



# The Old Flour Mills, East Hill, Willesborough, Ashford, Kent TN24 8PA

## Archaeological Desk-based Assessment

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## SUMMARY

*This desk-based assessment of land at The Old Flour Mills, East Hill, Willesborough, Ashford, Kent TN24 8PA (TR 01528 42754; Fig 1) was commissioned of Canterbury Archaeological Trust in March 2022 in view of proposed development of the site.*

*The report constitutes a rapid appraisal focused on the Historic Environment Record, map regression, satellite and aerial photography, and existing site records analyses, with provisional historical contextualisation.*

*Existing evidence is insufficient to judge the likelihood of prehistoric or Romano-British archaeology surviving within the PDA. The mention of mills in both Domesday and sixteenth-century manorial records, however, suggests a potential continuity of the use of the site during the Anglo-Saxon (and possibly earlier), medieval and post-medieval periods, with definite use of the site as a mill in the lattermost period confirmed by map regression and documentary evidence, continuing into the modern period.*

*Archaeological remains might be extant within the proposed development area and could be disturbed or destroyed through development groundworks.*

*Further mitigation of the potential effects of development groundworks is likely to be a condition on planning consent.*

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## 1. INTRODUCTION

- 1.1 This report presents a provisional desk-based assessment constituting rapid archaeological appraisal of land at The Old Flour Mills, East Hill, Willesborough, Ashford, Kent TN24 8PA (TR 01528 42754; Fig 1); it was commissioned of Canterbury Archaeological Trust in March 2022 in view of proposed development of the site.

## 2. SCOPE OF STUDY AND CAVEATS

- 2.1 It is understood that the scope of this initial appraisal is of necessity limited by the context of its production. The research undertaken, verbally agreed with the client and in accordance with the *National Planning Policy Framework* (NPPF 2021), has treated only with readily available circumstantial evidence in order to provide an initial assessment of the potential extent, nature and significance of any archaeological evidence within and near the proposed development area (PDA).
- 2.2 The report includes analysis and interpretation of the Historic Environment Record (HER), National Heritage List for England (NHLE on-line), map regression, aerial and satellite photographs, and any existing site records analyses, with some provisional historical contextualisation where this might qualify archaeological data in a meaningful way through understanding the site's general history. It has been beyond the means of this project to pursue detailed questions requiring an in-depth study of primary documentary and cartographic sources at this stage. Only readily available maps showing significant topographical developments are reproduced.
- 2.3 A site visit was not considered a meaningful research activity in this case and has not been undertaken.
- 2.4 Both designated and non-designated heritage assets are considered in the report, for the purpose of providing additional context for consideration of the significance of potential archaeological heritage assets. This report is not expected to produce any detailed heritage statements pertaining to any extant and known heritage assets or their setting, or, for example, to provide any detailed historic landscape analysis or other research requiring specialist input, such as geoarchaeological, or Palaeolithic study. Such studies may form the basis of a developing mitigation strategy, and be requested as additional work by the Local Authority, but will necessarily form the basis of separate projects and funding.
- 2.5 The level of detail and scope of this assessment and report are sufficient for the findings of a rapid appraisal, pointing to the need for further study if likely/recommended. Any request made of the client for further desk-based work should clearly demonstrate the benefits of such an approach, however, as opposed to actual fieldwork, for example, which would provide direct evidence, rather than more, and probably equivocal, circumstantial evidence.

2.6 An interim impact assessment is offered with this report. This is clearly based on the circumstantial evidence gathered from desk-based assessment. This interim impact assessment is offered chiefly as guidance to the client in terms of any potential for follow-on work. The interim impact assessment herein should not be considered or referred to as an 'impact assessment' *per se*, since we recognise that more fixed and specific detail of groundworks are required in order to compare with sufficient actual evidence from fieldwork for a full impact assessment. A further review point between this study and any follow-on fieldwork might indeed take the form of a standalone or add-on impact assessment, if and when a frozen design and particular strategy for development groundworks have been made available for consideration, and if sufficiently relevant, reliable, and detailed comparative data are available.

2.7 Relevant policy and research frameworks for the study are set out below as terms of reference.

### 3. POLICY AND RESEARCH FRAMEWORKS

3.1 This report has been prepared in accordance with national and local policy/policies regarding heritage assets and with reference to research frameworks.

#### *National policy*

3.2 The NPPF sets out a series of core planning principles designed to underpin plan-making and decision-taking within the planning system. Paragraph 189 (NPPF 2021, 55) states that heritage 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.*

3.3 By definition, the historic environment includes all surviving physical remains of past human activity. Heritage assets include extant structures and features, sites, places, and landscapes. Furthermore, the historic landscape encompasses visible, buried, or submerged remains, which includes the buried archaeological resource.

3.4 When determining planning applications, the following paragraphs (*ibid*, 56–8) are pertinent:

*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.*

*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.*

*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.*

*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.*

*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*

*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.*

*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.*

*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.*

*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.*

*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.*

*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.*

*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.*

*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.*

*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.*

*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.*

3.5 A footnote to paragraph 200b reads: 'Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets'.

#### *Local policies*

3.6 Applying the same general principles on a local scale, the *Ashford Local Plan* states the following regarding archaeology and heritage assets (ABC 2017, 295, 297).

##### *Policy ENV13 – Conservation and Enhancement of Heritage Assets*

*Proposals which preserve or enhance the heritage assets of the Borough, sustaining and enhancing their significance and the contribution they make to local character and distinctiveness, will be supported. Proposals that make sensitive use of heritage assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate and viable use consistent with their conservation, will be encouraged. Development will not be permitted where it will cause loss or substantial harm to the significance of heritage assets or their settings unless it can be demonstrated that substantial public benefits will be delivered that outweigh the harm or loss. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, or where a non-designated heritage asset is likely to be impacted, harm will be weighed against the public benefits of the proposal, including securing the optimum viable use of the heritage asset. All applications with potential to affect a heritage asset or its setting should be supported by a description of the asset's historic, architectural or archaeological significance with an appropriate level of detail relating to the asset and the likely impact of the proposals on its significance.*

##### *Policy ENV15 – Archaeology*

*The archaeological and historic integrity of Scheduled Monuments and other important archaeological sites, together with their settings, will be protected and where possible enhanced. Development which would adversely affect such designated heritage assets will be assessed in line with Policy ENV13.*

*In addition, where the assessment outlined in Policy ENV13 reveals that important or potentially significant archaeological heritage assets may exist, developers will be*

*required to arrange for field evaluations to be carried out in advance of the determination of planning applications.*

*Where the case for development affecting a site of archaeological interest is accepted, any archaeological remains should be preserved in situ as the preferred approach. Where this is not possible or justified, appropriate provision for preservation by record may be an acceptable alternative dependent upon their significance. Any archaeological recording should be by an approved archaeological body and take place in accordance with a specification and programme of work to be submitted to and approved by the Borough Council in advance of development commencing.*

#### *Research frameworks*

- 3.7 The national and local policies outlined above should be considered in light of the non-statutory heritage frameworks that inform them. While the regional South East Research Framework for the historic environment is still in preparation, initial outputs are available (SERF on-line) and have been considered in preparing this report, in order to take current research agendas into account.

#### 4. LOCATION, GEOLOGY AND TOPOGRAPHY

- 4.1 The PDA lies to the south of Mace Lane, the A292, over the confluence of the Great Stour and East Stour Rivers in Kent, to the east of Ashford town centre. The existing buildings within the PDA are the former flour mill, of 5 storeys plus attic level, with a 7-storey tower, built 1901; to its east is a contemporaneous two-storey warehouse with a metal barrel-vaulted roof (a 1981 replacement, following the destruction of the original during a 1974 fire), and a 1981 extension in the location of Provender Mill, which is 4 storeys plus attic level. A carpark (Flour Mills Carpark) lies to the south of the mill, and there is an undeveloped area, currently covered in vegetation, to the north-east of the Mill across the East Stour, on what is the southern half of an island in the river. The PDA is bounded to the north by Mace Lane, to the east by trees and vegetation bordering Mill Court, to the south by the Civic Centre North Park, an open grassed area, and to the west by East Hill, and properties to the south of East Hill, including The Star public house (Fig 1). The area lies at a height of 37m above Ordnance Datum.

- 4.2 Bedrock geology within the PDA is shown as Atherfield Clay Formation (mudstone), with superficial deposits of alluvium (clay, silt, sand and gravel) recorded (BGS on-line).

#### 5. DESIGNATIONS

- 5.1 The PDA does not affect or impact upon any World Heritage Sites, Scheduled Monuments, or Registered Battlefields. Historic Landscape Characterisation has been checked on-line.
- 5.2 The PDA lies within Ashford Town Conservation Area (designated 1986).
- 5.3 The designated historic Memorial Gardens (HER TR 04 SW 391; HER; HER MKE76; KCC 1996 no. 191) are centred 325m south-west of the PDA. This public open space includes

a sunken amphitheatre, pier, moorings, wide lawns, flowering fruit trees and fountains. The gardens also include two stainless steel gateways, designed by Anthony Robinson, depicting flying swans.

