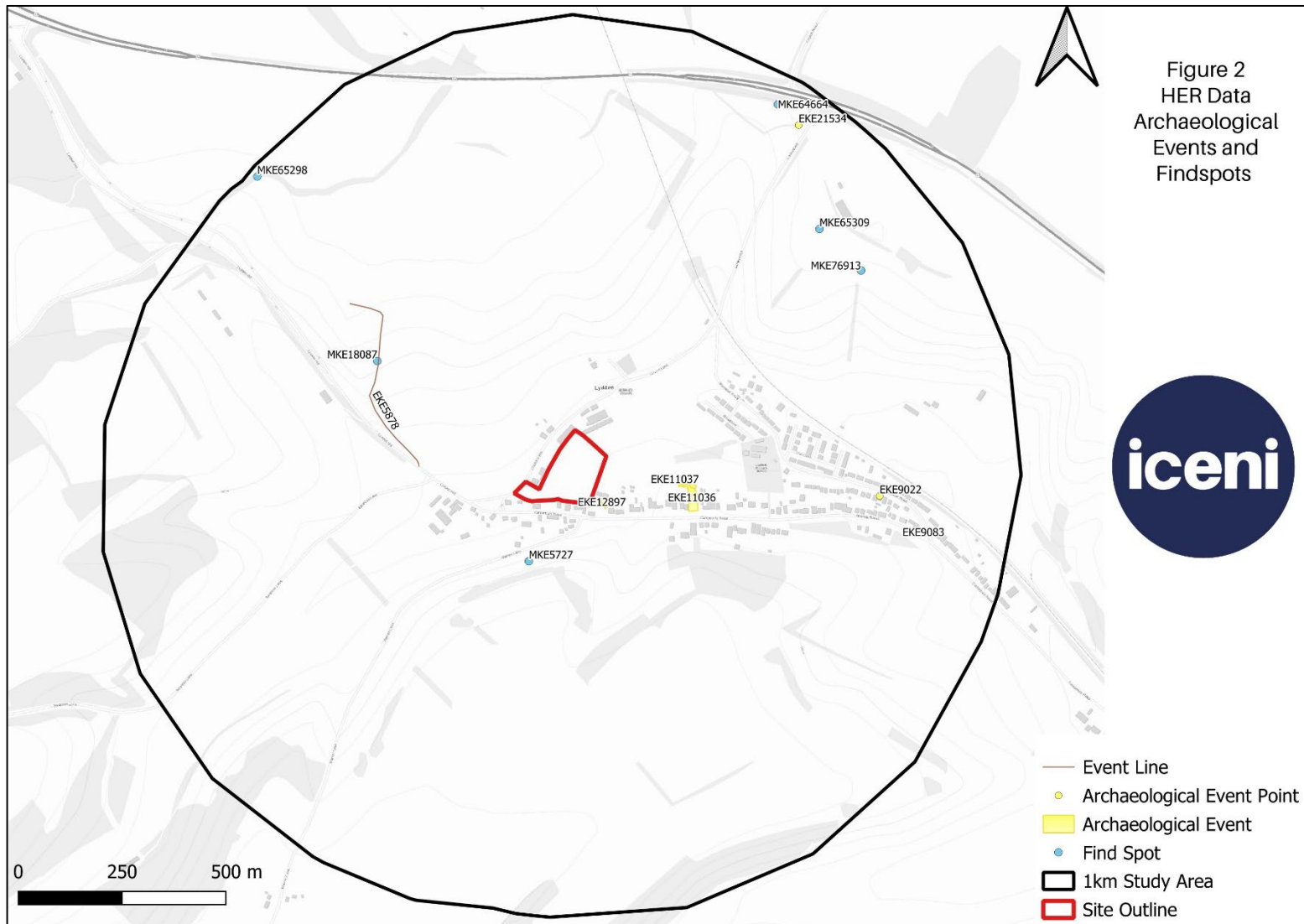
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