

**Land off Cherry Gardens,
Littlestone-on-Sea,
New Romney,
Kent TN28 8QR**

19 MAY 2023

Archaeological Desk-based Assessment

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SUMMARY

This desk-based assessment of land off Cherry Gardens, Littlestone-on-Sea, New Romney, Kent, TN28 8QR (TR 08011 25006; Fig 1) was commissioned of Canterbury Archaeological Trust in August 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.

Though any piling or augering might impact slightly upon deposits of largely only geoarchaeological or paleoenvironmental interest, there is a very low chance that archaeological features, artefacts or ecofacts may be disturbed or destroyed by other groundworks within the PDA. The destruction of preserved archaeology without proper record risks a major negative impact on the historic environment.

Subject to approval from the Local Authority's archaeological adviser, further mitigation of the potential effects of development groundworks seems unlikely 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 off Cherry Gardens, Littlestone-on-Sea, New Romney, Kent, TN28 8QR (TR 08011 25006; Fig 1); it was commissioned of Canterbury Archaeological Trust (CAT) in August 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 undertaken on 7 September 2022.
- 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 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 relevant Folkestone and Hythe (formerly Shepway) District Council policies Archaeological Monitoring at The Allotments, Church Lane, New Romney, Kent (SDC 2018 390 and 393) are HE1 (Heritage Assets) and HE2 (Archaeology).

Policy HE1 Heritage Assets

The District Council will grant permission for proposals which promote an appropriate and viable use of heritage assets, consistent with their protection and conservation, particularly where these bring redundant or under-used buildings and areas back into use or improve public accessibility to the asset.

Policy HE2 Archaeology

Important archaeological sites, together with their settings, will be protected and, where possible, enhanced. Development which would adversely affect them will not be permitted.

In areas where there is known archaeological interest, the District Council will require appropriate desk-based assessment of the asset has been provided as part of the planning application. In addition, where 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 heritage asset of archaeological interest is accepted, the 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. 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 District 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 3.1 The PDA is situated c 1.5 km east of the centre of New Romney in Littlestone-on-Sea, on the south-east coast of Kent, about 600m west of the present-day coastline. The PDA comprises a roughly triangular area (Fig 1) of flat grassed meadow, bounded by hedges and mature trees to the south-east, hedging to the north and fencing to the south-west. It is adjoined to the north by fields and the Littlestone-On-Sea Golf course, and on all other sides by residential properties within gardens: those to the south-west lie off Cherry Gardens and The Fairway, those to the south-east off Orchard Drive. The area lies at a height of 3–4m above Ordnance Datum.

4.2 Bedrock geology within the PDA is shown as Hastings Beds sandstone, siltstone and mudstone, with overlying superficial deposits of tidal flats sand (BGS on-line).

4.3 The superficial geology of the New Romney area was identified during geoarchaeological investigations on the former New Romney Allotments and during the First Time Sewerage Scheme, over 1km west/south/west of the PDA (Green and Young 2013; CAT unpublished archive; Fig 3). In both cases superficial deposits were represented by sands and laminated clay sands overlain by silty clays with sand laminae. Such a sequence ties in well with the overall soil sequence as mapped by Green (1968).

4.4 Recent work undertaken on the formation of the Romney Marsh during the later Holocene (Long et al 2007a) describes a complicated background within which the development of the PDA can be placed.

4.5 The marsh is surrounded by high ground that is formed by Cretaceous Hastings Beds (that also underlie the town) and Wealden Clay deposits. These upland deposits were eroded during the Pleistocene period to form a wide valley that developed into a large sandy bay. At approximately 4000 BC sea level rise slowed, at which point a shingle barrier was formed by longshore drift. This began to develop across the bay in a north-easterly direction eventually extending as far east as Dymchurch (Long et al 2007b, 207).

4.6 Tides containing large amounts of sediment were able to enter the area behind the barrier around its north-east tip forming mudflats as the sediment settled (Eddison 2000, 34; Long et al 2007b, 196). The mudflats slowly backfilled the area behind the barrier, with this process largely keeping pace with the shingle bank as it continued to extend eastwards. Eventually the mudflats became substantial enough for colonisation by plant life resulting in the creation of a salt-marsh.

- 4.7 The marsh continued to increase in size until approximately 1000 BC at which point the sea began to slowly re-advance forming a lagoon (Eddison 2000, 35–6). The deposition of further marine silts preserved much of the vegetation as peat. These silts have been identified to the rear of the barrier, notably along parts of Spitalfield Lane and Ashford Road during the First Time Sewerage Scheme (Holman, *forthcoming*). It was the deposition of these later sediments that allowed the eventual occupation of the marsh by man.
- 4.8 The present site lies to the east of the shingle barrier, in an area that that would have been within the sea until the post-medieval period (Long et al 2007b, 197).

5. DESIGNATIONS

- 5.1 The PDA does not affect or impact upon any World Heritage Sites, Scheduled Monuments, Registered Battlefields, Listed Buildings or Registered Parks and Gardens. Historic Landscape Characterisation has been checked on-line.
- 5.2 The PDA lies c 235m north-west of Littlestone Conservation Area (designated 1990).

6. ARCHAEOLOGICAL AND HISTORICAL EVIDENCE

- 6.1 An HER search (Figs 2–4) 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 08011 25006. 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 No archaeological remains are reported within the PDA or within a 500m radius of the PDA during this period. The various changes in sea-level from the Mesolithic period onwards mean that although initially part of the mainland, from c 8000 BC the PDA lay off the coast, and from c 4000 BC lay just to the east of the shingle bank mentioned in 4.5 above (Fig 5).

Romano-British (c AD 43–450)

6.6 No archaeological remains are reported within the PDA or within a 500m radius of the PDA during this period. It is likely that throughout this time the PDA lay in the sea, just to the east of the shingle bank mentioned in 4.5 above (Fig 5).

Anglo-Saxon (c AD 450–1066)

6.7 No archaeological remains are reported within the PDA or within a 500m radius of the PDA during this period. It is likely that throughout this time the PDA lay in the sea, just to the east of the shingle bank mentioned in 4.5 above (Fig 6).

Medieval (c AD 1066–1540)

6.1 Likewise, no medieval archaeological remains are reported within the PDA or within a 500m radius of the PDA. The town of New Romney, which was focused around Church Road and High Street, probably grew up beside a beach-side trackway, and dates to at least the twelfth-century when St Nicholas's Church (HER TR 02 SE 81) was founded (Tatton-Brown 1989, 258). New Romney was an important port during the early part of this period but was beginning to silt up after the early fifteenth-century (Fig 7). Archaeologically, the silting of the harbour was likely represented by the upper part of the depositional sequence recorded on the New Romney Allotments (Green and Young 2013). Here the silting was represented by greyish-brown silty clays containing marine shells. Similar deposits were recorded during monitoring of trenches cut from the town to the sewage works as part of the First Time Sewerage Scheme (unpublished CAT archive).

