



# OTTERPOOL PARK

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ENVIRONMENTAL STATEMENT  
OP5 CHAPTER 9 – **CULTURAL HERITAGE**

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March 2022



# OTTERPOOL PARK

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## APPLICATION CONTENTS

### Application Administration

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OP2	Planning Fee
OP3	Outline Planning Application Form, including relevant certificates & CIL Form.

### Environmental Statement

OP4	Non-technical Summary
OP5	Environmental Statement which assesses the impact of the proposed development on the following topics:

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Chapter 2	EIA Approach and Methodology
Chapter 3	Development and Consideration of Alternatives
Chapter 4	The Site and Proposed Development
Chapter 5	Agriculture and Soils
Chapter 6	Air Quality
Chapter 7	Ecology and Biodiversity
Chapter 8	Climate Change
Chapter 9	Cultural Heritage
Chapter 10	Geology, Hydrology and Land Quality
Chapter 11	Human Health
Chapter 12	Landscape and Visual Impact
Chapter 13	Noise and Vibration
Chapter 14	Socioeconomic effects and community
Chapter 15	Surface water resources and flood risk
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Chapter 17	Waste and resource management

Please refer to ES Contents page which provides a full list of ES Appendices

### Documents submitted for approval

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OP5 Appendix 4.2	Site Boundary and Parameter Plans
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### Documents submitted in support

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# OTTERPOOL PARK

## Environmental Statement Volume 2: Main ES Chapter 9: Cultural Heritage

MARCH 2022



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## 9 Cultural Heritage

### 9.1 Introduction

- 9.1.1 This chapter of the ES assesses the impact of construction and operation of the proposed Development with respect to Cultural Heritage.
- 9.1.2 This chapter should be read in conjunction with Chapters 1-4 (introductory chapters) and Chapter 12: Landscape and Visual Impact, Chapter 13: Noise and Vibration and Chapter 16: Transport.
- 9.1.3 It has also been prepared alongside and informed by Appendices 9.1 to 9.26 and Figures 9.1 to 9.9 in ES Appendix 9.1.
- 9.1.4 A Heritage Strategy (ES Appendix 4.12) for the site has been prepared alongside the OPA which gives the Heritage vision and strategic principles and commitments for development. The Strategy contains a detailed Mitigation Strategy (Appendix A of the Heritage Strategy (ES Appendix 4.12)). This is based on current understanding of the baseline and the proposed impact. The scope and content of the strategy has been agreed with the heritage consultees. It includes the strategy for the next phase of evaluation work as well as more detail of mitigation measures.
- 9.1.5 The Mitigation Strategy (as set out within this ES chapter, and also within Appendix A of the Heritage Strategy (ES Appendix 4.12)) is supported by an Archaeological Research Strategy (Appendix B to the Heritage Strategy (ES Appendix 4.12)). Both will be reviewed and updated during the life cycle of the development.
- 9.1.6 A Conservation Management Plan (CMP, ES Appendix 9.25) for Westenhanger Castle has also been prepared. The scope and content for the CMP has also been agreed with the heritage consultees. This forms Appendix 9.25 of the ES.
- 9.1.7 A Scheduled Monument Consent decision for Westenhanger Castle is attached at ES Appendix 9.26.

### Relevant Aspects of the Proposed Development

- 9.1.8 A description of the Proposed Development is given in Chapter 4: The Site and the Proposed Development. Specific aspects of the Proposed Development that relate to cultural heritage are as follows. Those aspects that involve ground disturbance will necessarily involve removal or disturbance of any surviving archaeological remains. Those aspects that involve demolition of buildings or structures may include buildings or structures of historical value. There will also be changes to the setting and views of archaeological remains, historic landscapes and historic buildings and changes to how these assets are experienced. There may also be damage to waterlogged archaeological remains due to changes in the water table as a result of the development. There is only one area of the Site (see Section 9.3 – Roman villa) where waterlogged archaeological remains have so far been identified.
- 9.1.9 The current Parameter Plans (ES Appendix 4.2) for the Proposed Development have been drawn to incorporate flexibility in the design with regards to final infrastructure designs. Features of the Proposed Development, such as proposed primary roads, proposed primary and secondary cycle paths and proposed local centres are considered to have an area of deviation to them. As a result, this ES Chapter and the Heritage Strategy (ES Appendix 4.12) have both assessed the worst case based on the area of deviation. The tiered approach is discussed below in 9.2.

## 9.2 Assessment Methodology

### Legislation, Policy and Guidance

- 9.2.1 This assessment has been undertaken in accordance with current legislation, along with national, regional and local plans and policies (current and emerging) relating to the historic environment in the context of the Proposed Development.
- 9.2.2 A detailed approach by the Project in response to the key legislation and policy guidance is included in ES Appendix 9.9, Table 1. This section summarises the key legislation and policy, pertinent to this assessment.

#### Legislation

- 9.2.3 There are a number of relevant statutes including the Town and Country Planning Act 1990 (Ref 9.1), the Planning (Listed Buildings and Conservation Areas) Act 1990 (Ref 9.2) and the Ancient Monuments and Archaeological Areas Act 1979 (Ref 9.3).

#### ***Town and Country Planning Act 1990***

- 9.2.4 The Town and Country Planning Act 1990 (Ref. 9.1) (read alongside the Planning and Compulsory Purchase Act 2004 which introduced the current system of development plans for England and Wales) gives primacy and planning decision to the statutory development plan. Section 70(2) states that in dealing with an application for planning permission the decision making authority shall have regard to the provisions of the development, so far as material to the application; section 38(5) of the Planning And Compulsory Purchase Act states that if regard is to be had to the development plan for the purpose of any determination to be made under the planning acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise

#### ***Planning (Listed Buildings and Conservation Areas) Act 1990***

- 9.2.5 The Planning (Listed Buildings and Conservation Areas) Act 1990 contains certain specific statutory duties which a decision must have regard to.
- 9.2.6 Section 66 (1) of the Act states that “In considering whether to grant planning permission for development which affects a Listed Building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historical value which it possesses”.
- 9.2.7 Section 72 (1) of the Act states “with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”.

#### ***Ancient Monuments and Archaeological Areas Act 1979***

- 9.2.8 The Ancient Monuments and Archaeological Areas Act 1979 gives statutory protection to any structure, building or work which is considered to be of particular historic or evidential value and regulates any activities which may affect such areas. Under the Act any work that is carried out on a Scheduled Ancient Monument must first obtain Scheduled Monument consent.

#### National and Local Policy

- 9.2.9 National policy relating to the archaeological resource is outlined in the National Planning Policy Framework (NPPF 2021) (Ref 9.16).
- 9.2.10 The assessment also considers those relevant policies of:
- The Folkestone & Hythe Places and Policies Local Plan (2020) (Ref 9.8);

- The Folkestone & Hythe Core Strategy Review (Adopted 2022) (Ref. 9.9); and
- The Folkestone & Hythe District Heritage Strategy 2019 (Ref 9.18).

## Guidance

9.2.11 As discussed in the following assessment methodology sections, cultural heritage guidance has been used to inform this assessment:

- Historic England Conservation Principles, Policies, and Guidance for the Sustainable Management of the Historic Environment 2008 (Ref 9.11).
- Department for Digital, Culture, Media and Sport Policy Paper Scheduled Monuments & nationally important but non-scheduled monuments (2013) (Ref 9.17).
- ICOMOS Guidance (Ref 9.12)
- Historic Environment Good Practice Advice in Planning 2: Managing significance in decision taking in the historic environment (2015) (Ref 9.14)
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition) (2017) (Ref 9.15)

## Consultation and Scoping

### Consultation

9.2.12 Table 3 in ES Appendix 9.9 provides a summary of the consultation undertaken for this chapter prior to and following the submission of the 2019 application (Y19/0257/FH). The table summarises how the comments have been addressed in this chapter, where relevant.

### Scoping

9.2.13 A previous EIA Scoping Opinion was undertaken for the 2019 application, where relevant, the comments from this process have been incorporated within Table 4 in ES Appendix 9.9. For this amended application, a request for a Scoping Opinion was submitted to F&HDC in June 2020. This outlined the work that had been undertaken to date and sets out the proposed approach to the EIA. A Scoping Opinion was issued by F&HDC in July 2020. Table 4 in ES Appendix 9.9 provides a summary of the scoping opinion comments relevant to this chapter, and how they have been addressed.

9.2.14 Additionally, a Scoping Addendum was submitted on 5 October 2021 to outline key changes to the application. These comprised additional land in the north-west corner of the site for provision of the waste water treatment works (WWTW), additional land for highway junction works at Newingreen Junction, minor amendments to clarify land ownership boundaries and a change in the assessment approach in relation to the future uses of Westenhanger Castle. A response was received from F&HDC on this Scoping Addendum as set out in Chapter 2: EIA Approach and Methodology. These All relevant changes since the submission of the scoping report have been assessed in this ES.

9.2.15 Temple, on behalf of F&HDC, undertook a review of the Draft ES in December 2021. The topic specific comments and response are provided in Table 4 in ES Appendix 9.9.

## The Study Area

9.2.16 The OPA boundary is an approximately 589ha area. At the time of writing, the majority of the appraisal reports (ES Appendices 9.2 to 9.8) used a 709 hectare (ha) 'site boundary' to assess the cultural heritage resource. The current approximately 589ha OPA boundary falls entirely within this 'site boundary'. A search radius of 1km around



the 709 ha 'site boundary' was used as a study area for all designated assets and 0.5km for all non-designated heritage assets. The study areas were set using professional judgement to establish the archaeological baseline for the site and its immediate vicinity. Additional heritage assets located beyond the study areas have been considered in the assessment process where appropriate. For example barrows (burial mounds) up to 5km away have been considered for the Statement of Significance on the barrows (Appendix 9.7).

- 9.2.17 The figures in some of the reports in ES Appendices 9.2 to 9.24 show previous application site boundaries as they were produced before the current, approximately 589ha OPA was decided. The Site is presently bounded by; the M20 and HS1 (or CTRL - Channel Tunnel Rail Link) to the north; the A20/Stone Street and Sandling Park to the east; Harringe Lane to the west, and; Aldington Road to the south. The Kent Downs Area of Outstanding Natural Beauty (AONB) bounds the area along its eastern and southern edges. The AONB also lies approximately 1.25km to the north.
- 9.2.18 The OPA boundary and the Framework Masterplan Boundary are depicted on all supporting figures (Figures 9.1-9.9) to this chapter, located in ES Appendix 9.1.

### **Tiered approach to Assessment and Mitigation**

- 9.2.19 The following section considers a three-tiered approach to assessment and mitigation, based on the determination process for the amended application of Proposed Development. The tiered process is illustrated in Figure 9.0.
- 9.2.20 For the Proposed Development, each tier represents a stage of further detailed design. The Parameter Plans (ES Appendix 4.2), the Development Specification (ES Appendix 4.1), the Strategic Design Principles (ES Appendix 4.3) and (to a lesser extent) the Illustrative Masterplan (ES Appendix 4.5) have been used to assess impact on the historic environment within Tier 1. As each tier progresses, detailed design will further our understanding of impact to the historic environment by the Proposed Development and therefore, allow for proportionate mitigation measures to be proposed prior to construction. The start of construction would follow determination of Tier 3 - Reserved Matters. As described in Chapter 2: EIA Approach and Methodology at Tier 1 a worst-case assessment has been provided, and subsequent applications at Tiers 2 and 3 will be required to demonstrate compliance with this assessment.
- 9.2.21 While a large amount of archaeological evaluation has taken place, there are areas of the Proposed Development that have not been subject to archaeological evaluation. This work will continue between Tiers 1 and 2 and between Tiers 2 and 3. This additional fieldwork will take the form of geophysical survey and archaeological trial trenching and test-pitting. Where appropriate, geoarchaeological assessment of the site will also take place. The fieldwork is designed to further our understanding of the archaeological resource within the site and support proportionate mitigation measures. It is anticipated that through continual assessment work and the flexibility in Tier 1 Parameter Plans (ES Appendix 4.2), opportunities for the enhancement of the historic environment through design can be identified and fed into the detailed design of Tier 3. It is expected further detail will be added to the Mitigation Strategy (Appendix A of the Heritage Strategy (ES Appendix 4.12)) but that the mitigation requirements will be within those set out at this OPA stage.

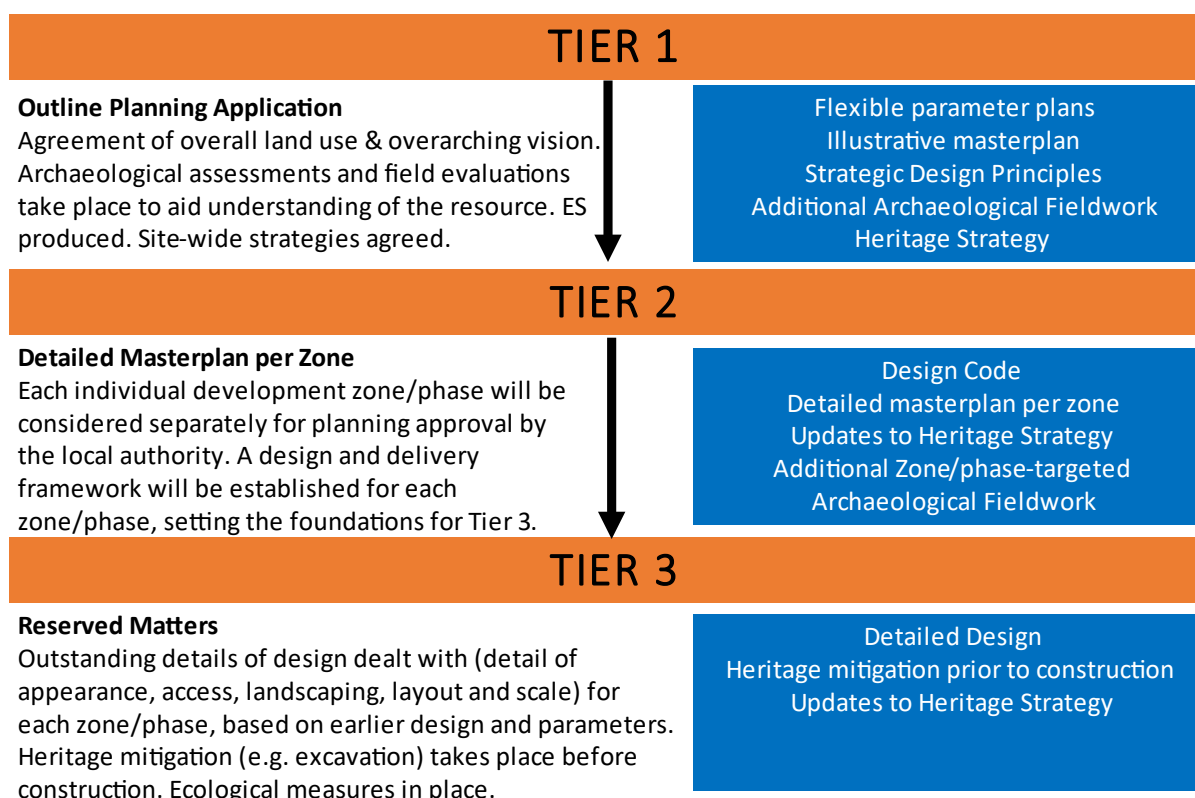


Plate 1: Tiered approach to cultural heritage assessment and mitigation

## Methodology for Establishing Baseline Conditions

### Establishing the Existing Baseline

9.2.22 This chapter is informed by baseline data gathered during the production of a Desk-Based Assessment (DBA) (ES Appendix 9.2) and several in-depth appraisal reports (ES Appendices 9.3 - 9.8), all prepared by Arcadis. The baseline is also informed by:

- Nine geophysical surveys (ES Appendices 9.10 – 9.15, 9.19, 9.23 and 9.24) undertaken by Headland Archaeology, SUMO Services, Magnitude Surveys and Wessex Archaeology.
- A geoarchaeological DBA (ES Appendix 9.16) written by Oxford Archaeology and Matt Pope.
- A watching brief on Ground Investigations (ES Appendix 9.17) carried out by Wessex Archaeology.
- A trial trenching evaluation (ES Appendix 9.18) carried out by Oxford Archaeology in 2017-2018 and a second phase of trial trench evaluation by Wessex Archaeology (ES Appendix 9.21) in 2020.
- A 2020 report by a landscape archaeologist, Paul Stamper, has also contributed to the baseline understanding of Westenhanger Castle and its landscape (ES Appendix 9.22).

9.2.23 Further detail of how the baseline has been established is included in ES Appendix 9.9.

## Forecasting the Future Baseline

9.2.24 The forecast of the future baseline considers that ongoing activities within the study area have the potential to change the setting of existing heritage assets. It also considers that new heritage assets may be identified over time, and existing heritage assets may be removed by other ongoing development or ploughing within the study area. However, the baseline conditions are not anticipated to alter materially in the future.

## Defining the Sensitivity of Resource

9.2.25 The value of heritage assets is referred to in NPPF Annex 2: Glossary (Ref 9.4) as significance (for heritage) and defined as:

“The value of a heritage asset to this and future generations because of its heritage value. That interest may be archaeological, architectural, artistic, or historic. Significance derives not only from a heritage assets physical presence, but also from its setting.”

9.2.26 Current national guidance on the assessment of the significance of heritage assets is provided by Historic England in the document *Conservation Principles, Policies, and Guidance for the Sustainable Management of the Historic Environment 2008* (Ref 9.11). In this document significance is weighed by consideration of an asset to demonstrate value criteria (see Table 9-1). In light of the 2008 *Conservation Principles* document, the term value has been used throughout this section when describing the significance ‘value’ of an asset. Consideration has also been given to the Department for Digital, Culture, Media and Sport (2013) Policy Paper *Scheduled Monuments & nationally important but non-scheduled monuments* (Ref 9.17).

9.2.27 To be clear, the ‘value’ in Table 9-1 derives from the four heritage values introduced in *Conservation Principles 2008* and the ‘interest’ from the terms used in the NPPF, as aligned with those heritage values. For ease, in this document the term ‘value’ has been used.

Table 9-1: Value Criteria for Heritage Assets

Value Type	Definition of Value
Evidential value	Deriving from the potential of a place to yield evidence about past human activity.  This is sometimes called archaeological interest or research value. There will be evidential value in a heritage asset if it holds, or potentially may hold, evidence of past human activity that could be revealed through investigation at some point. Evidential value in this context includes above-ground structures as well as earthworks and buried or submerged remains more commonly associated with the study of archaeology.
Historic value	Deriving from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative. A heritage asset is most commonly valued for its historical value – because of the way in which it can illustrate the story of past events, people, and aspects of life (illustrative value, or interest).  The historical value of places of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to change circumstance. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.
Aesthetic or Architectural value	The sensory and intellectual stimulation we derive from a heritage asset dictates its aesthetic value, which can be the result of conscious design, including artistic endeavour or technical

Value Type	Definition of Value
	<p>innovation, or the seemingly fortuitous outcome of the way in which a place has evolved and been used over time.</p> <p>Architectural value is an interest in the art or science of the design, construction, artistry and decoration of buildings and structures of all types.</p> <p>Artistic interest is derived from the use of human imagination and skill to convey meaning through all forms of creative expression.</p>
Community or communal value	<p>Deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Community values are closely bound up with historical (particularly associative) and aesthetic values but tend to have additional and specific aspects.</p> <p>It includes commemorative and symbolic values that reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it, i.e., war memorials.</p> <p>It also includes social value associated with places that are a source of identity, social interaction and coherence. Some may acquire communal significance through the passage of time as a result of stories linked to them. This can be closely tied up with spiritual value, where places can become symbolic of the beliefs and teachings of an organised religion or reflect past or present-day spiritual beliefs. It includes inspiration and wonder that can arise from personal contact with places long revered, or newly revealed.</p>

9.2.28 ICOMOS Guidance (Ref 9.12) provides guidance on assessing the value (in this case, 'heritage significance') of all heritage assets, not just World Heritage Sites (archaeological remains, historic buildings, or historic landscapes). Using this guidance and those set out in the above section and from professional judgement, an assessment of the heritage significance of each heritage asset has been made (Table 9-2).

Table 9-2: Asset Value Criteria (Cultural Heritage Assets)

Value	Factors deciding value
Very High	<p>World Heritage Sites (including nominated site)</p> <p>Assets of recognised international importance</p> <p>Assets that can contribute to acknowledged international research objectives</p> <p>Other buildings of recognised international importance</p> <p>Historic landscapes of international value, whether designated or not</p> <p>Extremely well preserved historic landscapes with exceptional coherence, time-depth or other critical factors</p>
High	<p>Scheduled Monuments (including proposed sites)</p> <p>Non-designated receptors of schedulable quality and importance</p> <p>Grade I and Grade II* Listed Buildings</p> <p>Other listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the listing grade</p> <p>Grade I and Grade II* Registered Parks and Gardens</p> <p>Conservation Areas containing very important buildings</p> <p>Non-designated heritage assets of clear national importance</p> <p>Non-designated historic landscapes of outstanding interest, high quality and importance, and of demonstrable national value.</p>

Value	Factors deciding value
	<p>Well preserved historic landscapes with exhibiting considerable coherence, time-depth or other critical factors</p> <p>Assets that contribute significantly to acknowledged national research agendas</p>
Medium	<p>Certain Grade II Listed Buildings</p> <p>Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations</p> <p>Conservation Areas containing buildings that contribute significantly to its historic character</p> <p>Designated or non-designated heritage assets that contribute to regional research objectives</p> <p>Non-designated historic landscapes of regional value.</p> <p>Averagely well-preserved historic landscapes with reasonable coherence, time depth or critical factor(s).</p>
Low	<p>Designated and non-designated heritage assets of local importance</p> <p>Locally Listed Buildings</p> <p>Historic (unlisted) buildings of modest quality in their fabric or historic association</p> <p>Assets compromised by poor preservation and/or poor survival of contextual associations</p> <p>Assets of limited value, but with potential to contribute to local research objectives</p> <p>Robust non-designated historic landscapes</p> <p>Historic landscapes with importance to local interest groups.</p> <p>Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations.</p>
Negligible	<p>Assets with little or no archaeological/historical value</p> <p>Buildings of no architectural or historical note; buildings of intrusive character</p> <p>Historic landscapes with little or no significant historical value</p>
Unknown	<p>The importance of the asset has not been ascertained from available evidence</p> <p>Buildings with some hidden (i.e. inaccessible) potential for historic significance</p>

9.2.29 While the values set out in Table 9-2 above give a guide for the assessment of the importance of heritage assets, these may vary based on the outcomes of research, consultation, or based on professional opinion. Variation would be based on assessment of significance, including contributions of setting, for an asset.

9.2.30 The above value criteria and values will be used alongside the method set out in Historic Environment Good Practice Advice in Planning 2: Managing significance in decision taking in the historic environment (Ref 9.14) and Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Ref 9.15) which recommends the following broad approach to assessment:

- Step 1: Identify which heritage receptors and their settings are affected.
- Step 2: Assess whether, how and to what degree these settings contribute to the significance of the heritage asset(s).
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance.
- Step 4: Explore the way to maximise enhancement and avoid or minimise harm.

- Step 5: Make and document the decision and monitor outcomes.

### Archaeological potential

- 9.2.31 An assessment of the archaeological potential of the site has also been undertaken as part of this assessment in line with Paragraph 189 of the NPPF (Ref 9.16).
- 9.2.32 Archaeological potential is the potential for places, structures, or landscapes to hold information regarding previously unknown archaeological or historic knowledge which would enhance the understanding of a place and its development. This is informed by all the known heritage assets within a chosen study area.
- 9.2.33 In this document archaeological potential is classified as:
- High for areas where there is a strong likelihood of finding archaeological remains of a given period or type.
  - Medium for areas where there is a likelihood of finding archaeological remains of a given period or type.
  - Low for areas where there is little likelihood of finding archaeological remains of a given period or type.

## Methodology for Assessing Impacts

### Impact Characterisation

- 9.2.34 The criteria for assessing the magnitude of impact and significance of effects to heritage asset are presented in Table 9-3 and Table 9-4 and is based on ICOMOS Guidance (Ref 9.12).
- 9.2.35 Potential effects from development can include changes to the setting of assets caused by visual, aural or other intrusion from a development and changes to the fabric of an asset caused by construction. Both forms of change can form a direct impact to heritage assets.

Table 9-3: Assessment Criteria for Impact Magnitude to Heritage Assets

Magnitude	Description
Major	Change to key elements, such that the resource is totally altered. Comprehensive changes to the setting.
Moderate	Change to many key elements, such that the resource is significantly modified. Changes to the setting, such that it is significantly modified.
Minor	Change to key elements, such that the receptor is slightly different. Change to setting, such that it is noticeably changed.
Negligible	Slight changes to elements or setting that hardly affect it.
No change	No change to fabric or setting.

## Assessing Significance

9.2.36 Table 9-4 illustrates how information on the value of the heritage receptor and the magnitude of impact is combined to arrive at an assessment of the level of effect arising from the Scheme. The matrix is derived from ICOMOS. The matrix in Table 9-4 is not intended to 'mechanise' judgement of the significance of effect but to act as a check to ensure that judgements regarding value, magnitude of impact and significance of effect are reasonable and balanced.

Table 9-4: Assessment Matrix for Significance of Effect on Heritage Assets

Value/ Sensitivity	Magnitude of Impact				
	Major	Moderate	Minor	Negligible	No Change
Very High	Very Large	Large/Very Large	Moderate/Large	Slight	Neutral
High	Large/Very Large	Moderate/Large	Moderate/Slight	Slight	Neutral
Medium	Moderate/Large	Moderate	Slight	Neutral/Slight	Neutral
Low	Slight/Moderate	Slight	Neutral/Slight	Neutral/Slight	Neutral
Negligible	Slight	Neutral/Slight	Neutral/Slight	Neutral	Neutral

9.2.37 Based on professional judgement and the guidance set out in Historic Environment Good Practice Advice in Planning 2: Managing significance in decision taking in the historic environment (GPA 2) (Historic England, 2017: Ref 9.14), a 'significant' effect in terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Ref 9.22) (hereafter referred to as the 'EIA Regulations 2017') is considered to be one of **moderate** significance of effect or above (from an adverse perspective).

9.2.38 For the purposes of this assessment, significant adverse effects are defined as an impact which will have a direct or physical impact on the heritage receptor which will result in the removal of all or most of the heritage receptor, or largely alter the historic setting of the receptor (Historic England, 2017: Ref 9.14). Significant adverse effects therefore may include:

- Direct impacts by operations which are not able to be mitigated.
- Alterations to the historic setting of a receptor, through intrusions to the receptor's setting, which alters the understanding of the receptor.
- Any operational impacts which will result in the permanent alteration to a receptor's character.

9.2.39 Generally, non-significant effects are impacts which are temporary or will not result in a long-term change in the character or setting of a heritage receptor. Direct physical impacts on the heritage receptor which will be archaeologically mitigated are also considered non-significant. Non-significant effects include:

- Noise and dust pollution associated with the construction phase of the Scheme.
- Changes to a receptor's setting, caused by temporary traffic.
- Direct impacts by operations conducted within the application boundary which are able to be mitigated.

9.2.40 The main body of the text focuses on significance of effect following embedded and additional mitigation. This is reported as the residual effect. However, the pre-mitigation potential significant effects are reported in the summary table at the end of this chapter (Table 9-7). The residual effects section (Section 9.5) reports the potential effects pre-mitigation and well as post-mitigation.

Accordance with the NPPF definitions of substantial harm/less than substantial harm

9.2.41 To identify any heritage assets that would experience ‘substantial harm’ in NPPF terms (NPPF 2021, paragraphs 199, 201 and 202 – see Appendix 9.9, Table 1) the following approach has been implemented to adapt the impact assessment terminology of the ICOMOS guidance (Ref 9.12) to correlate with the NPPF.

9.2.42 ‘Substantial harm’ to a designated heritage asset, or asset of equivalent value, is considered to constitute the total loss of significance of the heritage asset. Therefore, in the EIA terms used above this would be described a large or very large adverse significance of effect. Substantial harm or total loss of significance can occur due to a physical impact to a heritage asset or due to changes to the setting of a heritage asset that cause a severe enough reduction in its value. The assessment summary in Section 9.7 of this chapter identifies whether an effect is significant in EIA terms and whether it constitutes substantial harm or less than substantial harm to a designated, or equivalent value, heritage asset.

## Limitations and Assumptions

9.2.43 Data from Historic Environment Records (HERs) and other national datasets consists of secondary information derived from varied sources, only some of which were directly examined during the compilation of this assessment. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably correct.