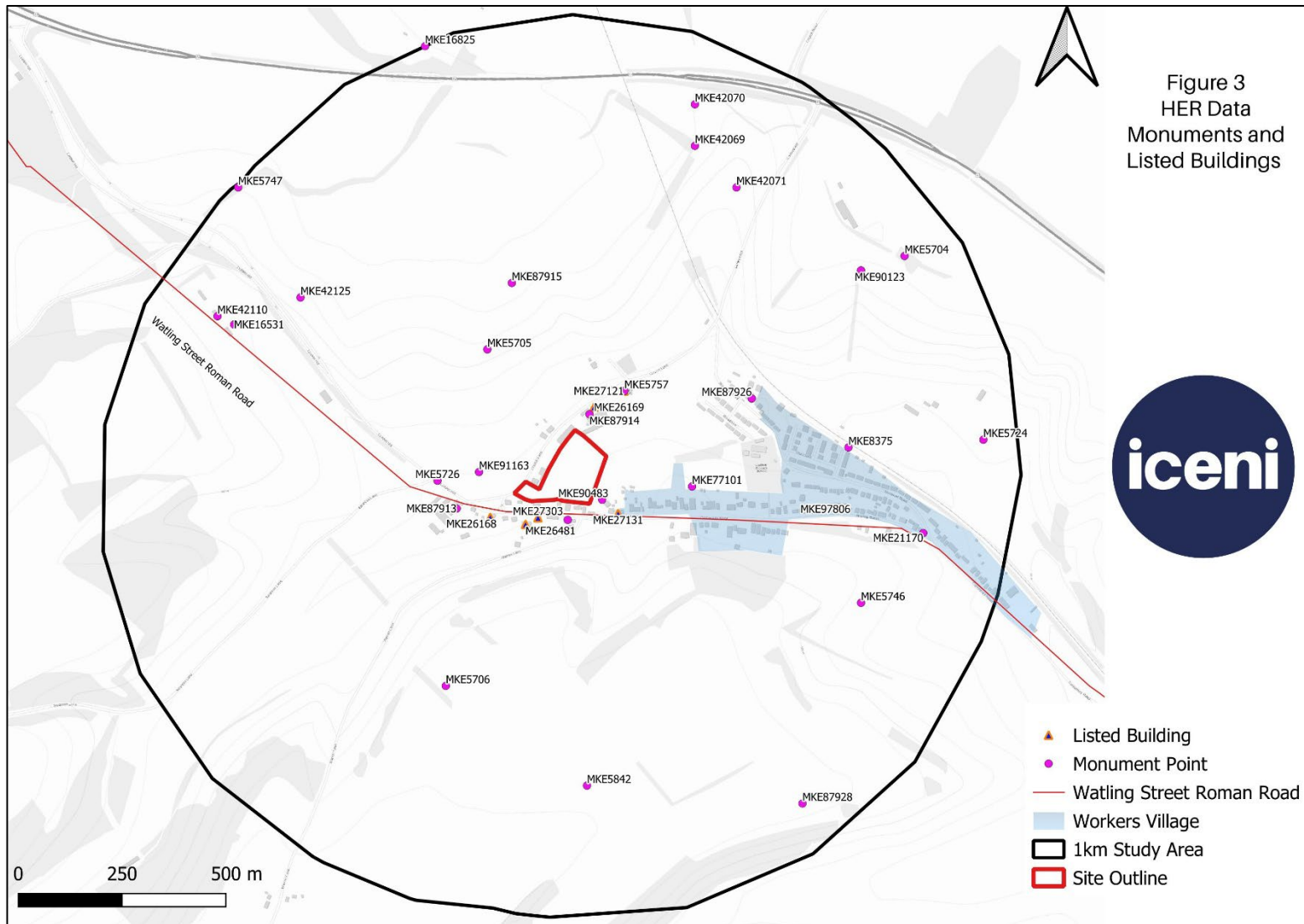