Post-medieval (c AD 1540–1900)

6.2 The formation of the land containing the PDA can be assumed to have occurred in the eighteenth century. Leland, writing about New Romney in the 1530s, stated that the sea '...is now two miles away from the town...' (Furley 1880, 199), suggesting the silting-up of the former harbour was well-underway at this time. However, a plan of the area dating to 1592 (Fig 8) shows the vicinity of the PDA as located on the very edge of the shoreline. The Andrews, Dury and Herbert map of 1769 (Fig 9) shows the area of the PDA as lying off-shore, while the 1799 Ordnance Survey (OS) drawing (Fig 10) has it located in a bay, with a spur of shingle to its east labelled as Little Stone, a position also shown on the 1801 Mudge map (Fig 11). The Mudge map seems to show the PDA as sited off the southern edge of an area of what appears to be a gradually forming area of reclaimed marshland labelled 'The Warren'. It is possible this area had been a tidal marsh prior to this. The 1841 tithe map (Fig 12) depicts the area around the PDA in detail, and shows the PDA as now lying in reclaimed land to the immediate north of a newly-built flood defence, which aimed to keep the land to its north from inundation, and to the west of a stream or flood drain labelled Nash's Run, within a parcel of land titled Nash's Run Salts. On the First Edition OS 6-inch (to a mile) map (Fig 13), surveyed in 1871–2, the PDA appears again as undeveloped open land to the immediate north-east of the flood-defence and west of the stream/drain labelled Nashes Run. The same

map shows Little Stone Coastguard Station (HER Number MWX44035) on the coast, c 500m east of the PDA. Close to the latter was the Watch House/Watch Tower, built in the 1870's as a Coastguard Watch Tower (HER TR 02 SE 220; HER MKE99670) and Lifeboat House, situated on the shoreline (HER MWX44036). The map also shows a Volunteer Rifle Range (HER MWX44045), extending 800 yards (c 730m), centred 200m north-east of the PDA, on what is now the golf course. The 1896–7 Second Edition OS 6-inch map (Fig 14) shows the PDA as still unoccupied open fields on the north-eastern boundary of the flood defence, with its southern boundary now defined by a nursery built north of the new St Andrews Road.

Modern (c AD 1900–2000)

6.3 The 1906 Third Edition OS 25-inch map (Fig 15) shows no changes from the Second Edition with regards to the immediate surrounds of the PDA. However, the 1938 survey (Fig 16) does show some development (residential) to the immediate east of the PDA, with two buildings set in gardens shown (the easternmost labelled Red Willows). These changes are also visible on a 1940s aerial photograph (Fig 17). A 1960s image (Fig 18) indicates more substantial changes, with developments continuing to the east of the PDA, and the southern tip of the PDA now part of a wooded area, grown up on the site of the previous nursery, while the land to the north and north-east had been developed as a golf course. By the 1990s (Fig 19), the building immediately east of the PDA had been demolished, leaving Red Willows, but there had been a massive residential development to the south-west (Cherry Gardens). This had been extended by 2003 (Fig 20), with a residential area being built in the former wooded area east and south of the PDA, replacing Red Willows. Subsequent images show no changes to this overall scheme, with the PDA remaining as undeveloped land bordered on the south-east and south-west by residential development, and the golf course to its north (Figs 21–22).

6.4 The only features of historic interest from this period found within a 500m radius of the PDA, aside from a George VI pillar box (HER TR 02 SE 178) at Warren Road, near St Nicholas Road, Littlestone-on-Sea, 415m west-south-west of the PDA, and the Romney, Hythe and Dymchurch Light Railway (HER TR 12 NW 50), built in 1926, which passes 450m west of the PDA, running between Hythe and New Romney, are Second World War coastal defensive features, including the following.

- The site of a Second World War light anti-aircraft (diver) battery (HER 1478151) at Littlestone-on-Sea, 270m east of the PDA. This was armed with three anti-aircraft tanks and twin Oerlikon guns at some time in August 1944. The manning details are unknown.
- The site of a Second World War diver rocket projector battery (HER 1478192) at Romney Warren Golf Course, 280m north-north-east of the PDA. This was armed with sixty-four U2P rocket projectors on 28 August 1944. No manning details are known.
- The site of a Second World War heavy anti-aircraft (diver) battery (HER 1477258) at The Golf Course, New Romney, 350m north of the PDA, deployed here on 30

July 1944. It was armed with four mobile 90mm guns and was manned by 124 Battalion of the USAAF. This formed part of the Littlestone-on-Sea Section of American Anti-Aircraft Mobile Battalion Heavy Anti-Aircraft Artillery.

- Second World War anti-tank cubes (HER 1535062), visible on aerial photographs of 1942, along a branch of the New Romney Main Sewer crossing the golf course to the north of Littlestone-on-Sea, centred 420m north-north-east of the PDA.
- An extensive stretch of Second World War barbed wire (HER 1535051), visible on aerial photographs of 1942, as structures just to the west of Littlestone-on-Sea Tower, centred 430m east-north-east of the PDA.

7. SITE VISIT

7.1 A site walkover was undertaken on 7 September 2022.

7.2 The site was noted to be flat, level and featureless grass meadow, with hedges to the north and north-east and mature trees to the south-east (Plates 1–5).

7.3 No archaeological features were noted. No impacts to the soil in terms of levelling or digging were in evidence. This supports lidar imagery of the site which is also devoid of any anomalous features (Fig 23).

8. INTERIM ARCHAEOLOGICAL IMPACT ASSESSMENT

8.1 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

8.2 While there is a possibility that remains from the Palaeolithic or Mesolithic might exist within the PDA from before the formation of the English Channel in the seventh-millennium BC, if such material did exist it would be below the deposits of sand which have accreted here from the post-medieval period onwards, and arguably may have already been scoured away by the movement of sea water prior to this, rendering the likelihood of preservation and therefore disturbance through building very low. For much of the prehistoric (from late Mesolithic times onwards), Romano-British, Anglo-Saxon and medieval periods, the PDA lay off-shore and an analysis of map and aerial photographic evidence from the late eighteenth-century onwards suggests that it became dry land only in the late eighteenth-century. It seems to have remained undeveloped open ground, perhaps farmland, until the present day. As a result, the

likelihood of archaeological features from these periods existing in the PDA is extremely low.

Potential existing impacts

8.3 Other than the putative tidal scouring, there is no evidence for previous impacts to the PDA that might have impacted on the survival of archaeological remains.

Potential impacts

8.4 Though any piling or augering might impact slightly upon deposits of largely only geoarchaeological or paleoenvironmental interest, there is a very low chance that archaeological features, artefacts or ecofacts may be disturbed or destroyed by other groundworks within the PDA. The destruction of preserved archaeology without proper record risks a major negative impact on the historic environment.

8.5 The research undertaken in this report suggest that the PDA lies in an area most unlikely to produce extant archaeological features, artefacts or ecofacts. As such, subject to approval from the Local Authority's archaeological adviser, further mitigation of the potential effects of development groundworks seems unlikely to be a condition on planning consent.

SOURCES

- BGS on-line, *GeoIndex Onshore: geology*, British Geological Survey
(<https://mapapps2.bgs.ac.uk/geoindex/home.html?layers=BGSBedrock50,BGSSuperficial50>)
- Draper, G and Meddens, F 2009, *The Sea and the Marsh: the medieval Cinque Port of New Romney*, Pre-Construct Archaeology Monograph 10, Dorset Press
- Eddison, J 2000, *Romney Marsh: survival on a frontier*, Stroud: Tempus
- Furley, R 1880, 'An Outline of the history of Romney Marsh', *Archaeologia Cantiana* 13, 178–200
- Green, R 1968, *Soils of Romney Marsh*, Soil Survey of Great Britain, Bulletin 4, Harpenden: Rothamsted Experimental Station.
- Green, C 1988, 'Palaeogeography of marine inlets of the Romney Marsh area', in J Eddison and C Green (eds), *Romney Marsh: evolution, occupation, reclamation*, Oxford University Committee for Archaeology Monograph 24, 167-74
- Green, C P and Young, D S 2013 'Church Lane, New Romney, Kent (NGR: TR 066 245): geoarchaeological fieldwork report', in 'Archaeological Monitoring at The Allotments, Church Lane, New Romney, Kent', unpublished Swale and Thames Survey Company Client Report CHU/WB/13
- Holman, J forthcoming, *Archaeological Investigations in advance of the New Romney and Greatstone First Time Sewerage Scheme, New Romney, Kent, 2004–2008*, CAT Occasional Paper
- Long, A J, Waller, P M and Plater, A J 2007a, *Dungeness and Romney Marsh: barrier dynamics and marshland evolution*, Oxford: Oxbow
- Long, A J, Waller, P and Plater, A J 2007b, 'The Late-Holocene Evolution of the Romney Marsh/Dungeness Foreland Depositional Complex' in Long *et al* 2007a, 189–207
- 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)
- SDC 2018, *Places and Policies Local Plan: submission draft*, Shepway District Council
(https://www.folkestone-hythe.gov.uk/media/770/Places-and-Policies-Local-Plan-Submission-Draft-February-2018/pdf/Places_and_Policies_Submission_Draft_Feb_2018.pdf?m=637284404859170000)

SERF on-line, *South East Research Framework*, East Sussex, Kent, Surrey and West Sussex County Councils with Historic England (<http://www.kent.gov.uk/leisure-and-community/history-and-heritage/south-east-research-framework>).