9.2.44 Due to the nature of archaeological remains, their identification and assessment necessarily requires an element of assumption. In particular, the nature, extent, survival, and even the precise location, of buried archaeological remains is often uncertain, as the majority of such sites have never been subject to archaeological investigation to modern standards. As such, assessment of the value of such sites is often heavily reliant on informed extrapolation from limited data, comparison with similar receptors in similar contexts, and on professional judgement.

9.2.45 Certain limitations have been placed on the amount of baseline data that it has been possible to collect. It has not been possible to gain access to all areas of the site so far to undertake trial trenching due to ecological constraints, landowner/tenant refusal, and cropping regimes. Geophysical survey also was subject to constraints caused by landowner permissions, ground conditions and vegetation or crop cover. The metal detecting survey planned to be carried out prior to the trial trenching in the area of the Prehistoric barrows could not be carried out due to unfavourable ground and weather conditions and cropping regimes. All of these factors combined to make conditions unsuitable for survey. The overall coverage of the geophysical surveys and trial trench evaluation undertaken to date can be seen on Figure 9.8 in ES Appendix 9.1.

9.2.46 The consultee request that the geoarchaeological DBA (ES Appendix 9.16) be developed into a deposit model is not possible at the time of writing due to lack of ground investigation data of the quality and quantity required to create meaningful



transects of the site. The availability of data to prepare a geoarchaeological deposit model will be reviewed as the project goes forward.

- 9.2.47 The limitations do not compromise the validity of the assessment as sufficient data was available to allow for drawing of evidenced conclusions for this assessment.
- 9.2.48 A worst case scenario from a heritage perspective has been assumed in this assessment. For example, where open space is proposed it is assumed that there will be groundworks and therefore impacts to below ground remains (apart from in areas where the Parameter Plans (ES Appendix 4.2) and Heritage Strategy (ES Appendix 4.12) specifically designate areas of open space to preserve key heritage assets). For buildings of heritage interest where there is flexibility as to whether a building is to be demolished or retained (see plan in support OPM(P)1015\_JJ\_02-02-22) it has been assumed here that it will be demolished as this would cause the most adverse effect. In the event the building is retained the effect would be less harmful than has been assessed here.

### 9.3 Baseline

#### Existing Baseline

- 9.3.1 The following section outlines the existing baseline conditions for designated and non-designated cultural heritage assets in the site (as defined by the 500m and 1km study areas). This section considers archaeological remains, built heritage and the historic landscape. Unique identifiers have been applied to all heritage receptors. For non-designated receptors this is a number although sometimes with the prefix **WS** for walkover survey assets, **FS** for farmstead, or **BH** for Built Heritage asset. For designated receptors a prefix and number are used. For listed buildings the prefix of **LB** is used, whilst for conservation areas the prefix of **CA** is employed. Scheduled monuments are prefixed by **SM** and Registered Parks and Gardens by **RPG**.
- 9.3.2 Some non-designated heritage assets, identified during baseline assessment work, were screened by Historic England's Enhanced Advisory Service to establish if they met the criteria for designation. The list of assets to be screened was agreed with Historic England and includes assets both within and outside the OPA area. The screening included all the buildings due for demolition and it also assessed other assets (buildings and monuments) that were due to be preserved but were identified as **medium** or **high** value. As a result, some assets (The Castle causeway **149** and barrows **44, 58, 113, 114, 115, 130, 131, 135** and **136**), have been designated as scheduled monuments and have been added to the National Heritage List for England in 2021. Additionally, Newingreen Farm (**BH25**) and Twin Chimneys (**BH24**) have been designated (both Listed Grade II) and added to the National Heritage List for England in 2021. These assets are discussed further below. If the screening has resulted in a change in an asset's significance rating this has been reflected in the baseline and impact assessment sections. Where a previously non-designated asset has now been designated, its project ID/prefix has not been changed. This is to allow for cross referencing between this chapter and supporting documents (including ES Appendices 9.2 – 9.7). However, the designation of these assets has been reflected through their inclusion on Figure 9.1 in ES Appendix 9.1 and discussion in the baseline and impact assessment.

- 9.3.3 A full and detailed baseline covering all assets within the study area and baseline data gathered from all desk-based sources is presented in the Desk-based Assessment and Addendum (ES Appendix 9.2). The detailed results of individual assessments, geophysical surveys and trial trench evaluation are presented in ES Appendices 9.3 to 9.23. Several heritage assets have been scoped out of assessment and this section will focus solely on the key receptors in order to present a focused assessment of the assets that are likely to experience impacts as a result of the Proposed Development.
- 9.3.4 The geophysical surveys and trial trenching conducted between 2017 and 2020 as part of this project has substantially added to the archaeological understanding of the site. The assets that have been identified by trial trenching and/or geophysics have been assigned a project ID. Those identified through the trial trenching are also generally referred to by their 'Field Number', as assigned by Oxford Archaeology who undertook the 2017-8 trial trenching.
- 9.3.5 Further geophysical survey was conducted in 2020 across eight areas of the application site and displayed on Figure 9.8 in ES Appendix 9.1 as well as further geophysical survey on the Roman villa site in 2021. The survey predominantly was a magnetometer survey, with an electromagnetic survey and resistivity survey also used at the Roman villa site (167). Ground penetrating radar was used alongside magnetometry covering 1ha of the total 5.5ha of Westenhanger Castle Scheduled area (ES Appendix 9.19). This phase of geophysical survey helped inform further trial trench evaluation, the results of which are also discussed here.
- 9.3.6 Further trial trench evaluation was conducted in 2020 by Wessex Archaeology (ES Appendix 9.21), covering a total of nine discrete areas of investigation (referred to as 'Areas i to ix'). The nine areas of trial trenching are displayed on Figure 9.8 in ES Appendix 9.1 and are primarily focused to the north of the A20 within the boundaries of the former deerpark associated with Westenhanger Castle. Three of the 2020 areas of trial trenching (Areas iii, vi and vii) are located south of the A20.
- 9.3.7 The location of trenches was informed by previous heritage studies, including LiDAR data and cartographic sources, along with geophysical survey results. Where trial trenching has furthered our understanding of previously identified heritage assets, discussion of the value added accompanies the previous text discussing the geophysical anomaly and uses previously assigned project IDs. The fieldwork carried out between 2017 and 2021 has demonstrated the potential for further archaeological assets to survive across the application site.
- 9.3.8 Areas of completed geophysical surveys and trial trenching in both 2017-2018 and 2020 are displayed on Figure 9.8 in ES Appendix 9.1.
- 9.3.9 To support a holistic approach to assessment, considering the nature of the archaeological and historic resource across the proposed Development's landscape, this baseline groups assets within their wider context and association. This is to allow for a comprehensive understanding of an asset's contribution to the wider historic development across the landscape. In turn, this allows for appropriate assessment of an asset's significance, setting and potential impact, based on this contextualisation.
- 9.3.10 As a result, the existing baseline is discussed chronologically and where appropriate, with the archaeological period's main asset grouping, e.g. barrows in the Bronze Age section. Discussion within archaeological period incorporates assets found through a range of assessment means (desk-based and fieldwork), all discussed in detail in ES Appendices 9.2 to 9.8 and 9.10 to 9.23. Designated and non-designated assets are discussed together, as well as archaeology and built heritage, where appropriate. The existing baseline section then ends with a discussion of Historic Landscape Character.
- 9.3.11 Heritage assets are presented on Figures 9.1-9.9 within ES Appendix 9.1. Figure 9.1 presents all designated heritage assets. Figures 9.2-9.9 present the data

chronologically (both designated and non-designated heritage assets) to support the headings of the baseline and asset groupings. However, not all assets are numbered or appear on Figures 9.2-9.9 in ES Appendix 9.1. This is because some are very tentative and require further investigation to verify their existence or date. Additionally, some assets such as individual small pits are too small to represent on a figure. The interest of these assets discovered by the fieldwork lies largely in their evidential value to inform our understanding of the past, and their historical value.

- 9.3.12 Key heritage assets are additionally depicted on the Key Heritage Assets/ Constraints Plan which is within the Appendix of the Design & Access Statement (ES Appendix 4.16), as well as on supporting figures in this document.

### Historic England's Designation Screening

- 9.3.13 Historic England's Enhanced Advisory Service undertook a designation screening of the Proposed Development. In 2021 The screening independently assessed heritage assets which have a potential to be either scheduled or listed. As a result, some that were non-designated have now become designated. The assets screened were identified for their medium or high value, or due to threat from demolition or change to their settings. Due attention to this significance has been taken to help inform this chapter, the Heritage Strategy (ES Appendix 4.12) and design of the Masterplan. The screening service has been split into two packages of work and include the following.

- 9.3.14 Package 1 consisted of assets within the application site boundary of the OPA and commenced February 2021. A series of buildings and monuments were screened for listing/designated status by Historic England. The following were rejected for initial assessment by Historic England and were therefore not designated. Those without ID numbers in bold have been scoped out of this ES assessment and are therefore not mentioned further:

- 1 and 2 Barrow Hill Farm Cottages;
- Benham Business Park and Benham Water Farm (**WS30, WS31, WS32, WS33** and **WS34**);
- Buildings of the former Folkestone Racecourse (including **271-281**);
- Cobtree Cottage & 2 Frank Villa;
- Cydonia & The Bungalow;
- Elmacres and associated land;
- Quorum & Craylands;
- Red House Farm (**FS3**);
- Somerfield Court Farm (**FS1**);
- The Airport Café; and
- Building/shed on Stone Street (**WS19**).

- 9.3.15 Assets that were scheduled following Package 1 screening on the 26th May 2021 include:

- The causeway to Westenhanger Castle (**149**);
- The western barrow grouping (**58, 113, 114, 115, 130, 131, 135**); and
- Two barrows east of barrow hill (**44** and **136**).

- 9.3.16 Assets within the Package 1 screening which were screened fully by Historic England but not designated are:
- The White House, as part of the building complex at Mink Farm (**FS2**);
  - Rose Cottage (**WS12**);
  - Hillhurst Farm (**BH32**), including farmhouse (**282**) and outbuildings (**283**);
  - Elms Farm (**FS5**); and
  - Battle Headquarters (**28**): and
  - Air raid shelter (**BH42**).
- 9.3.17 Package 2 of the designation screening assessed standing buildings outside the OPA but close to it. It also included Westenhanger Station (**BH3**). The following buildings were screened by Historic England but not listed:
- Westenhanger Station (**BH3**);
  - Nowell Cottage (**WS15**);
  - 1-3 Little Greys Cottages;
  - Pickett Hamilton Fort (**BH32**);
  - Berwick Manor (**BH28**); and
  - Barrow Hill Farm (**BH13, WS10**).
- 9.3.18 The following two buildings were assessed as part of Package 2 and were listed as a result of the screening (Grade II) on 15th September 2021:
- Twin Chimneys (**BH24**); and
  - Newingreen Farmhouse (**BH25**).

#### Early Prehistoric: Palaeolithic to Neolithic (up to 2500BC) (Figure 9.2, ES Appendix 9.1)

- 9.3.19 Human activity within Otterpool Park dating to the Palaeolithic, Mesolithic and Neolithic periods has been recorded through varying assessment methods. Known activity within the Early Prehistory is piecemeal and, as a result, no asset groupings are discussed within the Palaeolithic to Neolithic. All assets of this date are displayed on Figure 9.2.
- 9.3.20 Identified geoarchaeological potential represents the earliest possible activity within Otterpool Park. There is potential for Palaeolithic and / or Mesolithic deposits within the application boundary and this is discussed in detail in the Geoarchaeological DBA (ES Appendix 9.16). There are geological fissures or ‘gulls’ in the western part of Otterpool Park. These are found within Lower Greensand Hythe Beds, formed in the Quaternary Period, which show up well on the geophysics (ES Appendix 9.12 and Figure 9.8). Two of these fissures have been investigated by trial trenching (ES Appendix 9.18- Field 10) and deposits within them have been dated to the Palaeolithic period by Optically Stimulated Luminescence Dating. No finds or faunal remains dating to the Palaeolithic have so far been found within these fissures. Pollen analysis of these fissure deposits was also carried out with limited results.
- 9.3.21 Geoarchaeological and paleoenvironmental potential have also been identified through a watching brief of previous ground investigations (ES Appendix 9.17).
- 9.3.22 An area of electromagnetic survey was conducted south of the A20 Ashford Road, east of the site of the Romano-British Villa (**167**), with the hope this type of survey could identify any archaeological remains located below alluvial deposits that line the

stream course here. Deposits of potential interest were identified through survey, such as alluvial deposition from the East Stour River in the northern extent of the area, along with some broader areas of siltier/ more clayey deposition. However, results were too vague to provide any understanding of whether these deposits contain or overlay archaeological features.

- 9.3.23 Further analysis of geoarchaeological features was conducted during trial trench evaluation of the site in 2020 (ES Appendix 9.21). Patches of possible brickearth geology was identified within an interface between the natural bedrock geology of the Hythe formation and the superficial deposits of Head within Area iii of the trenching (east of Lympne Industrial Estate). Brickearth holds evidential value to potentially yield information on later Palaeolithic to Mesolithic activity within the site. Geoarchaeological test pitting was undertaken nearby in Link Park in 2021 (ES Appendix 9.20) which found similar deposits of Head/Brickearth but no archaeological remains.
- 9.3.24 This information will feed into the geoarchaeological deposit model that will be prepared of the site, prior to Tier 2 submissions subject to availability of suitable geoarchaeological data. It is considered that these deposits and geological features have the potential to provide evidence of the landscape formation of the site and possible hunter-gatherer interaction with this landscape.
- 9.3.25 The evidence for the Mesolithic and early Neolithic periods is mainly in the form of residual finds found in later features. Some finds and features denoting human activity have been identified and are discussed below.
- 9.3.26 Prior to trenching, one Neolithic arrowhead (**103**) was known from the northwest corner of the site, in the location of the Proposed Wastewater Treatment facility. The arrowhead is a findspot which has been removed from the site and therefore not considered further.
- 9.3.27 The trial trenching in Fields 2, 3, 8, 9 and the eastern part of Field 10, in 2017 to 2018, discovered a moderate to high quantity of Mesolithic or early Neolithic flint within later features but no flint scatters. This suggests a transient presence in the Mesolithic (Middle Stone Age) and could be seen as of **low** significance. In Field 5 a buried land surface was found (**220**) preserved underneath a later barrow (**136**). A sizable assemblage of Mesolithic flintwork was found within this buried land surface. The buried land surface (**220**) in Field 5 occupies an area of higher ground and could have been a particular focus of Mesolithic hunter-gatherer activity. Buried land surface **220** is a rare survival due to its preservation and is of **medium** value due to evidential value. The quantity of flintwork found in Fields 2, 3, 5, 8 and 9 and 10 suggests that these areas were visited by Mesolithic hunter-gatherers. The quantity of Mesolithic flint found in Fields 8 and 10 might suggest a Mesolithic site of **medium** value in the area as yet to be found, due to evidential and historical value.
- 9.3.28 The trial trenching in Fields 1 and 4 has recovered a substantial amount of Neolithic flintwork and there is also a substantial assemblage of Neolithic pottery from Field 1 found within later features. There was also a moderate amount of Neolithic flint found in Fields 8, 9 and 10 but no Neolithic pottery. The Neolithic material from all five fields is mainly redeposited within later features and therefore not depicted on Figure 9.2. One Neolithic ditch (**196**) in Field 4 was the only feature definitely dated to the Neolithic in both Fields 1 and 4. The Neolithic finds from Fields 1 and 4 suggests the presence of a Neolithic site of **medium** value within this area due to evidential and historical value.
- 9.3.29 Small pits of probable Late Neolithic/Early Bronze date have been found in Fields 2-3 (not numbered or represented on Figure 9.2). Late Neolithic to Late Bronze Age flint has been found spread across Fields 2 and 3 suggesting that further features of this

date might be present in this area. Field 4 also yielded significant quantities of flint of Late Neolithic/Early Bronze Age date, albeit mostly within later features. There is potential for assets of Late Neolithic to Early Bronze Age date to be present in all three fields which could prove to be **low** to **medium** value due to evidential and historical value.

- 9.3.30 Within Area iii of 2020 trenching, a Neolithic pit (**293**) was identified and included 9 sherds of Peterborough Ware and worked flint in trench 231. Other pits in the proximity may also be of the same date, although this is currently unconfirmed. The pits may represent a Neolithic occupation site. As a result, the asset holds evidential and historical value for the potential to yield further information on the interaction of the people in the Neolithic with the landscape at Otterpool Park. Consequently, pit **293** is of **medium** value.
- 9.3.31 Area viii of the 2020 trial trenching (west of Westenhanger Castle - **SM6**) identified two ring ditches showing on geophysical survey which are probable barrows (**263, 284**) as noted below in the Barrow section. However, a series of pits were identified inside and outside of the ring ditch **284**. One pit (**289**) inside the ring ditch included a large flake from Neolithic polished stone axe and a large flint hammerstone. These artefacts could represent earlier use of the land before the barrow's presence in the Bronze Age or they could be older artefacts that were 'curated' and deposited in the Bronze Age. Considering the presence of a potential Neolithic occupation site (**293**) in Area iii of the 2020 trenching pit **289** has the potential to contribute to the understanding of the Neolithic interaction with the landscape across Otterpool Park. As a result, asset **289** is of **medium** value due to historical and evidential value.
- 9.3.32 A semi-circular ditched enclosure (**175**) found in 'Field 1' in 2017/18 was tentatively interpreted as a Neolithic causewayed enclosure at the time due to the presence of apparently Neolithic pottery found with Iron Age pottery. A mini excavation of this feature was undertaken in 2020 to prove or disprove this. This involved the re-opening and widening of three earlier trial trenches. The mini excavation identified a further 5 ditches and two pits, which did not correspond to previous excavations or geophysical survey results. Dating evidence identified material dating from the Prehistoric, through to the Romano-British period, however, none of the material could provide definitive dating evidence. The 2020 report (ES Appendix 9.21) concluded that feature **175** could be described as a partially double ditched curvilinear enclosure of Bronze Age date at the earliest; although this still remains tentative. No conclusive evidence of a Neolithic causewayed enclosure was found. The results of one of the 2018 trenches, which led to the Neolithic causewayed enclosure potential, was deemed to be misleading in 2020 (ES Appendix 9.21). As a result, the importance of the enclosure and trackway (**175, 176**) are discussed as an Early to Middle Iron Age feature below, as part of the wider settlement and agricultural activity, west of Barrow Hill.

#### Later Prehistoric: Bronze Age (c 2500BC – 800BC) (Figure 9.2, ES Appendix 9.1)

- 9.3.33 In the Bronze Age the main evidence within Otterpool Park comes through two funerary landscapes, discussed as asset groups below. Additional activity, through the form of agricultural land management and some settlement activities are also present; although knowledge is currently limited in places due to the nature of evaluation which identified them.
- 9.3.34 The placename/road name of 'Barrow Hill', which is within the application site, derives from the presence of barrows (burial mounds) here and indicates the long-lasting influence of the Bronze Age funerary landscape. One group of barrows is located to the west of Barrow Hill (the road) and the second to the east. The following asset groupings are spatially displayed on Figure 9.2. Barrows which were recorded pre-

2020 are the subject of a statement of significance which explores their significance and setting in detail (ES Appendix 9.7).

- 9.3.35 Trenching which has either targeted the perimeter ditch of known barrows or identified new barrows have confirmed their date as Bronze Age, although some earlier Neolithic material has been identified in places. The barrows would have been built to contain a burial or multiple burials, either cremated or inhumed. Little cremated human bone was found but this is due to the fact that the centre of each of the barrows was deliberately avoided by the trial trenches in an attempt to leave any human remains intact.

### ***Barrows West of Barrow Hill***

- 9.3.36 The following 7 barrows form the western cemetery group: **58, 113, 114, 115, 130, 131, 135**. Of these, barrows **58, 113, 114, 115** were catalogued by Kent HER and barrows **130, 131** and **135** were identified either through aerial photography analysis or geophysics as part of this project.
- 9.3.37 The western barrow group was scheduled by Historic England as part of their screening decision on the 26<sup>th</sup> May 2021 and as such they now receive statutory protection. Their NHLE number is 1475132.
- 9.3.38 Barrows normally date to the Bronze Age and the trial trenching has confirmed a broadly Late Neolithic to Middle Bronze Age date for barrow **130**. Barrows **114, 115, 131** could not be closely dated but are thought, based on morphology and small amounts of Prehistoric pottery and flint in their fills, to be broadly Late Neolithic to Mid Bronze Age. Barrows **58** and **113** were not subject to trial trenching therefore there is no finds evidence to provide definite dating. Barrows **58** and **113** have mound survival and show on LiDAR. None of the other three barrows (**115, 130, 131**) contained evidence for an internal mound, being ploughed flat. Barrows **131, 130** and **115** are small examples and are typical of early Bronze Age barrows found locally and regionally. Barrow **58** is the largest of all the barrows at 60m diameter.
- 9.3.39 Barrow **114** is unusual in that it has a double ring ditch and one of these contained a deposit of cockle shells. The cockle shells could have been deposited in the Late Iron Age or Romano-British period rather than in the Bronze Age period of use, however.
- 9.3.40 The barrows are key heritage assets within the site. The rural settings of the barrows within the application site inform their significance as it has enabled preservation of archaeological remains and allows views between some of the barrows within the site and towards the locations of other barrows on the edge of the North Downs. However, their setting is not their main significance. The value of these assets is based mainly on their evidential value and group value. They form part of a Prehistoric funerary landscape which demonstrates the development of human activity within the area and their potential to reveal further information about this past activity. They are connected to other elements of the Bronze Age landscape that have been revealed through fieldwork i.e., Middle Bronze Age field systems (**187, 239**), non-barrowed cremation burials (**184, 203**), which are discussed below, and settlement remains (**26, 64, 121**). The relationships between the barrows, particularly between barrows **58, 113, 114** and **135** are important factors in their settings and contribute to their significance.
- 9.3.41 Barrows **58, 113, 114, 115, 130, 131** and **135** are of **high** value as reflected by their recent designated asset status/scheduling. They have group value as a barrow cemetery, archaeological potential/evidential value, survival/historical value and include a combination of rarer barrow forms and large sizes.
- 9.3.42 Barrows **155** and **156** are located outside of the application site, 1.2km south of the western barrow asset grouping and are displayed on Figure 9.2. These barrows were identified through LiDAR analysis as part of the assessment. Due to the distance and

intervention of Harringe Brooks Wood, their association and current setting is not clearly associated with the western barrow cemetery group. Barrows **155** and **156** were not screened by Historic England either as part of the western barrow cemetery group and therefore remain non-designated.

- 9.3.43 As a result, they are not included in the grouping but at one time likely, held some form of association but intervening woodland removes this association in the present. Due to the limited contextualisation with the main asset grouping, barrows **155** and **156** are of **medium** value, as they still hold evidential and historical value.

### ***Barrows East of Barrow Hill***

- 9.3.44 The following 9 barrows form the eastern barrow group: **44**, **46**, **116**, **133** (possible barrow), **134** (not surviving), **136**, **253**, **263** and **284**. Barrows **44**, **46**, **116** were recorded on the Kent HER, while **133**, **134**, and **136** were identified by LiDAR analysis or 2017/18 geophysics as part of this project. A further 3 probable/possible barrows (**253**, **263**, **284**) were identified through geophysical survey in 2020 (ES Appendix 9.19) and subsequent trial trench evaluation (ES Appendix 9.21-Area i (**253**) Area viii (**263**, **284**)).
- 9.3.45 All of these barrows lie within the application boundary with the exception of **46** and **116** which are located at least 80m west of the application boundary. However, proximity to possible barrow **133**, 140m east of these barrows, makes their association more discernible within the wider group.
- 9.3.46 Barrows **44** and **136** have very slight mound survival. These two have been scheduled by Historic England as of their screening decision on the 26<sup>th</sup> May 2021. Barrow **44**'s NHLE number is 1475133. Barrow **136**'s NHLE number is 1475688. The remainder of the barrows in this grouping are non-designated. Barrows **253**, **263** and **284**, identified in 2020, were screened for scheduling but were rejected, partly due to being completely ploughed flat and not having any particularly distinctive features.
- 9.3.47 The fill of Barrow **44**'s ring ditch contained slag and hammerscale which could indicate use or re-use in the Iron Age or later for iron working. Barrow **44** retains a very low mound. It is also unusual in that it contains a berm and postholes of an internal palisade.
- 9.3.48 Barrow **44** is recorded by the HER as having been dug in 1931 and only one piece of red ochre having been found in it. The geophysics shows possible disturbance in the centre of some of the barrows which might equate to holes dug by antiquarian archaeologists to retrieve burials and grave goods. Barrow **44** has a rarity form/historical value as a bell barrow with evidence for a palisade revetted mound and it also has archaeological potential/evidential value.
- 9.3.49 Barrow **136** is an unusual type in that it does not have a ring ditch, although it is broadly Late Neolithic to Middle Bronze Age in date. Barrow **136** seals Mesolithic buried soils discussed above (**220**). Barrow **136** is of **high** value.
- 9.3.50 To the east of Barrow Hill, Sellindge, geophysics revealed a circular geophysical anomaly (**133**) that was thought to be a partially ploughed out barrow. Trial trenching (in Field 8) did not confirm if it was a barrow. The dating from the ring ditch was mixed Medieval, Post-Medieval and Late Neolithic/Early Bronze Age and it contained no trace of a mound. It could be a Post-Medieval feature (**223**) connected to Barrow Hill Farm or an Early Bronze Age barrow. **134**, although shown on Figure 9.2, is no longer surviving. It showed as a vague circular patch on aerial photographs but when targeted by trial trenching, nothing was revealed. It is therefore either spurious or it was a barrow but has been destroyed by ploughing. As the evidence has revealed there are



no archaeological remains of a barrow present is not considered further in this assessment.

- 9.3.51 The circular form of ditch **253**, identified through geophysics, north east of the Racecourse Lake resembled a partial ring ditch and this was targeted by a trial trench which confirmed it as a ring ditch. The ring ditch contained 3 sherds of possible Early Bronze Age pottery and some burnt flint. As a likely barrow, it widens the Bronze Age funerary landscape further east.
- 9.3.52 At the southern extent of 2020 trenching area viii, a circular anomaly of a likely ditch feature was identified (**284**). There is the potential that this may relate to a Prehistoric barrow and contribute to the funerary/ceremonial landscape within the application site, currently dated to the Bronze Age. Trenching confirmed the feature as a barrow, noted above.
- 9.3.53 An undated ditched enclosure (**263**), measuring 12m x 13m was identified in a central location of the 2020 geophysical survey area. The results are currently limited to provide an interpretation as to a possible date and/or function. However, the feature could be a further barrow feature, based on its form and size.
- 9.3.54 The rural settings of the barrows within the application site inform their significance as it has enabled preservation of archaeological remains and allows views between some of the barrows within the site and towards the locations of other barrows on the edge of the North Downs. However, the setting of these asset is not the primary factor that informs their significance. The value of these assets is based mainly on their evidential value and group value. However, compared to the western group, the barrows of the eastern group are much further spread out, making their associations difficult to pick out. This is particularly due to later intrusions on their rural setting such as Folkestone Racecourse or the A20 providing a clear separation from barrow **136** south. Therefore, evidential value is the primary factor that informs the significance of these barrows.
- 9.3.55 Key viewpoints in this group are limited to between barrows **44** and **136**, with these views contributing to their individual significance.
- 9.3.56 Barrow **136** is of **high** value as reflected by its newly designated status/scheduling. It is quite well preserved, of unusual type and holds historic and evidential value. Barrow **44** is of **high** value as reflected by its newly designated status/scheduling. It too has unusual features. Barrows **46**, **116**, **253**, **263**, and **284** are of **medium** value due to their historic and evidential value. Although not well preserved, if **133** is a Bronze Age barrow it would have **medium** value as an element in a wider Bronze Age barrow landscape. If it proves to be Post-Medieval in date it would have **low** value.
- 9.3.57 Barrow **134** is of **negligible** value as, if it was a barrow, it does not appear to be extant.

#### ***Remaining Bronze Age activity***

- 9.3.58 A range of further Bronze Age assets have been identified within the application site and study area. Their associations are currently less clear as the main barrow asset groupings and therefore discussed below. All assets are displayed on Figure 9.2 in ES Appendix 9.1.
- 9.3.59 Kent HER records a Bronze Age settlement (**26**) and associated Prehistoric ditches (**121**) at Lypne Industrial Estate, both within the application site. These assets (**26**, **121**) have historical and evidential value as part of a wider Prehistoric settled landscape, with potential to reveal more information about Prehistoric activity. Limited archaeological investigation was carried out as part of another planning application

within this area but their character and state of preservation is currently not confirmed. These assets are of **medium** value.