Figure 4 Andrews, Dury and Herbert, *Topographical Map of the County of Kent* 1769

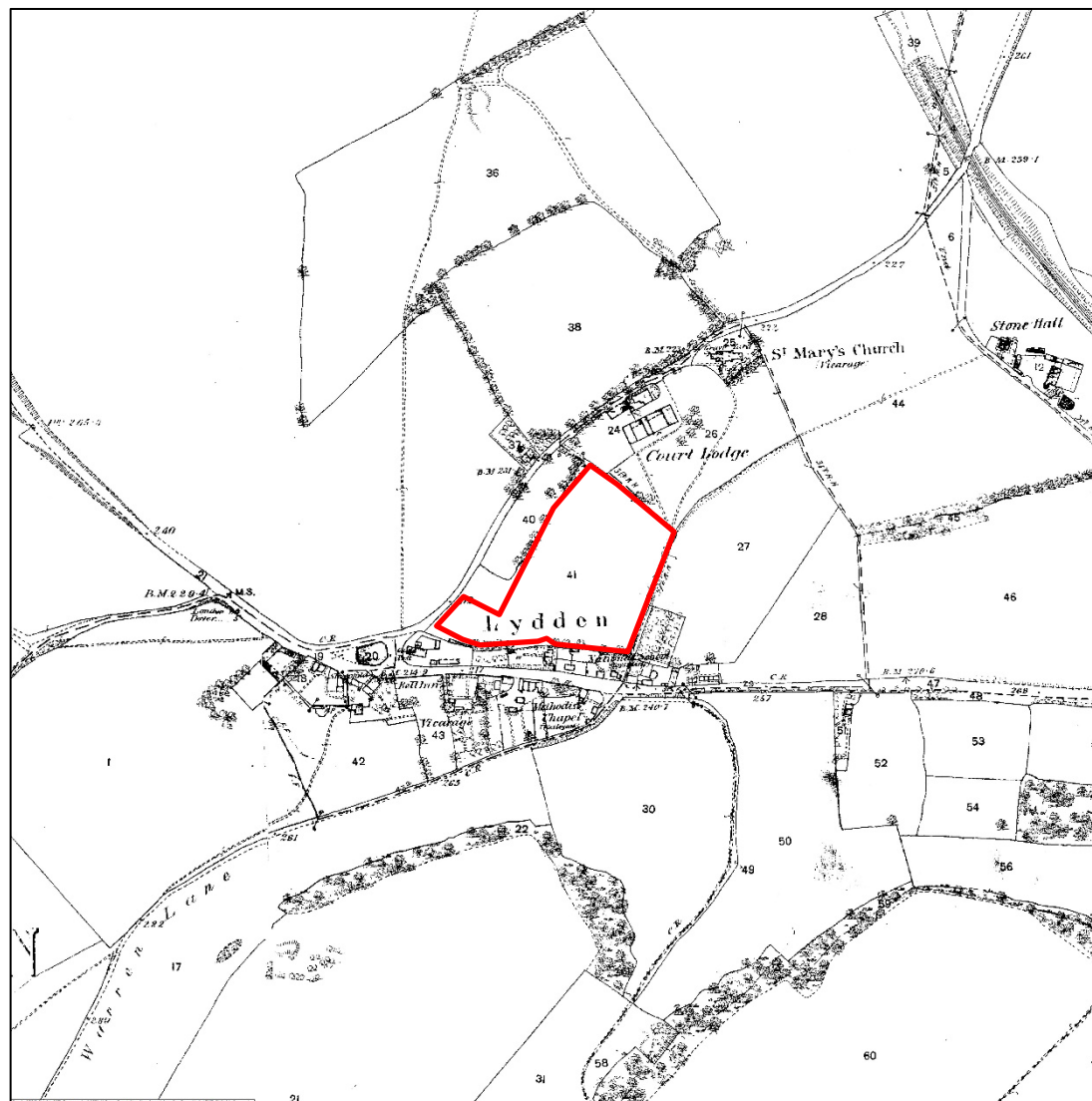


Figure 5 1872 OS Map (Landmark)