#### 5.4 There are many Listed Buildings within a 500m radius of the PDA.

- Grade II listed The Star Inn, No. 26 East Hill (HER TR 04 SW 194; HER; HER MKE21; NHLE 1071081), the frontage of which dates from 1830–1840 whilst the rear is an eighteenth-century house, 10m west of the PDA.
- Grade II listed 'Northside', No. 24 East Hill (HER TR 04 SW 237; HER; HER MKE22; NHLE 1362865), which has an early nineteenth-century façade to a probable eighteenth-century house, 30m west of the PDA.
- Grade II\* listed Bridge House, No. 22 East Hill (HER TR 04 SW 185; HER; HER MKE21; NHLE 1071079), eighteenth century, 45m west of the PDA.
- Grade II listed garden wall to west of No. 22 East Hill (HER TR 04 SW 354; HER; HER MKE22; NHLE 1071080), eighteenth-century red brick wall in English bond, about 10 feet high (3m), 50m west of the PDA.
- Grade II listed 11 East Hill (HER TR 04 SW 278; HER; HER MKE22; NHLE 1300169), eighteenth century, 115m north-west of the PDA.
- Grade II listed wall to south-east of No. 11 East Hill (HER TR 04 SW 193; HER MKE22; NHLE 1362808), eighteenth-century stock brick wall about 3 feet (1m) high, with stone coping surmounted by cast iron spear railings, 115m west-north-west of the PDA.
- Grade II listed The Fox Public House, Hythe Road (HER TR 04 SW 179; HER; HER MKE21; NHLE 1071096), mid-nineteenth century, 145m east of the PDA.
- Grade II listed wall to the south-east of No. 9 East Hill (HER TR 04 SW 210; HER; HER MKE21; NHLE 1071120), an eighteenth-century brick wall, about 8 feet (2.4m) in height, with brick coping, 210m west-north-west of the PDA.
- Grade II listed railings and wall to east of No. 14 East Hill (HER TR 04 SW 234; HER; HER MKE22; NHLE 1362864), 210m west of the PDA.
- Grade II\* listed Nightingale House, No. 14 East Hill (HER TR 04 SW 318; HER; HER MKE23; NHLE 1071078), eighteenth century, 215m west of the PDA.
- Grade II listed Brooke Place, No. 9 East Hill (HER TR 04 SW 155; HER; HER MKE23; NHLE 1362807), early nineteenth century, 230m west-north-west of the PDA.
- Grade II listed No. 5 East Hill (HER TR 04 SW 239; HER; HER MKE23; NHLE 1300162), eighteenth century, 250m west-north-west of the PDA.

- Grade II\* listed Whist House, Tannery Lane (HER TR 04 SW 302; HER MKE23; NHLE 1299918), dated 1707, 300m south-west of the PDA.
- Grade II listed County Hotel, No. 10 High Street (HER TR 04 SW 201; HER; HER MKE21; NHLE 1071091), eighteenth century, 305m west-north-west of the PDA.
- Grade II listed disused graveyard, Station Road (HER TR 04 SW 348; HER MKE22; NHLE 1071047), 320m west-south-west of the PDA. This graveyard has mainly early nineteenth-century memorials, including oval body-stones, table tombs and some headstones with sun-ray or urn motifs.
- Grade II listed Nos 12–18 High Street (HER TR 04 SW 178; HER MKE21; NHLE 1184514), mid nineteenth-century range, 325m west-north-west of the PDA.
- Grade II listed No. 19A High Street (HER TR 04 SW 198; HER; HER MKE21; NHLE 1071085), early nineteenth century, 360m west of the PDA.
- Grade II listed No. 23 High Street (HER TR 04 SW 172; HER; HER MKE21; NHLE 1184430), early nineteenth century, 370m west of the PDA.
- Grade II listed Whitehall, No. 25A High Street (HER TR 04 SW 206; HER MKE21; NHLE 1071086), a sixteenth-century timber-framed building, originally an inn, restored with some curved braces, 380m west of the PDA.
- Grade II listed No. 27 High Street (HER TR 04 SW 295; HER MKE23; NHLE 1362830), dated 1835, 380m west of the PDA.
- Grade II listed No. 32 Ashford High Street (HER TR 04 SW 232; HER MKE22; NHLE 1362878), 390m west-north-west of the PDA, the central part comprises a possible late medieval timber-framed hall-house altered in the sixteenth century. The front part is an added early eighteenth-century timber framed building, the rear part is also an eighteenth-century addition.
- Grade II listed No. 46 High Street (HER TR 04 SW 190; HER MKE21; NHLE 1071092), eighteenth century, 405m west of the PDA.
- Grade II listed No. 31A High Street (HER TR 04 SW 288; HER MKE22; NHLE 1184461), Early nineteenth century, 410m west of the PDA.
- Grade II listed railings of the churchyard of the parish church of St Mary the Virgin (HER TR 04 SW 229; HER MKE22; NHLE 1362843), iron railings of arrowhead pattern, 415m west of the PDA, dated 1835–7.
- Grade II\* listed The College, in Church Yard (HER TR 04 SW 146; HER MKE21; NHLE 1184332). This building was originally a college of secular priests, founded in the reign of Edward IV as the vicarage, 420m west of the PDA, but most of that building was demolished in the eighteenth century. Fifteenth-century timber-framed north-wing, eighteenth-century west wing in brick.

- Grade II listed No. 50 High Street (HER TR 04 SW 243; HER MKE23; NHLE 1071093), a timber-framed range, outwardly early eighteenth century, 435m west-north-west of the PDA.
- Grade II listed No. 54 High Street (HER TR 04 SW 177; HER MKE21; NHLE 1184522), an early eighteenth-century house, 440m west of the PDA.
- Grade II listed K6 telephone kiosk, near north-east corner of Church Yard (HER TR 04 SW 338; HER MKE21; NHLE 1221245), 440m west of the PDA.
- Grade II listed Nos 1–3 North Street (HER TR 04 SW 346; HER MKE22; NHLE 1071036), probably a seventeenth-century timber-framed building, 440m west-north-west of the PDA.
- Grade II\* listed Nos 51–55 High Street (HER TR 04 SW 270; HER MKE22; NHLE 1362831), a fifteenth to sixteenth-century timber-framed building, 440m west-north-west of the PDA.
- Grade II listed No. 20 North Street (HER TR 04 SW 226; HER MKE22; NHLE 1362884), a fifteenth-century timber-framed house, 440m west-north-west of the PDA.
- Grade II listed No. 1 Middle Row (HER TR 04 SW 215; HER MKE21; NHLE 1071065), a sixteenth-century timber-framed building, 450m west of the PDA.
- Grade II listed No. 18 North Street (East side) (HER TR 04 SW 163; HER MKE21; NHLE 1184708), a pair of timber-framed houses re-fronted in the eighteenth century, 450m west-north-west of the PDA.
- Grade II listed Masonic Temple and Hall, No. 32 North Street (HER TR 04 SW 207; HER MKE21; NHLE 1071040 ), early nineteenth century, 450m west-north-west of the PDA.
- Grade II listed No. 13 Middle Row (HER TR 04 SW 276; HER MKE22; NHLE 1300042), a narrow timber-framed building of unknown date, 450m west of the PDA.
- Grade II\* listed No. 22 North Street (HER TR 04 SW 203; HER MKE21; NHLE 1071037), an eighteenth-century two-storey house, 455m west-north-west of the PDA.
- Grade II listed No. 24 North Street (HER TR 04 SW 204; HER MKE21; NHLE 1071038), eighteenth century in origin but altered in the nineteenth, 455m west-north-west of the PDA.
- Grade II listed The Clergy House, Church Yard (HER TR 04 SW 158; HER MKE21; NHLE 1071116), eighteenth century, 460m west of the PDA.

- Grade II listed churchyard of the parish church of St Mary the Virgin (HER TR 04 SW 148; HER MKE21; NHLE 1184294). This contains some eighteenth-century table tombs, some eighteenth-century headstones with cherub, skull, hour-glass or book of judgement motifs, some oval body-stones and some early nineteenth-century headstones with shell and scroll motifs, 460m west of the PDA.
- Grade II listed No. 26 North Street (HER TR 04 SW 286; HER MKE22; NHLE 1362846), early nineteenth century, 460m west-north-west of the PDA.
- Grade II listed No. 1B Middle Row (HER TR 04 SW 333; HER MKE22; NHLE 1362860), a timber-framed building, 460m west-north-west of the PDA.
- Grade II listed K6 telephone kiosk in alley connecting northern line of High Street with Middle Row (HER TR 04 SW 197; HER MKE22; NHLE 1221256), 460m west-north-west of the PDA.
- Grade II listed No. 12 Middle Row (HER TR 04 SW 349; HER MKE22; NHLE 1071067), a sixteenth-century timber-framed building with plastered front, 460m west of the PDA.
- Grade II listed No. 11 Middle Row (HER TR 04 SW 218; HER MKE23; NHLE 1300040), eighteenth century or earlier, 460m west-north-west of the PDA.
- Grade II listed No. 28 North Street (HER TR 04 SW 252; HER MKE22; NHLE 1071039), early nineteenth century, 465m west-north-west of the PDA.
- Grade II listed wall to south-west of The College, Church Yard (HER TR 04 SW 355; HER MKE22; NHLE 1071115), 465m west-south-west of the PDA.
- Grade II listed No. 14 North Street (HER TR 04 SW 168; HER MKE23; NHLE 1362863), a timber-framed building re-fronted in the eighteenth century, 450m west-north-west of the PDA.