- 9.3.60 A Bronze Age hoard (**270**) was recently found by a metal detectorist at the north east corner of the junction of Stone Street and Ashford Road. Information of this asset came through the Senior Archaeological Officer at Kent County Council and is not recorded on the HER. The hoard consisted of a small group of mutilated flanged axe heads and a socketed dagger/knife with punched decoration and presume to be late early to an early middle Bronze Age date. The identification of these artefacts in the plough soil by metal detecting provides an indication for additional Bronze Age artefacts to be located within the area. It is unclear if the entire hoard has been recovered and therefore associated artefacts may remain. The hoard holds historical and evidential value for its potential to yield information on the material culture of the Bronze Age in the region, as well as the circumstances leading to the deposition of the objects; the latter being identified as a regional research objective. Based on the evidential value, the hoard (**270**) is of **medium** value.
- 9.3.61 The 2017-2018 fieldwork has identified further Bronze Age activity within the application site, which holds evidential and historical value. This includes:
- Late Bronze Age cremation burials in the northern part of Field 2 (**184**) and one nearby in the south-eastern corner of Field 10 (**203**) indicate that burial did not just take place within barrows and that funerary activity continued from the Middle Bronze Age in this area. These 'flat' cremation burials, i.e. those not contained within barrows, are of **low** value.
  - Fields 2, and 10 and probably Field 3 contained Middle Bronze Age ditches (**187, 239, 189**) thought to be part of a field system that was contemporary with the barrows. There are certain other undated ditches and enclosures in Field 2, some of which are on a similar alignment, and could also be contemporary (**186**). Field 2 also contained pits, an L-Shaped ditch and an adjacent ring ditch (**185**), all of Middle Bronze Age date. The latter two assets were clearly visible on the geophysical survey. The ring ditch (**185**) may represent an unusual type of barrow (with no internal mound) but is more likely to have a domestic function or to have enclosed a collection of cremation burials. Taken together with the barrows, the Middle Bronze Age features in Fields 2, 3 and 10 form part of a Middle Bronze Age landscape incorporating domestic, agricultural and funerary features which is of **medium** value.
  - The northern part of Field 4 also contained a Middle Bronze Age (or Late Bronze Age) pit and ditch (**195**), both of **low** value.
  - Middle Bronze Age activity is not just confined to the western part of the site. In Field 6 which is east of Stone Street lies a probable Middle Bronze Age enclosure (**112**) and field system ditches (**200**). The enclosure can be clearly seen on aerial photographs but was not detected by geophysics. The trial trenching evidence indicates a probable Middle Bronze Age date for the enclosure and the ditches. If proved to be of Middle Bronze Age date this enclosure and its related field system is of **medium** value as only three or four other possible enclosures of this date have been found in Kent and Middle Bronze Age field systems are still few in number regionally.
- 9.3.62 Further Bronze Age activity has been identified in the application site during 2020 fieldwork:
- Perpendicular ditches (**302**) were identified in Trench 9, located east of the scheduled area of Westenhanger Castle in trenching Area i. The northern ditch of the pair in Trench 9 included large fragments of a Bronze Age bucket shaped urn, as well as other sherds of Bronze Age pottery. No dating evidence was recovered

from the southern ditch from Trench 9, although its orientation, as mapped, appears to align with an undated ditch to the south east identified in Trench 182 (not shown on Figure 9.2). As a result, the three ditches may represent wider activity and possibly illustrate a field system of some sort, although the association is currently unknown. Due to the poor contextualisation of the ditches (**302**), they are of **low** value, however, hold evidential and historical value to yield further information.

- Prehistoric ditches (**298**) were identified in the north east area of the Racecourse's inner green, within trenching Area i. The ditches were identified in Trenches 30 and 31 and included Bronze Age pottery. A series of undated ditches were also identified in the northern area of the Racecourse and could therefore hold some form of association, although this is unclear due to limitations in the trial trench evaluation. Prehistoric ditches **298** are of **low** value due to their current limited contextual understanding, and they hold evidential and historical value.

Iron Age (c 800BC – AD 43) to Romano-British (AD 43 – c AD410) (Figure 9.3, ES Appendix 9.1)

9.3.63 Evidence of the Iron Age and Romano-British periods have illustrated a continuation of activity between both archaeological periods, particularly to the west of Barrow Hill where extensive Iron Age and Romano-British activity has been identified. The South East regional research framework (Ref 9.28) notes the transition period from the Iron Age to Roman Britain as a research objective, which given the current knowledge of the application site, Otterpool Park has the potential to contribute to. As a result, the two archaeological periods are discussed together in this baseline. All assets are displayed on Figure 9.3 in ES Appendix 9.1.

9.3.64 Three key asset groupings have been identified within this archaeological period. These groupings are displayed on Figure 9.3 and lead discussion of this section.

Iron Age to Romano-British Settlement Activity, West of Barrow Hill

9.3.65 The 2017-18 fieldwork identified extensive settlement activity and evidence of agricultural practices to the west of Barrow Hill. Activity dates to both the Iron Age and Romano-British periods, illustrating a continuation of activity within the area. The wider spatial area of the activity is illustrated on Figure 9.3 and consists of the following identified activities, discussed below.

9.3.66 Geophysical anomalies south of Somerfield Court Farm (west of Barrow Hill, Sellindge) were sampled by trenching in Field 10. They proved to be a settlement starting in the Middle Iron Age and continuing on through the Late Iron Age until the middle Romano-British period and structured around a major sinuous ditch (**214**). Materials deriving from the multiple archaeological interventions into this ditch dated it to between the Middle Iron Age and Middle Romano-British period but included the late Iron Age, suggesting that the ditch (**214**) remained a major feature throughout the life of the settlement. To the south of the sinuous ditch were a dense concentration of pits (**217**) including a large 'bell'-shaped pit. Either side of the sinuous ditch was a series of rectilinear enclosures (**212, 213, 215, 238**) and ditches (**216, 218**). These settlement enclosures and pits carried on until the Late Iron Age and Romano-British period. One enclosure (**213**) contained remains of a Romano-British post-built house. No roundhouses were identified, although the features that were discovered are indicative of at least one settlement. A late Iron Age to Romano-British quarry pit (**208**) in the south of Field 10 and an enclosure in the north-western part of Field 10 (**210**) are probably part of the same settlement. The Middle Iron Age, and Late Iron Age to

Romano-British settlement features (**208, 210, 212, 213, 214, 215, 217, 238**) are of **medium** value due to their evidential and historical value.

- 9.3.67 Geophysical anomalies (**219, 221**) in Field 10 that were not sampled by trial trenching are currently of unknown date. Their morphology and the presence of other Prehistoric and Romano-British features on this field makes it likely that these features are Prehistoric or Romano-British. Further work would prove if these anomalies were archaeological (rather than natural or Modern features). If they are associated with the barrows or part of the Middle Bronze Age field system, or alternatively, were Middle Iron Age to Romano-British in date they would be of **medium** value due to their evidential and historical value.
- 9.3.68 To the south of this settlement, in the middle of Field 10, is another enclosure (**206**) seen on geophysics. This double ditched rectilinear enclosure requires further investigation as only two trenches were dug into this feature, but the finds indicate a Late Iron Age Date. It could also be of **medium** value due to its evidential and historical value.
- 9.3.69 A curvilinear ditched enclosure (**175**) and a nearby L-shaped feature (**177**) showed on the geophysical survey in Field 1 of the 2017/18 trial trenching. Trial trenching suggests an Early to Mid-Iron Age date for both these assets (although the curvilinear enclosure also contained Neolithic finds – see above). Trenching in 2020 (ES Appendix 9.21) has suggested a slightly earlier Bronze Age date to asset **175**. These enclosures, as well as two pits and a nearby ditch (**175**) and an Early to Middle Iron Age ditch in the same field (**180**), suggest settlement activity of this date in the area. A hollow to the south of the enclosures also contained Early to Middle Iron Age pottery (**182**). A late Bronze Age or Early Iron Age curvilinear enclosure was also found in the northern part of Field 3 along with three Iron Age pits (**190**) indicating the periphery of an Early to Middle Iron Age settlement. All the enclosures, as well as the ditches, pits and hollows associated with them (**175, 177, 180, 182, 190**) are of **medium** value due to their date (Early Iron Age) as these are very rare in Kent.
- 9.3.70 A second hollow (**183**) was also found in Field 1 (to the south of ditches **177/178**). It contained artefacts broadly dated to the Prehistoric period, but it was not possible within the trial trenching to refine its dating. This would be of **medium** value if found to be associated with the Early to Middle Iron Age or earlier features in this field.
- 9.3.71 The southern area of Field 4 contained a sub-rectangular enclosure (**192**) which showed as a geophysical anomaly. Trial trenching established an Early to Middle Iron Age date for this feature and also revealed internal pits (**192**). Just to the north, a series of parallel ditches dated to the Early Iron Age to Early Romano-British period (**194**) may be related to the enclosure and it is possible (given the partial coverage of trenching in this field) that further Early to Middle Iron Age evidence may be revealed in Field 4 should further work take place. As with Field 1, the enclosure (**192**) is of **medium** value.
- 9.3.72 The fieldwork across the site has revealed an extensive array of other Romano-British features – all previously unknown. A rectangular enclosure (**193**) showing as a geophysical anomaly was investigated as part of the trial trenching in Field 4. This dates to the Middle Romano-British period and contained postholes and a beam slot signifying the presence of a timber building (also **193**), this indicates that the enclosure contained a Romano-British farmstead. An early Romano-British ditch and a Late Iron Age to Early Romano-British ditch to the north (**193**) may be earlier elements of its field system. Evidence from the archaeological investigations undertaken to date indicates that this field contains more elements of the field system associated with this

enclosed Romano-British farmstead. It is considered to be of **medium** value due to the asset's evidential and historical value.

- 9.3.73 The geophysics showed a system of ditched anomalies and small sub-rectangular enclosures west and north-west of Otterpool Manor (**LB20**). Some of these were investigated by trial trenching in Field 3 and they were also found to continue into the northern part of Field 1 (**178, 191**). A Late Iron Age to Early Romano-British date has been confirmed for those that have been subject to trial trenching and it is assumed that they form part of the same farmstead and associated field system. This settlement seems to have replaced the Bronze Age to Early to Middle Iron Age settlement further to the west (**175, 177**). A relatively large assemblage of early Romano-British pottery was found in the enclosure ditches in Field 3 including some complete and semi-complete vessels. This Late Iron Age/ Early Romano-British farmstead (**178, 191**) is of **medium** value.
- 9.3.74 Collectively, the above assets represent a range of settlement and agricultural evidence with continuation between the Iron Age and Romano-British periods. This activity also provides some continuation of land management from the Bronze Age, identified through trenching the same area and discussed above. The settlement activity is collectively of **medium** value due to their evidential and historical value. Details of the activity were identified through trial trench evaluation and geophysical survey and as a result, the asset group area holds evidential value for further associated remains to be present within is area of the application site.
- 9.3.75 A LIDAR feature, believed to be a barrow at first was confirmed as an Iron Age ring ditch (**132**) within the northern extent of the settlement activity. It is currently unclear what its function is but is likely associated with this activity. The feature is of **medium** value for its evidential value and historical value as a likely part of the wider Iron Age and Romano-British activity west of Barrow Hill.

#### Burch's Rough Roman Villa

- 9.3.76 Outside the OPA boundary, 750m to the west is the site of a Romano-British building or villa known as Burch's Rough. This is a scheduled monument. Nothing survives above ground. Appreciation of this asset in the Modern landscape is informed by its relationship to the Roman Road (Aldington Road - **8**) to the south and by its rural setting. Its probable focus during the Roman period was to the south on the Roman road, and there are no defined relationships in terms of setting or views to the area of the OPA site. It has been scoped out of the assessment as its setting is not altered to the extent its significance will be impacted and is therefore not shown on the Figures. Its presence has however informed our understanding of the archaeological potential of the OPA site for Roman remains.

#### Romano-British Villa at Otterpool (See Figure 9.3 in ES Appendix 9.1.)

- 9.3.77 Alongside the settlement activity west of Barrow Hill, further Romano-British settlement activity was identified through the identification of a villa building, south of the A20 in 2018.
- 9.3.78 Geophysics (magnetometry – ES Appendix 9.12) and trial trenching has revealed a previously unknown Romano-British villa (**167** and including ditches to the west - **168**) east of Otterpool Quarry and south of Ashford Road. The trial trenching report (Field 5, ES Appendix 9.18) and the Statement of Significance on the villa (ES Appendix 9.8) give full details on this key heritage asset including its significance and setting. The villa survives as limestone foundations as well as associated floor layers of varying preservation. A series of rooms were exposed including a possible bath house. Heated floors are indicated by the survival of a hypocaust with the remains of the bases of tile *pilae*. Window glass, roof tile, flue tile, voussoir tiles, column bases of imported stone as well as a range of other finds including coins and imported pottery indicate a

building of high status with access to good trade links. Two structural phases could be recognised on numerous buildings. Some structural features and a large south-west to north-east aligned ditch can be dated to the first century AD, and a small amount of possible conquest period (43AD) pottery was discovered. However, the majority of the features date to the middle Romano-British period. Little material dates to the 4<sup>th</sup> century, and no Late Romano-British structural features were uncovered. The villa included a possible malting oven with a raised floor, a suggestion of a glass furnace and possible milling activity. Romano-British rubbish pits with waterlogged fills preserving organic finds were revealed next to the former channel of a stream, in the north-eastern part of the Field. Other features include a north-west to south-east aligned road, linear ditches and pits and a possible fishpond. A large boundary ditch extending south-west to north-east from the main villa buildings is contemporary with the villa buildings and may form one side of an enclosure. Another two ditches roughly parallel to this dated ditch showed as geophysical anomalies in the paddock to the west (**168**) to the north. These two ditches (**168**) have yet to be tested by trial trenching but are likely to be contemporary with the villa and may form the north-western side of the enclosure mentioned above.

- 9.3.79 Further geophysics (ground penetrating radar) was carried out across the villa field to attempt to define the walls of the building and to establish its extent (ES Appendix 9.15). Magnetometry and trial trenching was also carried out on the southern part of the field to the north of the A20 to establish if the villa extended north of Ashford Road (ES Appendix 9.19 and 9.21). The villa does not appear to extend into the field to the north however it is still not certain what its southern and western extent is.
- 9.3.80 The ground penetrating radar on the villa field detected a suite of other features of undetermined origin, comprising irregular shapes and small rounded discrete anomalies possibly representing ditched enclosures, some walls and general spreads of material (no identification numbers). However, it did not pick up the walls of the villa thus its floorplan is currently rather unclear.
- 9.3.81 Electromagnetic geophysics was undertaken on the villa site, with a focus on the waterlogged area of the site (ES Appendix 9.19) and did not identify any further remains or provide any further detail.
- 9.3.82 A resistivity survey of the villa site was conducted in 2021 (ES Appendix 9.23). Results of the survey did not identify any further clarity on the overall floor plans of the villa building. Previously identified features such as enclosure ditches delineating the settlement activity at the site, were shown in greater clarity, but overall the survey has failed to further our understanding of the detailed character of the villa.
- 9.3.83 From what has been currently excavated, the villa (**167**) does not appear to be particularly well preserved compared to other villas across the UK. It shows signs of extensive robbing. Only one course of walling survives – the rest of the stonework comprising wall foundations. No plaster or mosaic floors were found which suggests truncation by ploughing.
- 9.3.84 Waterlogging in the eastern part of the field to the east of the main villa foundations and adjacent to the water course means that environmental preservation was good. Here pits and, ditches, all of Romano-British date, were shown by the trial trenching to be waterlogged and to preserve organic remains such as wood and antler objects as well as charcoal. There is the potential for pollen and plant/insect remains. There is therefore ample potential for reconstruction of the local environment, as well as for the recovery of further wooden objects. The ditches may simply be for drainage, but the straight alignment of the wider eastern ditch anomaly may indicate deliberate channelling of water from the adjacent stream, and, together with the recovery of

fragments of a millstone, may indicate that there was once a mill associated with the site in the Romano-British period.

- 9.3.85 The water table was also found to be high in Trenches 244 and 257 in the northern part of the field and the area to the east was also seen to be boggy on the surface. Also, the water table was seen to be high in the western part of this field as seen in the fills of Romano-British ditches found in Trench 259. This offers high potential for waterlogged wooden objects and environmental remains that are not always present on villa sites. This will facilitate reconstruction of the local environment in the Romano-British period.
- 9.3.86 There is nothing visible of the villa (**167, 168**) above ground (or from the air). The setting of the villa is informed by its predominantly rural surroundings which contribute to its significance by allowing an appreciation of its topographic location and situation in relation to the site of contemporary and earlier activity in the area. Villas were usually carefully sited with respect to topography and natural resources and so the ability to appreciate this makes a more major contribution to its significance. While the general surroundings of the villa site are agricultural, as they would have been when the villa was in use, the nature of this has changed greatly and the layout of the landscape does not retain any of this much earlier organisation. Consequently, this aspect of its setting makes a smaller contribution to its significance.
- 9.3.87 Current knowledge of the villa (**167** and including probably related ditches **168**) indicates that it is of **medium value**. Clearly it has archaeological potential/evidential and historical value.
- 9.3.88 Area vii of the 2020 trenching (Figure 8) was the field to the east of the Romano-British Villa site (**167**). No further evidence of the villa was identified, nor any archaeological features pertaining to any other phase of activity.

#### Romano-British Industrial Activity

- 9.3.89 To the south of the villa (**167, 168**) and east of Lypne Industrial Estate, geophysics (magnetometry – see ES Appendix 9.10) revealed an area of rectilinear ditched enclosures (**225**). A double ditch (**225**) to the north indicates a trackway (possibly leading to the villa **167**) and subdivisions with the enclosures (**225**) probably indicate settlement enclosures. The site is within the former Lypne Airfield (**27**) and the geophysical anomalies shows signs of disturbance by airfield features, possibly even bombs. Some pit-like anomalies may therefore have Modern origins. Further geophysics (resistivity) was carried out on part of this site (ES Appendix 9.14) to find out more information. This resistivity survey established that the asset (**225**) is not a stone-built structure, but the survey was otherwise somewhat inconclusive.
- 9.3.90 To the south-east of ditched enclosures (**225**) east of Lypne Industrial Estate, a magnetometry survey (ES Appendix 9.14) detected other ditches (**226**) on a different alignment.
- 9.3.91 Trial trench evaluation in 2020 (following UXO surveys) targeted geophysical anomalies **225** and **226**, covered in trenching Area iii (ES Appendix 9.21). The assets were confirmed as a Romano-British enclosure system related to industrial or extraction processes with multiple quarry pits identified. The enclosure system appears to roughly align with the Romano-British villa buildings (**167**) and ditches (**168**) to the north, with a trackway excavated in trenches 225 and 234 (ES Appendix 9.21) roughly leading northeast towards the villa, leading to a suggestion the complexes are contemporary. Due to the likely association of the enclosure system (**225, 226**) with



the villa, in context, assets **225** and **226** are of **medium** value due to their evidential and historical value.

- 9.3.92 In 2020 geophysical survey was conducted west of Stone Street and on the north eastern edge of the former boundary to Lympne Airfield (**27**). In the centre of the field were two positive anomalies (**258**) which likely represent extraction or quarry pits. They are currently undated, but it is feasible that they had association with the Romano-British quarrying activity (**225, 226**) to the west and therefore, these results may be representative of wider activity. Due to their (**258**) association with assets **225/226**, they could be of **medium** value due to their evidential and historical value.

#### Remaining Iron Age and Romano-British Activity

- 9.3.93 The following section discusses assets dating to the Iron Age and Romano-British periods not clearly associated with the previously discussed asset groups. Discussion below focuses on the Iron Age and then the Romano-British. Where appropriate, some discussion with the above asset groupings is made.

- 9.3.94 Two Iron Age assets (**74, 78**) are recorded outside the development boundary on the Kent HER, 100m and 123m away from the application boundary respectively. These two occupation sites are described as an Iron Age rural landscape (**78**) and late Iron Age to Romano-British pits and ditches (**74**), both located to the north of Westenhanger and north of the HS1 line. They indicate the continuation of occupation across the landscape with particular focus on the slight rises of land around the East Stour River. These assets demonstrate the continued attractiveness of the lands of the East Stour for farming and settlement. Their settings are limited to their location north of the HS1. Trial trenching in proximity to the assets in field 6 (ES Appendix 9.18) and Area viii (ES Appendix 9.21) did not identify any conclusive associated remains within the application boundary. A single large Iron Age ditch (**278**) was found 160m south of asset **78** during 2020 trenching. The ditch is a likely stand-alone landscape feature. However, a potential association with asset **78**, to the north and outside of the application boundary cannot be discounted. For further assessment in the ES, asset **278** is taken forward as a separate asset. Assets (**74, 78**) are of **medium** value due to their evidential and historical value.

- 9.3.95 Fieldwork identified a range of individual archaeological features which may date to the Iron Age, but due to difficulty in clearly identifying the Roman transition, may be early Roman, which is noted, where appropriate:

- In Field 6, during the 2017-18 fieldwork, to the east of the Romano-British road Stone Street (**5**), are two linear geophysical anomalies (**198**) which were excavated within the trial trenches and found to date to the Late Iron Age or early Romano-British period. These are of **low** value.
- During 2020 fieldwork, Trench 307, in the north east corner of Area viii identified part of a substantial Iron Age ditch which showed signs of being recut twice (**287**) and therefore maintained over a period of time. The ditch yielded a substantial amount of Iron Age material. The extent and function of the ditch is unclear however it could be part of a monument or a boundary ditch. Asset **287** is of **medium** value, however, this value could increase should further detail of the monument's nature become available through further study.

- 9.3.96 The HER also records two Roman roads which would have been fundamental to supporting settlement growth and trade of Roman agricultural and industrial activity, discussed above. One Romano-British road (**5** – Stone Street) passes through the site and a further Romano-British road (**8** – Aldington Road) bounds the site along its southern border. These assets are of **medium** value as they are historic routeways which are still in use today and are likely to have earlier origins. The value of these assets is based in their historical value as early and continually used routes within the



study area, linking the landscape at Otterpool to other Romano-British centres such as Canterbury, Maidstone and Dover and the Romano-British fort at Stutfall Castle.

- 9.3.97 The Romano-British road network through Lympe indicates a high archaeological potential/evidential value for Romano-British activity at the site. Lympe is considered a location of some significance in the early Romano-British period and later 4<sup>th</sup> century for its links to a known Romano-British port (*Portus Lemanis*) in Modern day West Hythe and the resultant links to the continent (Ref 9.26). A geophysical survey was undertaken in April 2020, to the east of Lympe and approximately 300m south east of the application boundary (at Shepway Cross). A late Iron Age to Romano-British ladder settlement was identified based around a linear trackway (Ref 9.26), further illustrative of the importance the Romano-British road network has on settlement activity in the area. Although located outside the application boundary, this recent investigation supports the potential for extensive late Iron Age and Romano-British settlement activity to be located within the site, based on the known road network (**5**, **8**) and previous archaeological evaluation discussed below.
- 9.3.98 2017-2018 fieldwork identified a range of individual archaeological features, some of which were confirmed as Romano-British in date. They are:
- Isolated ditches of Romano-British date have been found by trial trenching including one ditch (**230**) in Field 7, south of Westenhanger Castle, indicating a general potential for assets of Romano-British remains across this part of the site. This ditch on its own is of **low** value.
- 9.3.99 At the southern edge of the site, within Lympe Airfield (**27**), 2020 geophysics (ES Appendix 9.13) has revealed another set of enclosure-type anomalies that indicate another field system (**237**). It has not been possible to conduct further investigation of the asset due to a health and safety risk associated with unexploded ordnance on the airfield. The proximity of these features to Aldington Road (**8**) which is a Romano-British road may indicate a Romano-British date. However, the fact that Bronze Age settlement has been recorded in the vicinity of Lympe Industrial Estate (**26**, **212**) makes a Bronze Age date equally feasible. The lack of pits makes it more likely that these enclosures (**237**) are field systems rather than settlements, resulting in their separation from the industrial asset grouping further north of their location. **237** are considered to have **low** value, due to their nature as field systems although they remain of evidential value.
- 9.3.100 Further potential Romano-British activity has also been identified through 2020 fieldwork. These assets have evidential and historical value. These assets are:
- An area, north of the A20, south of the River Stour and west of the main oval of the former Folkestone Racecourse was surveyed in two distinct areas, west and east. In the western part, several weak linear anomalies (**245**, **246**) were identified and loosely interpreted as former land divisions forming a field system, as part of the hinterlands to the Romano-British settlement site located south of this location. However, further investigation would be required to confirm this. Due to the poor contextualisation of the asset, it is **low** value.
  - A possible Romano-British ditch (**303**) was identified in trench 250, in Area iv. The ditch did not contain any dating evidence but is in proximity to the villa site (**167**) south of the A20 (ES Appendix 9.21). However, the ditch's functionality and relationship, if any, with the villa as part of a possible wider complex is currently unknown. Due to the poor contextualisation of the asset, it is **low** value.

Early Medieval c AD 410- 1066 (Figure 9.4, ES Appendix 9.1)

- 9.3.101 The Early Medieval period is underrepresented in the archaeological record, partly due to the difficulty in identifying remains associated with the period. This is reflected in

the limited available information of the period's influence on the Otterpool Park landscape. As a result, display of these assets is located on Figure 9.4 with the Medieval period. No asset groupings are discussed in this section.

- 9.3.102 The HER records a cropmark site (a series of pits) of a putative Anglo-Saxon palace (**52**) lying within the grounds of the Folkestone Racecourse (**153**) within the application site which is thought by some to be the site of the precursor to Westenhanger Manor (**SM6**). These pits can be seen on Google Earth imagery from 1940 and are located north of where the racecourse lake was later created. Further investigation (drone photogrammetry in the summer of 2018, geophysics and trial trenching in 2020) has not discovered any trace of these features. The cropmarks more likely relate to the use of the Racecourse for aviation and WW1 training camps. This asset (**52**) is of **negligible** value as there is very little evidence that actually exists. This value is based in the asset's evidential value to yield further information about the origins and extent of Westenhanger Manor.
- 9.3.103 During 2017-2018 fieldwork, two charcoal-rich pits (**174**) were found in the same trench in Field 1, to the east of Harringe Brooks Wood. These both contained evidence of in situ burning and one of the pit fills was dated, by radiocarbon dating, to the Middle Saxon period. It is assumed that the adjacent pit is of the same date. These might represent settlement evidence or some industrial process such as charcoal burning and could be of **low** value due to its evidential and historical value.
- 9.3.104 During 2020 fieldwork, a possible Anglo-Saxon storage area (**295**) was identified in the south west corner of Area i. A cluster of 9 pits were uncovered in Trench 5, although only one pit was excavated. The pit was a likely storage pit, yielding two mid-late Anglo-Saxon loom weights, as well as industrial waste material and fired clay. It is likely that the remaining pits are contemporary, although at this stage unconfirmed. The Anglo-Saxon storage area is of **medium** value due to its evidential and historical value.

#### Medieval c AD 1066- 1540 (Figure 9.4, ES Appendix 9.1)

- 9.3.105 The Medieval period provides evidence of an agricultural landscape with some associated settlement activity within Otterpool Park. The principal residential property is that of Westenhanger Castle (**SM6, LB1, LB5**) with its earliest standing remains dating to the 14<sup>th</sup> century.
- 9.3.106 Westenhanger Castle represents a major influence on the Otterpool landscape from the Medieval through to the present day, with its fundamental period of activity stretching from the 14<sup>th</sup> through to the 18<sup>th</sup> centuries and therefore between the Medieval and Post Medieval periods respectively. To respect the main asset grouping and the contribution of Post Medieval assets on the Westenhanger landscape, all Castle related activity is discussed here, to consider the overall development of the asset group's features and landscape impact. All assets associated with Westenhanger Castle and its deerpark are displayed on Figure 9.4 in Appendix 9.1.

#### ***Westenhanger Castle and Deerpark (Medieval and Post-Medieval)***

- 9.3.107 Westenhanger Castle (**SM6**) is a Scheduled Monument and Grade I Listed Building located within the northern boundary of the application site. As a medieval manor which was later fortified, it dates to at least the 12<sup>th</sup> century but most architectural elements date from the 14<sup>th</sup> to 18<sup>th</sup> centuries. A licence to crenellate was given to the owner, Sir John de Criol, in 1343, however the architectural style of the curtain-wall, gatehouse, towers and parts of the manor house is later 14<sup>th</sup> century. As well as the structural elements, the Castle remains also comprise earthworks and below-ground features. It is laid out with an inner and outer court. The inner court consists of a roughly square quadrangle formed by the curtain wall and towers and enclosed by a moat. The Grade I Listed (and scheduled) manor house (**LB5**) lies within the north-

east corner of the inner court. This is also identified as farmstead (**BH34**). To the west lies the outer court, the main above ground features of which are the two Grade I listed 16<sup>th</sup> century stone-built barns (**LB1**). The north-south barn has a fine hammerbeam roof and has been carefully restored. Access between the outer and inner courts was via a gatehouse. The entirety of the scheduled area of the Castle and its Listed buildings now lie within the OPA boundary. The area of a probable former walled Tudor garden (**166**) to the Castle lies to the south, largely outside the scheduled area, but within the application boundary.