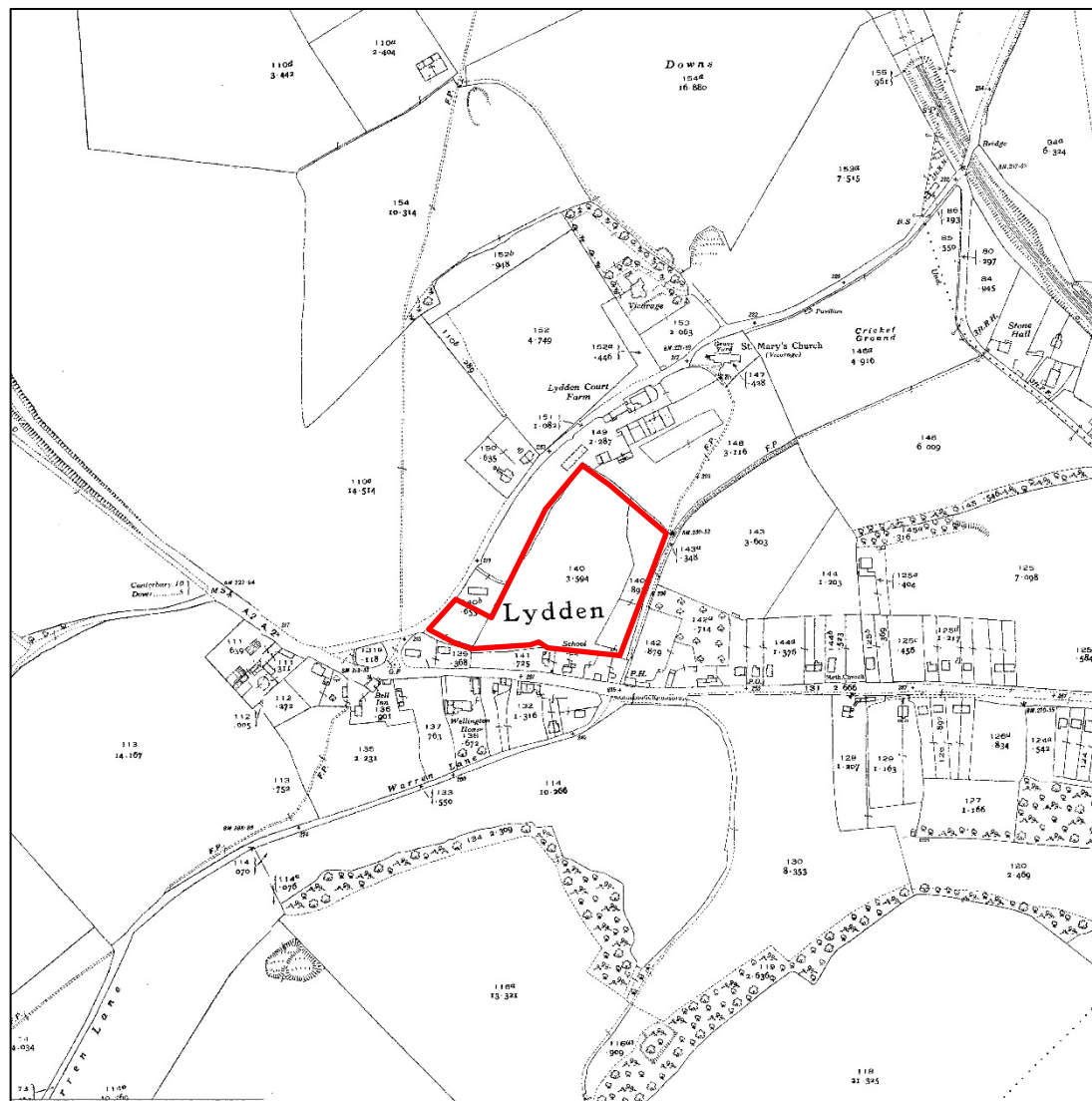


Figure 6 1937-1939 OS Map (Landmark)