## 6. ARCHAEOLOGICAL AND HISTORICAL EVIDENCE

- 6.1 An HER search (Figs 2–5) was ordered from Kent County Council, as well as a list of reports of archaeological investigations not yet included in the HER. The HER and reports search covers a radius of 500m around NGR TR 01528 42754. These records have been assessed in terms of their particular relevance to the PDA and only significant evidence is cited in this report.
- 6.2 General historical context for archaeological findings is provided where applicable/ significant in terms of results, and a survey of published and unpublished maps (including geology and contour survey) has been undertaken.
- 6.3 No pertinent geophysical surveys were available. Only photographs, images or results showing significant features or topographical developments are reproduced, the

findings incorporated with map regression, documentary evidence and archaeological sections of the report as appropriate, and fully referenced.

6.4 All results of analyses are presented below in synthesis and in order of chronology.

*Prehistoric (c 500,000 BP – AD 43)*

6.5 The PDA falls within the area classified by the Stour Basin Palaeolithic Project as Palaeolithic Character Area (PCA) 36 (Fig 5), defined as 'Stour alluvium and underlying deposits, within Wealden basin in vicinity of Ashford, and as far north as Wye'. The report notes that 'Few finds are known. The main site is the quarry at Conningbrook Manor [1.7km north-east of the PDA]. This has produced (very rare, for Britain) evidence of Early Upper Palaeolithic presence in form of a distinctive part-bifacially worked blade point. Otherwise, the only find is the surface find of a handaxe at Westhawk Farm (MKE18145) [3.19km south-west of the PDA], which most likely has been reworked from terrace deposits above the alluvium' (Cuming 2015, appendix 5, 40).

6.6 No further prehistoric archaeological remains are reported within the PDA or within a 500m radius of NGR TR 01528 42754.

*Romano-British (c AD 43–450)*

6.7 The Roman road running from Benenden to Canterbury via Ashford (HER TQ 93 NE 66; HER MKE4461; Margary 1973, Road 130) passed c 500m to the west of the PDA.

6.8 No Romano-British archaeological remains are reported within the PDA or within a 500m radius of NGR TR 01528 42754.

*Anglo-Saxon (c AD 450–1066)*

6.9 No Anglo-Saxon archaeological remains are reported within the PDA or within a 500m radius of NGR TR 01528 42754.

*Medieval (c AD 1066–1540)*

6.10 *Domesday* records Ashford as two settlements: Ashford with 21 households, two mills and a church; and South Ashford, a smaller settlement to the south-west, comprising 4 households (*Domesday on-line*, sv Ashford and South Ashford). There is a possibility that the mill or mills mentioned were watermills in the locality of the PDA.

6.11 The only nearby record from this period on the HER is 'Mummerys' Nos 18–20 (even) East Hill, (HER TR 04 SW 77; HER MKE879), 170m west of the PDA, recorded as a medieval house of c 1500.

*Post-medieval (c AD 1540–1900)*

6.12 A watermill is one of the buildings listed in a schedule of manorial landholdings in Ashford transferred in 1556 to Sir Andrew Judde of London ('Manor of Ashford', 1556, Kent Archives, catalogue number U386/T40, see Icení 2021, 10). Given the position of the settlement of Ashford in this period to the west of the river, it is likely the mill stood on or near the current PDA.

6.13 Edward Hasted (1798, 526) described the parish in 1798 as follows.

*... it is most pleasant and healthy, on the knoll of a hill, of a gentle ascent on every side, the high road from Hythe to Maidstone passing through it, from which, in the middle of the town, the high road branches off through a pleasant country towards Canterbury... The lands round it are much upon a gravelly soil, though towards the east and south there are some rich fertile pastures, intermixed with arable land, and several plantations of hops; but toward the west, the soil is in general sand, having much quarystone mixed with it, where there is a great deal of coppice wood, quite to Potter's corner, at the boundary of this parish.*

6.14 The 1769 Andrews, Dury and Herbert map (Fig 6) depicted Ashford as restricted to the current High Street to the west of the Stour and surrounded by pasture and arable land as Hasted describes; it showed the main road crossing the river, with some indication of buildings immediately west of the bridge, and an L-shaped building straddling the river – most probably a mill. The 1797 Ordnance Survey (OS) drawing (Fig 7) showed a little more detail, including the branching of the River Stour into the Great Stour and East Stour, but while it showed buildings west of the bridge there is no indication on this map of buildings straddling the river. The Mudge map of 1801 (Fig 8) likewise showed no development on the land between the river branches, but these are probably not indicative of the true position. We know the mill was in existence at this time as a sales particular of the Manor of Ashford from 1804 (Kent Archives, catalogue no U55/SP/304) records the sale of the mill and adjacent lands. The auction catalogue notes that the building was currently under a fourteen-year lease (1798-1812) to a Mr John Hutton, at a yearly rent of £52:10:0. The mill is described as follows (Icení 2021, 10).

*'a Capital Water Corn-Mill, with 2 Pair of French Stones and 4 Floors, advantageously situated for Trade, at the bottom of Ashford Town, on a regular Stream well supplied with Water, and capable of grinding 30 Quarters of Corn per Week, with a neat Dwelling House adjoining, containing a small entrance Hall, Parlour, Kitchen, and Scullery, two good Bed Chambers and two neat Garrets'. Lot 5 also included a garden, paddock, and, across the road, 'a Stable for four Horses... with a Lodge for a Wagon [sic] and Cart'.*

6.15 The 1843 tithe map apportionments of Ashford Parish named the same John Hutton as the owner and occupier of the land in question, consisting of the mill, stable and yard, garden, and pasture (Apportionments on-line, sv Ashford). The accompanying map (Fig 9) showed the PDA as made up of a north-eastern island between the two branches of the river, and a separate neck or nose of land between the two rivers to its south. It

recorded a building on the north-eastern island, but nothing explicitly on the southern, though a building was recorded alongside the road on the west bank of the Great Stour, which appeared on later maps as a corn mill. The field to the south was recorded as Great Bridge House field, owned by a Richard Greenhill.

6.16 The 1872 OS large-scale (1:500) town plan (Fig 10) showed the mill, recorded on the HER as East Hill Flour Mill (HER TR 04 SW 483; HER MKE11), as T-shaped. This was following the addition of an engine house to the immediate north-east of Provender Mill, on the north-western side of the PDA, and crossing the Great Stour, with a circular tank recorded on the north island, and houses or other buildings on the north-eastern. The map labelled the bridge as Mill Bridge, and showed the wider environs beginning to be developed, with a public house (The Queen's Head) opposite the mill to the north-west and other plots of land shown with residential developments. The First Edition OS 6-inch (to a mile) map of 1876 map (Fig 11) recorded Mill Bridge below Martyrs Field, with Hythe Road running eastwards from the bridge, now lined on the south side by rows of houses. The PDA was shown as an extensive corn mill, with buildings shown again on the north-east island. The 1898 Second Edition OS 6-inch map (Fig 12) showed little change within the PDA, though part of the buildings on the southern part of island beside Martyr's field was now labelled as a Post Office. The more detailed Second Edition 25-inch OS map of the same year (Fig 13) showed four terraced houses on the southern part of the island near Martyr's Field, the most south-easterly labelled PO, with a property set further back from the bridge, and showed the area to the east as labelled 'Allotment Gardens'. The corn mill was still present, whilst the rest of the PDA to its south remained undeveloped, though houses were present beyond the PDA, outside of the mill property.

6.17 Other features from this period recorded on the HER include the following.

- The site of a brewery on Wellesley Road (HER TR 04 SW 97; HER MKE908), 240m north-west of the PDA. The brewery was reportedly established before 1847, after which it changed hands several times.
- A tannery (HER TR 04 SW 98; HER MKE166) located at the end of Tannery Lane, next to the Great Stour, 345m south-south-west of the PDA.
- A milestone (HER TR 04 SW 399; HER MKE78), now used as a gatepost in a retaining wall by No. 120 Hythe Road, 325m south-east of the PDA.
- Henwood Pumping Station (HER TR 04 SW 21; HER MKE396), a late nineteenth-century water pumping station, 355m east of the PDA.
- Ashford Cottage Hospital (HER TR 04 SW 110; HER MKE17), established in 1869, 360m north-west of the PDA but superseded by a purpose-built hospital in 1877.
- A former workshop or warehouse (HER TR 04 SW 93; HER MKE166) on Park Street, 400m west of the PDA. It has been suggested that this was the site of a former print works.

- The site of Lion Brewery (HER TR 04 SW 100; HER MKE90) on Dover Place, 445m south-south-west of the PDA. It was established in 1850 and had to be rebuilt after a fire in 1864.
- A warehouse (HER TR 04 SW 431; HER MKE16) to the rear of No 8 North Street, 445m west of the PDA.
- A Baptist church on Station Road (HER TR 04 SW 473; HER MKE10), built in 1881, 300m west of the PDA.
- East Stour Farm (HER MKE87338), a loose courtyard plan farmstead with buildings to three sides of the yard, 430m south-south-east of the PDA.