- 9.3.108 The development of the Castle and its environs has been studied in detail through a range of sources. The archaeological assets recorded on Kent HER have been supplemented by fieldwork (geophysical surveys, trial trenching and archaeological monitoring of ground investigations) around the Castle and racecourse, all carried out for the project. Added to this the project has commissioned cartographical studies, documentary research, Lidar, walkover survey and drone photogrammetry to help further understanding of the Castle and its former landscape. A Statement of Significance of the Castle written in 2018 (ES Appendix 9.6) provides more detail of the history of the Castle and barns, and what contributes to their significance and setting. Discussion below starts with the scheduled area of the Castle, followed by the heritage assets outside the scheduled area that contribute to the wider setting and context, namely activity within the Castle's former deerpark (**154**). It is very likely that there will be a range of other, as yet unidentified, buried former buildings, structures and deposits within the grounds of the Castle and outside its scheduled boundary which will need to be tested through archaeological research and investigation. This further assessment will take place in Tier 2.
- 9.3.109 To the north-west of the Castle, within the scheduled area is an area of earthworks. An earthwork survey was carried out in 2004 (Ref 9.24). A series of sunken linear features, drainage channels and flat top terraces and platforms were observed within the survey area. Following additional research, the earthworks were interpreted as representing a likely water management system, associated with the East Stour River. The management system includes a possible early Post-Medieval watermill, known from a 1559 manorial survey, although the mill could be of Medieval origin. The earthworks provide evidence for possible Medieval and Post-Medieval activity associated with the running of the Westenhanger Estate. The earthworks hold significance for their contribution to the wider understanding of Westenhanger Castle and its development. The remains also hold potential to contribute to regional research objectives in the study of related agricultural infrastructure such as mills, and this industry's contribution to private organisation of space (Ref 9.25). These earthworks are representative of the likely good preservation of archaeological remains in the remainder of the scheduled area. This area has also been subject to geophysical survey (ES Appendix 9.19). This did not shed much light on the nature of the earthworks.
- 9.3.110 The Castle moat is surrounded on at least three sides by an earthwork bank that is a possible raised walkway. This had an additional function as a dam for the moat on the northern side of the Castle (ES Appendix 9.22). These walkways are indicative of high-status residences in the later Medieval period (ES Appendix 9.22).
- 9.3.111 Several features associated with the Medieval or Tudor (early Post-Medieval) landscape of Westenhanger Castle (**SM6**) are located within both the Castle's scheduled area and the application site or have settings which extend into the application boundary. The following all have evidential and historical value for their

likely association with the Medieval and Post Medieval landscape around Westenhanger Castle, which contributes to their overall heritage value. These are:

- Cropmarks of a trackway and field system north-west of the Castle (**42**). These show clearly on recent aerial photography. The trackway is formed by two parallel cropmark ditches leading from the north-western part of the scheduled area of the Castle in a north-west to south-east direction into the neighbouring field to the west of the Castle. It lies partly within the application site. The HER states that it is Medieval. The date has not been ascertained by fieldwork and it does not show on early maps so may be later than Medieval. The Medieval trackway (**42**) is largely outside the scheduled area. The accompanying Medieval field system appears to be to the east of the trackway within the north-western part of the scheduled area of the Castle and within the application boundary. The Medieval field system showing as cropmarks or parchmarks to the east (**42**) is partly within the scheduled area and is associated with Castle. This area was subject to geophysics in 2020 (ES Appendix 9.19) which found an L-Shaped ditched (**259**) anomaly in the area near where the cropmark passes through the scheduled area. These assets (**42** and **259**) are of **medium** value.
- Putative Deserted Medieval Village sites of Westenhanger (**53**) and Eastenhanger (**54**), are recorded on the HER north of the Castle within the scheduled area. The HER gives little detail. The evidence for assets **53** and **54** being Deserted Medieval Villages has not been tested as, under the current OPA, this area is not to be subject to any impacts. The HER states that these two assets may well have been misinterpreted. A more feasible interpretation for these earthworks could be ponds and channels of Medieval date that are associated with Westenhanger Castle. They are of **medium** value.

9.3.112 Geophysical survey (Ground Penetrating Radar/GPR) in 2020 (see ES Appendix 9.19) identified several anomalies within the inner and outer court of the Castle, most of which accord with documentary and map evidence for former Castle buildings. Anomalies of a walled rectangular building 12m x 11m in size with internal features and subdivisions (**266**) was revealed on north side of the inner court. This is the remains of the northern range of buildings that are known from historical records. These anomalies continued to the south (**267**), lining the inside of the eastern wall. Also, within the inner court, just to the north of the gatehouse was a rectilinear anomaly (**268**) of a walled building, possibly a guard house. In the outer court the GPR revealed clear rectangular foundations of a walled structure (**285**). This is in the exact location that documentary records have located the medieval Church of St Mary (**45**) and it is likely to represent the foundations of this church. Human remains have been formerly found where the graveyard of this demolished church would have been. Architectural elements in one of the east-west 16th century Listed Barns (**LB1**) may have been re-used from the church (which fell into disuse under Henry VIII). Just to the north of the church the GPR revealed a square, walled building with internal partitions (**269**). This building is as yet undefined (see ES Appendix 9.19). It may have been the rector's house as the Criol family are documented as giving a house to the rector of the church in the 14<sup>th</sup> century.

9.3.113 The deerpark would have included areas of woodland, to provide good hunting, with the whole park probably enclosed by a ditch (the pale) and railings. As well as providing grounds for the management and hunting of deer it is likely that parts of the park may have included areas of pasture for the keeping of livestock, game bird, boar, hare and pig. Other food for the table may have come from managed rabbit warrens and ponds for the keeping of freshwater fish. The deerpark fulfilled an important role in the social life of the Castle, providing royal hunting grounds, but also through the combination of pasture, park, woodland, river and ponds provided a range of foodstuffs

and materials to support the functions of the household. The deerpark (**154**) is made up of and contains various landscape features:

- A portion of filled-in ditch (**222**) surviving partly as a hedgerow and partly as a below-ground feature (confirmed during geophysics and trial trenching) is the likely western boundary of the deerpark, as it accords with historic map evidence. It lies within the application boundary.
- Causeway to Westenhanger Castle (**149**) which is within the application boundary and is the only designated heritage asset within the deerpark.
- Tudor walled garden of Westenhanger Castle (**166**) which is within the application boundary.
- Possible former orchard (**161**) which is shown on a late 18<sup>th</sup> century map as being between the Castle and Ashford Road, to the east of the Causeway. It may have been related to Westenhanger Castle however this is not confirmed. Trial trenching did not find any evidence for it therefore it is not considered further in this assessment and is not represented on Figure 9.4.

9.3.114 A historic landscape appraisal of Westenhanger Castle and its environs was undertaken for the project in 2020 (ES Appendix 9.22). This appraisal discussed the immediate landscape around the Castle, as well as the wider setting of the deerpark.

9.3.115 Some doubt is cast on the dating of the walled garden (**166**) to the south of the moat. Tudor records describe a walled garden at the Castle and this is the place that such a 'privy garden' would be expected. There is also a small area of terracing surviving adjacent to the southern arm of the moat which suggests a viewing platform here. A walled enclosure is shown on late 18<sup>th</sup> and 19<sup>th</sup> century maps in this location and this wall/boundary was also found by geophysics in 2017 (ES Appendix 9.11). During 2017-2018 trenching within Field 7, four trenches were targeted on the area of the Tudor garden (**166**). Tentative evidence for the wall of the Tudor garden was revealed. This comprised an L-shaped ditch and a robbed-out wall (**227**) on the line of the boundary of the walled garden or orchard as identified from geophysics and historic mapping. The ditches and robbed wall contained 15<sup>th</sup>-17<sup>th</sup> century brick and tile (as well as some later brick). Tree throw holes (pits), some containing fragments of 16<sup>th</sup> to 18<sup>th</sup> century tile and brick (no identification number) were also found inside the area of the Tudor garden which would be consistent with what would remain from an orchard, or a garden containing trees. This is good evidence for a walled garden or orchard in this location of the right date to be identified with the Tudor walled garden described in documentary sources. However, it is possible that the walled enclosure dates to the 18<sup>th</sup> century instead of the Tudor period (ES Appendix 9.22). What little exposed of the garden/orchard wall appears to be poorly preserved however and therefore has **medium** value. Of the four trenches excavated, none produced any evidence of garden features such as pathways, ornamental beds, bases of fountains or statues etc.

9.3.116 Wider landscape features were also studied in the 2020 landscape appraisal (ES Appendix 9.22) and this appraisal has resulted in the re-drawing the boundary of the surrounding deerpark (**154**) (illustrated on Figure 9.4), so that the eastern park boundary crosses to the east of Stone Street and follows the line of the A20 at the north of Sandling Park (**RPG2**). This revision has been based on late 19<sup>th</sup> century field boundaries and administrative boundaries (ES Appendix 9.22). In 1559 the deerpark was reckoned to encompass 400 acres, a typical size for the fifty parks in Kent at that period. The bounds suggested in Figure 9.4 include about double that area. At the moment, the two areas cannot be reconciled, unless the 1559 estimate is set aside.

9.3.117 The main approach to the Castle in its heyday was from the south via a causeway, as shown on historic maps. Records of the causeway are available from as early as AD

1700 (ES Appendix 9.22). The causeway (**149**) survives as a linear earthwork, now forming a field boundary, and has been further examined through LiDAR analysis, aerial photogrammetry and the 2020 trial trenching. The causeway surface, as identified in one of the trial trenches in the western part of the former racecourse, was formed by redeposited natural geology and stones. The surface sealed a Post-Medieval ditch, illustrating at the earliest, a Post-Medieval date to the causeway surface (ES Appendix 9.21). This asset was scheduled by Historic England as of their screening decision on the 26<sup>th</sup> May 2021. Its NHLE number is 1475108.

9.3.118 Additional features within the deerpark, which are of evidential and historical value, have the potential to contribute to the context and understanding of Westenhanger Castle. These include:

- The site of the former Pound House (**157**), a late Medieval building related to the Castle and situated on Stone Street and outside the application site boundary by 7m. The Pound House is a potential candidate for the former lodge building to Westenhanger deerpark (**154**), based on its adjoining trackway (**158**) as well as descriptions of elaborate ceilings, expected of a lodge building (ES Appendix 9.22). However, its location next to a public highway (Stone Street) is deemed curious for a lodge building and it may instead have functioned to provide overflow accommodation for staff, during the visits of large parties to the Castle (ES Appendix 9.22). It was demolished in the early 20<sup>th</sup> century and is of **low** value.
- A track (**158**) leading from the former Pound House (**157**) on Stone Street to Westenhanger Castle. The track dates to the late Medieval or early Tudor period and may have been located by 2017-18 trial trenching as a cobbled track with flanking ditches (**229**), both within the application boundary. Trenching in 2020 also identified two ditches believed to mark the trackway (**158**) to Pound House, although no dating evidence was recovered (ES Appendix 9.21). It is of **low** value.
- A group of water features (**128/137, 138, 139, 147, 148**) identified through LiDAR, walkover and historic mapping analysis lying within the former Westenhanger Castle deerpark, close to or within the current racecourse (**153**). Four of these are former field boundaries (**128/137, 138, 139**) and take the form of drains within the Modern landscape. All are within the application boundary and are of **medium** value.
- Part of what is now Twin Chimneys Farm on Stone Street (**BH24-** discussed further in the Post-Medieval section) dates from the 16<sup>th</sup> century including its west stone wall. It is likely that this part of the building, given its location in the eastern part of the deerpark, was part of either a dwelling or an estate building/structure associated with the deerpark.

9.3.119 The causeway (**149**) survives as a field boundary taking the form of a long linear earthwork with a raised bank. It is of **high** value as reflected by its newly designated status. It has aesthetic and historical value in marking the historic southern routeway to the Castle. It provided an unfolding view of the Castle and barns nestled against the North Downs and set within its deerpark. The deerpark (**154**) only survives in a fragmentary way and its boundary ditch has been located in two possible places (**222** and possibly **292**). It is not possible to assign a meaningful value to the whole deerpark but only to the individual features that make up the deerpark. Some of these elements are not considered to hold much evidential value and are considered to have **low** value. The water features (**128/137, 138, 139, 147, 148**) are considered to have **medium** value, particularly **147** and **148** which may be former fishponds and may contain waterlogged remains. Further archaeological evaluation along the causeway is planned to take place prior to Tier 2 which will include an auger survey within the water feature areas **147** and **148**. This will clarify the nature of archaeological remains in this area including if they contain waterlogged remains. All these assets offer group



value with the nationally important Westenhanger Castle (**SM6, LB1, LB5**). Their value is mainly in their historical value, and their evidential value as remnants of a mostly lost Medieval and Tudor formal landscape.

9.3.120 Field work in 2017-2018 identified features which may be associated with deerpark activity, but their context is currently limited, in part due to the nature of trial trench evaluation. These include:

- Post-Medieval linear ditches (**222**) were found in Field 8 to the east of Barrow Hill, Sellindge. Among these were a pair of parallel ditches, 4m apart aligned north-east to south-west. These two filled-in ditches follow the line of the western boundary of the deerpark to Westenhanger Castle (**154**) as mapped from historic maps and this boundary can be seen on LiDAR as a double ditch. The ditches (**222**) did not contain any Medieval or early post-medieval material, only 19th to 20th century glass, iron and brick/tile. However, this is fairly normal for Post-Medieval field boundary ditches that were in use for several centuries and that would have been routinely cleared out. Either this part of the park boundary was constructed as a double ditched boundary or one ditch is a later redefinition of an earlier park ditch. These assets are of **low** value.
- Other Post-Medieval ditches (**228**) was also exposed to the east of the Tudor garden (**166**) which probably also relate to landscape features of the Castle. These assets are of **low** value.

9.3.121 2020 trial trench evaluation was principally located within the area of the deerpark (**154**) to Westenhanger Castle and as a result, a range of archaeological features associated with Medieval and Post-Medieval activity in the park have been identified. These features include the following:

- A stretch of poorly preserved Tudor dated brick wall (**288**) was identified within Trench 306 of Area viii. The wall aligns with a T-shaped geophysical anomaly (**260**). It is not known what the size or function of the structure was, although its date hints at a likely association with Westenhanger Castle. Due to the current poor contextual understanding, wall **288** is of **low** value.
- **292** - a possible boundary ditch to Westenhanger deerpark was possibly identified within three trenches. Original interpretations attempted to map the ditch across the southern parts of trenching areas i, ii and iv, respectively. However, later interpretation has only projected the potential ditch within Area i, as mapped on Figure 9.5. The ditch is a substantial feature, although its presence away from the A20 challenges the interpretation of the park boundary. A range of artefacts were recovered from the ditch dating to from the Post-Medieval to the Modern period.
- **299** - Medieval ditches and a large pit located within the south east of Area i in trench 174. Features were dated through a range of Medieval pottery artefacts and potentially illustrate activity associated with the use of the deerpark.
- **301** - large ditch feature, visible on LiDAR (Figure 9.2) targeted by three trial trenches in the easternmost part of Area i, which may have associations to the deerpark. The ditch is currently undated.

9.3.122 The contextual understanding of assets **292, 299** and **301** are currently limited in their functionality and relationship to other features. All three assets hold historical value, as well as evidential value for their potential to yield further remains and contribute to the understanding of human activity potentially associated with the use and management of the deerpark. Due to the current limited understanding of these assets, they are of **low** value.

9.3.123 The setting of assets **SM6, LB1, LB5** is influenced by the understanding of other non-designated assets which contextualise the development of the Castle in its landscape.

In turn, this contributes to their value. The historic setting would have been linked to the surrounding agricultural area which the Castle (having also functioned as a manor) administered and defended. Its historic setting also included its designed landscape which included the surrounding deerpark (154), the water management features to the south (147, 148) and north, the Tudor garden to the south (166) and the causewayed approach from the south (149). Although the current setting of Westenhanger Castle has been much curtailed to the north by the HS1 line and the M20, important historic views are still available from the west, which add to the understanding and significance of this asset as a defensive feature in the landscape. Its connections to the former deerpark and some of its symbolic views across the flood plain of the East Stour have been largely removed. Views to the south are impacted by the racecourse, whilst views up the causeway looking north are obscured by intervening tree cover and racecourse structures so that the listed buildings are largely screened. Views of the Castle along the current access from the east (which was not the historic access route) are impaired by intrusive and unsightly racecourse buildings. Analysis of current views to and from the Castle complex has informed the assessment of effects on the setting of the Castle and its park. This views analysis been undertaken within Chapter 12: Landscape and Visual (LVIA) but additional, historically important views have also been assessed outside the LVIA. Links to other settlements such as Lympne (CA1) and manors (Moated site Belle Vue House 51, Harringe Court 59, Upper Otterpool LB20, Otterpool Manor LB38, Lympne Castle LB3) which are contemporary with Westenhanger Castle (SM6) inform the understanding of this asset within the landscape. More detailed discussion of Westenhanger Castle and its setting can be found in ES Appendix 9.6.

9.3.124 The value of these assets (SM6, LB1, LB5) is informed by their historical value as part of the Medieval landscape of Kent, their **architectural value** as surviving structures from the Medieval, Tudor and Georgian periods, and their evidential value for their potential to yield further information about the development and use of the site across its history, evident for example, through the research potential identified through the 2004 earthwork survey and the geophysical surveys. These assets (SM6, LB1, LB5) are of **high** value.

### **Remaining Medieval Assets**

9.3.125 Several additional Medieval features, catalogued by the HER are located within the application boundary, or lie outside it but have settings which extend into the application boundary. These are features associated with the wider Medieval landscape, contemporary with Westenhanger Castle (SM6) but outside of the former Castle Park and therefore excluded from the main asset grouping. These assets are also displayed on Figure 9.4 in ES Appendix 9.1 and include:

- A holloway with associated enclosures and buildings (107) which presents potential settlement activity associated with a moated site (51) at Belle Vue and a site of an aisled barn (66) to the north. These are outside the application boundary by between 140m and 150m. They are all of **medium** value.
- An area of ridge and furrow within the application boundary (122) by Park Wood, identified through LiDAR analysis, is of **low** value.
- The site of Harringe Court (59), a farmhouse described on the Kent HER as a brick and stone house of probable 15th century date. It is outside the application site by 140m. Historic map regression revealed that the farmhouse was demolished in the late 1960s to early 1970s and rebuilt (BH6). It stands within the original farmstead and some of the courtyard buildings still survive, however due to its Modern construction and loss of historic elements it is of **negligible** value.
- Possible Medieval settlement activity (76), in the form of ditches (75, 79) and enclosures (77), to the north and north-east of Westenhanger Castle, outside the



application site boundary by between 150m and 200m away. They are of **low** value.

- **WS17** – length of ditch surviving as an earthwork running along the western side of Stone Street. This is likely to be a section of Holloway, possibly defining an earlier or wider course of Stone Street in use in the medieval period. This is of **low** value.

9.3.126 Additional Medieval features have been identified through recent fieldwork within the application boundary and are displayed on Figure 9.4 in ES Appendix 9.1. These assets hold evidential and historical value. Assets identified during 2017-2018 fieldwork include:

- The geophysics and trial trenching revealed various Medieval enclosures and field systems across the site showing evidence of the area being farmed and settled from the Norman period. A Medieval ditch (**179**) and a nearby pit (no identification number) and set of ditches (no identification number) including one beam slot (**179**) were found in the north-east part of Field 1. The ditches and pit contained pottery dating AD1075-1300 and have been interpreted as an agricultural enclosure containing a possible timber building. These were revealed not far from Otterpool Manor (**LB20**) and may possibly be a precursor to the building. These Medieval features (**179**) are of **low** value.
- A Medieval enclosure (**188**) was revealed in the western side of Field 2 as well as several undated ditches (**186**) that could be contemporary with it. **186** is displayed on Figure 9.7 due to its unknown date. These features (**186, 188**) are of **low** value.
- In Field 3 there was one Medieval ditch (no identification number) and other as yet undated linear geophysical anomalies (no identification numbers) that could be Medieval. These assets are also of **low** value.
- In Field 6, west of Hillhurst Farm, several Medieval boundary ditches (**197**) were recorded which are of **low** value. A Medieval pond or hollow (**201**) was also recorded south-west of Hillhurst Farm in the same field. This pond was either cut into a probable Bronze Age enclosure (**112**) or made use of a hollow formed by its partly filled in ditch. This pond is of **low** value. A single ditch (no identification number) of possibly Medieval date was found in Field 8 which is probably related to an adjacent circular feature (**223**) which is likely of a Post-Medieval date (shown on Figure 9.5). Ditch (**223**) is of **low** value. A small amount of Medieval pottery of the 13th or early 14th centuries was discovered in Field 8, mainly from topsoil and subsoil contexts which hints at Medieval settlement focus nearby which, if found could be of **low** value. There are other geophysical linear anomalies (no identification number) in this area that remain to be dated.

9.3.127 Area vi of the 2020 trial trench evaluation was located south of the A20. Trenching here identified the edge to a potential Medieval occupation area (**294**). The occupation is located outside the deerpark to Westenhanger Castle at the southern extent of Area vi. The Medieval occupation area (**294**) was identified through a series of pits and ditches, with one pit yielding 74 sherds of Medieval pottery, indicating a likely storage pit. The potential occupation area holds evidential and historical value and is of **medium** value.

9.3.128 An extraction pit (**265**) with an assemblage of Medieval artefacts was identified to the west of Westenhanger Castle during 2020 trenching. Its association with the Castle and wider activity is currently unknown and further assessment would be required to

contextualise the pit and any associated activity. Pit **265** holds evidential and historical value and is of **low** value.

Post-Medieval c 1540-1914 (Figure 9.5, ES Appendix 9.1).

- 9.3.129 A large number of assets date to the Post-Medieval period and are displayed on Figure 9.5 in ES Appendix 9.1. Assets from the Post-Medieval period represent settlement growth, with some urban encroachment on the overall agricultural character, such as Lympne, Barrow Hill and the introduction of leisure activity through the creation of Folkestone Racecourse.
- 9.3.130 Heritage assets of the period (farmsteads, field boundary ditches) provide evidence for the predominantly rural character of the Otterpool Park landscape in this period.
- 9.3.131 Folkestone Racecourse is made up of several individual buildings and structures, some demolished. Overall they make up a prominent late Post Medieval feature within the application site. The racecourse is therefore discussed as an asset group. The remaining Post Medieval assets, particularly buildings, are of individual architectural and historical value. They are not discussed as an asset group as, although they contribute to the overall settlement and agricultural development of the period and across Otterpool Park, there are no other clear associations amongst numerous assets to constitute a further grouping.
- 9.3.132 Discussion in this section is led by the asset grouping of Folkestone Racecourse and followed by discussion of settlement growth with built heritage and then by archaeological features.

#### ***Folkestone Racecourse***

- 9.3.133 Folkestone Racecourse (**153**) was first constructed in 1898 within the former grounds of Westenhanger Castle (**SM6**). The course comprises of a righthand oval with a straight section heading west towards Barrow Hill, Sellindge. A series of structures are located within the Racecourse (**271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281**) which still stand, with others demolished over time as the inner course was repurposed for farming. Some of the structures on the racecourse date to the original period of activity, namely the Eastern Grandstand (**276**), a watch building (**271**), viewing box (**272**) and judges viewing box (**274**), but most have now been replaced by Modern structures. More detailed discussion of the Racecourse can be found within ES Appendix 9.6. The Racecourse (**153**) and buildings/features (**271-281**) offer historical value as a major development in the character of the area and its varied use throughout its history. In particular this historical value can be linked to the military use of the landscape within the 500m study area across both of the World Wars. The Racecourse and buildings also offer aesthetic value due to its influence on the landscape within the site. Overall, the Racecourse (**153**) is of **low** value due to its local importance and connection to nationally significant events through its activity during the World Wars. Where original buildings of the Racecourse still stand, and or can be connected to military activity at the Racecourse, these too (**271, 272, 274, 276**) are of **low** value. The remaining Modern buildings and racecourse features (**273, 275, 277, 278, 279, 280, 281**) are of **low** value for their historical value for the development of the Racecourse itself. The buildings making up Folkestone Racecourse have been screened by Historic England and have not been listed.

#### ***Post-Medieval settlement activity***

- 9.3.134 Post-medieval settlement activity largely takes the form of extant houses, farms and other buildings described below. They are largely discussed by geographical area, with designated heritage assets being discussed first, as appropriate. All assets are

illustrated on Figure 9.5 in ES Appendix 9.1. Designated heritage assets are also illustrated on Figure 9.1.

- 9.3.135 Two Listed Buildings are located either side of Otterpool Lane. Upper Otterpool (**LB20**) and Otterpool Manor (**LB38**). Upper Otterpool is a 16<sup>th</sup> to 17<sup>th</sup> century Grade II listed farmhouse which lies 25m outside the application boundary. This asset has relationships to Otterpool Manor (**LB38**) with which it had manorial links, and Westenhanger Castle (**SM6, LB1, LB5**) which inform its historical value. Upper Otterpool (**LB20**) also has potential to contain elements of an earlier structure contributing to its evidential value. Its setting extends into the application boundary and forms part of its significance. Its setting is mostly informed by its immediate agricultural surroundings i.e. sheep pasture to the north and west and an arable field to the east. Earthworks are present to the north and north-west of the farmhouse which may relate to its earlier farming history (**WS16**). It is well screened from the wider landscape by its own environs being enclosed by a ragstone perimeter wall and by hedges and trees on three sides. It has open aspects along its approach road to the north and also to the north-west. The principal aspect of the group at Upper Otterpool is to the north west to Otterpool Manor. There is also a view north east to Westenhanger Castle. However, from the Castle looking across the A20 there is no clear view of Upper Otterpool as it is mainly hidden behind vegetation. The reading of the asset in its historic context, in a rural landscape with dispersed farmsteads and manors, party informs its value. This asset (**LB20**) is of **medium** value.
- 9.3.136 The Barn (**BH20**) at Upper Otterpool (**LB20**) is a small brick building with potential Medieval origins. It lies outside the application site by 20m. **BH20** is displayed on Figure 9.4 but discussed here for its context with the primary assets of Otterpool Manor and Upper Otterpool whose fabric is predominately Post Medieval in date. Also close to Upper Otterpool is a small L-shaped pigsty which is also of potential historical value. These assets (the barn and pigsty **BH20**) are of **low** value. They offer historic and potential evidential value as early farm buildings associated with the manor house. They are protected under curtilage to the grade II listed house (**LB20**).
- 9.3.137 Otterpool Manor (**LB38**) is a 17<sup>th</sup> century Grade II listed house which lies 30m outside the application boundary, close to Otterpool Lane. The house has historic links to Upper Otterpool (**LB20**) which may have been the original manorial seat before Otterpool Manor was built. The Medieval barn and other farm buildings (**WS8**) which lie to the north of the house add to its heritage value and have group value with this asset as part of its curtilage. This value is contributed to by its historical value in illustrating the social and agricultural history of the area, and its aesthetic value as a good example of the architecture of the period for Kent. The farmstead can still be partially appreciated within its historical context, a predominately agricultural landscape, with which it has a functional and historical connection. The setting of this asset (**LB38**) extends into the application boundary and contributes to its significance. The principal aspect faces south-east along Otterpool Lane and as a group the farmhouse (**LB38**), barn and farm buildings have a rural, semi-isolated setting, surrounded by farmland and small areas of woodland. They have some inter-visibility with Westenhanger Castle and views further to the east, particularly with Upper Otterpool (**LB20**). This asset (**LB38**) is of **medium** value.
- 9.3.138 The Barn and other buildings at Otterpool Manor (**WS8**) lie 30m outside the application site. They are of mixed date and character reflecting the styles of various periods. The Barn is potentially Medieval and may pre-date the construction of Otterpool Manor (**LB38**) and be part of an earlier outfarm belonging to Upper Otterpool (**LB20**). Other structures date from the Medieval through to the 19<sup>th</sup> century and demonstrate the development of the farmstead over time. Due to their medieval date the barn (**WS8**) is displayed on Figure 9.4 but discussed here for its context with the primary assets of Otterpool Manor and Upper Otterpool whose fabric is predominately Post Medieval in

date. All are good examples of the vernacular style in a mix of brick and stone. These assets are of **medium** value and have group value. The Barn and other assets are listed under curtilage to Otterpool Manor (**LB38**).