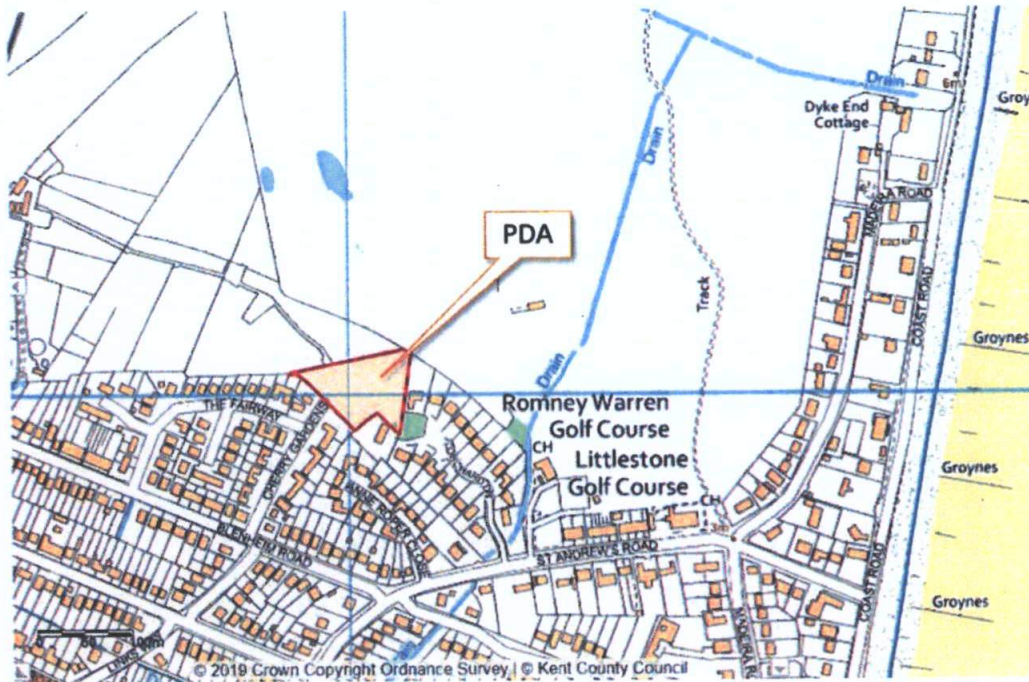


Fig 1a. Location of the PDA

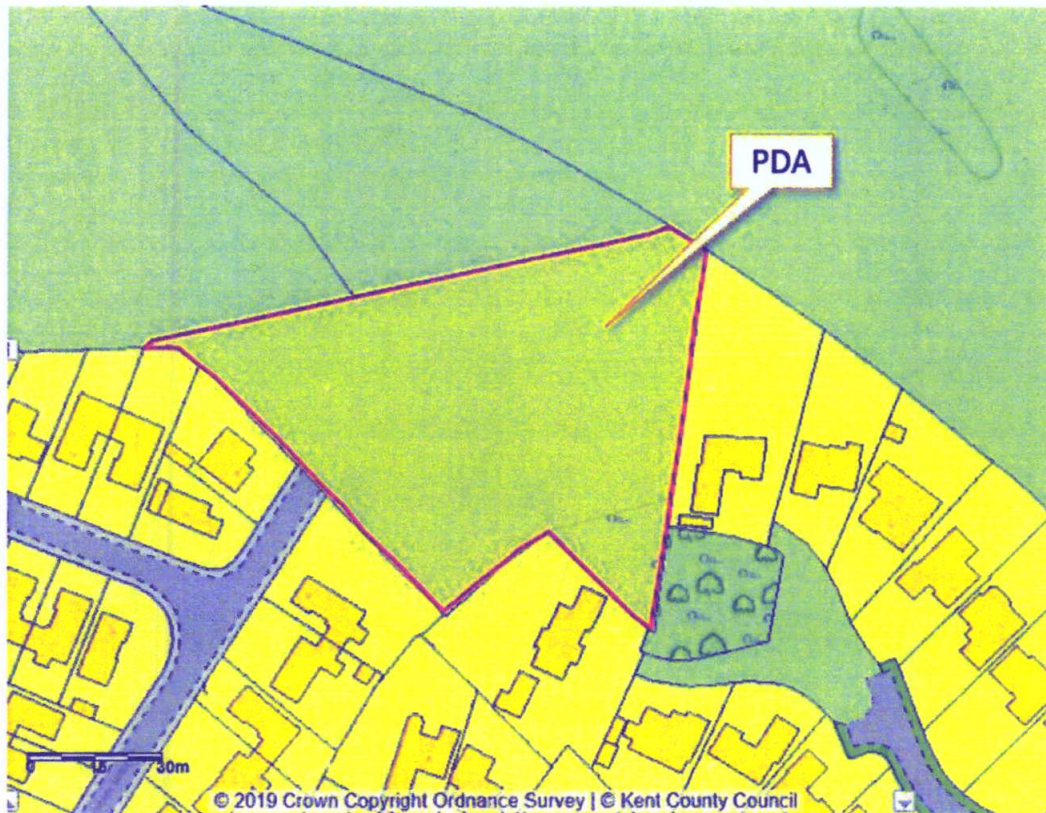


Fig 1b. Location of the PDA (detail)