#### *Modern (c AD 1900–2000)*

6.18 The Third Edition OS 25-inch map of 1907 (Fig 14) showed massive development within the PDA. Though little change had occurred on the island to the north-east (near Martyr's Field), within the rest of the PDA the main mill (now labelled Victoria Flour Mills) had been expanded in 1901 by H S Pledge (1838–1903), who had erected a large building (flour mill and a warehouse) to its east, with further ancillary buildings to its south, quadrupling the footprint of the mill buildings, but keeping the older ones intact. Further expansion to the ancillary buildings was shown on the 1935 Fourth Edition OS 25-inch map (Fig 15). Aerial photographs from the 1940s and 1960s (Figs 16–17) show little change, but a 1990s aerial photograph (Fig 18) shows the loss of the southern ancillary buildings and the building of a carpark, following the ending of operations at the mill by a fire in 1974. Similarly, the buildings on the southern part of Martyr's Field had been demolished and the new bypass, Mace Lane, had been built to the immediate north of the PDA. Satellite images from 2003 to the present (Figs 19–23) show little change within the PDA since the 1990s.

6.19 Other features from this period in the vicinity include:

- a George V pillar box on Hythe Road (HER TR 04 SW 419; HER MKE77), 240m south-east of the PDA;
- a Second World War air raid shelter (HER TR 04 SW 405; HER MKE78) on Station Road, 460m south-west of the PDA.

## 7. INTERIM ARCHAEOLOGICAL IMPACT ASSESSMENT

7.1 The following interim impact assessment is clearly based mainly on the circumstantial evidence gathered from desk-based assessment, and, along with resultant mitigation suggestions, is offered chiefly as guidance to the client on likely follow-on work. It should not be considered or referred to as an 'impact assessment' *per se*, since we recognise that more fixed and specific detail of groundworks are required in order to compare with sufficient actual evidence from fieldwork, for a full impact assessment.

### *Circumstantial archaeological evidence*

- 7.2 The PCA 36 deposits recorded in the area (Fig 5), suggest a moderate in places, otherwise low, likelihood of producing Palaeolithic remains, with such potential finds 'likely to be of high importance, [as would be] any recognition of buried Stour fluvial deposits with palaeo-environmental remains' (Cuming 2015, appendix 5, 40).
- 7.3 Existing evidence is insufficient to judge the likelihood of other prehistoric or Romano-British archaeology surviving within the PDA. However, the proximity of the site to the river, and the record of mills in both *Domesday* and sixteenth-century manorial records suggest a possibility of the use of the site during the Anglo-Saxon, medieval and post-medieval periods, with definite use of the site for a mill in the last period, confirmed by map regression and documentary evidence, and continuing into the modern period.

### *Potential existing impacts*

- 7.4 Previous impacts to the PDA might be associated with groundworks from the construction and demolition of the early twentieth-century mill buildings and any associated services, but this is unlikely to have completely removed earlier archaeological remains.

### *Potential impacts*

- 7.5 There is a chance that extant archaeological features, artefacts or ecofacts may be disturbed or destroyed by groundworks within the PDA. The destruction of preserved archaeology without proper record risks a major negative impact on the historic environment.
- 7.6 Further mitigation of the potential effects of development groundworks is likely to be a condition on planning consent.

## SOURCES

- ABC 2017, *Ashford Local Plan 2030*, Ashford Borough Council  
(<https://www.ashford.gov.uk/media/jw3nbvg1/adopted-ashford-local-plan-2030.pdf>).
- Apportionments on-line, *Tithe Apportionments for Kent*, Kent Archaeological Society  
(<https://www.kentarchaeology.org.uk/research/tithes/ashford>).
- BGS on-line, *Geology of Britain Viewer*, British Geological Survey  
(<http://mapapps.bgs.ac.uk/geologyofbritain3d/>).
- Cuming, P (ed) 2015, *Stour Basin Palaeolithic Project: Final Report Version 2.1*, Kent County Council  
([https://archaeologydataservice.ac.uk/archives/view/stourbasin\\_he\\_2017/downloads.cfm](https://archaeologydataservice.ac.uk/archives/view/stourbasin_he_2017/downloads.cfm)).
- Domesday on-line, *Open Domesday*, Powell-Smith, A, Palmer, J, and Slater, G  
(<https://opendomesday.org/place/TR0142/ashford/>  
<https://opendomesday.org/place/TR0041/south-ashford/>).
- Hasted, E 1798, *The History and Topographical Survey of the County of Kent*, vol 7, Bristow, Canterbury (<https://www.british-history.ac.uk/survey-kent/vol7/pp526-545>).
- Iceni, 2021, 'Former Pledge's Flour Mill Ashford Heritage Statement', unpublished Iceni Projects Client Report.
- KCC 1996, 'The Historic Parks and Gardens of Kent (Kent Gardens Compendium)', unpublished Kent County Council and Kent Gardens Trust document.
- Margary, I D 1973, *Roman Roads in Britain*, London: J Baker.
- NPPF 2021, *National Planning Policy Framework*, Ministry of Housing, Communities and Local Government  
([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004408/NPPF\\_JULY\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004408/NPPF_JULY_2021.pdf)).
- SERF on-line, *South East Research Framework*, East Sussex, Kent, Surrey and West Sussex County Councils with Historic England (<https://www.kent.gov.uk/leisure-and-community/history-and-heritage/south-east-research-framework>).