- 9.3.139 Belle Vue House (**LB21, BH11**) is an 18<sup>th</sup> century Grade II listed house with outbuildings (**WS6**) which lies 250m outside the application boundary, at the junction of Otterpool Lane and Aldington Road (**8**). There is also a 19<sup>th</sup> century service wing to the north of the house and some elements were converted to flats in the Modern period. It has historical value as part of the social development of the area, evidential value due to its potential to yield evidence of earlier structures within or beneath it, and aesthetic value as an example of the architecture of the period. The setting of this asset is limited to its immediate surroundings and makes little contribution to its significance. The house is enclosed within its grounds and screened by trees on all sides. The farmhouse and outbuildings face onto Otterpool Lane, which is their primary aspect. This asset (**LB21**) is of **medium** value.
- 9.3.140 In the west, Harringe Court (**BH6**) and Harringe Cottages (**WS18**) are located outside the western edge of the application boundary by 200m. Harringe Court (**BH6**) is a house historically known from the 15<sup>th</sup> century, but it was replaced in the late 20<sup>th</sup> century. Harringe Cottages (**WS18**) are two semi-detached houses dating to the late 19<sup>th</sup> century. These assets are of **low** value. The value of these assets is formed by their historical value as an early farmstead for the area and associated assets and for Harringe Cottages (**WS18**) their aesthetic value as examples of a regional architectural style.
- 9.3.141 A series of listed buildings are located in Sellindge, outside of the application site. Stream Cottage and Grove Bridge Cottage (**LB11**) are two Grade II listed cottages which lie 50m outside the application boundary to the south of the HS1 railway line. The cottages date to the 17<sup>th</sup> century or earlier and were formerly one dwelling but were split into two cottages at an unknown date. This asset has aesthetic value as a good example of vernacular architecture for the region and historical value as one of the earliest surviving buildings in the settlement of Barrow Hill, Sellindge. The setting of this asset (**LB11**) extends into the application boundary and forms some part of its significance. Although part of the urban fabric of Barrow Hill, Sellindge, its setting is curtailed to the north by the HS1 line. Built form and vegetation, together with a rise in topography, screen the cottages to the west, whilst later 20<sup>th</sup> century built development at Grove Bridge and Meadow Grove screen them to the east. The asset has a **medium** value.
- 9.3.142 A further 5 listed buildings are located within Sellindge, north of the application boundary and CRT. These include:
- Grade II Little Rhodes (**LB10**), 310m north of the application boundary. The setting of this asset is informed by its proximity to Rhodes House (**LB35**), proximity to the south east of Sellindge and surrounding agricultural land.
  - Grade II Railway Cottages (**LB17**), 130m north-east of the application boundary. The setting is informed by its location alongside the HS1 railway for which it holds a historic association.
  - Grade II Somerfield Court (**LB28**), 130 north of the application boundary. The setting of the asset is informed by its location in the south of Sellindge and surrounding agricultural land. Historically, Somerfield Court (**LB28**) has had a functional relationship with the application site, through a trackway providing access to farm the land west of Barrow Hill and within the application site. The introduction of the M20 and CRTL severed this relationship with the application site and resulted in the introduction of Somerfield Court Farm (**BH5/FS1**) within the application site to manage the surrounding land.

- Grade II Barn Complex about 66m west of Somerfield Court (**LB33**), 135m north of the application boundary. The setting of this asset is informed by its proximity and historic association with Somerfield Court (**LB28**), 80m to the east.
- Grade II Rhodes House (**LB35**), 260m north of the application boundary. The setting of this asset is informed by its proximity to Little Rhodes (**LB10**), proximity to the south east of Sellindge and surrounding agricultural land.

9.3.143 The setting of all five buildings contribute to their significance, alongside their individual historic and architectural values. Each building (**LB10, LB17, LB28, LB33, LB35**) is individually of **medium** value.

9.3.144 All five buildings (**LB10, LB17, LB28, LB33, LB35**) are located outside of the application boundary and have limited to no interaction with the application site, principally due to intervening infrastructure of the M20 and or HS1 line. Therefore, the operation of Otterpool Park is not anticipated to have any impact due to the extension of setting. However, consideration for construction activity, in the form of traffic movement through Sellindge and in proximity to the buildings and their settings, is made.

9.3.145 Further non-designated built heritage assets have contributed to the development and focal point of settlement activity on the edge of the application site, particularly south of the HS1 either side of Barrow Hill. These date from the 19<sup>th</sup> to 20<sup>th</sup> centuries and comprise of:

- Humble Bee Hall (**WS11**);
- Humble Bee Cottage (**WS13**);
- Chapel Cottages (**WS28**);
- Several 1840s Victorian cottages (including Ivy Cottages and Oak Cottages) (**WS5**);
- Merlin Cottage (**WS27**);
- Mistletoe and Ottermere Cottages (**WS26**);
- St Johns Cottages (**WS25**);
- Klondyke House (**WS23**);
- Grove Bridge house (**WS22**);
- Gables east and west (**WS29**);
- Bernhurt (**WS21**); and
- A Milestone (**WS4**).

9.3.146 These properties have group value as a collection of buildings which reflect the development of the settlement of Barrow Hill, Sellindge. Due to proximity, their settings extend into the application site, which forms the agricultural setting to Barrow Hill. These assets are of **low** value. The value of these assets is based in their historic and evidential value as examples polite architecture expanding into the area through the expansion of the rail network.

9.3.147 Two farmsteads are located around Barrow Hill and contribute to settlement activity and illustrate the reliance of much of the settlement in the Post Medieval period on the rural landscape to sustain the local economy. Barrow Hill Farm (**BH13**) and the Oast House and barn at Barrow Hill Farm (**WS10**) is a collection of buildings which form part of a 19<sup>th</sup> century dispersed farmstead. These assets lie 30m outside the application boundary close to the southern end of the village of Barrow Hill, Sellindge.

They have been screened by Historic England for potential listing but have not been listed. The farmhouse (**BH13**) and barn are of **low** value and local importance. The Oast House (**WS10**) is of **medium** value due to its unconverted state and survival of historic fabric, as well as its rarity and the fact that it is representative of Kentish vernacular tradition. The value of these assets is based in their historical value as part of the agricultural development of the area. In addition, the Oast House offers evidential value as an undeveloped example of the type of potential earlier date. More details on this can be found in ES Appendix 9.5.

9.3.148 The Mount (**BH17**) is a 19<sup>th</sup> century farmhouse which lies 80m outside of the application boundary, within the settlement of Barrow Hill, Sellindge. The setting of this asset contributes to its significance and extends into the development boundary. The farmhouse has key views to the east across the rural, agricultural landscape. Its value is based mostly in its historical value as part of the development of settlement and agricultural within the area. This asset is of **low** value.

9.3.149 To the east of Westenhanger Castle is another concentration of settlement activity – that of Westenhanger Village. The principal buildings within Westenhanger Village, identified to hold heritage value include:

- The three Arts and Crafts Cottages on Stone Street, in Westenhanger village (**WS9**) date to the mid-19<sup>th</sup> century and are built of brick with decorative features and tile roofs. They lie outside the application area by approximately 10m. They have been screened by Historic England but have not been listed. These three buildings are of **medium** value. The value of this asset is based in its historic and aesthetic value as an early example of the arts and crafts style in Kent built by local architects of note (see ES Appendix 9.5 for more details).
- Westenhanger Station (**BH3**) lies within the application site is a mid-19<sup>th</sup> century station house which was built to serve the London to Dover Railway and is constructed in yellow brick with ashlar detailing. It has been screened by Historic England but has not been listed. The asset is of **medium** value. The value of this asset is based in its historical value due to its connections with the important rail route to the south coast, and its aesthetic value as an unusual example of a national style within the region. The station building (**BH3**) has been screened by Historic England and has not been listed (see ES Appendix 9.5 for more details).
- Twin (Tin) Chimney Farm (**BH24**) is a farmhouse which lies to the east of Stone Street 10m outside the application boundary. It is stone-built with brick quoins. It retains possible 16<sup>th</sup> century fabric incorporated within a building probably of the 17<sup>th</sup> century. The building was converted into two cottages in the late 19<sup>th</sup> century, reverting to a single dwelling in the mid 20<sup>th</sup> century. Internally it retains its timber-framing and carpenters marks. It is likely that the stone west wall is in situ, and from its composition, is probably 16<sup>th</sup> century. The location within the eastern part of Westenhanger Castle deerpark suggests that the wall was part of either a dwelling or an estate building/structure connected with the Tudor deerpark. The asset is of **medium** value. The value of this asset is based in its aesthetic/architectural, evidential and historic value Twin Chimneys has been recently listed (Grade II) as a result of Historic England's screening and its list entry number is 1476733. More details on this can be found in ES Appendix 9.5.

9.3.150 East of Westenhanger Village is Hillhurst Farm (**BH32**) which is within the application site. It is a good and complete example of a 19<sup>th</sup> century regular courtyard farmhouse (**282**) which is built mostly in brick in the polite style with slate and tile roofs. The farm is of a full regular courtyard layout with L-shaped brick barn (**283**) located north of the farmhouse. This asset is of **low** value. The value of this asset is based on its historic



and aesthetic value as an example of the characteristic farmstead type for the region. Hillhurst Farm has been screened by Historic England and has not been listed.

- 9.3.151 Sandling Park (**RPG2**) is a Grade II registered park and garden which was laid out by Henry Milner in 1897. The asset is bounded by the site on its western edge where the park is mostly comprised of arable farmland and deciduous woodland. The Park offers aesthetic value as an example of an informal woodland garden. The Park also offers historical value through its connections to the earlier estate and Westenhanger Wood which may have formed part of the hunting forest for the manor/Castle of Westenhanger (**SM6**). The views from this park are mostly to the south and east, towards Saltwood and the sea. This asset is of **medium** value.
- 9.3.152 An additional concentration of settlement activity is located around Newingreen, around the eastern boundary of the application site, which is discussed below.
- 9.3.153 The Royal Oak Public House (**LB15**) is a 19<sup>th</sup> century Grade II listed building which lies adjacent to the application boundary by 1m and within the settlement of Newingreen. It has historical value as part of the development of the A20 Ashford Road as an important route through Kent to London and in turn for the raising fortunes of the area. The asset also has aesthetic value as an example of the architecture of the area from the 19<sup>th</sup> century, with later internal alterations. The setting of this asset extends within the application boundary and forms part of its significance. This setting is mostly informed by its position on the crossroads of the A20 Ashford Road and Stone Street (**5**) which it has historically served. Its faces south-east, with limited immediate views to the north and south due to intervening built form. This asset is of **medium** value.
- 9.3.154 Newingreen Farm (**BH25**, also known as Stone Court) is a 19<sup>th</sup> century nucleated farmstead which lies to the south west of Newingreen, on Stone Street. It is outside the application site by 40m. The farm is built mostly of red brick with tiled roofs, but the farmhouse (which is 16<sup>th</sup> – 17<sup>th</sup> century) is rendered and features timber-framing. The steading has a full regular courtyard plan of which there are relatively few in the south-east of England. The former threshing and aisled barn with adjoining east range (probably a stable), have been converted into Stone Court. The farm as a good surviving example and demonstrates the development of farmsteads in the area over the 18<sup>th</sup> and 19<sup>th</sup> centuries. The complex also survives in appearance as a whole and single farmstead despite modern development of some of the outbuildings. Together with the farmhouse and farm sign, these components form a cohesive group of agricultural buildings of the mid 18<sup>th</sup> to early 19<sup>th</sup> centuries, and earlier. This asset is of **medium** value due to its historic, aesthetic/architectural, and evidential value. This asset (**BH25**) has recently been listed (Grade II) as a result of Historic England's listing screening. Its List Entry number is 1476746 (see ES Appendix 9.5 for more details).
- 9.3.155 A Post-medieval outfarm is recorded on the HER south west of Newingreen, outside the application area (**BH26**). This is now demolished and is of **low** value.
- 9.3.156 Berwick Manor (**BH28**) is a 19<sup>th</sup> century farmhouse built mostly in brick with tile roof and a stone pediment. It lies on Stone Street, just to the north of Berwick Manor Farm. It is outside the application site by 68m. The house reflects the early Georgian style with later alterations. This asset is of **medium** value. The value of this asset is based in its historical value as part of the manorial farm system of the area and evidential value due to its potential to hold evidence of an earlier structure within the later building. This asset (**BH28**) was screened by Historic England but did not meet the criteria for listing (see ES Appendix 9.5 for more details).
- 9.3.157 Berwick House (**LB29**) and Little Berwick (**LB27/BH27**) are two Grade II listed houses which lie 5-10m to the east of the application boundary between the settlements of Lympe and Newingreen. Berwick House (**LB29**) is of unknown date with a 19<sup>th</sup>

century façade. Little Berwick (**LB27, BH27**) is thought to date to the 17<sup>th</sup> century. Along with Berwick Manor (**BH28**) these assets formed the historic core of a small settlement known as Stone Hill and one or both were likely the manor house for Berwick historically. The value of these assets is based in their aesthetic and historical value as part of the development of the area and its architectural styles. The houses are also little investigated and therefore have evidential value for their potential to yield further information about their origins. The setting of these assets includes views into the site and forms part of their significance. These assets still retain some of their original setting through a small area of fields which surrounds them, however, their immediate surroundings have been altered within the Modern period which has contracted their setting to comprise only the immediate vicinity. These assets (**LB27, LB29, BH28**) are of **medium** value.

9.3.158 At the south eastern extent of the Lymgne Conservation Area (**CA1**) lies 5m to the south of the application boundary and includes nine Grade I and II listed buildings. Its location and setting are important in understanding its significance. The settlement is designated for its historical value through connections to key historical figures and also as a key defensive site from the Romano-British period onwards. The southern part of the conservation area has commanding views across Romney Marsh from its position at the top of the escarpment. Due to these views the conservation area also has aesthetic value. The Conservation Area (**CA1**) is well screened from the application site to the north and west by treelines and more recent development. This Conservation Area is of **medium** value.

9.3.159 There are several buildings of heritage value along Aldington Road, west of **CA1**, all of which are located approximately 20m outside the application boundary but have settings which extend into the site. These mostly date from the 19<sup>th</sup> to 20<sup>th</sup> centuries and comprise:

- The Lodge (**WS2**);
- Old Mill Cottage (**WS3**);
- Nowell Cottage (**WS15**);
- Cliff Cottage (**WS7**); and
- Outbuildings at Belle Vue (**WS6/WS24**).

9.3.160 Nowell Cottage (**WS15**) has been screened by Historic England's designation screening service but has not been listed. It is a dwelling of 18th century origins which has been extended and remodelled in the 19th and 20th centuries. The cottage has a 20th century character and although part of a late-18th century vernacular building is retained in the extended cottage, the extensive, cumulative changes to the building have resulted in the loss of historic fabric and form, eroding its architectural and historic interest. The value of these assets is due to the historical value as examples of settlement development within the study area, and their aesthetic value as containing features relevant to the vernacular of the area. These properties are of **low** value.

9.3.161 Port Lymgne is a Registered Park and Garden (**RPG1**) (Grade II\*) which borders the OPA to the south but has been scoped out of the assessment and is therefore not shown on Figure 9.1. It has been scoped out due to its setting not being impacted by the proposals. There is no visual connection between the RPG and the area of the OPA due to the topography and thick tree cover. The setting of the RPG and its listed buildings is very contained, being surrounded on all sides by woodland. Views out are designed to be to the south, south-east and south-west towards Romney Marsh and the Sea. Additionally, the setting of the designed gardens and the built aspects has



also been partially altered by the installation of the wild animal park infrastructure across the park and to the east in additional land owned by the trust.

9.3.162 A further two farms and two cottages situated with the application site are of interest:

- Mink Farm (**FS2**), (includes the White House);
- Elms Farm (**FS5**);
- Farm Cottage (**WS35**); and
- Tollgate Cottage (**WS36**)

9.3.163 Mink Farm (**FS2**) is an 18th or 19th century farm located on the north side of Ashford Road. The earliest evidence for Mink Farm is presented by the 1797 Ordnance Survey map which records a single structure. On the 1st Edition Ordnance Survey of 1877, the farm is depicted as a single building within a square plot of land. By 1898 a second structure was built to the east (the White House). By the 1970s the farm comprised 4 buildings. The name Mink Farm indicates mink farming. Of the remaining buildings, The White House is of most historic interest. The White House is a typical, modest late 19th century dwelling with weatherboard cladding and timber frame. It has been significantly altered externally and internally, resulting in the loss of historic fabric. It has some (**negligible**) value as being representative of the vernacular building tradition. Elms Farm (**FS5**) is on the south side of Ashford Road. It appears to have been a small farmstead, The earliest buildings no longer survive and the house that survives is a modest brick building of early 20th century date which has been much altered. It is of **negligible** value. Mink Farm (**FS2**) and Elms Farm (**FS5**) have been screened by Historic England and have not been listed.

9.3.164 Farm Cottage (**WS35**) is in an isolated position west of Westenhanger Castle. It is a two storey detached house of uncoursed stone with brick dressings, with a slate roof and two tall brick chimney stacks. There is a modern conservatory to one side and a weather boarded lean-to with corrugated roof to the other side. Ground-floor windows have segmental (brick) heads (similar to other buildings in the area such as Upper Otterpool - **LB20** and Twin Chimneys - **BH24**). It is of late 19th century date, first appearing on the OS map of 1899. The original window frames appear to have been replaced with UPVC. It is built in the vernacular style and has some (**negligible**) value. Tollgate Cottage (**WS36**) is a detached stone built, two storey building situated on Stone Street, to the east of Westenhanger Castle. It has a hipped tiled roof. The front elevation is of roughly coursed stone with brick dressings. Its rear elevation has no fenestration (apart from modern velux windows in the roof) and is of uncoursed stone. It appears on maps as early as 1877. It has been heavily modified particularly to the front, with the insertion of modern windows. A modern conservatory has been added to its south side. Its long thin shape and lack of windows to the rear give it a barn-like appearance. A large former opening on the front elevation with a brick segmental head has been blocked in and replaced with a modern door and window. It is of some historic interest. It is not known if it actually was a Tollhouse or if Stone Street was a turnpike road. Tollgate Cottage appears on an inventory of turnpike roads (Ref. 9.29) but it has not been possible to find out categorically. Its immediate setting is Stone Street which it faces onto. If it originated as a barn it may have been associated with Westenhanger Castle which was a farm at the time that Tollgate Cottage was constructed. Tollgate is considered to be of **low** value.

### ***Post-Medieval archaeological resource***

9.3.165 A range of archaeological features of Post Medieval date have been identified within the application site, either catalogued by Kent HER or identified through further assessment including fieldwork. Some of these features are discussed above in the Medieval section, where they likely relate to a later phase of the Westenhanger Castle

asset group development. Assets discussed here are likely to relate to the agricultural land management of the application site during the Post Medieval period, representing a continuation from the Medieval period with little change until the Modern.

- 9.3.166 Two Post-Medieval assets (**22, 25**) are recorded on the Kent HER located to the east of Stone Street, between Westenhanger village and Newingreen. Features (**22**) formed of a series of pits, ditches and a large linear feature were discovered on either side of Stone Street during the HS1 construction work, which were assessed to be of a late Post-Medieval date. These lie within the application site. However, trial trench evaluation in 2020 (Area i, ES Appendix 9.21) did not find any evidence of any features in the vicinity of asset **22**. Post-Medieval features were found during an archaeological evaluation at the site of the Royal Oak Motel (**25**) on Stone Street which are outside the application site by 100m. 2020 trenching within the application boundary (Area i and Area v, ES Appendix 9.21) in proximity to the asset **25**'s location did not identify any further associated remains. Any activity to the west of asset **25** and of Post-Medieval date are considered part of the deer park activity and considered under a separate project ID. Both assets are of **low** value due to their limited survival and contextual associations (and limited evidential and historical value). As a result of the findings in 2020 trenching, neither **22** nor **25** are considered further.
- 9.3.167 Three demolished 19<sup>th</sup> century farmsteads (**BH19, BH23, BH38**) are located within the application boundary. Although no above ground evidence survives, below ground remains may still remain. These assets are of **low** value.
- 9.3.168 During 2017-2018 evidence of Post-Medieval activity was present across the site. Post-Medieval ditches that mark recently filled-in field boundaries shown on OS maps have not been described below or given identification numbers, unless of particular value, as they are of **negligible** value. The assets described below hold evidential and historical value:
- In Field 6, just south of the HS1 line and west of Hillhurst Farm (**BH32**), a 19<sup>th</sup> century brick clamp (kiln) was exposed by geophysics and confirmed by trial trenching (**275**). The geophysical survey suggests that the brick clamp continued below the railway line. The clamp should therefore pre-date 1843, when the construction of this stretch of South Eastern Railway was completed. The dating indicates that the last use of the clamp is likely to have been in the 1840s, and thus either just before, or during, the construction of the railway. It is plausible to suggest that the brick clamp was established here for the construction of the railway. The brick clamp is an important addition to the history of the local area and the railway, but as there do not appear to be any examples of the products of the kiln, is only of **low** value.
  - Post-Medieval linear ditches (**222**) were found in Field 8 to the east of Barrow Hill, Sellindge. Among these were a pair of parallel ditches, 4m apart aligned north-east to south-west. These two filled-in ditches follow the line of the western boundary of the deer park to Westenhanger Castle (**154**) as mapped from historic maps and this boundary can be seen on LiDAR as a double ditch. The ditches (**222**) did not contain any Medieval or early post-Medieval material, only 19<sup>th</sup> to 20<sup>th</sup> century glass, iron and brick/tile. However, this is fairly normal for Post-Medieval field boundary ditches that were in use for several centuries and that would have been routinely cleared out. Either this part of the park boundary was constructed as a double ditched boundary or one ditch is a later redefinition of an earlier park ditch. These assets are of **low** value.
  - In Field 10 a cobbled track (**209**) aligned east to west was exposed by geophysical survey and trial trenching. This corresponds to a parish boundary. One or two ditches (no identification numbers) at right angles to this track containing Post-

Medieval pottery were found and probably represent contemporary sub-divisions of the field. These assets are of **low** value.

- In 2020, **286** in Area viii, previously identified through geophysical survey, was confirmed as a likely pit dug to discard waste material associated with the railway to the north. The asset is of **low** value.

### Modern (1914 to present) (Figure 9.6, ES Appendix 9.1)

9.3.169 In the Modern period archaeological remains within the application site are mostly military in nature. This forms the principal asset type and grouping within the period and therefore discussion is led by the remains associated with Lymgne Airfield. Some additional Modern assets are discussed after this, all of which is displayed on Figure 9.6 in Appendix 9.1.

### Military Remains

9.3.170 Military remains consist of both built heritage and below-ground archaeology. They are in differing states of preservation, with some potentially impacted by the later development of Lymgne Industrial Estate, east of Otterpool Park.

9.3.171 Lymgne Airfield (**27**), a former airfield dating from 1916 and used for military and civilian purposes. In WWII it was known as RAF Lymgne. The airfield extends both sides of Otterpool Lane and up to Lymgne village in the east and Upper Otterpool in the north. Most of its extent lies within the application site. Much of the airfield has now been removed by Lymgne Industrial Estate. Part of the civilian airfield runway (**152**), which was used in the 1950s and 1960s and its taxiway to the west (**39**) still survive in the field east of the Industrial Estate and can be seen on the ground and from the air and on LiDAR. The World War II runway was a grassed runway and no longer survives. The airfield holds historic and evidential value for military activity and community value for its influence on the Otterpool landscape, both physically and socially on the community who likely held strong connections to the airfield and associated military activity. Lymgne airfield (**27**) is of **medium** value.

9.3.172 More information and discussion of Lymgne Airfield can be found in the Zetica UXO Desk Based Study for the site (Ref 9.19) and also in ES Appendices 9.2 and 9.5. The airfield (**27**) and associated assets described below have historical value and potential evidential value to reveal further information about Lymgne Airfield, its past uses and the important role it played in 20<sup>th</sup> century conflicts. The creation of Lymgne Industrial Estate has removed many of the airfield buildings and has negatively affected the setting of this asset (**27**). The poor preservation and lack of survival of original contextual associations has compromised the value of many of these military assets. However, as a group (and combined with the built military assets described in the built heritage section below) they form a key feature of the local landscape (**27**).

9.3.173 Within the application site, a series of military assets contribute to the overall group narrative of military activity centred on Lymgne Airfield and influencing some of the most recent changes to the Otterpool Park landscape. These assets hold evidential and historical value and include:

- The remains of three aircraft dispersal pens (**29, 40, 162**), all of which lie within the application site. **162** was identified from aerial photographs. None survive above ground, but all may survive below ground. These are of **low** value. **162** is known of from aerial photographs and may actually be an air raid shelter (**BH42**).
- A concrete base of unknown use (**61**), located inside the application site within Link Park Industrial Estate is likely to be related to the Airfield and WWII and is of **low** value.

- A narrow-gauge railway (**127**) which joined Lymgne Airfield (**27**) to RAF Westenhanger and Westenhanger Station (**BH3**) in the north. RAF Westenhanger became an active airfield from 1944, following the use of the racecourse as a dummy airfield to remove attention from RAF Lymgne between 1940 and 1941. The narrow-gauge railway (**27**) connected the two airfields and lies within the application site. It is now mostly lost but can be seen on LiDAR, geophysics and on an OS map of 1920. Trial trenching in 2020 identified the narrow-gauge railway (**127**) in multiple trenches, positioned across the LiDAR feature (Appendix 9.21). This asset (**127**) is **low** value.
- Remains of an array of buildings (**129**) were identified from LiDAR and geophysics lining Aldington Road within the application site, on Lymgne Airfield. An aerial photo of the airfield in the 1930s shows hangars in this location. These do not show on maps of the 1920s or 1940 so were short-lived. Below ground remains may survive. This asset is of **low** value.
- The site of a former building seen on LiDAR at the airfield (**150**) (within the application site) which may be a remnant of the WWII infrastructure which lay along the southern edge of the airfield. This is of **low** value.
- The site of a possible gun emplacement or other airfield feature (**151**) to the south-west of the former civil airfield runway and within the application site. This feature survives as cropmarks and is visible on LiDAR. It is visible on the ground as a hollowed-out circle with trees now growing inside. This is of **low** to **medium** value depending on survival.
- The sites of six former pillboxes (**BH43-47**) formerly forming an east-west line of defence near the northern part of the airfield. This were identified from the Kent HER. They are not visible on aerial photos or Lidar. All except **BH45** have been visited and no upstanding remains were seen. Stands of trees/ thick vegetation at or near the recorded locations of **BH44** and **BH46** likely indicate the location of these two, demolished to base level (although **BH46** would be slightly further north than where the HER and Figure 9.6 put it). All six are located within the application site. They are of **low** value.
- An extant raid shelter (**BH42**) within the application site, located at the southern edge of the airfield on the north side of Aldington Road. This is of **medium** value. This asset has been screened by Historic England and has not been listed.
- The remains of a machine gun testing range (**37**) which survives as a concrete track and small area of concrete paving within the application site. There is also some rubble, in woodland close to the Aldington Road, which may represent part of this asset. This is poorly preserved and has lost its original setting. It is of **low** value.
- The remains of an ammunition store (**69**) located close to the machine gun testing range (**37**) on Lymgne Airfield (**27**), within the application site. The concrete remains of **69** are in a poor condition and have lost their original setting. **69** is of **low** value due to its poor state of preservation.
- The concrete foundations of an over-blister aircraft hangar and trackway (**36**) are located near **37** and **69**, at the south eastern corner of the airfield. This asset is located within the application site. This asset (**36**) is of unknown condition and is of **low** to **medium** value depending on survival.
- Auxiliary Unit Operations Base (**4**), an underground structure which still survives and lies just within the application boundary at its western extent. This is of **medium** value.

- Battle HQ and Bunker (**28**), two underground structures which still survive. Both lie within an arable field within the application site. They are located at what was the north-western boundary of the airfield and formerly were shielded by a small wood which has now been removed. These are of **medium** value. The Battle HQ and bunker have been screened by Historic England but have not been listed.
- The wall of the former rifle range (**126**) seen during walkover survey, next to Lymgne, at the eastern edge of the airfield. This is within the application site. It is of **medium** value.
- A further asset (**144**) of unknown purpose or date lies to the southwest of the civil runway (**152**) at Lymgne Airfield (**27**). The asset is of unknown date or purpose but on LiDAR it appears to be a small rectangular structure or base of a structure which may be a building associated with the airfield. It lies within the application site. It is of **low** value.

