



Marion Geary
Case Officer
Planning
Maidstone Borough Council
Maidstone House
King Street
Maidstone
ME15 6JQ

**Heritage
ECE GT**
Invicta House
County Hall
MAIDSTONE
ME14 1XX

Phone: 03000 413448
Ask for: Ms Wendy Rogers
Email: wendy.rogers@kent.gov.uk

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SENT BY EMAIL

Re: 23/504471/OUT – Land at Moat Road Headcorn

Thank you for your letter consulting us on the above outline planning application for up to 120 dwellings with associated works.

The site of proposed development lies in an area of potential associated with prehistoric and later activity. The site lies within a valley of the River Beult with a tributary, School Stream, running just outside the southern end of the scheme. This area would have been attractive to prehistoric settlement and industrial activity with some potential for Palaeolithic remains within alluvium. Bronze Age and Iron Age remains are known to the east and south and similar remains could survive within the application site. Evidence of Roman activity is also recorded in the nearby area and there are PAS findspots from the application site itself.

Headcorn is a Medieval market town with a 14th century church of St Peter and St Paul, however, there may well have been a settlement here during the Early Medieval period. Although the development site is north west of the historic core of Headcorn, there may be evidence of early medieval farming, cultivation, horticulture etc on the development site. There are two corn mills either side of the development site; to the east is White Mill, early 19th century smock mill, and to the west is Black Mill, an 18th century smock mill. Although they are not functioning anymore they are clear indications of community need and post medieval industry. An earlier mill may have been to the south at Moat Farm. This is a medieval moated manor complex including a designated 16th century residence set within a designed and managed landscape. This complex utilised the stream to form the moat and there are indications of possible fish or mill pond and other water management systems and structures. To the west of Moat Farm is part of the post medieval or earlier functioning farm compound. The historic buildings have been partly replaced by more modern structures, but remains of the original farm buildings may survive on site either above or below ground.

The development site itself contains a known heritage asset of modern period. This is the underground ROC structure built to monitor nuclear explosions and fallout. This would have been a very distinctive purpose built structure reflecting 20th century cold war heritage. Remains may not survive above ground but they are likely to survive below ground. Such

remains could be considered of national importance due to their rarity and distinctiveness as well as the visible reminder of national and local defence and challenges.

As noted above, there is a rich and diverse heritage resource for this development site ranging from early prehistoric to 1960s. This heritage resource needs to be suitably acknowledged, described and assessed. The impact from this proposed housing development needs to be clearly set out in appropriately detailed manner. Impact and proposed mitigation needs to be proportionate and reasonable and evidence-based.

I note the application is supported by a Heritage and Archaeological Statement by Pegasus which has been updated from the report submitted for an earlier application. I welcome the revisions. Although the report is still not a thorough Archaeological Deskbased Assessment it does provide a brief account of known archaeological remains. I do not agree with the assessment of potential, especially given the extent of the multi-period remains to the east. In addition I do not agree that remains of post medieval agricultural activity would be of “no heritage significance”. Elements may be of local and low archaeological potential but not none whatsoever. However I acknowledge the additional assessment work done.

I particularly welcome the geophysical survey, which addresses one of the pre-determination recommendations for the earlier application. I note in the report the lack of identified anomalies for any archaeology but suggest “absence of evidence is not evidence of absence.” There is still potential for archaeology to survive on the site, just not necessarily remains which provide a strong magnetic signal.

I also welcome the additional information on the ROC station, however, the assessment of this feature is still very disappointing. I disagree with the conclusion set out in 5.20 and 5.30 of the Pegasus report that there are unlikely to be important remains surviving. Such structures are so solid they are difficult to remove and are most likely to be just covered over; there is still potential for associated cultural and communication remains surviving; and even “the site of “ is of importance as a local heritage asset. I welcome the documentary evidence provided but would now also welcome some positive mitigation to ensure the proposed development appropriately considers a locally important archaeological asset.

I am also disappointed at the lack of an archaeological landscape assessment. This site may well contain evidence of the post medieval to early 20th century use of this land such as connective pathways between Headcorn village and the fields and between the mills or boundaries marking out old fields, pastureland and orchards. There seems to be virtually no assessment of the designated The Moat’s “feeder pond” or its role within the farm or its earlier role within the 18th century or earlier moated complex. The “feeder pond” lies within the application site and it is not sufficient to simply discount its local heritage importance because it will be part of open space.