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



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



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

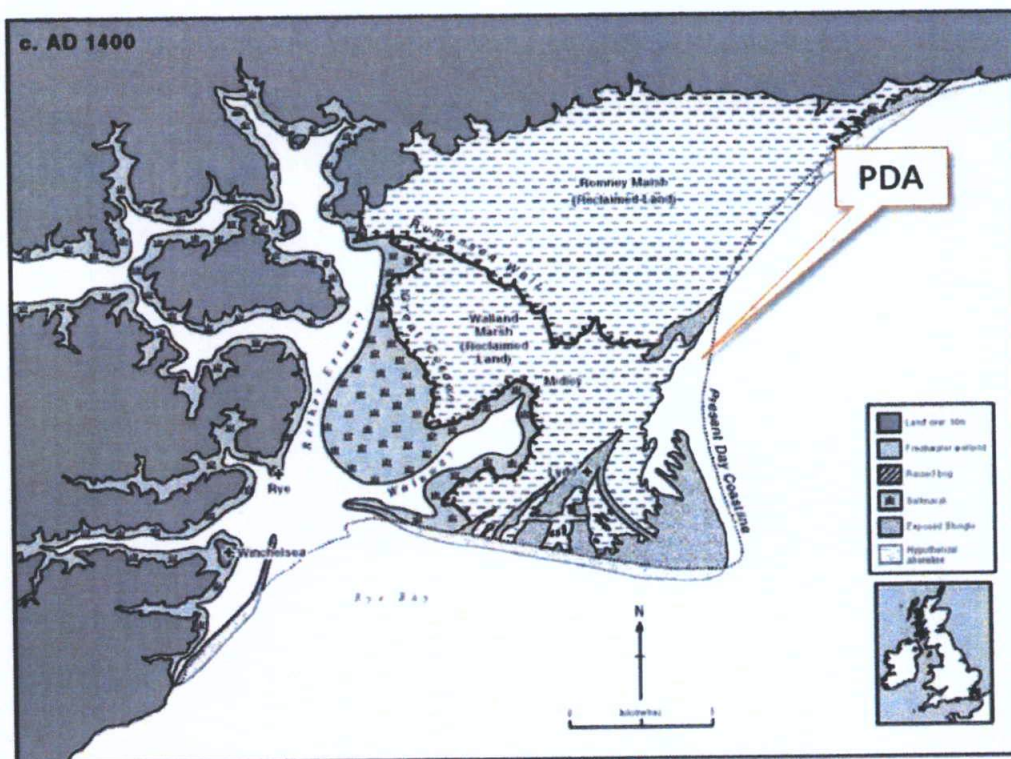


Fig 7. Reconstructed sea-level for AD 1400, showing the PDA now on the shoreline

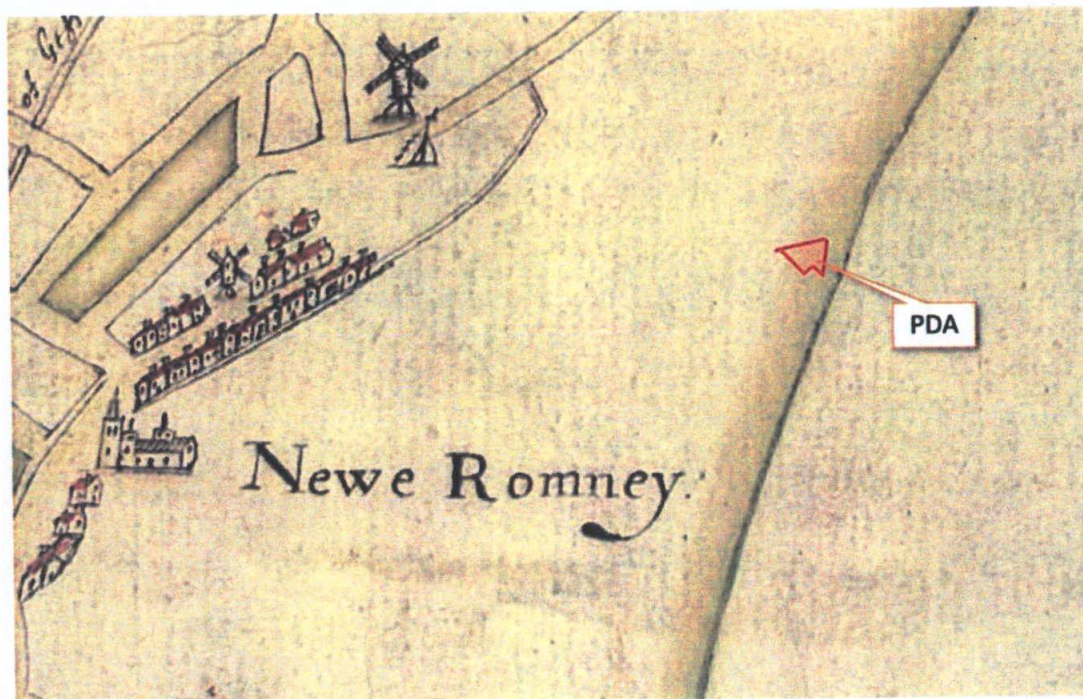


Fig 8. Extract from 'The plat of Romney Marsh, describing as well the Common Watercourses, with Their Heads, Armes, Pinocks, Bridges, and Principal Gutt', a 1592 derivative of a drainage map attributed to Thomas Langdon, showing the location of the PDA (<http://www.bl.uk/onlinegallery/onlineex/unvbrit/t/zoomify82807.html>)

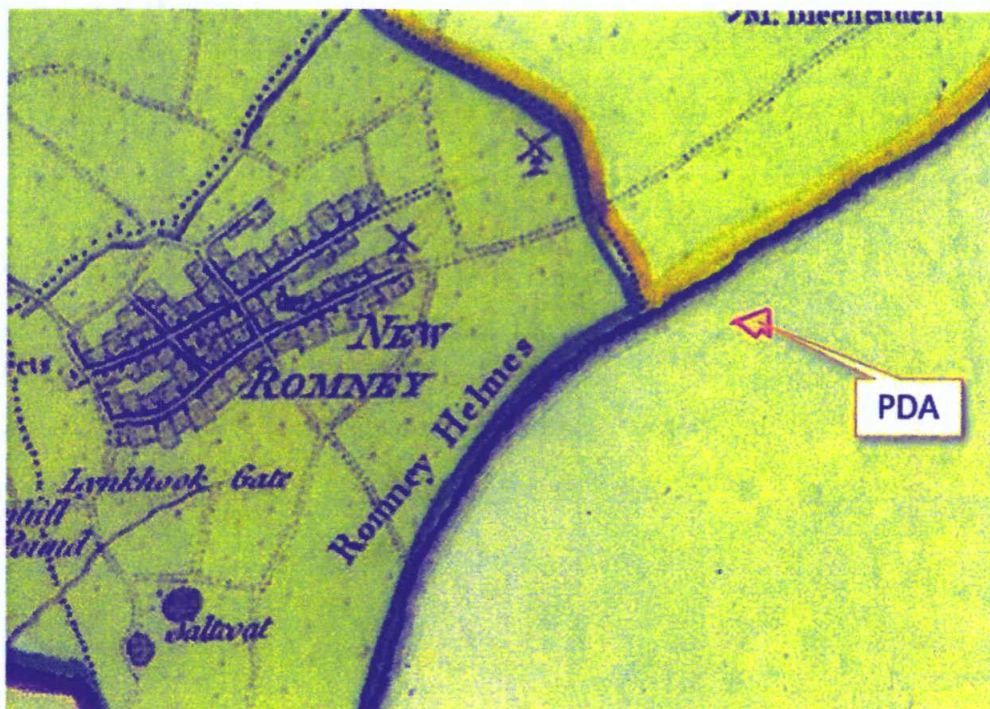


Fig 9. Extract from the Andrews, Dury and Herbert map of 1769 showing the location of the PDA