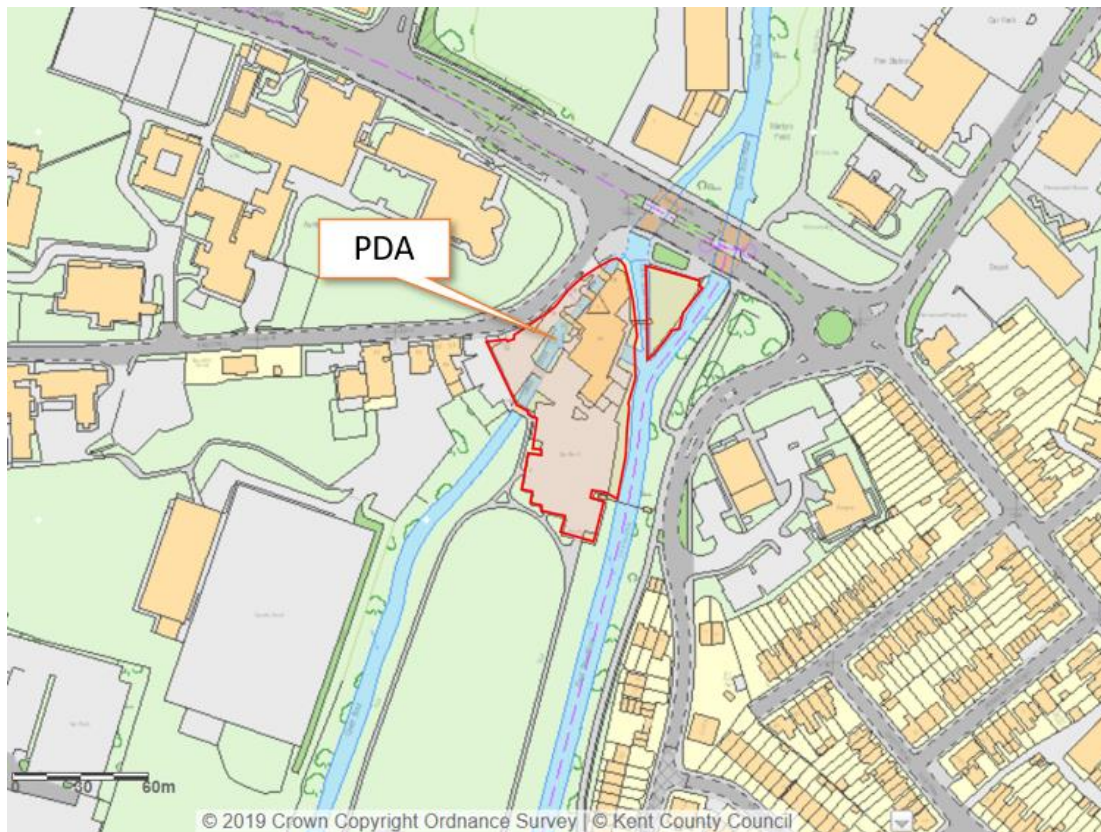


Fig 1. Location of the PDA

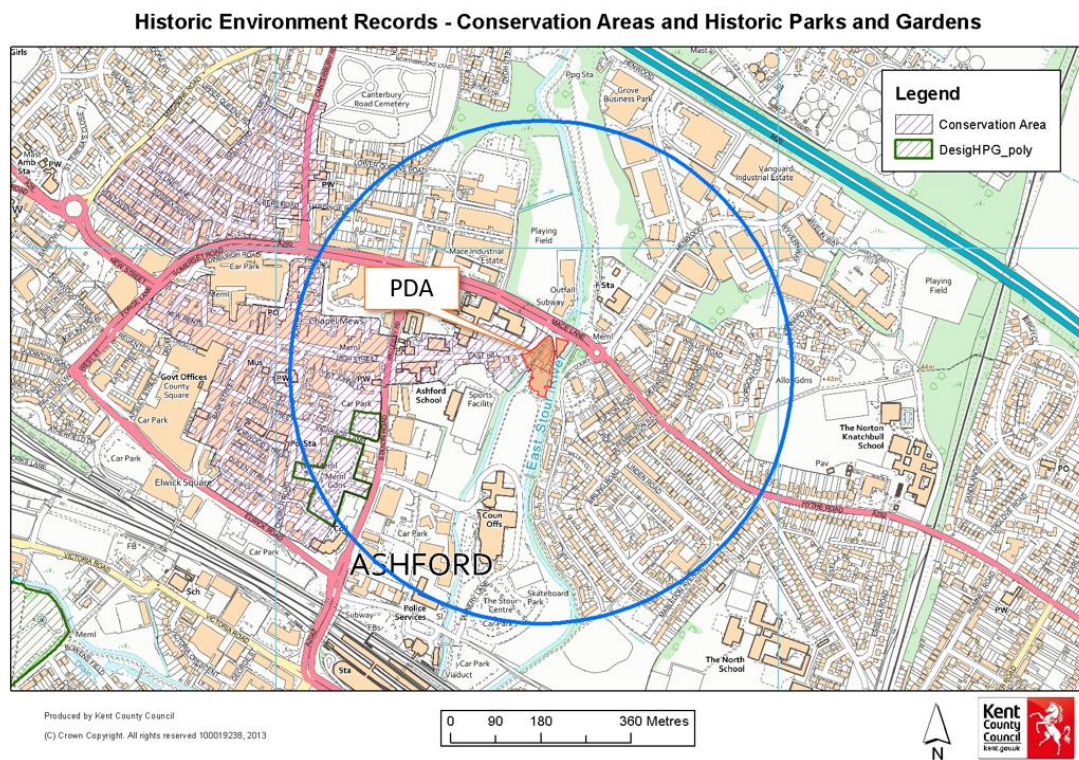


Fig 2. HER search of 500m radius of the PDA (centred) showing results for Conservation Areas and Historic Parks and Gardens

### Historic Environment Records - Events

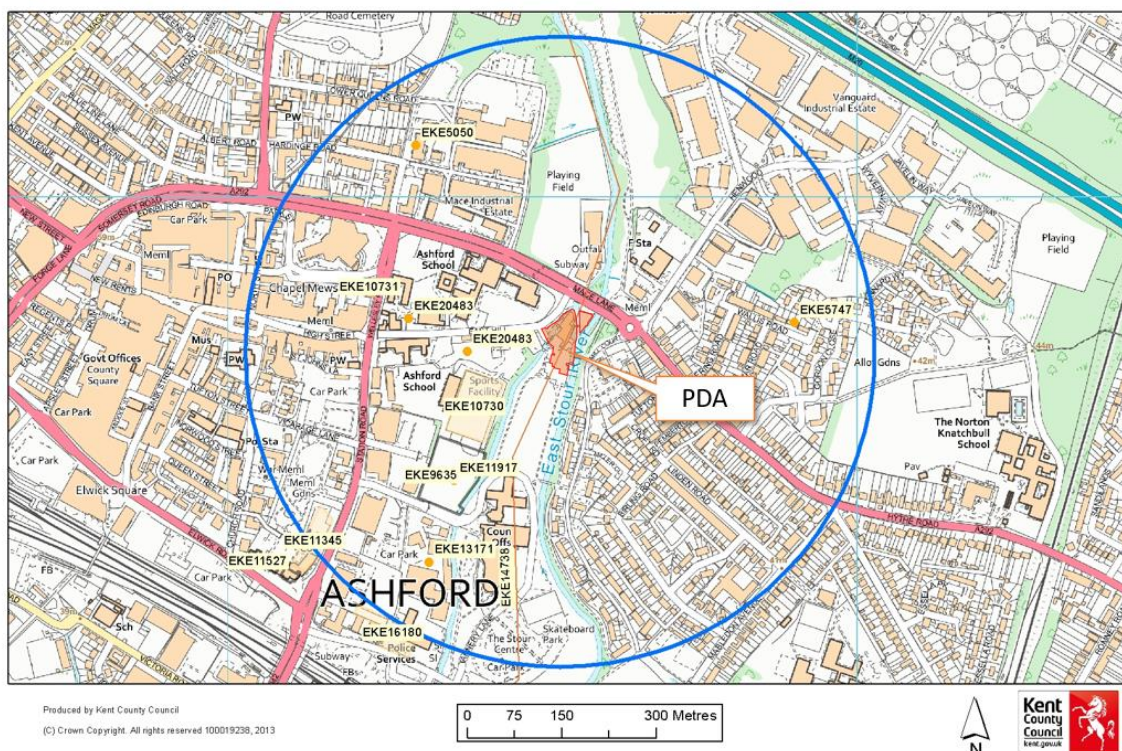


Fig 3. HER search of 500m radius of the PDA (centred) showing results for Events

### Historic Environment Records - Monuments

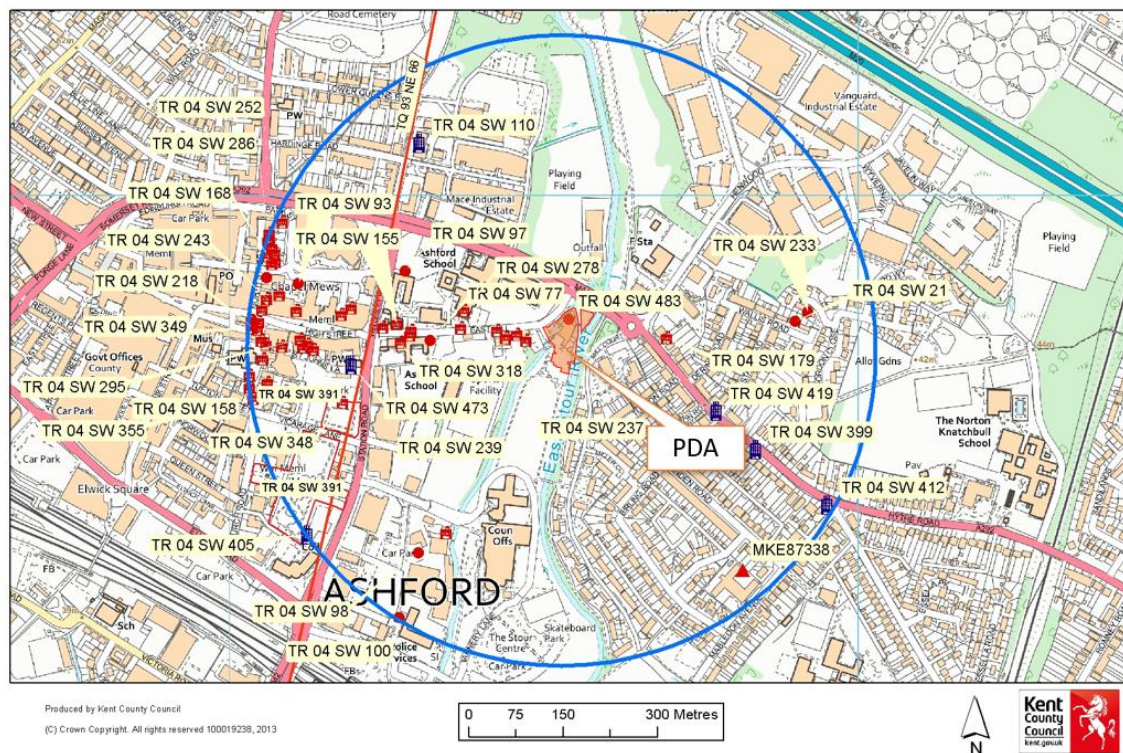


Fig 4. HER search of 500m radius of the PDA (centred) showing results for Monuments

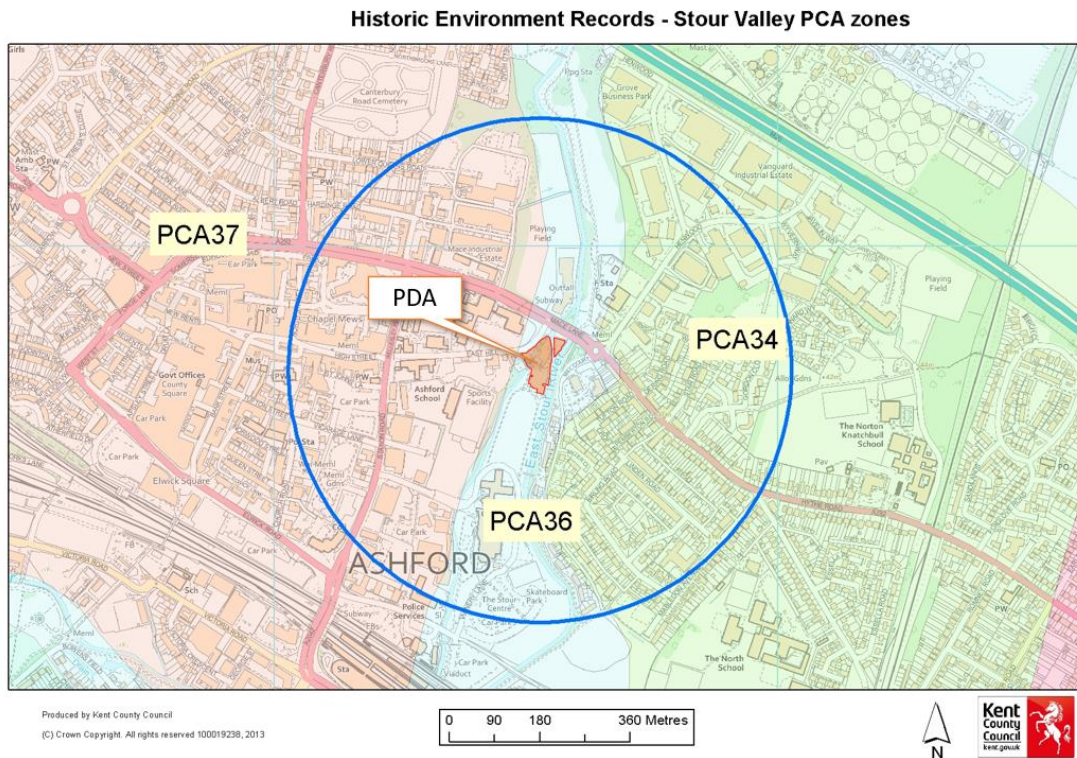


Fig 5. HER search of 500m radius of the PDA (centred) showing results for Palaeolithic Character Areas