I note with disappointment the assessment and proposals for the farm. Although this farm may not be of high significance, it is on the HER as a heritage asset on the basis of the Historic England Farmstead Survey (2012). It may be of post medieval or earlier origin but it was part of The Moat, a now designated complex. Current upstanding buildings may not merit preservation in situ but again the complex is a heritage asset and there should be consideration of a full and varied range of appropriate mitigation.

Although I still have some concerns regarding the archaeological assessment, outstanding archaeological concerns could be addressed through conditions, including a conditioned formal archaeological work, and I do not request further revisions to the Heritage Assessment by Pegasus.

I note that Heritage and Archaeology are covered in the Planning Statement but unfortunately the section from 6.63 reflects a misunderstanding of archaeology and considerable typos. This limited understanding and consideration of heritage by the applicant is reflected in the lack of proposals for positive heritage enhancement measures or even reasonable mitigation proposals.

There does not seem to be details of proposed mitigation for archaeology but a full phased programme of archaeological work would be required across the site prior to commencement of any consented development, including trial trench evaluation, detailed mitigation (excavation and/or watching brief) and post excavation and publication.

In addition there seems to be no proposals for heritage enhancement measures which would contribute towards the awareness, understanding and enjoyment of local archaeology by the new and existing community. This also suggests that the applicant has not considered opportunities to utilise the heritage resource to the benefit of the development's quality, character and environment or to the benefit of the community.

With reference to positive heritage enhancement measures, I recommend two enhancement measures are taken forward and integrated in to a revised masterplan prior to detailed consent. These two enhancement measures include:

- Conservation and safeguarding measures for the ROC post including investigation, recording and preservation. Following completion of such investigation, the site of the ROC post will be subject to heritage interpretation measures with long term conservation plan and measures to visibly reflect the character and function of the ROC post within the landscape design of the development; and
- Following suitable investigation and archaeological recording of The Moat farm complex, including the feeder pond, the area will be subject to sympathetic landscaping, reflecting its historic character, which will ensure the community can be aware and enjoy the site of a historic farm complex and moat feeder pond.

Recommendations

Prior to determination of this application, I recommend that the applicant submits a revised Masterplan which includes safeguarding and sympathetic landscaping measures for the sites of the ROC post and elements of the historic farm of The Moat, as agreed with the county Archaeologist. Following formal submission of a revised masterplan reflecting these two heritage assets, I would be happy to recommend the following draft conditions:

- 1 Prior to commencement of development the applicant, or their agents or successors in title, will secure the implementation of*
 - i archaeological field evaluation works in accordance with a specification and written timetable which has been submitted to and approved by the Local Planning Authority; and*
 - ii following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a specification and timetable which has been submitted to and approved by the Local Planning Authority*

Reason: To ensure that features of archaeological interest are properly examined and recorded and that due regard is had to the preservation in situ of important archaeological remains.

2 *Prior to occupation, the applicant, or their agents or successors in title, will secure the implementation and completion of a programme of archaeological post excavation and publication work in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.*

Reason: To ensure that results of archaeological investigation are properly assessed and disseminated in accordance with NPPF

3 *Prior to commencement of development, the applicant, or their agents or successors in title, will secure the long term conservation and interpretation of the ROC post in accordance with the ROC Archaeological Conservation and Management Strategy, with timetable, which has been submitted to and approved by the Local Planning Authority.*

Reason: To ensure community awareness, understanding and enjoyment of the ROC post
and

4 *Prior to commencement of development, the applicant, or their agents or successors in title, will secure the targeted conservation and interpretation of Moat Farm in accordance with the Moat Farm Conservation and Landscape Management Strategy, with timetable, which has been submitted to and approved by the Local Planning Authority.*

Reason: To ensure community awareness, understanding and enjoyment of The Moat farm surviving heritage assets, including the moat feeder pond.

I would be pleased to discuss the above further.

Yours sincerely

Wendy Rogers Senior Archaeological Officer Heritage Conservation