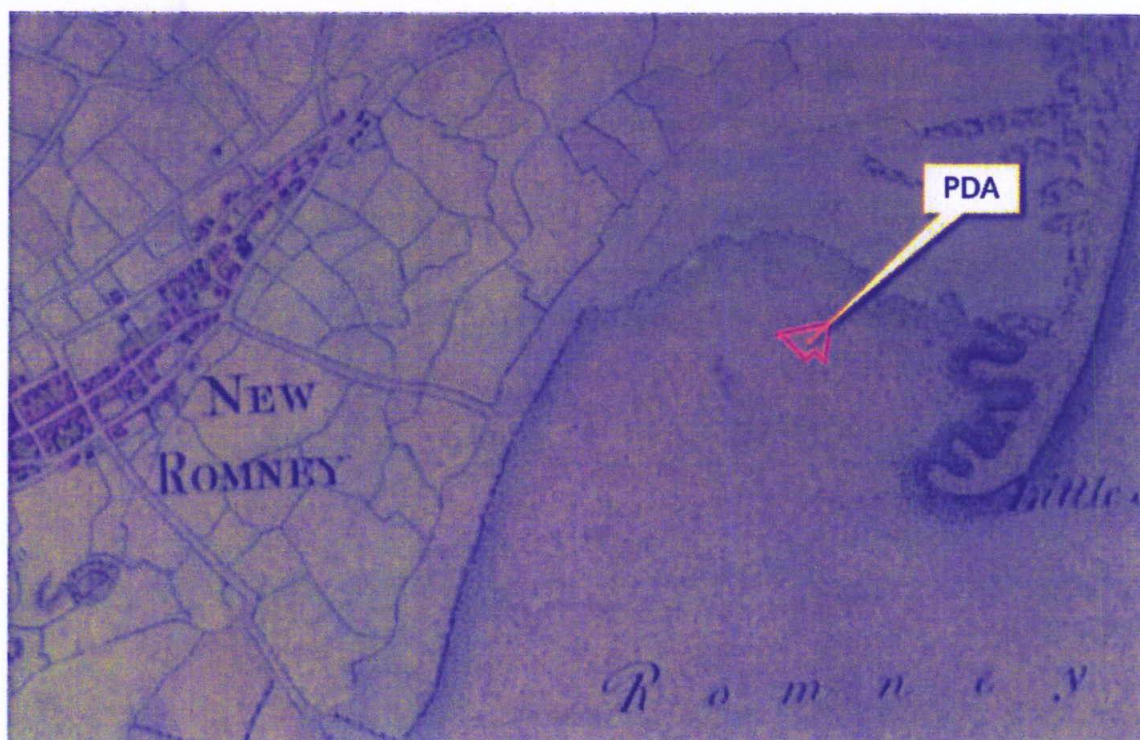


Fig 10. Extract from the Ordnance Survey (OS) drawing of 1799, showing the location of the PDA (British Library shelfmark OSD 104 (PT2))

