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SENT BY EMAIL

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

Further to my letter of 10 November 2023, additional information has been received on the above outline planning application for up to 120 dwellings with associated works. On the basis of the additional information I would like to submit further comments.

The applicant and their archaeological agent have been liaising with me regarding the concerns set out in my letter of 10 November. I welcome their positive approach. As a consequence, I have received draft plans of an ROC Enclosure Retention (PSO5) and Layout Adjustment for ROC (SK04). These plans suggest the ROC site is to be preserved in situ and highlighted as an open space, integrated into the new development. This is very welcome and can be seen as a heritage enhancement measure. These need to be formally submitted.

The liaison meetings with the applicant also raised the issue of positive heritage landscaping for the area in the south east corner close to the designated Moat. I have encouraged landscaping for this proposed open space area to reflect the pond and moated elements as well as water management features and the farm building character. I have not yet seen any details on further consideration of this and would welcome details from the applicant.

So further to my comments of 10 November, there has been positive consideration of heritage enhancement measures but I notice nothing has been submitted formally yet. I encourage the applicant to submit a revised masterplan and the plans showing the preservation in situ of the ROC site.

Further comments in my letter of 10 November do not seem to have been addressed yet and I encourage further consideration of heritage measures. I repeat my earlier comments and recommendations:

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.

The recommended enhancement measures were being considered by the applicant but I note nothing has been formally submitted yet.

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