Fig 6. Extract from the 1769 Andrews, Dury and Herbert map, showing the location of the PDA (detail, right).



Fig 7. Extract from the Ordnance Survey (OS) drawing of 1797 (British Library Shelfmark OSD 105), showing the location of the PDA

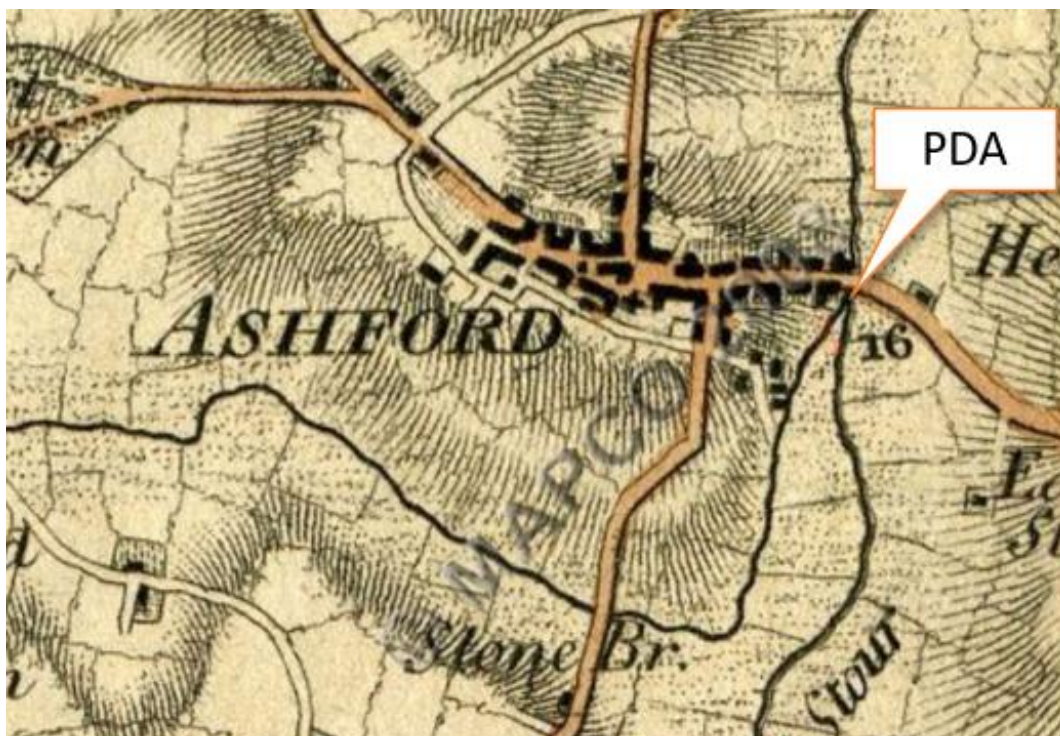


Fig 8. Extract from the 1801 Mudge map, showing the location of the PDA.

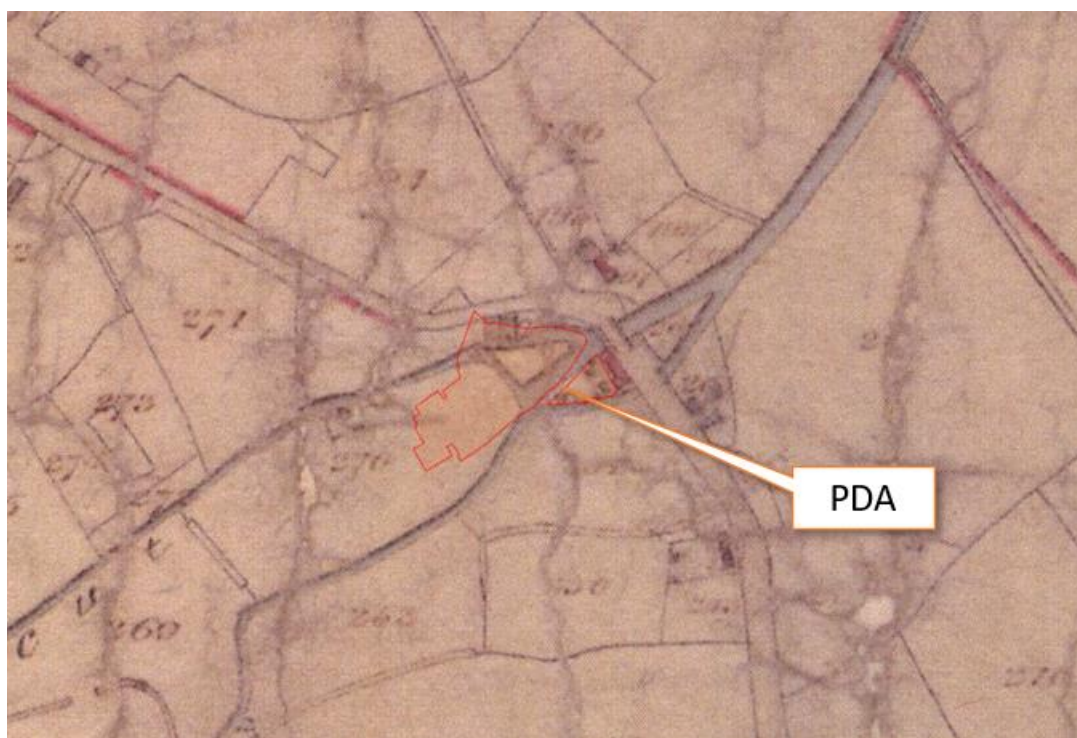


Fig 9. Extract from the 1843 tithe map, showing the location of the PDA

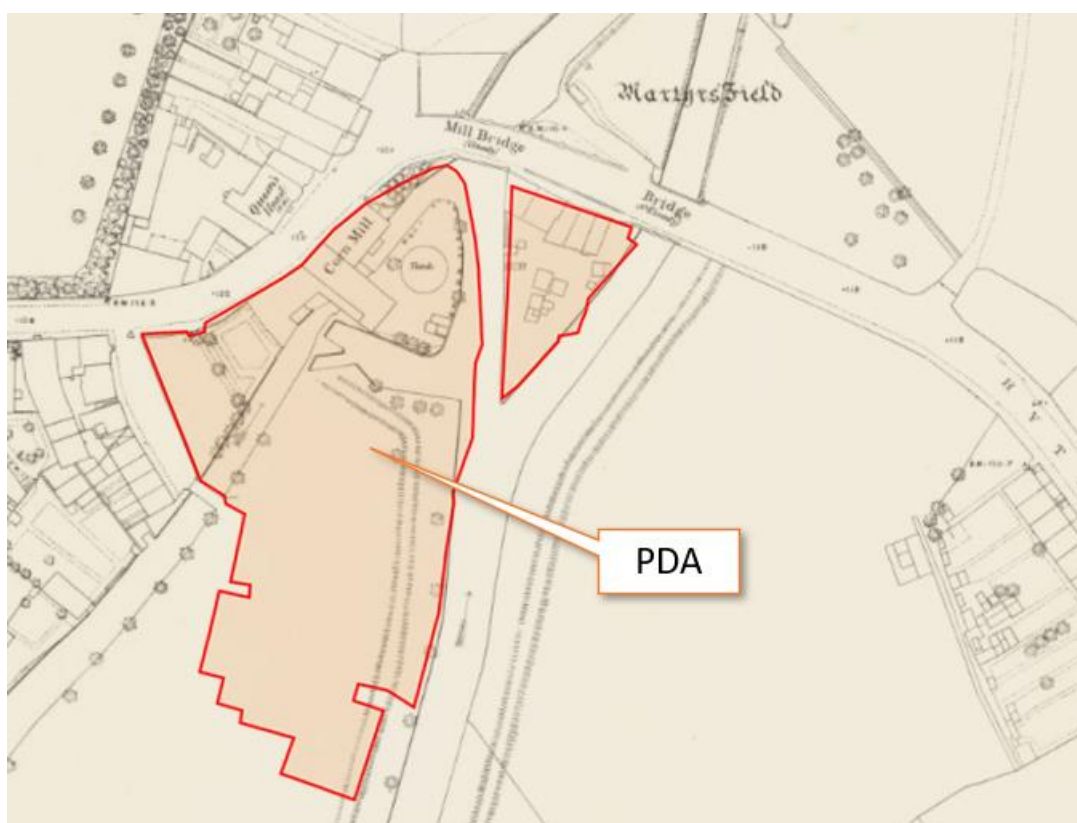


Fig 10. Extract from the OS 1:500 plan Kent LXV.5.20, surveyed 1871, published c 1872, showing the location of the PDA