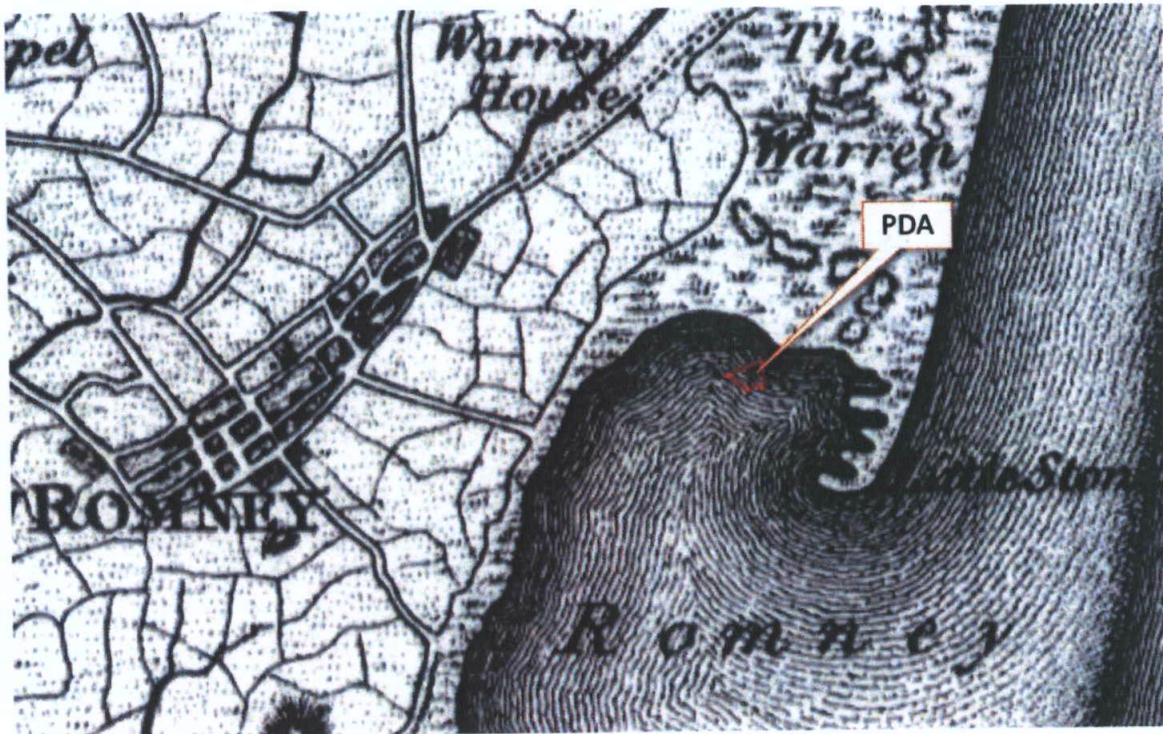


Fig 11. Extract from the Mudge map of 1801 showing the location of the PDA

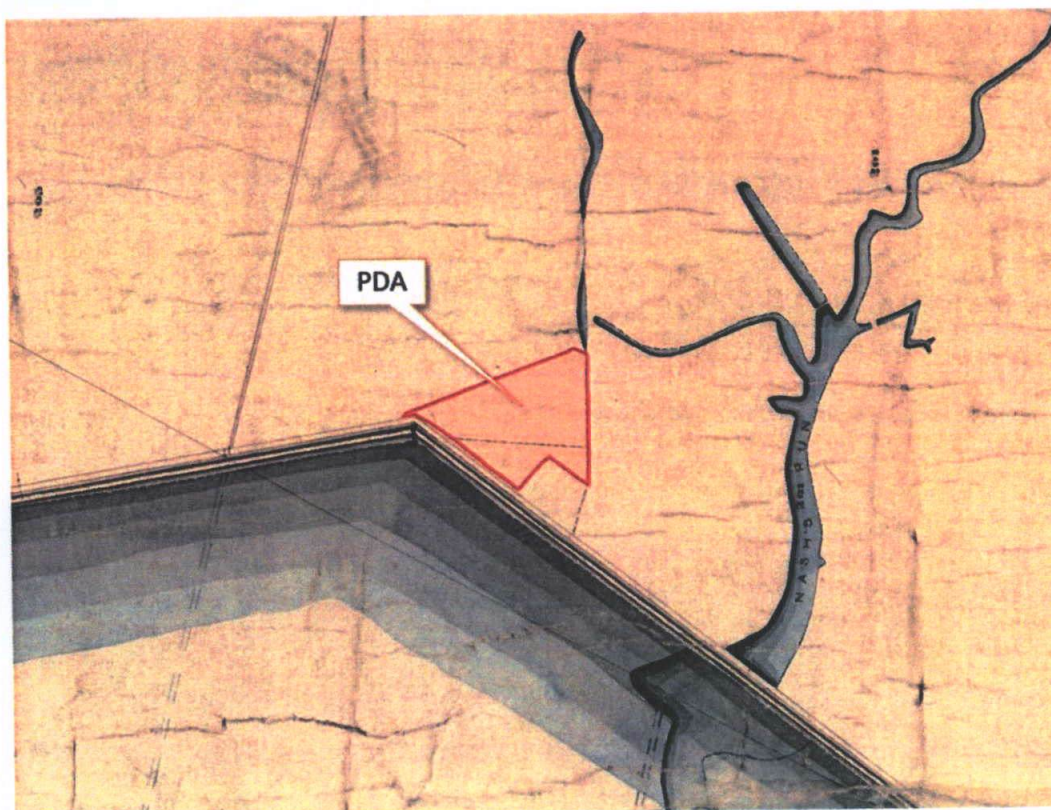


Fig 12. Extract of the tithe map from 1841 showing the location of the PDA

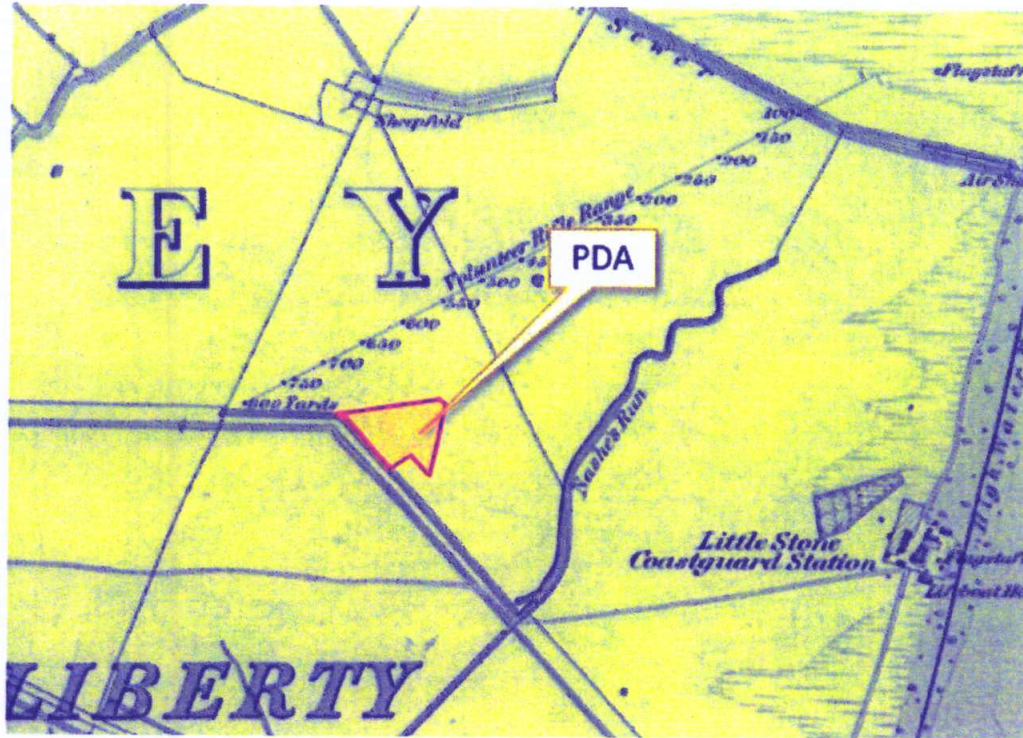


Fig 13. Extract from OS 6-inch map Kent LXXXIV, surveyed 1871–2, published 1877, showing the location of the PDA

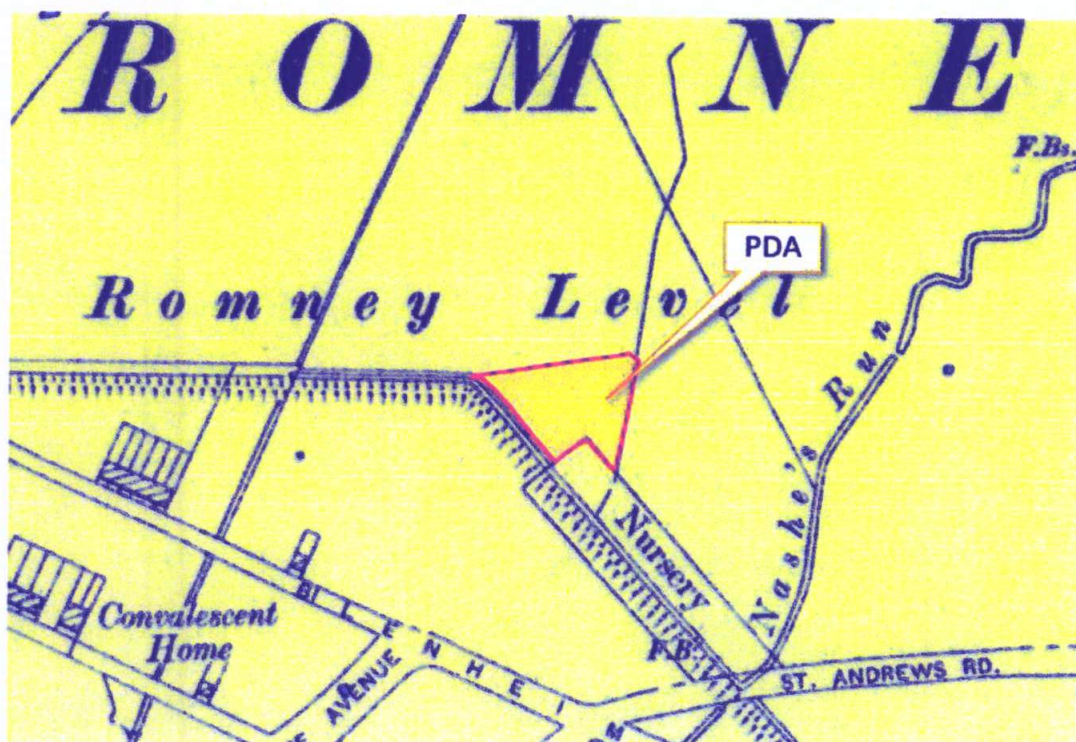


Fig 14. Extract from OS 6-inch map Kent LXXXIV.NE, revised 1896–7, published 1899, showing the location of the PDA

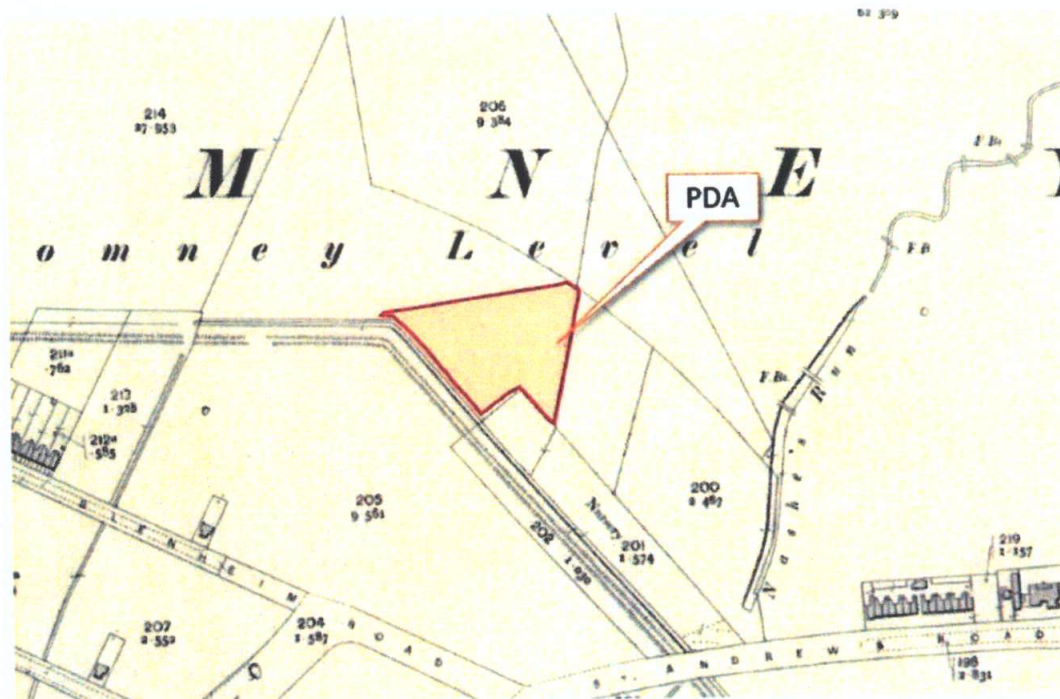


Fig 15. Extract from OS 25-inch map Kent LXXXIV.4, revised 1906, published 1908, showing the location of the PDA