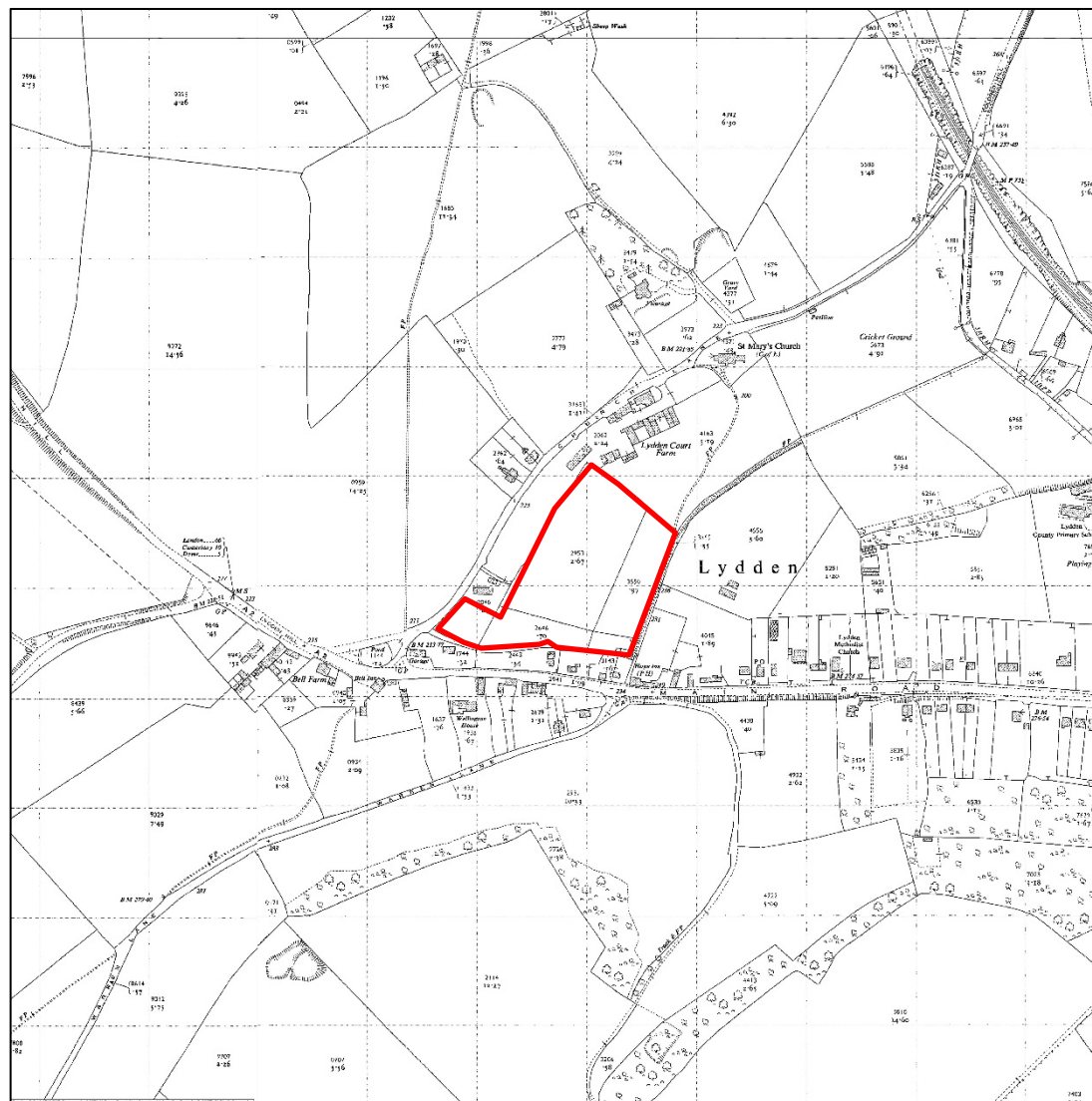


Figure 7 1957-58 OS Map (Landmark)