Fig 11. Extract from the First Edition OS 6-inch map Kent LXV, surveyed 1871–22, published 1876, showing the location of the PDA

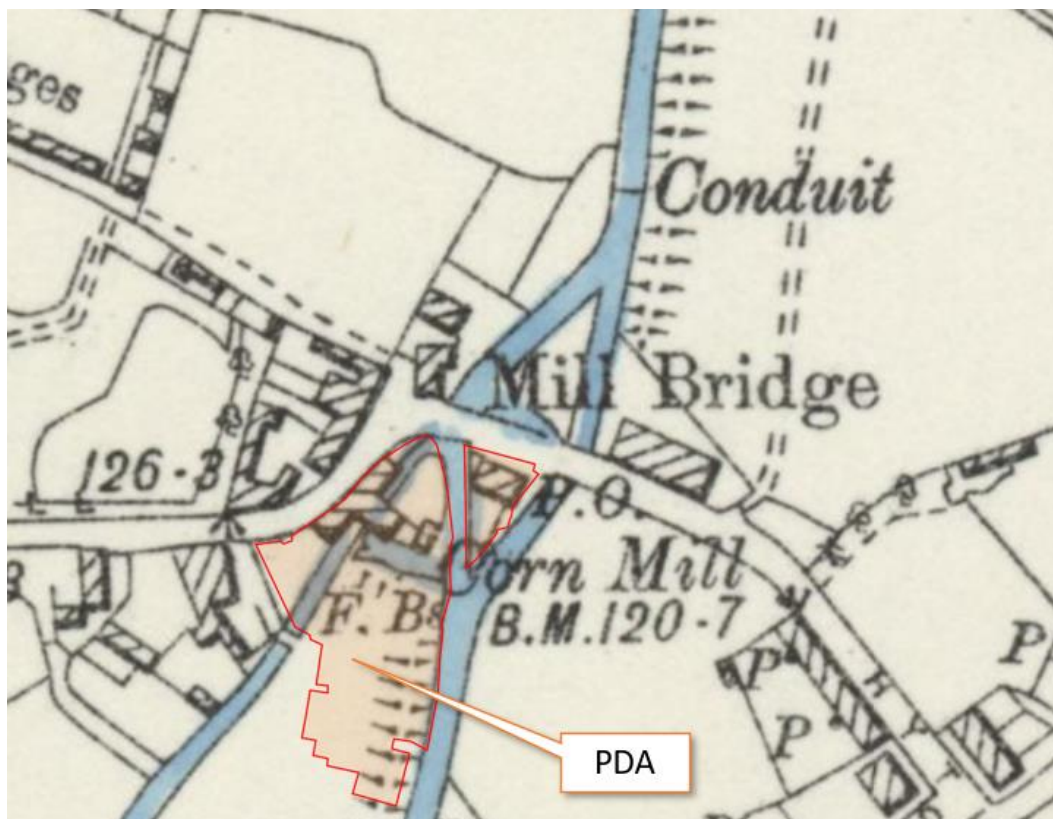


Fig 12. Extract from the Second Edition OS 6-inch map Kent LXV.NW revised 1896, published 1898, showing the location of the PDA

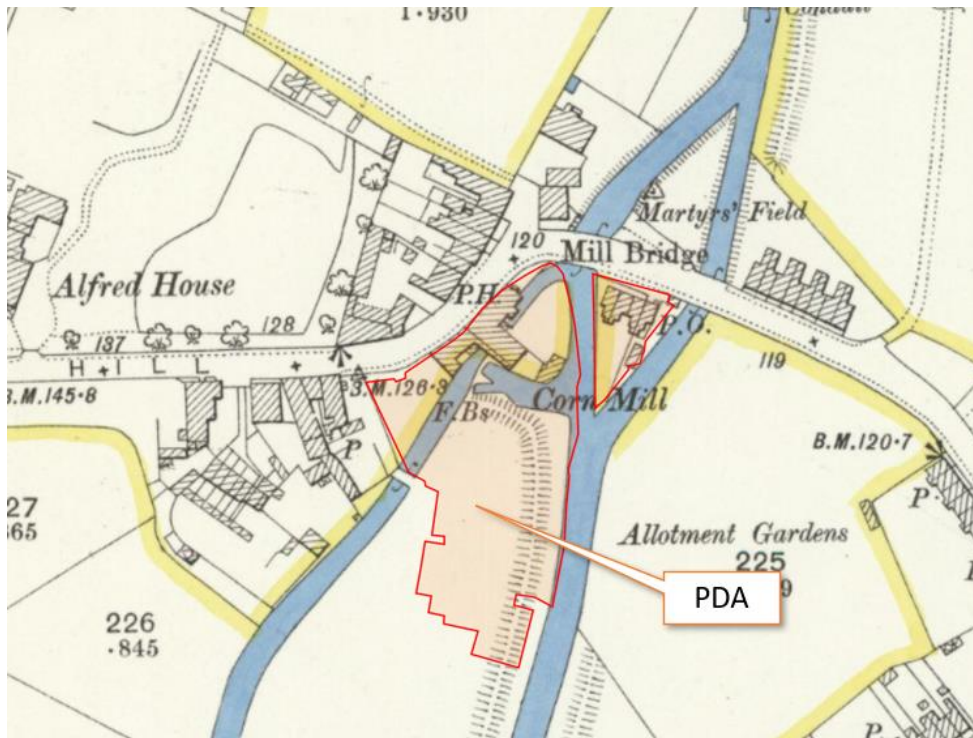


Fig 13. Extract from the Second Edition OS 25-inch map Kent LXV.5, revised 1896, published 1898, showing the location of the PDA

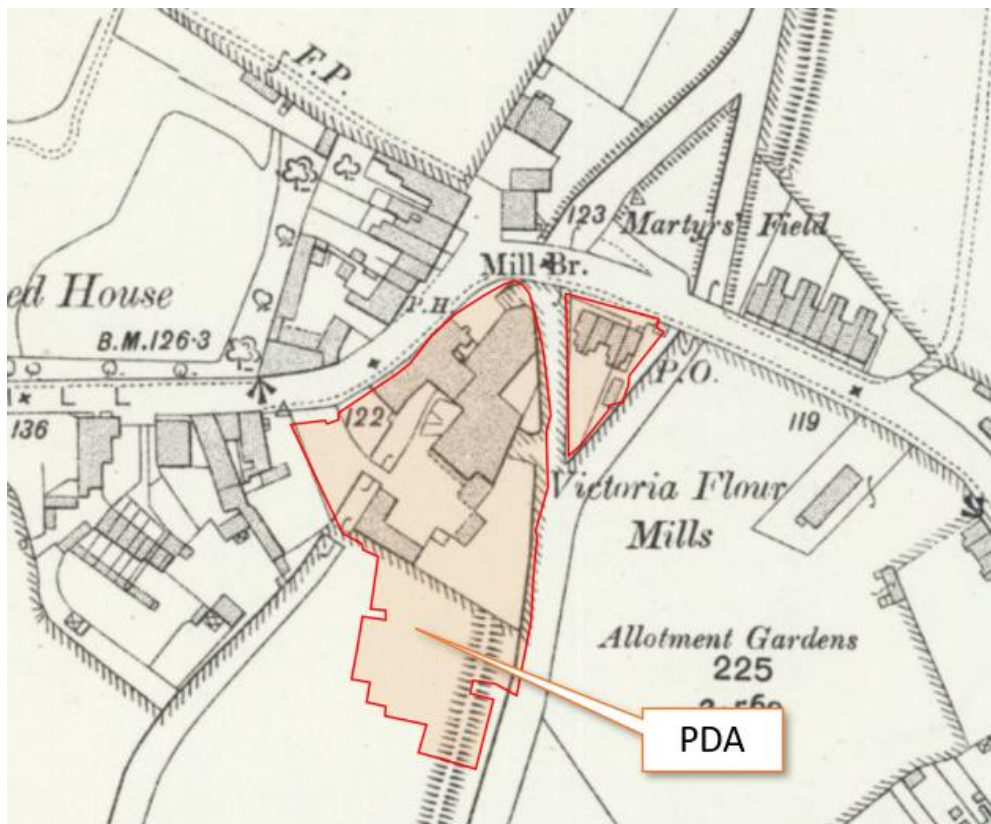


Fig 14. Extract from the Third Edition 25-inch OS map Kent LXV.5, revised 1906, published 1907, showing the location of the PDA