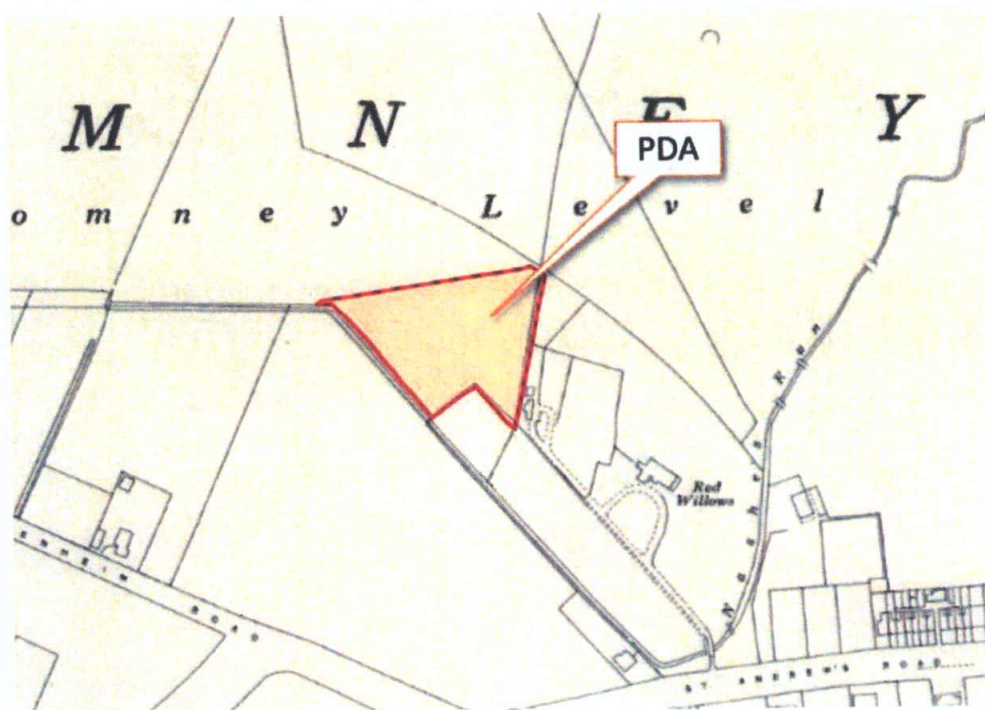


Fig 16. Extract from OS 6-inch map Kent LXXXIV.NE, revised 1938, published c 1945, showing the location of the PDA

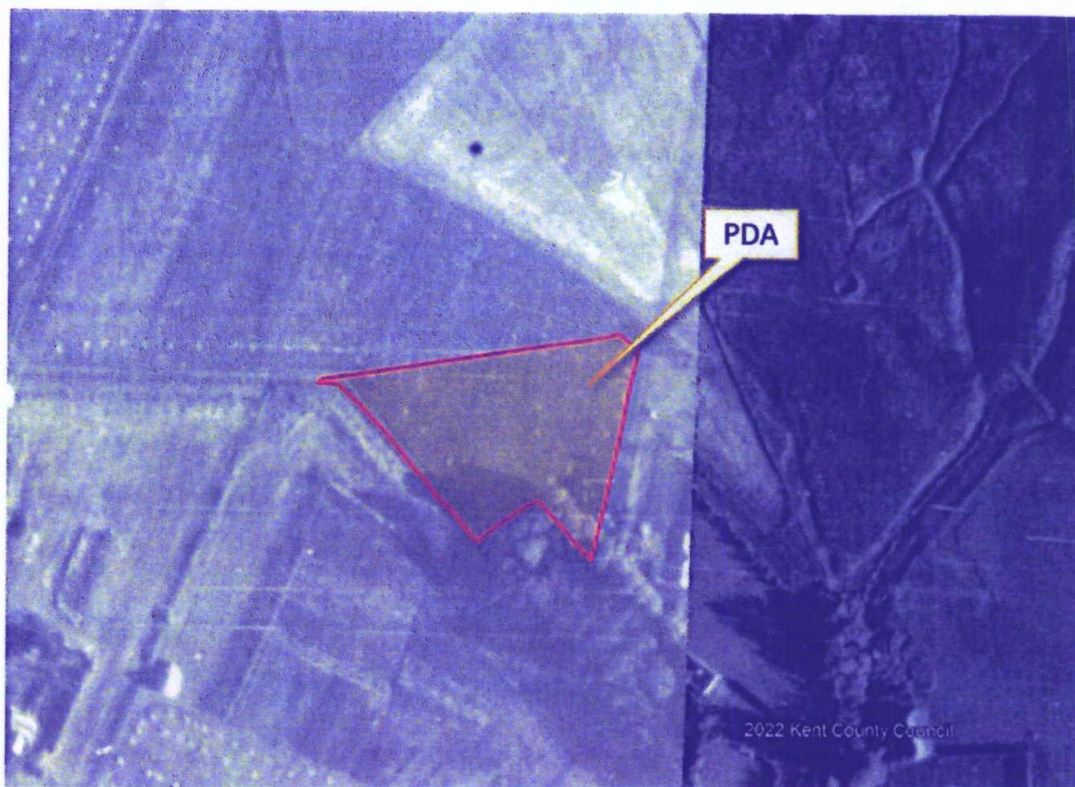


Fig 17. Aerial photograph from the 1940s, showing the location of the PDA (source: Google Earth)

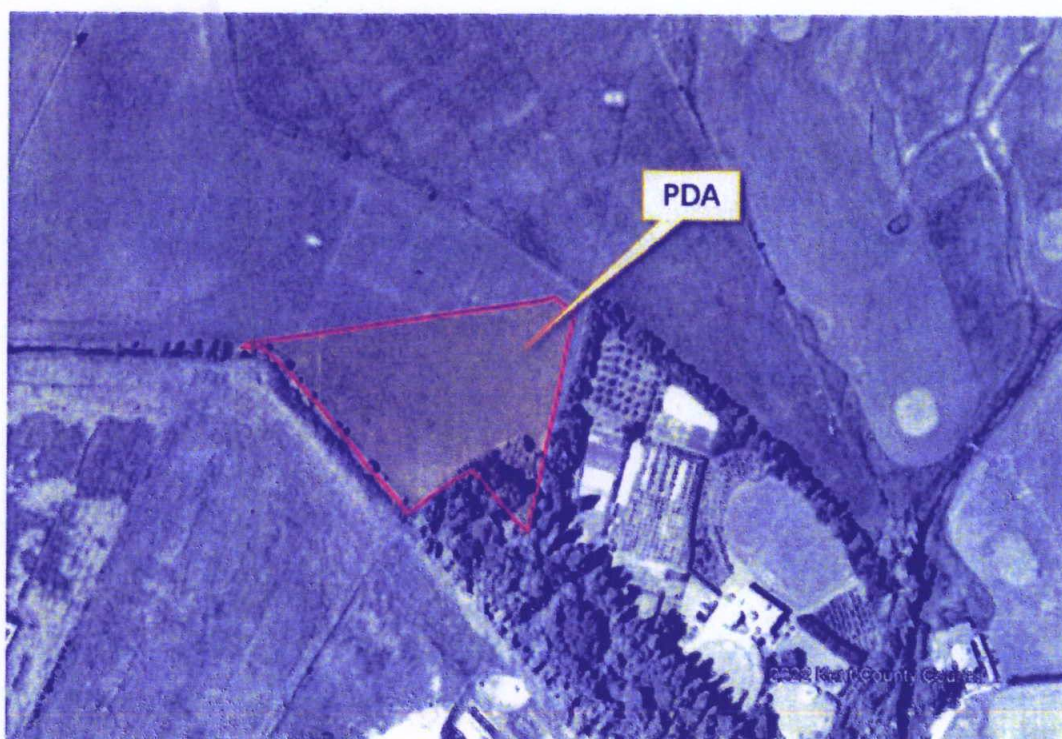


Fig 18. Aerial photograph from the 1960s, showing the location of the PDA (source: Google Earth)