9.3.174 Within the application site, and footprint of the former Lymgne airfield, fieldwork as part of the project has potentially identified further military remains consisting of:

- A 'Z-shaped' geophysical anomaly (**231**) found by the resistivity survey carried out east of Lymgne Industrial Estate (ES Appendix 9.14). This looks recent and given its location at the northern end of the former airfield is likely to be a filled-in military feature. It is of **low** value.
- Geophysical anomalies shown up by magnetometry survey carried out on the airfield (ES Appendix 9.13) (**236**), thought to be airfield related. It is of **low** value.
- The former taxiway (**232** and **233**) of the airfield shown by magnetometry survey carried out on the airfield (ES Appendix 9.13). **232** corresponds with **39**. These are of **low** value.
- A previously unrecorded probable aircraft dispersal pen (**235**) showing up as an anomaly by magnetometry survey carried out on the airfield (ES Appendix 9.13). It is of **low** value.
- A former wind tee (**234**) showing as anomaly on magnetometry survey carried out on the airfield (ES Appendix 9.13). It is of **low** value.

9.3.175 An area with several buildings south of Ashford Road (within Benham Business Park) which possibly formed part of a munitions store in WWII (**WS20**). It was formerly a complex of 4-8 huts and Nissen huts. The munitions store has been largely lost and the original layout was no longer extant prior to the 1960s. However, some structures may survive or have been re-used in the vicinity of it. **WS20** consists of:

- a row of relocated conjoined Nissen huts (**WS30**), total length is around 27m and represents a series of sections of hutting adjoining end to end. They do not appear on 1940s aerial photographs and have presumably been relocated from elsewhere on the airfield.
- a group of four military huts (**WS31**, **WS32**). These are single-storey structures, mostly of concrete blockwork with pitched corrugated metal or asbestos roofs with a mixture of end and side window and door openings, some of the window openings retaining metal windows. They do not appear on 1940s aerial photographs and are also presumed to have been relocated from elsewhere on the airfield
- and a pair of buildings identified as in-situ elements of the munitions store which appear in aerial photographs of the period (**WS33**, **WS34**). These comprise a small single-storey hut built of corrugated material on a metal frame with metal windows and modern alterations to the door, and a low, largely roofless, red



brick building which has some evidence of a corrugated roof and surviving metal framed windows.

- 9.3.176 The munitions store is likely linked to the RAF base at Lymgne Airfield (**27**). Though some of the structures are clearly survivals from WWII, they are of common types and have been modified to varying degrees. It is clear that at least one has been relocated for reuse and later introductions have impacted the rest of the group altering their setting. Due to the poor state of repair of these structures, their adaptation and relocation, and the commonality of Nissen huts, there is little evidential or aesthetic value present in these assets. The structures (**WS30-WS34**) as part of **WS20** do provide historical value as remnants of the extent to which the landscape was modified by the military during WWII. They also provide a link for the community to the memories of this period, adding communal value. The munitions store (**WS20**) and associated buildings (**WS30-WS34**) are of **low** value as although some structures survive or have been re-used, the overall layout has been lost. The munitions store lies within the application site. **WS30-WS34** were screened by Historic England and not listed.
- 9.3.177 A 20<sup>th</sup> century brick building in Westenhanger village (**WS19**) which is located inside the application site. It was built before 1931 and may have had a military role during WWII as it was marked as a ‘depot’ on some early mapping. Aside from its possible early date the structure offers little value, largely due to the Modern loss of its original accompanying structures and warehouses which would have provided a significant group value to the structure and its surroundings. The structure does offer local historic significance through its telling of the widespread military history of the area, but this significance is limited due to the lack of related structures or documentary evidence relating the structure to the wider area. This structure is not a remarkable survival and offers **low** heritage value. It also appears that the structure has been adapted several times since its construction making internal survival of features unlikely. **WS19** has been screened by Historic England and has not been listed.
- 9.3.178 A series of built military assets are located outside of the application site, but their individual historic and evidential value contributes to the overall group narrative of military remains within the application and focused are Lymgne Airfield. The following military assets are located outside of the application site, but due to historic association, their setting is considered to extend into the application site:
- The remains of a Pickett Hamilton Fort (**60**) within Link Park Industrial Estate. These are small circular retractable pillboxes that were designed to defend airfield runways. This was recorded by a walkover survey in 2005 and was observed then as is retracted into the ground so that only the top was visible. It was not seen during walkovers for this project as it appears now to be located under a large spoil heap. If surviving it would be of **medium** value.
  - A second Pickett Hamilton fort (**32**) which survives above ground to the west of Otterpool Lane. It lies 60m outside the application site. This has been screened by Historic England but has not been listed. This is of **medium** value.
  - Several sites of defensive trenches (**34**) and slit trenches (**33**), both outside the application site by 289m and 70m respectively. These are no longer visible on aerial photographs, presumably they have been filled in or ploughed out and no longer extant. These are of **low** value.
  - Anti-tank pimples (**7**) 160m west of the application site boundary. It is unknown if these still survive, and they are of **low** value.
  - The crash site remains of four military aircraft (**MR1, MR2, MR3, MR4**) located around the outskirts of the application site. These have inaccurate spatial locations and therefore there is the possibility that one or more of these planes might have

crashed within the application site. Military aircraft crash sites are often classed as war graves and can comprise both surface and buried artefacts, human remains and unexploded ordnance. These sites are covered not only by the Ancient Monuments and Archaeological Areas Act 1979 but also the Protection of Military Remains Act 1986. Crash sites have significance for remembrance, commemoration, their cultural value as historic artefacts and the information they contain about both the circumstances of the loss and of the aircraft itself. If elements of the crashed plans do survive, they would be of **medium** value.

- Air raid shelters (**31**) which survive below ground in various conditions to the west of Otterpool Lane in the former airfield. They are 60m outside the application site boundary.
- Gas Decontamination Building (**30**) which survives as a ruined structure above ground. This lies 55m outside the application site and is close to **31, 32, 35** and **WS14**.
- Several former barracks huts (**35**) and RAF huts (**WS14**) which survive in a ruinous state west of Otterpool Lane. These are outside the application site by 80m.
- A bulk fuel installation (**38**), condition unknown. This lies 300m outside the application site, west of Otterpool Lane in what was the south-western corner of the airfield.
- The sites of two possible Pillboxes have been tentatively identified on LiDAR but not visited by walkover survey (**142, 143**). These lie around the edge of the huts (**35/WS14**), to the west of Otterpool Lane. These are outside the application site by 200m and are within the former airfield.
- A munitions store located at Farnead Farm, 100m outside the application site boundary (**BH1**), survives as a ruined building.

9.3.179 Military assets are mostly of **low** to **medium** value. This value is based on their relationship to the former Lympne Airfield (**27**) which was an important staging location during WWI and WWII. These assets have historical value due to their links to these nationally significant events and the airfield. Several assets are of **low** value (**35, 142, 143, WS19, WS20** (including **WS30-WS34**)). Other assets are of **medium** value (**4, 31, 28, 30, 32, 32, 60, 38, WS14, 126, BH1**) due to their surviving fabric and contextual associations. Two of the latter (The Battle HQ (**28**) and the Pickett Hamilton Fort west of Otterpool Lane (**32**) have been screened by Historic England and have not been listed. More detailed discussion of these military structures can be found in ES Appendix 9.5.

### ***Remaining Modern Assets***

9.3.180 An isolated ditch feature (**241**), east of Stone Street was identified through 2020 geophysical survey and believed to be of modern date. No evidence of the geophysical ditch feature **241** was found in 2020 trench 203 in trenching Area i and is therefore not considered further.

9.3.181 Three farms are situated with the application site which hold some historical value for their contribution to the development of the agricultural and rural character of much of the application site from the Medieval and into the present. These farms are:

- Somerfield Court Farm (**FS1**), a Modern farm built after 1990 as a replacement to **LB28**, of **negligible** value. This was screened by Historic England and not listed;
- Benham Water Farm (**FS4**) a Modern 20<sup>th</sup> century farm of **negligible** value; and
- Red House Farm (**FS3**), a Modern 20<sup>th</sup> century farm developed in the 1970s is of **negligible** value. This was screened by Historic England and not listed.

9.3.182 Discussion of their nature and contribution can be found ES Appendix 9.3, Historic Landscape Characterisation and Farmstead analysis. All three farms have been screened by Historic England and have not been listed.

9.3.183 Rose Cottage (**WS12**) is a modern 1970s bungalow on Ashford Road. Historic maps record a building on the site, possibly from 1819 and conclusively from 1873. The building was screened by Historic England and not listed. There was no visible survival of the earlier building on the site or within the bungalow. The asset is **low** value.

### Undated Assets

9.3.184 Despite the work carried out via desk study and fieldwork, some assets remain undated. Some assets have been identified as potentially dating to certain periods and this is noted, however, their context and any associations remains unclear to confidently assign a period and therefore they remain undated for the purpose of this assessment.

9.3.185 Undated assets are displayed on Figure 9.7 in ES Appendix 9.1.

9.3.186 Desk study and walkover surveys have identified the following features of current unknown date, within the application site:

- Undated features (**WS16**) comprising an area of earthworks north of Upper Otterpool (**LB20**) which are within the application site. These earthworks (**WS16**) were recorded on the walkover survey and may relate to Medieval or Post-Medieval activity at Upper Otterpool.
- Pimple- like features seen on LiDAR (**140, 141**) to the south of the RAF Military Huts (**WS14**), west of Otterpool Lane. These are outside the application site by at least 100m. They have not been inspected by walkover survey.
- Undated drainage features and ponds to the east of Stone Street seen on LiDAR (**145, 146**). These assets are within the application site. Both have been trenched in 2020 (ES Appendix 9.21) and no evidence pertaining to either LiDAR feature were found. They have therefore been removed from further assessment.
- Three small features identified from LiDAR to the south of the HS1 line which may be mounds of Modern dumping or may be geological (**123, 124, 125**). These are all within the application site.
- One undated cropmark (**48**) investigated during previous excavations at Link Park. This was not accessible during the site visit. This is within the application boundary.

9.3.187 These assets (**WS16, 140, 141, 143, 123, 124, 125, 48,**) are of **low** value due to their unknown period or function. Geophysical survey did not record anything of interest in the locations of **123, 124, 125**. They are therefore of **negligible** value. They offer evidential value for their potential to yield further information about past land use and human activity.

9.3.188 A geophysical survey, conducted prior to the Project was conducted in the northwest corner of the site, at the location of the Proposed Wastewater Treatment Plant. The survey identified a series of linear anomalies (**111**) which are undated. They are of **low** value for their evidential value.

9.3.189 Several geophysical anomalies from 2017-2018 remain undated – parallel ditches at the northern edge of Field 1 (**173**), a north-south ditch at the southern end of Field 10 (**205**), a possible field boundary or path (**224**) south-west of the Racecourse and north of the A20, and a small double ditched feature at the southern boundary of Field 1 (**181**). These assets are currently of **unknown** value.

9.3.190 There are various other geophysical anomalies across the site that have not yet been subject to archaeological trial trenching. Due to their location, some of these may prove



to be Prehistoric. These include: linear features (**207, 211, 242**), curvilinear features (**204,240**) and sub-rectangular geophysical anomalies (**202**) located west of Barrow Hill; two parallel curvilinear ditches in the south eastern corner of Field 2 (no identification number or figure representation); and linear ditches in Field 4 (no identification number or figure representation). These may, upon investigation, prove to be Prehistoric but later periods cannot be discounted. As a result, it is not possible to assign value to them at them at this stage. These investigations will take place prior to Tier 2.

9.3.191 North of Upper Otterpool (**LB20**), some geophysical anomalies (**171**) could be Medieval in date and may be related to earthwork features seen on the walkover survey (**WS16**). There are other undated linear features (**169, 170**) showing on geophysics to the north-east of Upper Otterpool and south of Field 5 that may be Medieval field systems or other features. All these features have **low** value.

9.3.192 2020 trial trenching in trenching Area i (ES Appendix 9.21) identified features associated with assets **251** and **252** from the geophysical survey. Asset **251**, a ditch feature, was identified across 4 trenches located across the geophysical anomaly, however, a clear change in orientation was picked up in Trench 97 (ES Appendix 9.21) indicates that line of the ditch was coincidental with the geophysics results and likely represent different features. The function of the ditch is unclear but may represent a previous agricultural stock fence which would be of **low** value. However, it could equally be Modern disturbance from a previous re-enactment festival called the War and Peace Revival which would hold no heritage value.

9.3.193 During 2020 trenching, a series of undated features were identified in Area i which have the potential to yield evidence of past human activity. The understanding of their function and relationship with other features is currently limited, and as a result they are of **low** value. These include:

- **297** - Potential field system located within trench 168 in the south west of Area i identified through two contemporary ditches. No clear association to any other features.
- **296** - Two ditches, identified in trench 153 in the south west of Area i, with clear direction to intersect beyond the trench boundaries. No clear association to any other features due to density and positioning of trenches in the area.
- **300** - a concentration of past human activity has been identified in the southern part of the racecourse. Although no results of the geophysical anomalies **254** or **255** were identified, a range of previously unidentified ditches were discovered. They don't present any definitive pattern, due to limitations of the trenching, and remain undated.
- **304** - ditches identified in trenches 93, 103, 104, which are undated.
- **305** - undated ditches and pit identified in trench 150, in addition to the potential deerpark feature (**292**).

9.3.194 Trial trenching Area ix, located within the former Westenhanger Castle deerpark, identified a single undated waste pit (**292**) of **low** value.

9.3.195 A series of undated ditches (**306**) were also identified within Area ix, in trenches 279, 280, 282, 286, 291 but are of no discernible feature or phase of activity. Due to their poor context they are of **low** value.

9.3.196 Asset **252** was a ditch mapped across three trenches in trenching Area i (ES Appendix 9.21). The ditch is undated and its function and its relationship with other features is currently unknown. As a result, the value is **low** value.

- 9.3.197 No evidence of assets **254** or **255** were identified across seven trenches targeting them (ES Appendix 9.21). As a result, both are not considered further in this assessment. These assets are of **low** value.
- 9.3.198 The eastern part identified two linear anomalies (**248, 250**) form an overall L-shape with an internal rectilinear shape (**249**) measuring 10m x 10m. Due to proximity to the villa site (**167**), **249** may be Romano-British in date. North west of the potential structural anomalies, a curving linear anomaly (**247**) and through its proximity to the East Stour River, interpreted as a water management feature of an unknown date. Asset **247** is of **low** value.
- 9.3.199 Trial trenching in 2020 (ES Appendix 9.21) targeted these geophysical features in trenching area iv Trenches targeting assets **248** and **250** were archaeologically blank. As a result, both assets **248** and **250** are not considered further. A trench was placed over asset **249**, and a corresponding ditch matches the anomaly, however, the ditch remains unexcavated. The roughly south east north west return of geophysical anomaly **249** was covered by the same trench but was not identified. Assets **248-250** are of **low** value.
- 9.3.200 A cluster of undated pits (**291**) were identified in trench 249, to the south of Area iv. No information on their relationship or function could be deduced from the evaluation. Although the pits hold evidential and historical value to yield further information on past human activity, potentially associated with Westenhanger deerpark, they are of **low** value.
- 9.3.201 Additional responses of archaeological/evidential value included a curving linear feature (**244**) on the edge of probable valley deposits, associated with the East Stour River. Further ditches were also identified (**243**) in the south west corner of the western part of area 3, however, along with **244**, neither feature could be specifically interpreted. These assets are of **low** value.
- 9.3.202 **286** in Area viii, identified through geophysical survey, was confirmed as a likely pit dug to discard waste material associated with the railway to the north. The asset is of **low** value.
- 9.3.203 An L-shaped ditch alignment (**262**) was identified south of assets **260, 261**. No evidence of the geophysical feature was identified during trenching (ES Appendix 9.21) and asset **262** is therefore not discussed further.
- 9.3.204 No evidence of geophysical ditch feature **241** was found in trench 203 in trenching area i and therefore not considered further.
- 9.3.205 A series of ditches (**307**) were identified in the southern parts of Area v, across trenches 256, 263, 264, 265, 273, 275, 336. The ditches were undated and hold no overriding pattern and or relationship to suggest a particular form of historic activity in the area. As a result, **307** is of **low** value due to its limited historical and evidential value.
- 9.3.206 A Geophysical Survey was conducted in September 2021 at Land at Lyveden, immediately south of Westenhanger Village and west of Stone Street. The survey identified a series of anomalies of potential archaeological interest. The principal feature is a potential enclosure (**308**) formed of three enjoined linear features. A cluster of pits (**309**) are located to the northwest of the enclosure, with three isolated pits (**310, 311, 312**) spread across the southern area of the survey area. All features are undated, with the anomalies not yet tested by trial trench evaluation. However, they could be of a Prehistoric date, either Bronze Age or Iron Age, and illustrate another area of focused Prehistoric Activity within the Otterpool landscape. For their evidential value, all assets are of **medium** value.

## Historic Landscape (Figure 9.9, ES Appendix 9.1)

- 9.3.207 A range of activity can be traced across the site which predates available historic mapping. Kent HER data and other sources provide details of likely influences from these early assets on Historic Landscape Character (HLC). Detailed analysis of the Historic Landscape Character Types (HLCTs), identified by County HLC within the site, has been undertaken in the Desk Based Assessment (ES Appendix 9.2) and the Historic Landscape Characterisation and Farmsteads Analysis (ES Appendix 9.3) which identifies variations in type and elements which make up the individual HLCTs.
- 9.3.208 The HLC for most of the site is formed of enclosed fields dating from the late Medieval to post Medieval periods, specifically between the 16th to 19th centuries. Those fields with very straight edges are typical of mid-18<sup>th</sup> or later century parliamentary enclosure. Those fields with wavy boundaries were likely enclosed earlier, in the late medieval period to early 18<sup>th</sup> century. The remaining landscape is formed of post 1810 settlements, 20th century industrial activity and the 19th century Racecourse (**153**). Little Modern development has occurred in the western half of the site, and agricultural fields remain dominant character type, with sparse historic woodlands and some historic hedgerows still evident. The western part of the site is bordered by Harringe Brooks Wood- an ancient woodland. The central and eastern of the site is more mixed in character, with greater settlement, development and industrial activity. The site is crossed by the East River Stour and its tributaries which has been a focus for human activity from at least the Bronze Age (although its course in early prehistory was not exactly the same as today).
- 9.3.209 The presence of several Bronze Age burial mounds/barrows (**44, 46, 58, 113,114,115, 130, 131,135, 136, 155, 156, 284**) indicates the early use of the landscape for funerary activity. The Romano-British roads of Stone Street and Adlington Road, and Romano-British settlement and farming evidence found in the site, indicate the continuation of activity through the Romano-British period. This activity is thought to continue through to the Early Medieval (Anglo-Saxon) period. Although evidence of Early Medieval settlement is sparse it is indicated by burials of this date found at the edges of the application site. Evidence of Anglo-Saxon charcoal burning was also found (**174**) on the western part of application site. Anglo-Saxon and Medieval settlement is unnucleated and scattered – a form of settlement which continues to the post-Medieval period.
- 9.3.210 By the Medieval period, it is assumed that the landscape was largely unenclosed agricultural land, parkland and woodland. Westenhanger deerpark (**154**) probably originated in this period, however the boundary of the park at this time is not known. Based on national trends, it is likely that clearance of the landscape for agriculture would have intensified during the Medieval period and continued into the post-Medieval period. Enclosure of the landscape occurred mostly in the 17th and 18th centuries and is still clearly visible across the site. The use of the landscape for agriculture remains across large parts of the site.
- 9.3.211 The Tudor (Post-Medieval) deerpark (**154**) of Westenhanger Castle (**SM6**) covers a large area (approx. 800 acres) in the north and east part of the site (Figure 4) as mapped by historic maps, field boundaries and LiDAR. Remnants of this formal landscape are mostly lost to arable and pasture agriculture and the Racecourse (**153**). Some elements of the deerpark may survive as below-ground remains. The majority of the deerpark within the OPA boundary has been subject to trial trenching and this has added little to our understanding of it although a length of ditch (**292**) was discovered in the 2020 trial trenches that may denote the southern park boundary. Within the area of the deerpark (**154**), the field edges are largely ruler-straight. This is a landscape of enclosure, which on stylistic ground would be 18th -century or later. It can be assumed with confidence that the enclosure of the deerpark dates from some

time after the park was given up, which map evidence dates to between 1695 and 1769. The house was largely pulled down in 1701, and this change in the site's status would be a possible context for the disparkment. OS mapping of 1797 shows a large orchard (**161**) south of the Castle and east of the causeway (**149**), extending to the present A20. The orchard may have been longstanding, but evidence for it is lacking. So, unless other evidence is forthcoming, the likelihood is that the present agricultural landscape within the majority of the deerpark is of the mid- to late 18th century. This is very much in accord with the conclusions of the Historic Landscape Characterisation.

9.3.212 The expansion of settlement across the site advanced in the 19th century with increases in built development along the major roads. Industrial and military activity during the 19th and 20th century had a significant impact on the landscape character of the site. The disused gravel and clay workings in the centre of the site date to the late 19th century and have until recently been used for a commercial park. Lymgne Airfield, once a military and later civil site, is no longer in use and has limited legibility as an airfield, partly due to part of being adapted into an industrial estate. Whilst the airfield has lost its military use, there remain a number of military buildings across the site which form part of its 20th century character.

9.3.213 The landscape is fairly fragmented and has several visual detractors such as the M20 transport corridor, Lymgne Industrial Estate and Modern built form. The latter can overshadow the Ragstone and brick vernacular buildings. In the Sellindge Plateau Farmlands (encompassing the north, north-east, and east half of the site) the historic landscape patterns are obscured and there are more discordant elements.

9.3.214 Generally, the historic landscape has reasonable time depth and coherence, demonstrating clear yet varied historic character. The historic landscape within the site offers evidential value for its potential to reveal more information about past land use and human occupation due to the good survival of the landscape from the Prehistoric, Medieval and Post-Medieval periods. The landscape also offers historical value for its diverse character and time depth, with evidence of the development of the landscape through almost every period from the Prehistoric to the Modern. The aesthetic and communal value of the landscape lies in the agricultural heritage of the area, the past and present activity around Lymgne Airfield, and Westenhanger Castle site.

9.3.215 Overall, the historic landscape within the site has a **medium** value.

### Historic Hedgerows

9.3.216 The criteria for hedges to qualify for protection under the Hedgerows Regulations of 1997 (Ref 9.20) are twofold: ecological and historical/archaeological. This section only examines the historical and archaeological potential of the hedges within the site.

9.3.217 A cartographic assessment (ES Appendix 9.3) has identified that the many of the hedges marked on the various parish tithe maps dated 1839-1840 survive within the site (Figure 9.9). These predate the General Enclosure Act of 1845, therefore the extant 1840s hedges could qualify for protection under the Hedgerow Regulations 1997 as they form an integral part of a field system pre-dating the Inclosure / Enclosure Acts.

9.3.218 Those hedges that are considered to meet these criteria are marked on Figure 9.9. Under the Hedgerow Regulations decisions to remove whole or parts of important hedges would need to be justified.

### Future Baseline

9.3.219 The future baseline is the situation that would prevail should a proposed Development not proceed. The future baseline is further defined by the assessment scenario that

the topic adheres to. The future baseline for cultural heritage has identified the following.

- 9.3.220 If the Otterpool Park scheme did not proceed, the baseline within the site would remain and is not predicted to change significantly in the future through discovery of new assets or further development.
- 9.3.221 However, the effects of arable farming on certain assets including the Romano-British Villa (**167**) and the Barrows (**44, 46, 58, 113, 114, 115, 130, 131, 284**) would result in a slow and continued degrading of these assets over the long term.
- 9.3.222 Similarly, military assets around the site have been noted to be degrading due to lack of curatorship and awareness of them as a group. It is predicted that if the Scheme did not proceed this decline would continue in the long term.
- 9.3.223 Folkestone Racecourse (**153**) is allocated within the Local Plan for development and as such would still face loss through development in the long term if the Scheme did not proceed.

## 9.4 Design and Mitigation

- 9.4.1 The following section sets out, for construction and operation:
- The embedded design measures, including good practice approaches, relied on in this assessment; and
  - The potential significant effects remaining after the application of embedded design measures and good practice approaches, and any additional mitigation required to address these potential significant effects.
- 9.4.2 The potential significant effects prior to additional mitigation are identified in the Assessment Summary table.
- 9.4.3 Environmental considerations have influenced the proposed Development throughout the design development process, from early options assessment through to refinement of the Project design. An iterative process has facilitated design updates and improvements, informed by environmental assessment and input from the Project design teams, stakeholders and public consultation.
- 9.4.4 Impacts would be reduced by measures embedded into the design of the development, as well as by additional mitigation, and together these measures would act to avoid, reduce and mitigate effects. The measures have been summarised by whether they are embedded design measures, which are secured through the documents for approval, or additional mitigation secured, for example, by planning condition or legal agreement. Embedded measures are described as measures that form part of the design, developed through the iterative design process and good practice standard approaches and actions commonly used on development projects to avoid or reduce environmental impacts, typically applicable across the whole Development. Additional mitigation is described as any additional Development-specific measures needed to avoid, reduce or offset potential impacts that could otherwise result in effects considered significant in the context of the EIA Regulations.
- 9.4.5 Further detail on the embedded design measures and additional mitigation is provided for each asset assessed in the subsequent section (separated into construction and operation).

## Construction Approach and Mitigation of Construction Effects

- 9.4.6 Mitigation measures are proposed to prevent, reduce, and where possible, offset any potential effects of the proposed Development.
- 9.4.7 The proposed Development will involve extensive groundworks at the construction phase in the form of topsoil stripping for compounds, soil storage and haul roads; demolition of buildings; foundations for new buildings; drains; sewers; roads; levelling for sports pitches and creation of channels and shallow basins for SUDs. There will also be areas of ecological mitigation possibly involving creation of ponds, 'ridge and furrow' and water vole ditches. These groundworks will inevitably have a permanent effect on below-ground archaeological remains, where they are known or suspected to exist, and archaeological mitigation will be required.
- 9.4.8 It is acknowledged in local and national planning guidance that there should be a presumption in favour of retaining and conserving designated assets. Where this is not possible efforts have been made to minimise harm, as required by the NPPF. One of the main methods of mitigation is 'preservation by record' where heritage assets cannot be preserved in situ. The proposed Development presents an opportunity to advance our knowledge of the historic environment through archaeological excavation or historic building recording before construction. The results of these investigations would then be disseminated to the Otterpool Park residents, the general public and the archaeological community.
- 9.4.9 Construction will also have a direct impact on the significance of several historic buildings, structures and monuments through changes within their setting and measures to mitigate this temporary effect are also proposed.
- 9.4.10 Archaeological assessment and mitigation is a phased successive approach where the results from one phase informs the next. The initial phases of archaeological assessment have taken place. The first stage comprised desk-based studies. This was followed by field evaluation involving geophysical survey, trial trenching and some test-pitting over part of the site. The evaluation phase is ongoing. The results of the desk-based studies and evaluation has provided sufficient information to develop an understanding of the heritage resource within the site and has informed how mitigation is approached. However, it is recognised that in parts of the site the evaluation is incomplete (see section 9.2). These areas will continue to be evaluated as part of an ongoing programme of assessment between Tier 1 and Tier 2. The ongoing evaluation is likely to involve further geophysics, trial trenching plus possible test-pitting, augering and archaeologically-led boreholes. The current results provide a sufficient level of assessment data to identify mitigation requirements for those areas that have been evaluated.
- 9.4.11 The geo-archaeological desk-based assessment for the site (ES Appendix 9.16) has also informed the mitigation.

### Embedded Design Measures

- 9.4.12 Embedded design measures (measures that are designed in and secured on the Parameter Plans (ES Appendix 4.2), Strategic Design Principles (ES Appendix 4.3), Development Specification (ES Appendix 4.1) and Heritage Strategy (ES Appendix 4.12)) are listed in the Scheme Design and Mitigation of Permanent Operational Effects Section below. These include preservation under open space and screening, among other measures.
- 9.4.13 The embedded design measures also include good practice, such as protecting heritage assets from physical harm during construction by the following measures,

which are included within the Outline Code of Construction Practice (CoCP)(ES Appendix 4.17):

- Carefully siting haul roads to avoid heritage assets
- Use of hoarding or fencing to demarcate and protect certain heritage assets from construction
- Conducting toolbox talks to inform sub-contractors and construction crew as to where these heritage assets are and how to avoid them.
- Reducing temporary effects to the settings of heritage receptors from increased noise including from construction traffic flow. This would be controlled through and around the application site using a CTMP to control vehicle movement i.e. control of vehicle movement through the site, speed limits and defined routes (refer to Chapter 13: Noise and Vibration and Chapter 16: Transport as well as the respective sections of the CoCP (ES Appendix 4.17)).
- Reducing temporary impacts to the settings of heritage receptors caused by construction activity through increased dust and noise (refer to Chapter 6: Air Quality and Chapter 13: Noise and Vibration). This would be achieved by fencing, hoarding and bunding, damping down of the construction area as well as limiting the hours in which construction can be carried out. These measures are proposed in the CoCP (ES Appendix 4.17) (Section 6.3).