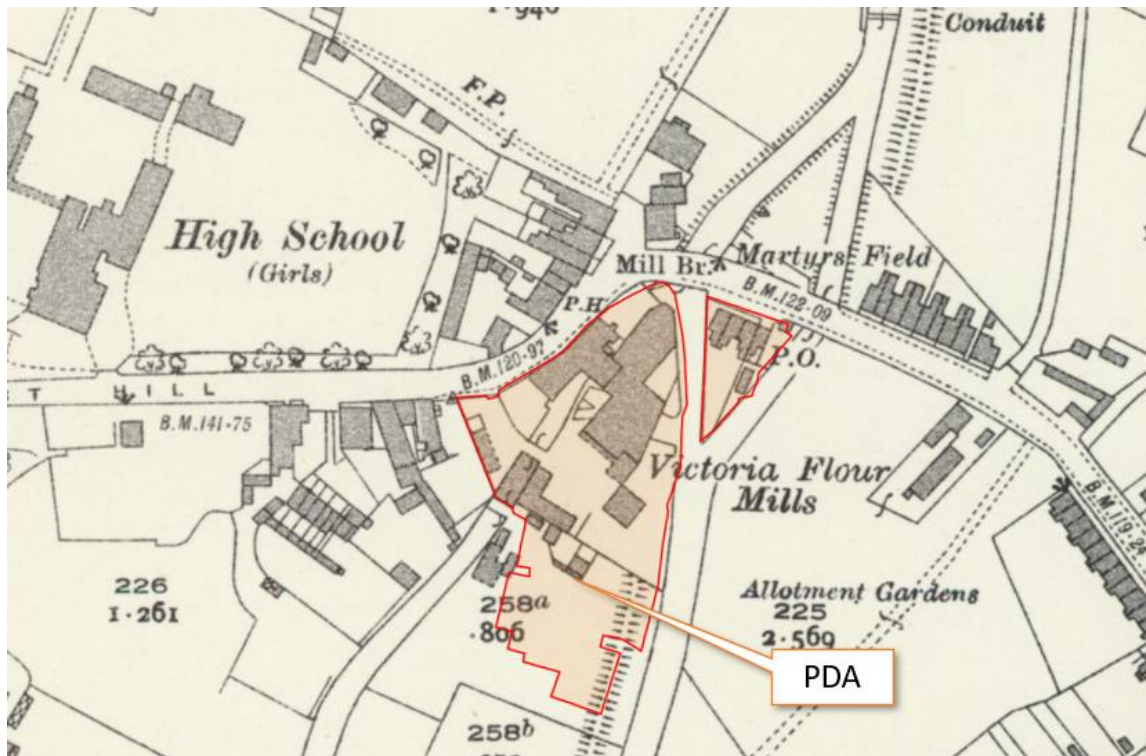


Fig 15. Extract from the Fourth Edition OS 25-inch map Kent LXV.5, revised 1931, published 1935, showing the location of the PDA

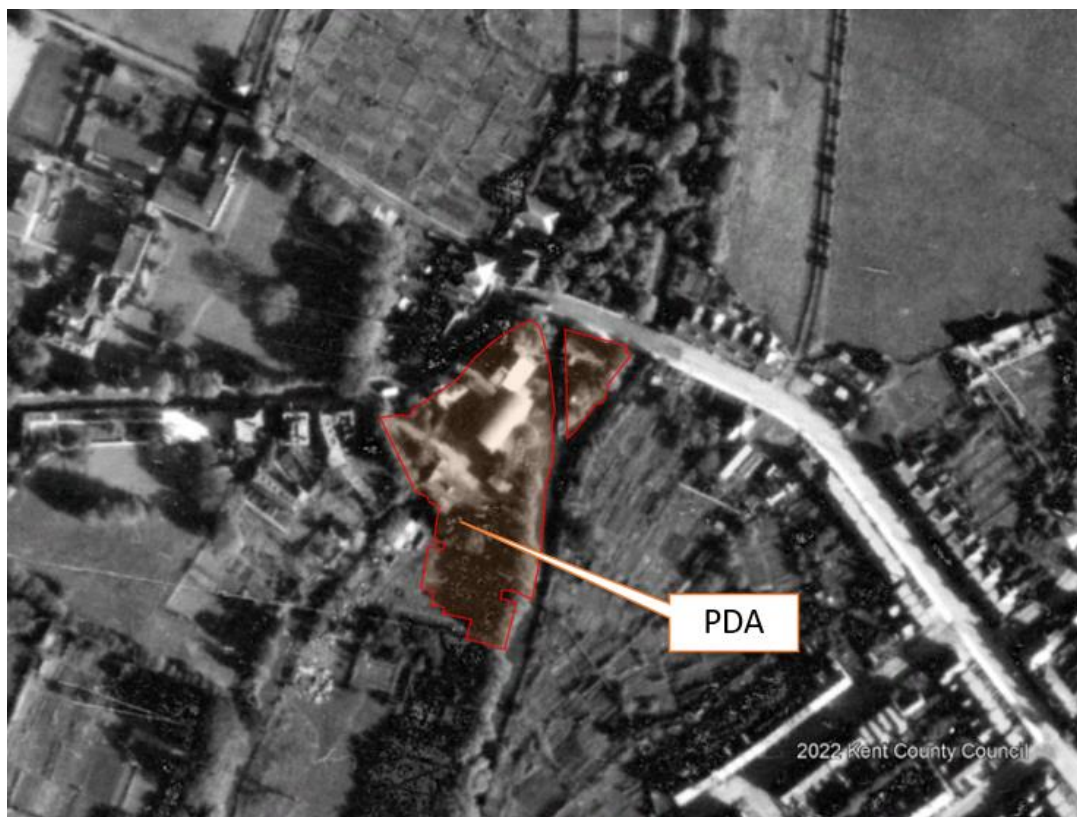


Fig 16. Aerial photograph from the 1940s, showing the location of the PDA (source: Google Earth)



Fig 17. Aerial photograph from the 1960s, showing the location of the PDA (source: Google Earth)



Fig 18. Aerial photograph from the 1990s, showing the location of the PDA (source: Google Earth)



Fig 19. Satellite image from 2003, showing the location of the PDA (source: Google Earth)



Fig 20. Satellite image from 2007, showing the location of the PDA (source: Google Earth)

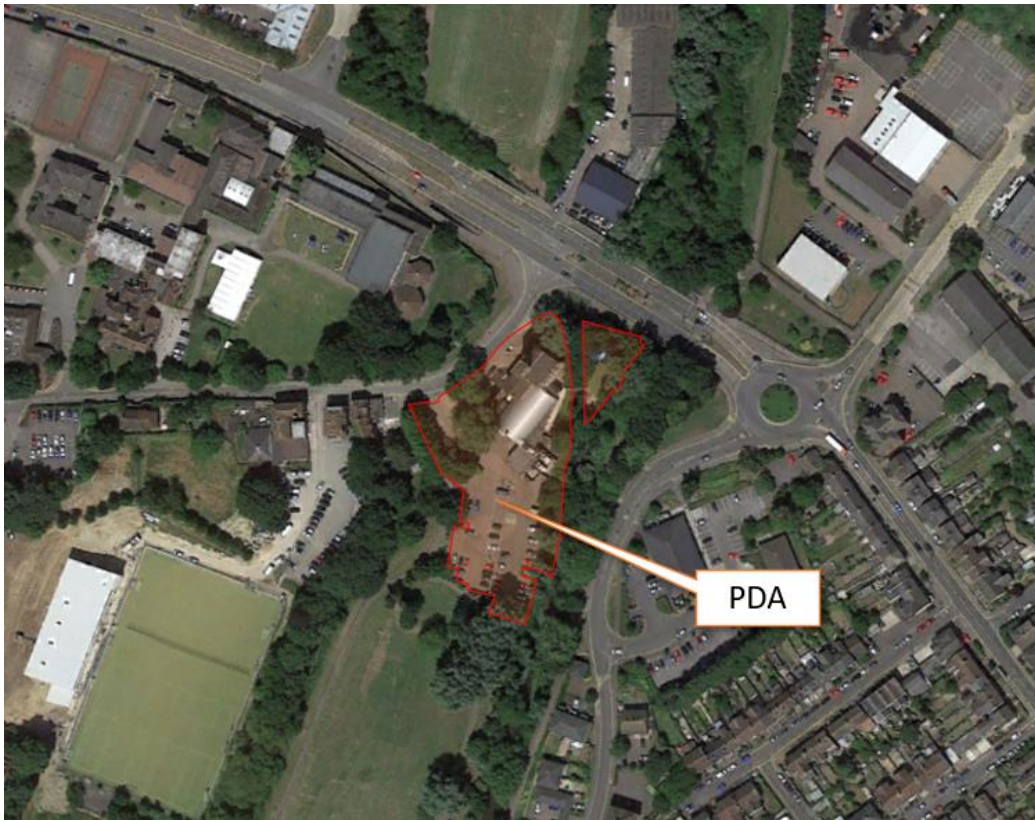


Fig 21. Satellite image from 2013, showing the location of the PDA (source: Google Earth)



Fig 22. Satellite image from 2017, showing the location of the PDA (source: Google Earth)



Fig 23. Satellite image from 2021, showing the location of the PDA (source: Google Earth)