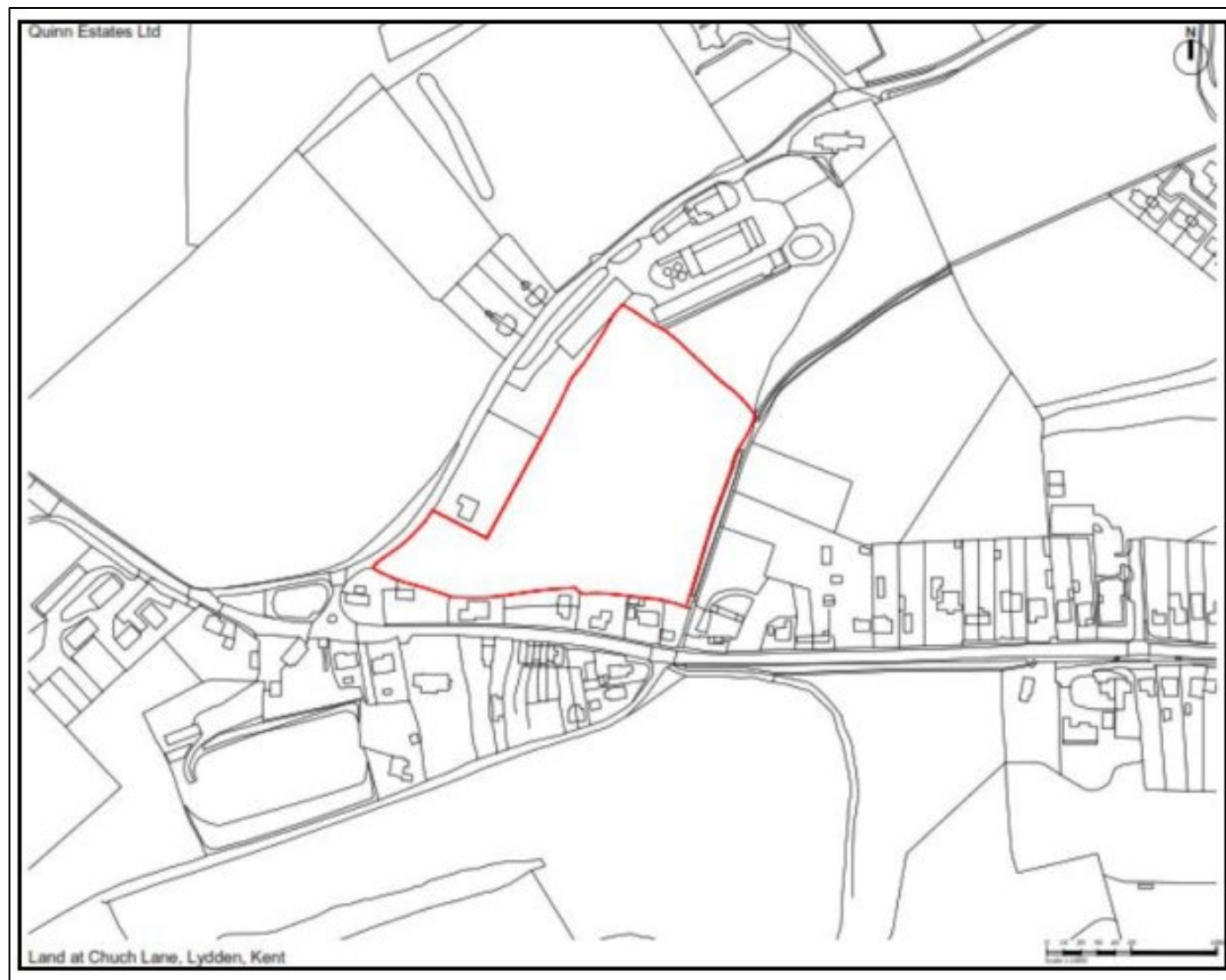


Figure 8 Existing Site Plan



Figure 9 Proposed Development Plan

Appendix A: Planning Policies

National Planning Policy Framework (NPPF) 2021

In July 2021, the government published the updated National Planning Policy Framework (“NPPF”). This maintains the focus on the promotion of sustainable development that was established as the core of the previous, 2012, NPPF. The heritage policies within the NPPF are largely unchanged with the exception of new paragraph 198.

The guidance contained within Section 16, ‘Conserving and enhancing the historic environment’, relates to the historic environment, and developments which may have an effect upon it. Relative paragraphs have been reproduced in full below:

Conserving and enhancing the historic environment

Para 189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Para 190. Plans should 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. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

Para 191. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

Para 192. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

Para 193. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

Proposals affecting heritage assets

Para 194. 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 assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Para 195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account

of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Para 196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

Para 197. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Para 198. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal

Considering potential impacts

Para 199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Para 200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Para 201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the Site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the Site back into use.

Para 202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Para 203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Para 204. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

Para 205. Local planning authorities 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 (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Para 206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Para 207. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

Para 208. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Local Planning Policy

Following the Planning and Compulsory Purchase Act 2004, Planning Authorities have replaced their Unitary Development Plans (UDP), Local Plans and Supplementary Planning Guidance with a new system of Local Development Frameworks. UDP policies have been either 'saved' or 'deleted'. In most cases archaeology policies are likely to be 'saved' because there have been no significant changes in legislation or advice at a national level, whilst Built Heritage policies often have been subject to change and strengthening, following the lead of the NPPF. On occasion Supplementary Planning Documents may also apply.

Dover District Adopted Core Strategy 2010

The current development plan for the district includes only one historic environment policy and no saved policies relating to archaeology. Such an approach is at odds with current government advice which requires that local planning authorities set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment, including heritage that is most at risk through neglect, decay or other threats.

Dover District Heritage Strategy 2013

The Dover District Heritage Strategy was commissioned by Dover District Council and English Heritage (now Historic England) to ensure that the heritage of the District plays a clear role in shaping any future regeneration, development and management decisions. It is intended that the strategy provides a strategic and clear approach to dealing with Dover's heritage and that the document might act as a pilot exemplar for similar schemes elsewhere in the country.

The document contains recommendations to ensure that any future policies and approaches to the district's heritage are based on a clear understanding of the place, its significance and its value. The aim of the Dover District Heritage Strategy is therefore to enable Dover District Council to achieve their objectives for the protection and enhancement of the historic environment as set out in the District's Core Strategy.