9.4.14 The Parameter Plans (ES Appendix 4.2) have been designed with some flexibility in movement for key pieces of infrastructure such as roads, footpaths and cycleways, which will allow for preservation in situ of as-yet undiscovered archaeological remains.

9.4.15 The assessment of effects for both construction and operation need to take into account the flexibility of the Parameter Plans (ES Appendix 4.2). As a result, the assessment follows two principles:

- Where an asset, either archaeological or built, is to be preserved in situ in an area of open space that has been specifically designed to preserve the asset (s) in situ it is considered impacts might still occur, but only to its setting. Due to the flexibility designed within the Parameter Plans (ES Appendix 4.2), there is potential for pieces of infrastructure to move with varying levels of deviation. Movement has the potential to alter changes within setting. To address this, ranges in magnitude of impact have been given to the assets where changes as a result of flexibility in the Parameter Plans (ES Appendix 4.2) has the potential to increase or decrease the significance of effect.
- Where an asset is located either in part or in whole, within a confirmed development area or within (other) open space, it is deemed that, that asset would be physically impacted (removed or disturbed) during construction/landscaping. Therefore, assessment can be given as to the construction impact, mitigation and residual effect. Please refer to further consideration of embedded measures in the following section.

#### Additional Mitigation Measures

9.4.16 An iterative appraisal of the Proposed Development taking into account the embedded design and good practice was undertaken to identify any potential significant effects that would require additional mitigation during construction. Effects on cultural heritage receptors that could be significant and therefore required further consideration for additional mitigation were as follows (the individual assets are further described below and in Table 9.7):

- Direct impacts to designated and non-designated heritage assets through physical alteration or destruction such as resulting from groundworks, de-watering, compaction, demolition etc;



- Direct impacts arising from changes within settings of designated and non-designated heritage assets due to increased noise or dust from construction and from visibility of construction traffic and construction works; or
- Indirect (or secondary) impacts to designated or non-designated heritage assets that bring about physical alterations or alterations to setting.

9.4.17 The measures below are additional to the mitigation that is already part of the design. Exact form and scope of construction mitigation to take place will be defined following the completion of the evaluations across the OPA site. Of necessity therefore, the mitigation measures proposed below are fairly broad but will likely involve the following:

- Preservation ‘by record’ of archaeological remains involving a series of open area excavations on parts of the site where there is dense archaeology or archaeological potential is thought to be high. This would take place pre-construction;
- Preservation ‘by record’ of a standing building prior to its demolition or adaption by building recording. Recording would be completed in line with guidance issued by Historic England (Historic England, 2016: Ref 9-21);
- Preservation ‘by record’ involving discrete areas of the site being subject to archaeological monitoring (‘watching brief’) during construction;
- Preservation ‘by record’ of earthworks by earthwork survey;
- Archaeologically-led boreholes, augering and test-pits; and
- For Modern remains such as military features, an element of documentary and air photo research will be required, possibly alongside other mitigation measures such as buildings recording.

9.4.18 ‘Preservation by Record’ would take place at the Tier 3 stage, prior to construction, except in the case of archaeological watching brief which will take place during construction. A mitigation strategy has been drawn up as part of the Heritage Strategy (ES Appendix 4.12) (Appendix A of the Heritage Strategy). This mitigation strategy will be regularly updated during Tiers 2 and 3 of the application.

9.4.19 These additional mitigation measures will be implemented through planning conditions at the Tier 3 stage. The scope and extent of the mitigation measures will be agreed with the local planning authority. As part of these conditions, the archaeological contractors, working on behalf of the Applicant, will be required to submit and agree a written scheme of investigation (WSI) with the local planning archaeological advisor (and Historic England, where appropriate) prior to the commencement of this work.

9.4.20 Fixed locations of infrastructure will be confirmed at reserved matters application stage in Tier 3 of the planning process. Appropriate mitigation is addressed in the Mitigation Strategy (Appendix A of Heritage Strategy (ES Appendix 4.12)).

### **Construction Measures (Embedded and Additional) by Asset/group of assets**

9.4.21 The sections below discuss heritage assets by chronological period. Designated assets are not split out from non-designated. Construction effects are discussed first followed by operation.

9.4.22 The heritage assets lying within the application boundary identified in the preceding Baseline section (9.3) will experience physical impact during construction. These impacts would be permanent. Permanent impacts will comprise the removal of the



whole or part of an asset. Proposed mitigation for these assets is outlined in Table 9-7 below.

#### Early Prehistoric: Palaeolithic to Neolithic

##### ***Embedded Design Measures***

9.4.23 The buried land surface (**220**) found under barrow **136** during the recent archaeological evaluations will be preserved in situ in open space. It would not experience any impacts as a result of the proposed Development.

##### ***Additional Mitigation***

9.4.24 Evidence from the trenching and geophysics included some potential Neolithic occupational, farming or funerary activity. The following assets are located within confirmed areas of Proposed Development and would need archaeological excavation in some form as mitigation. Archaeological excavation would allow further contextualisation of these assets and potential study. The following assets identified through trial trenching will be subject to archaeological excavation:

- Activity (pits) associated with potential Neolithic occupation, possibly transient, located in trenching Area viii (**289**) and trenching Area iii (**293**).
- Prehistoric ditches (**298**) in trenching Area i.
- Neolithic Ditch (**196**) in Trenching area Field 4.

#### Later Prehistoric: Bronze Age

##### ***Barrows West of Barrow Hill***

##### ***Embedded Design Measures***

9.4.25 Prehistoric barrows (**58, 113, 114, 115, 131, 135**) will not be physically impacted by the proposed Development as they will be preserved in situ under open space. The Parameter Plans (ES Appendix 4.2) were adapted in order to reduce land take of development area HT.1 to ensure no physical impacts will occur to the wider scheduled area for barrows **58, 113, 114, 135**. An area of open space, larger than just the scheduled area of barrow **131** has been provided to preserve the barrow in situ. However, all (**58, 113, 114, 115, 131, 135**) will experience change to their settings from the proposals.

9.4.26 Flexibility in the Parameter Plans (ES Appendix 4.2) for the bus, cycleway and emergency vehicle route at the southwest corner of Barrow Hill Green has been limited to ensure preservation of barrows **115** and **130**. The busway, cycle path and emergency vehicle route is located south of barrow **130**. However, any flexibility for deviation north, has been removed to ensure the preservation in situ of barrow **130**. Other parts of the busway, cycle path and emergency vehicle route in proximity to barrows **115** and **130** are capped to a deviation of 20m, to ensure the preservation in situ of both barrows as well as preventing the potential crossing of the infrastructure in between the two barrows which would have an impact on their group setting and the line of sight between the two barrows. Capping of deviation of the busway, cycle path and emergency route to the 20m deviation will also ensure there is no threat of physical impact to the scheduled area encompassing both barrow **115** and **130**.

9.4.27 Design mitigation for the setting of the barrows is discussed below.

9.4.28 Temporary changes to the settings of the barrows would be caused by construction activity through increased dust, noise and vehicle movement. Impacts arising from these changes would be mitigated through damping down of the construction area. The flow of construction traffic would be controlled through and around the application

site using traffic management i.e. control of vehicle movement through site speed limits and defined routes (refer to Chapter 16:Transport). This mitigation would reduce temporary changes within the settings of the barrows.

*Additional Mitigation*

9.4.29 No additional mitigation is required for the Barrows West of Barrow Hill.

**Barrows East of Barrow Hill**

*Embedded Design Measures*

9.4.30 Prehistoric barrows **44** and **136** will not be physically impacted by the Proposed Development as they will be preserved in situ under open space. However, they will experience change to their settings from the proposals.

*Additional Mitigation*

9.4.31 The following barrows have been identified by 2020 evaluation and located within an area of Proposed Development resulting in direct physical impact. Therefore, the following assets will be mitigated by archaeological excavation prior to construction:

- Possible barrow (**253**) from trenching Area i and possible barrow (**263**) and barrow (**284**) from trenching Area viii.

**Remaining Bronze Age assets**

*Embedded Design Measures*

9.4.32 There are no relevant embedded design measures for these assets.

*Additional Mitigation*

9.4.33 There are three assets which date from the Prehistoric period (**26, 64, 121**) which are located within Link Park, north of Lympne Industrial Estate which will be directly impacted by the construction of built development and also open space (potentially SUDs according to the Illustrative Masterplan (ES Appendix 4.5)). This area will be archaeologically excavated prior to construction.

9.4.34 A Bronze Age hoard (**270**) was identified by metal detectorists to the east of Stone Street and north of the A20. The hoard's location is located within an area of proposed built development. Although, the hoard itself cannot be impacted due to its removal from the site, there is the potential for further items from the hoard to be scattered in the ploughsoil which could be impacted. No evidence of further Bronze Age material was found during trial trenching in 2020 (Area 5, ES Appendix 9.21). However, archaeological fieldwalking and a metal detector survey will be carried out prior to ground works commencing in order to identify any residual artefacts associated with this hoard.

9.4.35 To the east of Stone Street is a cropmark of a Bronze Age enclosure (**112**). The cropmark asset will be directly impacted by new built development. The potentially associated field system (**200**) will also be impacted by proposed new built development. Mitigation in the form of excavation will be undertaken for both **112** and **200**.

9.4.36 Fieldwork in 2017-2018 identified a range of Bronze Age activity to the west of Barrow Hill which, if studied, will likely provide context to the contemporary setting of the barrow cemetery in the area. These assets, principally formed of agricultural field systems evidenced by ditches, are located within areas of proposed built development. As a result, the following assets will be archaeologically excavated: **184, 185, 186, 187, 189, 190, 195, 203, 239**.

9.4.37 The following assets have been characterised by further evaluation and located within an area of Proposed Development resulting in direct physical impact. Therefore, the

following assets will be mitigated by archaeological excavation prior to construction (both in trenching Area i):

- Prehistoric ditches with Bronze Age Pottery (**298**); and
- Perpendicular ditches with Bronze Age pottery (**302**).

#### Iron Age to Romano-British

##### ***Iron Age to Romano-British Settlement Activity***

###### *Embedded Design Measures*

9.4.38 Due to the proximity of activity to Bronze Age barrows, the following assets will benefit from the proposed open space around the barrows and therefore be preserved in situ: **206, 208 219**.

###### *Additional Mitigation*

9.4.39 Archaeological fieldwork in 2017-2018 identified extensive Iron Age to Romano-British settlement activity to the west of Barrow Hill. The majority of which is located under proposed built development or associated infrastructure. As a result, the following assets will be archaeologically excavated prior to construction: **175, 176, 177, 178, 182, 183, 191, 192, 193, 194, 212, 213, 214, 215, 216, 217, 218, 221, 238**.

##### ***Iron Age monuments***

###### *Embedded Design Measures*

9.4.40 There are no relevant embedded design measures for these assets.

###### *Additional Mitigation*

9.4.41 Iron Age ditch (**287**) located in 2020 trenching area viii may form part of a monument. It would be under proposed development, playing fields or other open space and will therefore be archaeologically excavated.

##### ***Romano-British Industrial Activity***

###### *Embedded Design Measures*

9.4.42 There are no relevant embedded design measures for these assets.

###### *Additional Mitigation*

9.4.43 Geophysical survey and trial trenching have revealed the presence of a discrete area of Romano-British enclosures (**225, 226**) likely to represent industrial (including quarrying) activity, south of the A20. The activity is located within an area of proposed built development and will therefore be archaeologically excavated.

9.4.44 The following assets are yet to be trial trenched and will therefore, be subject to evaluation as part of a phased approach to assessment to allow for detailed mitigation. These assets are:

- Romano-British quarry/extraction pits (**258**)- east of the principal Romano-British industrial area.

##### ***Romano-British Villa***

###### *Embedded Design Measures*

9.4.45 The Romano-British villa (**167**, and part of ditch **168**) will be preserved in situ in open ground. Design mitigation for this and a change of setting is discussed further under 'Scheme Design and Mitigation of Permanent Operational Effects' below.

9.4.46 Temporary impacts to the settings of the Roman villa would be caused by construction activity through increased dust, noise and vehicle movement. These impacts would be

mitigated through damping down of the construction area. The flow of construction traffic would be controlled through and around the application site using traffic management i.e. control of vehicle movement through site speed limits and defined routes (refer to Chapter 16: Transport and the Outline COCP in Appendix 4.17). This mitigation would reduce temporary impacts to the villa's setting.

*Additional Mitigation*

9.4.47 No additional mitigation is required apart from to the stretch of villa ditch **168** that will potentially be affected by SUDs, which will be subject to excavation.

***Remaining Iron Age to Romano-British Activity***

*Embedded Design Measures*

9.4.48 The Romano-British ditch (**230**) identified in Field 7 in 2020, would benefit from design associated with Tudor Garden (**166**) and therefore be preserved in open space although it may suffer some physical impact in the course of the creation of the reimagined Tudor Garden.

*Additional Mitigation*

9.4.49 A watching brief during any road improvement works to the Roman Road of Stone Street, within the application site, east of Westenhanger, will be undertaken. This will be to assess and, if appropriate, record the survival of any surfaces and or remains associated with the Roman Road.

9.4.50 Within Lypne Airfield are a series of enclosure-type geophysical anomalies (**237**) along Aldington Road which are currently undated but have the potential to be Romano-British in origin. These have not been trial trenched so far due to the risk of unexploded ordnance. These features (**237**) lie partially within an area of planned built development and will be subject to archaeological mitigation following evaluation.

9.4.51 A late Iron Age to Early Romano-British field system to the east of Stone Street (**198**) is located within an area of proposed development. As a result, it will be archaeologically excavated.

9.4.52 A Romano-British ditch feature (**303**) found in trenching Area iv is located within an area of proposed development. As a result, it will be archaeologically excavated.

Early Medieval

*Embedded Design Measures*

9.4.53 Concentration of Anglo-Saxon pits (**295**)- in the Wessex Archaeology 2020 trenching area i. These pits are to be preserved in open space to the east of the causeway (**149**).

*Additional Mitigation*

9.4.54 The Two burnt pits of middle Saxon date (**174**) found in in 2017-2018 trenching in Field 1 are located within an area of Proposed Development resulting in direct physical impact. Therefore, the impact will be mitigated by archaeological excavation prior to construction:

Medieval

9.4.55 The main asset group of the Medieval period at Westenhanger Castle, including Post Medieval assets with clear association, will principally be mitigated through scheme design, associated with operation.

9.4.56 However, some temporary impacts for mitigation during construction is discussed below, along with any archaeological mitigation, where appropriate.

## **Westenhanger Castle and Deerpark**

### *Embedded Design Measures*

- 9.4.57 Temporary changes within the settings of Westenhanger Castle (**SM6/LB5**) and its barns (**LB1**) would be caused by construction activity through increased dust, noise and vehicle movement. Negative impacts arising from these changes would be mitigated through use of fencing, hoarding and bunding, damping down of the construction area. The flow of construction traffic would be controlled through and around the application site using traffic management i.e. control of vehicle movement through site speed limits and defined routes (refer to Chapter 16: Transport and the Outline CoCP (ES Appendix 4.17)).
- 9.4.58 Construction may result in negative, temporary changes to the setting of Westenhanger Castle, which could discourage some potential custom to Castle activity during the construction phase. This, however, is not likely to impact to the Castle's heritage significance and therefore is not within the remit of this chapter to assess.
- 9.4.59 The Castle (**SM6, LB5**) and Barns (**LB1**) will be left undisturbed physically under the OPA proposals. Features within the Scheduled Area of the Castle will also be left undisturbed under the OPA proposals (**42/259, 45/285, 53, 54, 259, 266, 267, 268 269**). The causeway to the Castle (**149**) will be preserved and brought back into use as the Castle's main (non-vehicular) approach. Its connection to the Castle will be restored, enhancing the significance of both the Castle and the causeway. There may be some limited physical impacts to the causeway's surface in order to create a surface for cycleway/ footpath and crossing points along it but these will be minimised. Water features south of the Castle and east of the causeway (**147, 148**) will be preserved for their historic value as well as their importance as a habitat for great crested newts and reptiles. There may, however, be some groundworks required in order to re-water this area. The route of the Pound House Track (**158 and 259**) will be preserved as a cyclepath/footpath between two blocks of built development. There may be some limited physical impacts to it in order to create the path.
- 9.4.60 The filled in ditch (**222**) represents part of the western boundary of the Westenhanger deerpark (**154**). The existing field boundary which follows the line of the ditch in this area will be enhanced with advanced tree planting to provide the feature with greater prominence in the landscape of Otterpool Park.
- 9.4.61 Design mitigation for the setting of Westenhanger Castle and its related features is discussed further under 'Scheme Design and Mitigation of Permanent Operational Effects' below. will be preserved in situ under the current plans.
- 9.4.62 Although some assets will be preserved in situ, they will experience change to their settings from the proposals. Design mitigation for undesignated Westenhanger Castle assets is discussed further under 'Scheme Design and Mitigation of Permanent Operational Effects' below.
- 9.4.63 As with Westenhanger Castle (**SM6, LB 1, LB5**) itself, its individual archaeological components within the scheduled area (**42/259, 45/285, 53, 54, 259, 266, 267, 268 269**) will be screened from construction activity by appropriately designed hoarding. This will mitigate temporary impacts to setting from construction.

### *Additional Mitigation*

- 9.4.64 There is no additional mitigation required for the Castle itself (**SM6, LB1, LB5, BH34**) at this stage. The only additional mitigation required during construction is an archaeological watching brief during demolition of modern Racecourse buildings within its outer court (which is a condition of the outline Scheduled Monument Consent received for this work).
- 9.4.65 The site of the walled Tudor Garden (**166/227**) will not be developed. However, further evaluation may be undertaken to inform the details for the re-imagining of the asset within the Masterplan. Mitigation in the form of excavation will be undertaken if the re-creation of the garden requires groundworks or tree planting which might damage the buried archaeological remains.
- 9.4.66 Elements of the Castle's deerpark (**154**) will be subject to archaeological mitigation in the form of excavation. There will also be opportunities for further desk-based studies on the deerpark using historic maps and records which will increase our knowledge.
- 9.4.67 Channels north of the Racecourse Lake (extant ditches **138, 139, 128/137**) are potentially connected with the Castle. They will be retained if possible (see the Strategic Design Principles (ES Appendix 4.3) (ES Appendix 4.3) and ES Appendix 7.3 Figure 2). However, as a worst case scenario (filling in and not preserving them) is given here, it is assumed that they will be directly impacted by development. They will be subject to archaeological mitigation in the form of excavation, if required. Some of these ditches may relate to the former outfarm (**BH23**) which will also be directly impacted and will also be included in this archaeological mitigation.
- 9.4.68 Just to the south of the Castle, the trial trenching revealed several post-Medieval features (**229, 228**) which may be associated with the Castle complex or the non-extant outfarm (**BH23**) and may be partially physically impacted by groundworks for landscaping or a cyclepath/footpath. These, as well as the remains of **BH23** will be subject to mitigation to be defined in the heritage strategy following further evaluation work.
- 9.4.69 The following assets have been characterised by further evaluation and located within an area of Proposed Development resulting in direct physical impact. Therefore, the following assets will be mitigated by archaeological excavation prior to construction:
- Activity associated with Medieval and Post Medieval activity in the deerpark located across trenching Areas i, ii and iv including ditches and pits (**299, 301**) and the potential boundary ditch to the deerpark (**292**).
  - Tudor Brick Wall (**288**) of unknown structure- 2020 trenching Area viii.

### **Other Medieval assets**

#### *Embedded Design Measures*

- 9.4.70 An area of Medieval ridge and furrow (**122**) is located to the west of Barrow Hill, Sellindge within an area of dense woodland. The ridge and furrow is located within the existing Harringe Woodland which will be left in situ as historic woodland and therefore not directly impacted.
- 9.4.71 No mitigation is therefore proposed for these assets.

### *Additional Mitigation*

- 9.4.72 Seven assets lie outside the application boundary but represent archaeological features such as Medieval ditches that may extend into the application site (**75, 76, 77, 79**) and may therefore be physically impacted by the Proposed Development. However, no evidence of these assets extending into the application site has not been identified and therefore no mitigation is proposed for assets **76, 77, 79**. Evaluation

within the application site will consider the presence of asset **75** within the application and if identified, mitigation would be in the form of archaeological mitigation.

- 9.4.73 The following Medieval assets are anticipated to be directly impacted by built development, roads and water infrastructure and will be subject to archaeological mitigation in the form of excavation: ditch (**179**) Field 1; ditches (**188, 186**) Field 2, boundary ditches (**197**), pond or hollow (**201**) Field 6.
- 9.4.74 The following assets have been characterised by further evaluation and located within an area of Proposed Development resulting in direct physical impact. Therefore, the following assets will be mitigated by archaeological excavation prior to construction:
- Medieval extraction pit (**265**)- trenching Area viii.
  - Edge of Medieval occupation area (**294**)- trenching Area vi.

## Post-Medieval

### **Folkestone Racecourse**

#### *Embedded Design Measures*

- 9.4.75 The racecourse (**153**) will be largely lost to new built development and to the creation of public open space. The racecourse lake will however be retained. A decision has been taken (guided by Historic England) to design the public park in this area to evoke a sense of Westenhanger Castle's former landscape, hence it is not possible to retain the racecourse within this vision. However, there will be references to the racecourse in the design of the new Castle Park. This may involve re-creating or echoing the viewing boxes or mobile towers in some way within the new Castle Park to be created.
- 9.4.76 The winner's enclosure (**279**) and Ornamental Pond (**280**) at Folkestone Racecourse will be preserved in situ in open space as part of the park to be created around Westenhanger Castle.

#### *Additional mitigation*

- 9.4.77 The impact to the racecourse (**153**) will be mitigated by archaeological survey and the grandstand buildings will be subject to historic buildings survey prior to demolition.
- 9.4.78 The buildings at Folkestone Racecourse (**271-278** and **281**) are proposed for demolition to make way for new development at Otterpool Park. They will be subject to building recording, if warranted, prior to their demolition.

### **Post-Medieval settlement activity**

#### *Embedded Design Measures*

- 9.4.79 Principally, the known Post Medieval settlement activity comprises extant buildings. Where these buildings are to be retained, the impacts will principally arise from changes within the setting of these assets. Construction activity will have a temporary impact, discussed here, while Proposed Development will have a permanent impact, discussed below. Where a building is proposed for demolition, mitigation is discussed here for construction impacts.
- 9.4.80 Temporary impacts to heritage assets arising from changes within their setting would be caused by construction activity through increased dust, noise and vehicle movement. These impacts would be mitigated through use of fencing, hoarding and bunding, damping down of the construction area. The flow of construction traffic would be controlled through and around the application site using traffic management, i.e. control of vehicle movement through site speed limits and defined routes (refer to ES Chapter 16: Transport and the outline CoCP (ES Appendix 4.17)). This mitigation would reduce temporary changes within the settings of Little Rhodes (**LB10**), Stream Cottage and Grove Bridge Cottage (**LB11**), The Royal Oak Public House (**LB15**),



Railway Cottage (**LB17**), Upper Otterpool (**LB20**), Belle Vue House (**LB21**), Little Berwick (**LB27**), Somerfield Court (**LB28**), Berwick House (**LB29**), Barn Complex about 66 metres west of Somerfield Court (**LB33**), Rhodes House (**LB35**), Otterpool Manor and barns (**LB38**) as well as Lympe Conservation Area (**CA1**) and Sandling Park (**RPG2**).

- 9.4.81 The above mitigation of temporary effects would also reduce changes within the setting of the historic landscape and the settings of non-designated built heritage assets. These would include: **BH1, BH6, BH13, BH17, BH25, BH28, BH32 and WS3, WS2, WS4, WS5, WS6, WS7, WS8, WS9, WS10, WS11, WS12, WS13, WS14, WS15, WS18 and WS36.**
- 9.4.82 Designated assets are discussed further under Scheme Design and Mitigation of Permanent Operational Effects below.

#### *Additional Mitigation*

- 9.4.83 The following non-designated Post-Medieval built heritage assets are due to be demolished as part of the proposals: the Modern part of the courtyard of **BH32** (Hillhurst Farm), **FS2** (Mink Farm, including the White House), and, potentially, Farm Cottage (**WS35**). Of these assets, **BH32** (Hillhurst Farm) will be subject to building recording as mitigation.
- 9.4.84 No mitigation is proposed for the following built heritage assets to be demolished or demolished/retained **FS1** (Somerfield Court Farm), **FS2** (Mink Farm), **FS3** (Red House Farm), **FS4** (Benham Water Farm) and **FS5** (Elms Farm) as this assessment has determined that they will experience only slight impacts as a result of the Proposed Development as they are of **negligible** heritage value. **BH3** and **BH6** will not experience any impacts being outside the OPA boundary, so no mitigation is proposed.
- 9.4.85 Although the historic buildings of Hillhurst Farm (**BH32/282/283**) will be retained within the Proposed Development, some changes to the fabric of the building are suggested. As a result, Hillhurst Farm structures (**282/283**) will be subject to building recording to record its historic layout and fabric prior to any changes for its repurpose within the Otterpool Park development.
- 9.4.86 All buildings within the site which are proposed for demolition have either been screened by Historic England's Enhanced Advisory Service for potential listing or have been assessed by Arcadis, or both. Where buildings are not included within this assessment, they are considered to be of no or negligible heritage value and therefore, no mitigation has been proposed.

#### **Other Post-Medieval features**

##### *Embedded Design Measures*

- 9.4.87 There are no embedded design measures for post-medieval archaeological features.

##### *Additional Mitigation*

- 9.4.88 The demolished 19<sup>th</sup> century Sandling Farm (**BH38**) lies east of Hillhurst Farm in an area associated with the proposed A20 upgrade. Another non-extant 19th century farm north-west of Berwick House (**BH19**) lies within an area planned community orchard. As it is unclear if these assets survive as below ground remains, trial trenching will be undertaken at Tier 2 to determine this and then, if needed, the evaluation will be followed by archaeological mitigation in the form of excavation.
- 9.4.89 Post-medieval features identified in Fieldwork in 2017-18 that will be physically impacted are: brick kiln (**199**) in Field 6; cobbled track (**209**); ring ditch of probable post-medieval date (**223**) and ditches in Field 10. **199, 209 and 223** will be mitigated through excavation.

9.4.90 A post-medieval extraction pit (**261**) found by Trial Trenching (Area viii) in 2020 will be physically impacted and will be mitigated by archaeological excavation.

#### Modern

9.4.91 No mitigation is proposed for modern (1914 onwards) assets apart from military remains – see below.

#### **Military Remains**

##### *Embedded Design Measures*

9.4.92 The following extant airfield features within the OPA boundary (**28, 36, 37, 60, 69, 126, 152, 162 / BH42**) will not be physically impacted by the Proposed Development as they will be preserved in situ under open space and /or trees to be retained,. However, they will experience change to their settings from the proposals.

9.4.93 A probable retracted Pickett Hamilton Fort (**60**) in Link Park which is presumed to still be extant below ground, will be subject to evaluation. If it is shown to survive it will be preserved under open space. Documentary and air photo research will also contribute to understanding their future interpretation. It will experience change to its setting.

9.4.94 Design mitigation for the setting of the extant airfield features will include hoarding, measures to limit dust and noise and the flow of traffic during construction.

##### *Additional Mitigation*

9.4.95 The following airfield features (**4, 29, 33, 39, 40, 48, 61, 127, 129, 150, 151, BH43-47**) will be physically impacted by built development, structure planting or (potentially) by SUDs infiltration areas. Following trial trenching, archaeological mitigation will be carried out in the form of documentary and air photo research and either excavation or survey as appropriate.