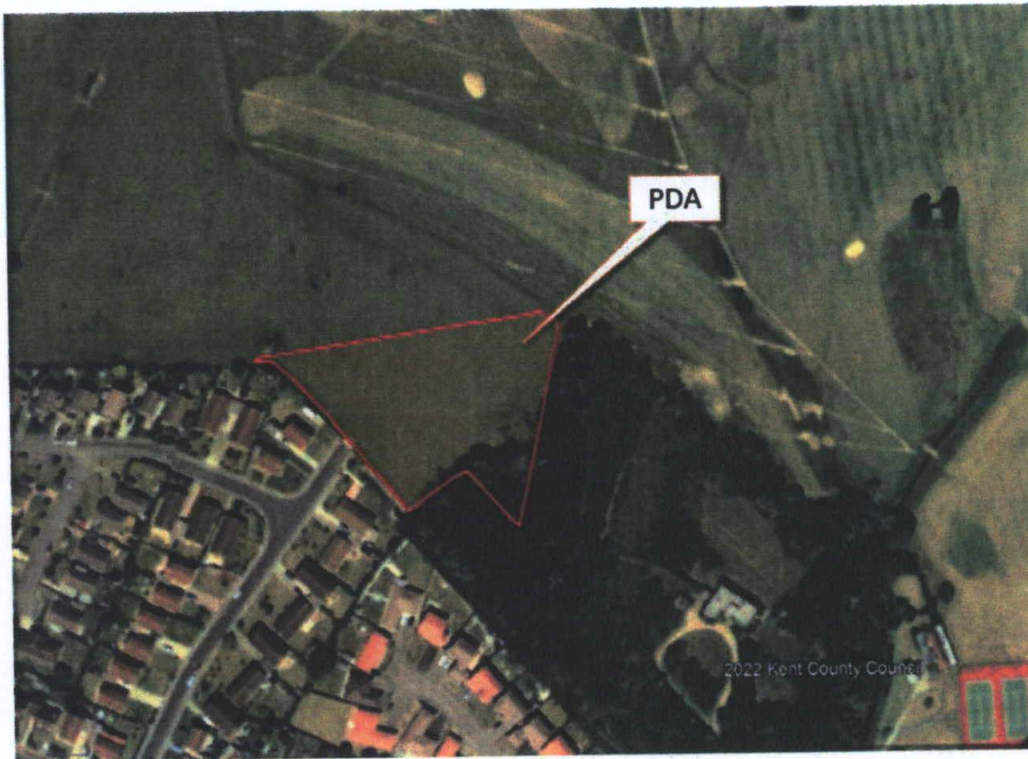


Fig 19. Aerial photograph from 1990, showing the location of the PDA (source: Google Earth)

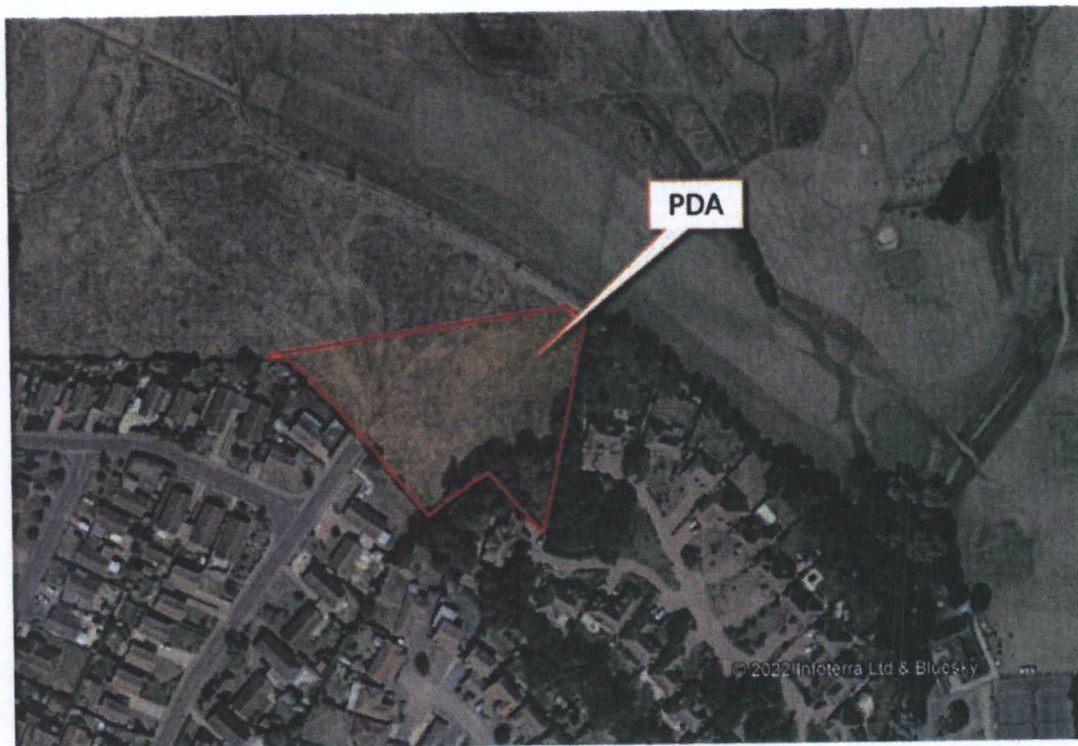


Fig 20. Satellite image from 2003, showing location of the PDA (source: Google Earth)



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



Fig 22. Satellite image from 2021, showing the location of the PDA (source: Google Earth)

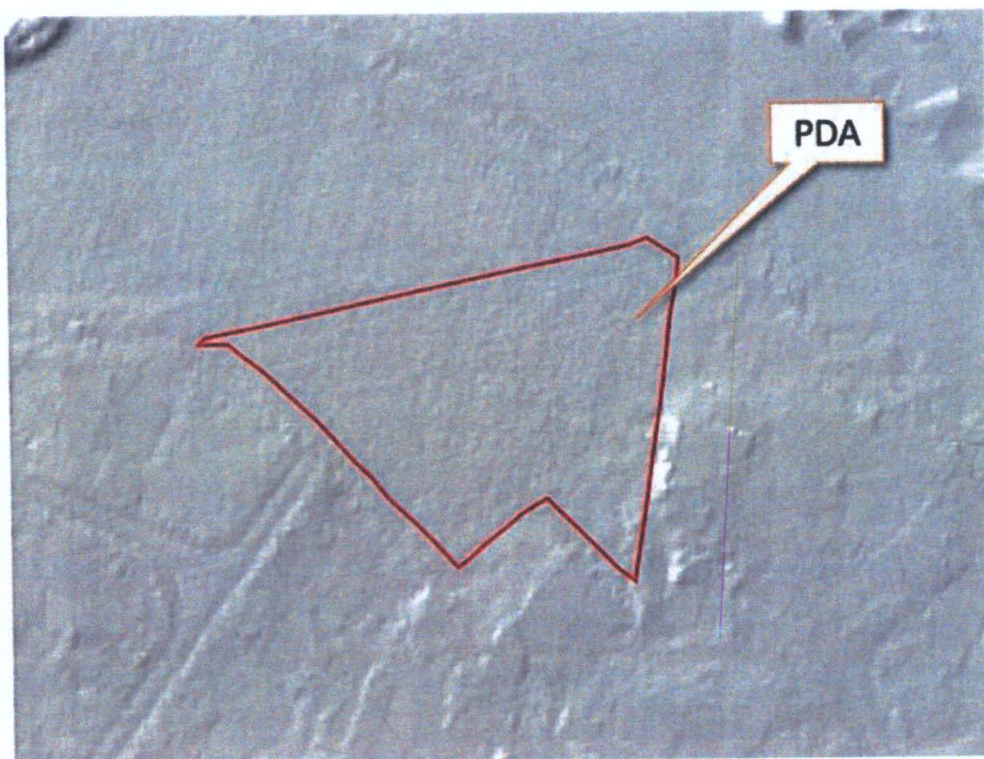


Fig 23. Lidar image of the site (source: <https://www.lidarfinder.com/>)



Plate 1. View from the south of the PDA, looking north



Plate 2. View from the centre of the PDA, looking north-east



Plate 3. View from the northern edge of the PDA, looking east



Plate 4. View from the northern edge of the PDA, looking south



Plate 5. View from the northern edge of the PDA, looking west