9.4.96 The military aircraft crash sites (**MR1, MR2, MR3, MR4**) recorded on the HER all lie outside the application site. However, some may not be accurately provenanced so it is possible that the remains could be within the application site. It is not known if any of the crash sites preserve any human remains or remains of the crashed aircraft, as this information is not available on the HER. It is, however, likely that the crash sites were cleared at the time or shortly afterwards. Added to this are 30-35 further crash sites recorded by the Zetica UXO desk study for the site (Ref 9.19) but which are not recorded on the HER. Most of these aircraft crashed within Lympne Airfield (**27**) between 1940 and 1941 and it is likely that all were cleared at the time. All military aircraft crash sites in the United Kingdom are controlled sites under the Protection of Military Remains Act 1986. If any human remains were found these would be classed as a war grave. A licence must be obtained from the Ministry of Defence (MOD) to authorise any disturbance of these sites and a licence to excavate must be issued from the Joint Casualty and Compassionate Centre (JCCC), part of the Defence Business Services (DBS). Prior to a licence being issued the applicant is required to research and supply the JCCC with the location of the crash site, type of aircraft and the fate of the crew. A licence will not normally be issued if human remains are likely to be found at the site and also if there are significant amounts of unexploded ordnance at the site. Preferred mitigation would be avoidance of these remains. Further evaluation work around these locations would be required at Tier 2 in order to locate these remains and avoid them. If they are detected on site during construction or archaeological mitigation all work should stop, and the remains should be reported.

9.4.97 Military remains associated with the airfield were revealed by the geophysical surveys in the 2017-2018 fieldwork season. Those that will be impacted and subject to archaeological mitigation are: 'Z' shaped anomaly east of Lympne Industrial Estate (**231**), possible aircraft dispersal pen (**235**), anomalies (**234, 235, 236**) and former taxi ways (**232, 233**). These have not yet been evaluated by trial trenching. Following trial trenching, archaeological mitigation

will be carried out in the form of documentary and air photo research and either excavation or survey as appropriate.

9.4.98 A series of military buildings are proposed for demolition to make way for new development at Otterpool Park, which would result in the physical removal of the built heritage asset. The following buildings are currently proposed for demolition:

- Munitions store (**WS20**) south of the A20 within Red House Farm and Benham Business Park, including the individual huts (**WS30-WS34**) forming **WS20**. These are either to be retained or demolished but it is assumed demolished.
- Possible wartime depot on Stone Street (**WS19**) to either be retained or demolished, but assumed demolished.

9.4.99 Buildings (**WS19, WS30-WS34**) will be subject to building recording prior to their demolition.

### **Other Modern assets**

#### *Additional Mitigation*

9.4.100 Impacts to **WS12** (Rose Cottage), will be mitigated through archaeological watching brief of groundworks involving the land below the cottage, in order to record any earlier structures. The property itself will not need historic building recording.

### **Undated Assets**

#### *Embedded Design Measures*

9.4.101 There are no relevant embedded design measures for these assets.

#### *Additional Mitigation*

9.4.102 Part of the earthworks (**WS16**) located close to Upper Otterpool (**LB20**) will be archaeologically evaluated followed by mitigation by earthwork survey and excavation. This applies to the remains which would be impacted by advanced planting and creation of a cycle path. Parts of **WS16** would be maintained under open space and therefore likely undisturbed.

9.4.103 Undated archaeological features found during the 2017-2018 archaeological evaluations (**169, 170, 171, 207**) close to Upper Otterpool may be impacted by landscaping (potentially SUDs) and structure planting. Impacts to them will be mitigated by archaeological excavation, if required.

9.4.104 Located immediately south of the railway line, within the centre of site, are three undated and unknown assets (**123, 124, 125**). These are anticipated to be directly impacted by SUDs (potentially), wetland creation or built development and will be archaeologically evaluated during Tier 2 and the appropriate mitigation applied if required, i.e. excavation.

9.4.105 Linear geophysical anomalies at Harringe Court (**111**) would be impacted by the Wastewater Treatment facility. The anomalies are undated and will be subject to evaluation to allow for detailed mitigation.

9.4.106 Geophysical survey conducted in 2017 and 2020 revealed the presence of a range of archaeological features across the application site, some of which are undated and are yet to be evaluated by trial trenching. The following will be subject to evaluation at Tier 2 to allow for mitigation. These assets are:

- Undated linear anomalies (**243, 244, 245, 246, 247**) west of trenching area ix, north of the A20.
- Geophysical anomalies **308, 309, 310, 311, 312** identified through survey at Land at Lyveden (on Stone Street), in September 2021.

- Irregular linear anomalies, possible ditch features (**240**)- identified north of Harringe Court, south of the East Stour River.
- Linear anomalies (**242**) to the west of Barrow Hill.

9.4.107 The following assets have been identified by further trial trenching evaluation in 2020 and located within an area of Proposed Development resulting in direct physical impact. Therefore, the following assets will be mitigated by archaeological excavation prior to construction:

- Linear anomalies (**250, 251, 252**)- trenching Area i.
- Linear anomalies (**260**)- 2020 trenching Area viii.
- Cluster of pits (**291**)- trenching Area iv.
- Undated features representing various concentrations of activity in trenching Area i (**296, 297, 300**).
- Undated ditches and pit (**304/305**)- trenching Area i.
- Undated features (**306**)- trenching Area ix.
- Undated features (**307**)- trenching Area v.

9.4.108 These remaining undated archaeological assets will also be impacted but have not been subject to trial trenching: **48, 173, 181, 202, 204, 205, 211, 224, 243, 244, 245, 246, 247**. Following evaluation suitable mitigation will be proposed.

Historic landscape (Figure 9.9, ES Appendix 9.1)

#### *Embedded Design Measures*

9.4.109 Hedges and woodland contribute to the historic character of the application site. Those historic hedges that have been assessed to meet the criteria for protection under the Hedgerow Regulations of 1997 are marked on Figure 9.9 in ES Appendix 9.1. A percentage of certain of these hedges will be breached in order to create new roads, cycleways and footpaths. As the location of secondary routeways is not yet fixed and as there is flexibility in where exactly the primary routeways will be located it is not possible to show the locations of the breaches on a plan at OPA stage. The size of the breaches will be kept to a minimum and existing gaps in hedges will be utilised where possible. The Open Space and Vegetation Parameter Plan (ES Appendix 4.2) shows the hedges and woodland to be retained.

9.4.110 Care will be taken not to cause long term damage to the remainder of the hedge in each case. As part of the OPA the removal of hedges will be assessed under the Hedgerow Regulations by the LPA. Decisions to remove whole or parts of important hedges would need to be justified.

9.4.111 Any construction activity in the vicinity of historic hedgerows or historic woodland, as marked on Figure 9.9, would be managed to avoid causing accidental damage to them. Where practicable, exclusion zones would be set up around the hedgerows and historic woodland to avoid accidental damage. The CoCP (ES Appendix 4.17) sets out measures that will be in place for protecting hedgerows.

#### *Additional Mitigation*

9.4.112 No additional mitigation is required.

## Scheme Design and Mitigation of Permanent Operational Effects

9.4.113 The Proposed Development will take place in phases over a period of approximately 19 years therefore construction and operational effects will occur concurrently. Detailed design proposals including heritage mitigation will be brought forward in the future Tiers 2 and 3 submissions. Where appropriate, additional archaeological assessment in Tier 2 will be used to support detailed design proposals in Tier 3.

9.4.114 A Heritage Strategy (ES Appendix 4.12) has been devised that sits alongside this chapter. The Heritage Strategy (ES Appendix 4.12) details design mitigation and enhancement of heritage assets and groupings and incorporates commitments for how the design will be achieved. A framework to deliver these outcomes also forms part of the Heritage Strategy (ES Appendix 4.12). Design proposals at Tier 2 and 3 stages, where applicable, will be submitted in general accordance with the Heritage Strategy (ES Appendix 4.12). However, information required to meet the requirements of the EIA Regulations is included in the ES chapter itself.

### Embedded Design Measures

9.4.115 Some mitigation has been embedded in the design. Such as:

- Preservation 'in situ' i.e. the heritage assets are left undisturbed by the creation of open space;
- Screening by trees and hedgerows and creation of buffers of open space to preserve setting;
- Removal of visual detractors (e.g. Modern racecourse buildings around the Castle) to improve the setting of heritage assets;
- Opening up views and reinstating historic routeways such as the track to the Pound House (**158**) and the Castle causeway (**149**);
- New built development being designed to respect and echo the local vernacular. This is in the Strategic Design Principles (ES Appendix 4.3) document which informs the ongoing design. A Kent Vernacular Study has also been produced as part of the OPA;
- Reducing developable areas around Westenhanger Castle to sustain the rural setting which makes an important contribution to its significance;
- Careful design of built development density and heights, landscaping, interface of green spaces and built areas and retention of key historic features in order to preserve and enhance setting.
- Maintaining, managing and monitoring open space in order to preserve heritage assets effectively and to conserve their significance. This includes as-yet undiscovered archaeological remains of national importance that may be discovered in the future;
- Maintaining and managing historic structures, e.g. the Battle HQ (**28**) and air raid shelter (**BH42**), to prevent them being vandalised; and
- Actively conserving historic buildings and maintaining appropriate long-term uses for them, e.g. Hillhurst Farm (**BH32**) and Westenhanger Castle (**SM6, LB1, LB5**).

### Additional Mitigation

9.4.116 An iterative appraisal of the Proposed Development taking into account the embedded design measures and good practice was undertaken to identify any potential significant effects that would require additional mitigation during operation. No effects

on cultural heritage receptors that could be significant were identified during the operational phase.

9.4.117 Due to the flexibility of design, embedded in the Parameter Plans (ES Appendix 4.2), there is the potential for the above mitigation measures and the overall operational effect to change. As a result, where appropriate, operational effects are given in a range to account for the potential changes in setting to assets, as a result of the potential change in location to large pieces of infrastructure. Assessment of the existing Parameter Plans (ES Appendix 4.2)' operational effects is addressed first, with any deviation considered after, to discuss potential changes.

#### Enhancement Measures

9.4.118 Additional measures alongside the mitigation above would also be put in place. These measures would increase public understanding of the historic environment in the vicinity of the site and connect the local community with the heritage resource. These would include:

- Community engagement, for example, involving local groups in researching and recording heritage assets;
- Involving local interest groups in deciding how assets are preserved and interpreted;
- On-site interpretation boards containing information on heritage assets (including that derived from the archaeological investigations);
- Open days for the public during excavations;
- Temporary displays of artefacts found from the application site;
- Re-creation of elements of the historic environment;
- Dissemination of data derived on the historic environment on the application site to the local population, general public and academia;
- Improvement to public access and enjoyment of heritage assets; and
- Creation of a Heritage Trail.

9.4.119 The following enhancements may bring beneficial effects:

- Benefits involving protecting certain vulnerable assets from gradual erosion through ploughing and protecting them under open space; and
- Benefits of active management of certain built heritage assets that are currently decaying through neglect.

9.4.120 Phasing of construction is not yet known therefore it is not possible to give the timescales for the delivery of any heritage benefit. Timescales for delivery of benefits for the Castle Phase are given under discussion of Westenhanger Castle and deerpark below.

9.4.121 Discussion below is of the heritage assets which are considered for mitigation by design and discussed by asset group where appropriate.

## Operational Measures (Embedded and Additional) by Asset/group of assets

Late Prehistoric: Bronze Age

### **Barrows West of Barrow Hill**

#### *Embedded Design Measures*

9.4.122 Barrows **58, 113, 114, 115, 130** and **135** will be preserved 'in situ' under one unified area of public open space. The important key views between the barrows forming the group west of Barrow Hill, Sellindge will be preserved, i.e. views between **58, 113, 114,** and **135,** will be maintained. The intervisibility between the barrows east and west of Barrow Hill, Sellindge will not be maintained within the design. However, there is no clear evidence that these groups of barrows were intervisible in prehistory, nor are they clearly intervisible at present, therefore this is not a key view. Limitations to flexibility within the Development Areas and Movement Corridors Parameter Plan (ES Appendix 4.2) will ensure the preservation in situ of barrow **115** and **130** through the removal of deviation opportunities of the busway, cycle path and emergency vehicle route near barrow **130**. There are further limitations to the deviation of the busway, cycle path and emergency vehicle route to no more than 20m of flexibility east and west of the scheduled area of barrow **115** and **130**. Structure planting surrounding the northern edge of this public open space will be discontinuous to allow for visibility from Barrows **58, 113, 114** and **135** north and north-eastwards to the barrows on the Downs.

9.4.123 Barrow **131** to the north-west of and slightly downslope of the barrow group will be preserved within its own small area of public open space. It is not shown on the Parameter Plans (ES Appendix 4.2) but is detailed in the Heritage Strategy (ES Appendix 4.12) and an illustration of how it might be arranged is featured on the Illustrative Masterplan (ES Appendix 4.5).

9.4.124 These barrows will be interpreted by sign boards and by inclusion on a Heritage Trail which will link them to the other preserved barrows within the OPA site. The Heritage Strategy (ES Appendix 4.12) contains more detail on the strategy for preserving and enhancing the setting of the barrow group.

#### *Additional Mitigation*

9.4.125 No additional mitigation is required.

### **Barrows East of Barrow Hill**

#### *Embedded Design Measures*

9.4.126 Barrows **44** and **136** will be preserved 'in situ' under public open space. The open space around Barrow **44** is too small to be shown on the Parameter Plans (ES Appendix 4.2). However, it is detailed in the Heritage Strategy (ES Appendix 4.12) and an illustration of how it might be arranged is featured on the Illustrative Masterplan (ES Appendix 4.5).

9.4.127 The intervisibility between the barrows east and west of Barrow Hill, Sellindge will not be maintained within the design however there is little evidence that these groups of barrows were intervisible in prehistory nor are they clearly intervisible at present, therefore this is not a key view.

9.4.128 The lack of a generous amount of open space to be afforded around Barrow **44** will have the effect of altering its open rural setting which will adversely impact the significance of the barrow. The key (pre)historic view between this barrow (**44**) and the barrow to the south (**136**) will be lost due to the precedence of preserving other important views (particularly the scheduled barrow group to the west of Barrow Hill).



The detailed masterplan for these areas where Barrows **44** and **136** are located will be designed to protect the barrows in green space. Both barrows will experience a positive benefit from being taken out of ploughing regimes which are eroding them over time. Additionally, these barrows will be interpreted by sign boards and by inclusion on a Heritage Trail which will link them to the other preserved barrows within the OPA site.

9.4.129 Barrows **46**, **116**, **155** and **156** lie outside the application boundary and their settings will not be impacted due to distance from the scheme and intervening topography (**155** and **156**) or the enclosed nature of their locations (**46**, **116**).

9.4.130 The information derived from the trial trenching (ES Appendix 9.18 and Appendix 9.21) and from future excavation will be used to inform on-site interpretation of the barrows within the OPA boundary. The Heritage Strategy (ES Appendix 4.12) contains more detail on the strategy for preserving and enhancing the setting of the barrow group.

#### *Additional Mitigation*

9.4.131 No additional mitigation is required.

#### **Remaining Bronze Age Assets**

9.4.132 For many of the archaeological assets, permanent impacts from the construction phase would continue into the operational phase (as they are permanent) but would not give rise to additional effects. Therefore, no additional mitigation during operation is considered necessary for these assets.

#### Iron Age to Romano-British

##### **Romano-British Villa**

##### *Embedded Design Measures*

9.4.133 The Parameter Plans (ES Appendix 4.2) have been designed to incorporate the remains of the recently discovered Romano-British Villa (**167** including most of the area of ditches **168**) into public open space so that it will be physically preserved 'in situ'. The significance of this asset is largely derived from its evidential value, i.e. its potential to answer research questions about aspects of our Romano-British past. Its setting is not the major contributor to its significance. However, an adequate area of open space has been allowed around the known Villa buildings and surrounding ditches to allow the asset to be appreciated and understood. It is to be incorporated into the new Country Park and will be interpreted for the public as part of that open space. Further evaluation and excavation may be selectively used to extrapolate more information about the villa and its ancillary buildings to inform appropriate management and to inform the public. The environmental evidence contained within the waterlogged pits and ditches that form part of the villa complex on its eastern side would be lost if the groundwater table drops as part of the development. However, groundwater tables in this area are likely to remain as current levels or possibly may increase due to additional recharge occurring upstream and infiltration which will still occur due to the soft landscaping that will remain in place (Chapter 10 Geology, Hydrology and Land Quality).

9.4.134 The Heritage Strategy (ES Appendix 4.12) outlines various options for the long-term preservation, management and display of the villa. The most appropriate strategy will be confirmed at Tier 2 and the detail of the preservation, management and display proposals will be confirmed at Tier 3.

9.4.135 The flexibility of the Parameter Plans (ES Appendix 4.2) is not anticipated to result in a change of setting to the villa site. A restricted deviation of up to 5m to the east, is implemented on a nearby cycleway, to maintain the villa's preservation in situ. As noted above, any intrusive works for ecological mitigation (water vole ditches), and /

or for the cycleway, in proximity to the villa will be mitigated by archaeological watching brief during construction.

#### *Additional Mitigation*

9.4.136 No additional mitigation is required.

#### **Remaining Iron Age and Romano-British Activity**

9.4.137 For many of the archaeological assets, permanent impacts from the construction phase would continue into the operational phase (as they are permanent) but would not give rise to additional effects. Therefore, no additional mitigation during operation is considered necessary for these assets.

9.4.138 Stone Street (**5**) is a Roman road which runs through the eastern portion of the application site. The Parameter Plans (ES Appendix 4.2) include the creation of a new town centre street to the west of Stone Street. Stone Street (north of Newingreen and south of the railway station) will not be a through route for traffic resulting in a benefit to this asset.

#### Medieval

#### **Westenhanger Castle and Deerpark**

##### *Embedded Design Measures*

9.4.139 The Proposed Development has been designed to enhance the setting of and views from and to the scheduled monument of Westenhanger Castle (**SM6**) and its Grade I listed buildings (**LB1, LB15**) which lie at the northern part of the application site.

9.4.140 The Castle will be safeguarded for a potential commercial and community use (see Chapter 2). The Tier 2 Masterplan and Design Code will include further detailed designs for enhancing the setting of Westenhanger Castle. There is the potential for detailed changes within the Castle and its grounds to support its future use (likely to include sensitive new building, carparking, repair of the Listed Barns, landscaping etc). However, details of the quantum of new buildings are still under discussion and a feasibility study is being prepared, therefore no development is shown on the Parameter Plans (ES Appendix 4.2) or Illustrative Masterplan (ES Appendix 4.5). The heritage consultees and the LPA have agreed that, rather than defining what works will be taking at the Castle at this Tier 1 outline stage, a CMP (ES Appendix 9.25) for the Castle will act as a control document for the outline application and will define the conservation principles that will guide the future development. The CMP (ES Appendix 9.25) has been submitted as part of the outline application, and it is anticipated that this CMP (ES Appendix 9.25) will be subject to a planning condition. A full planning application may be required to assess the impacts to these future works (further description of the process is provided in Chapter 2: EIA Approach and Methodology).

9.4.141 Assessment of operational effects to Westenhanger Castle (**SM6, LB1, LB15**) and its associated features have been made below, based on the Parameter Plans (ES Appendix 4.2). Elements that are not shown on the Parameter Plans (ES Appendix 4.2) (such as the reimagining of the Tudor Garden – **166**) are secured in the Heritage Strategy (ES Appendix 4.12). Ranges are given to account for the flexibility of routeways and location of the town centre. Discussion of non-designated Heritage Assets that form part of the Castle's landscape and are to be preserved or partially preserved (such as **147, 148, 149, 154, 158, 166**) are also discussed below, with the Castle.

9.4.142 The original OPA submitted in 2019 was limited to providing space around the Castle as, at that time, it was in private ownership and outside of the project's control. The applicant has since acquired the Castle, its barns and 14 acres of adjoining land. This has enabled the application site to be extended to include The Castle which now

means it can be fully integrated into the new town. This provides better prospects for its long-term sustainable future as well as providing real opportunity to open up views of the Castle and restore its presence in the landscape.

- 9.4.143 The current usage of the land to the south of the Castle is as a former racecourse (Folkestone Racecourse, disused since 2012), now comprising: lake, rough grassland, river, channels, a marshy area and (principally) arable land. While preserving open space this current land-use does not engender understanding of the former deerpark (154) or help to place the Castle in its historic setting. The Castle is currently cut off from what was its deerpark and gardens and its setting is therefore compromised. It's historic southern approach (149) has been long abandoned and has been dislocated by the imposition of the racecourse in the late 19th century. A new eastern access has been created which was not the route by which the Castle was designed to be approached. Furthermore, the Castle, although well maintained and managed, is hidden away behind trees and modern racecourse buildings and is not readily understood or appreciated from outside the Castle complex. It is little visited apart from private hires.
- 9.4.144 During operation, Westenhanger Castle/Manor (SM6/LB5/BH34) and the Barns at Westenhanger Castle (LB1) will experience changes to their setting as a result of the visual changes to the surrounding landscape. Although the immediate setting of these assets will not experience change, the proposed built development to the east, west and south will considerably alter the character of the wider landscape. However, the proposals provide for the historic connections between these assets and the Medieval and the Post-Medieval deerpark and other landscape features to be enhanced, which will increase the significance of these assets. Additionally, the development will result in an increase in the numbers of visitors and customers coming to the Castle and barns which will help it to remain viable. This will form the scope of the feasibility study of Westenhanger Castle, as part of Otterpool Park. These are benefits and in accordance with NPPF para. 197(a and b).
- 9.4.145 The Proposed Development will remove some of the open land to the south, west and east of the Castle (SM6/LB5/LB1). The loss of open space around the Castle will be offset by the careful design of the generous envelope of open space that will be re-established around it. This open space will take the form of a town park for the settlement ('Castle Park') located largely where the racecourse is now. The Castle's former landscape, which included an extensive deerpark (154), water features (147 and 148), river, orchards (161), ornamental garden (166) will be evoked by the design of the new park. The Castle's southerly causewayed approach (149) will be reinstated thus re-establishing the intended approach to the Castle. The design of the masterplan has been informed by analysis of key views from and to the Castle and within its proposed 'Castle Park' carried out by the project in 2021. These views and sketches showed the current views and proposed views with proposed landscaping in place and showing the likely scale of the new buildings.
- 9.4.146 Views from and to the south side of the Castle and barns will be improved by the thinning out of trees in the moat and by the removal of inappropriate modern racecourse stables within the outer court. The latter has received Scheduled Monument Consent in principle (in ES Appendix 9.26).
- 9.4.147 To the west of the scheduled area of the Castle, where there are currently arable fields, there will be built development (up to 15m height closest to the Castle and up to 18m height beyond that). The built development will be fronted by open space. To the east of the scheduled area of the Castle, where there is currently grassed areas including the eastern part of the racecourse, there will be built development of up to 15m high. This new built development will incorporate a new High Street. These proposed areas of built development represent an encroachment on the setting of Westenhanger

Castle. Design mitigation will ensure an area of open space south of the Castle to maintain some of the existing setting and limit encroachment.

- 9.4.148 To the east, the area between the new built development and the scheduled area of the Castle will be redesigned as part of the new Castle Park. The winners circle of the racecourse and the ornamental pond (**279** and **280**) will be retained and given more prominence in the park design. Grandstand buildings in this area (**273, 276, 277**) and racecourse offices will be removed and views to the Castle will be opened up from the east. Their removal will provide a larger open space between the Castle and built development to the east than at present, a distance of approx. 110m compared to 70m currently. The line of the track to the former Pound House on Stone Street (**158**) will be preserved and echoed as a footpath/cyclepath running north west to south east between built development blocks. There will be no deviation to this routeway so that the historic line of the Pound House Track will be preserved. To the south and south east of the scheduled area of the Castle, beyond the racecourse lake (which is to be retained) where there is currently racecourse and arable fields, there will be built development up to 18m in height. This built development will incorporate a new town centre and the continuation of the new High Street. To the south west of the scheduled area, where there is currently the racecourse and arable fields, there will be new built development south of the river and either side of the causeway (**149**). The new built development here will be up to 18m high. Having new built development within the former deerpark (**154**) will ensure that the Castle is not isolated from the rest of the new town and that it can be linked functionally and visually with the new community which will be beneficial for place-making. The new built development either side of the causeway will provide connectivity between the town centre to the east and the rest of the development to the west and south, and ensure this space is overlooked.
- 9.4.149 Housing will be well-designed (following careful design coding). The Tier 1 Strategic Design Principles (ES Appendix 4.3) set principles to be followed in the Tier 2 and Tier 3 submissions. The outer edges of the development blocks fronting sensitive open spaces (including the new 'Castle Park' and the causeway) will be of lower density to create more permeable edges. A more detailed design code will be submitted at Tier 2 of the planning process. There will be an enhancement to the Castle setting rather than an adverse impact. The landscaping around the edge of the parkland will form screening to contribute to the reduction in encroachment on the Castle's setting. The planting will also be designed to contribute to a fluid and blended landscape approach, enhancing the overall character of the parkland and understanding of the Castle in a recreation of its original setting. Any association of this former setting was lost with the introduction of Folkestone Racecourse in close proximity of the Castle and therefore the proposals will allow for a new appreciation of the Castle and immediate environs. It will bring life and activity back to the Castle community and improve its financial prospects by having people living closer by.
- 9.4.150 The causeway (**149**), will be set within a wide strip of open space (minimum 65m) which will splay out to the north, providing views to the Castle and barns. The exact width of the buffer to be provided to the causeway will be confirmed in Tier 2/3 detailed design stages. The causeway has recently been scheduled and its future management and surfacing will be for further discussion and approved through a future Scheduled Monument Consent application. Further archaeological evaluation along the causeway is planned to take place prior to Tier 2. This evaluation will include the excavation of test pits and further trenches along the causeway, to further understand its character and condition and to inform potential future uses (e.g. pedestrian or vehicle access) within the masterplan. Sufficient information on the causeway is available for the purposes of the outline planning application.
- 9.4.151 The proposal is to restore and enhance this historic route to become a key (non-vehicular) access way through the proposed Castle Park, connecting the Garden

Town development to Westenhanger Castle and providing a pleasant path and cycleway from which to enjoy views across the landscape. The causeway will be designed to allow staged views northwards to the Castle and its barns, with the backdrop of the Downs behind. It is proposed that the causeway is lined both sides in trees and green spaces, though its character will change as it traverses the park (as would likely have been the case historically). At the south end of the causeway where it meets the A20 Ashford Road there will be an arrival point provided by carefully configured built development, open space and from public art. This will provide a sense of a threshold to the former deerpark and will encourage views to towards the Castle and the Downs beyond. There will be no deviation to the line of the proposed public routeway along the causeway so that its historic location will be preserved.

- 9.4.152 The new Castle Park and the plans for the Castle itself will improve appreciation of this nationally important but currently under-valued heritage asset. The park will be designed to evoke the sense of what would have been the landscaped grounds of this great house in its heyday and thereby will enhance its setting. The Castle's relationship with the wider local landscape will be better established and thinning out of trees to the south of the Castle and removal of Modern stable buildings will further enhance the views to and from the Castle. The water features to north-west of the lake (**147** and **148**) have potential to contain waterlogged archaeological remains although this is yet to be tested. They will be preserved as part of a wetland habitat area east of the Causeway (see Green Infrastructure Strategy ES Appendix 4.11 and the Strategic Design Principles (ES Appendix 4.3) which will be partially re-flooded as part of the scheme (see Water Cycle Study ES Appendix 15.2, Flood Risk Assessment and Surface Water Drainage Strategy ES Appendix 15.1). It is not anticipated that water levels within this habitat area will drop. In fact, the opposite will occur, thus any potential waterlogged remains in the area of **147** and **148** will not suffer desiccation. The walled Tudor Garden (**166**) will be represented by a new formal garden which evokes the Tudor gardens, although its exact layout is a subject for detailed design and will be informed by further archaeological investigations.
- 9.4.153 Westenhanger Castle and its landscape/deerpark features are a key element of the proposed new development and will be central to creating a sense of place for the new community. The new 'Castle Park' will be a publicly accessible green space which respects the memory and heritage of the historic deerpark that once existed on this site and provides setting and context to Westenhanger Castle. The new park will once again provide a setting to this nationally important heritage asset.
- 9.4.154 The revised Parameter Plans (ES Appendix 4.2) have Westenhanger Castle with its own indicative phase. Timescales for the delivery of the above heritage benefits to the Castle and its setting will be within 6-10 years of outline planning permission being given.
- 9.4.155 Deviation (as shown on the Development Areas and Movement Corridors Parameter Plan (ES Appendix 4.2)) could come from two aspects of infrastructure, around Westenhanger Castle. Proposed indicative roadways located within blocks of Proposed Development to the south west and east of the Castle have the potential to move closer to the open space. Where the proposed road is located on the edge of the development block, deviation is restricted to 5m in the direction of the open space, and deviation is restricted to 50m towards the open space where the roadway is embedded within the built development block. Restrictions in deviation towards the open space are designed to keep the roadways within the density of proposed built development, thus maintaining the open space and maintaining the proposed opening up of the Castle's setting to reflect its historic nature with open space surrounding it. There is the potential for the roadways to move 100m away from the Castle open

space which would be beneficial to reducing noise intrusion. The effects of deviation in the Parameter Plans (ES Appendix 4.2) of roadways is considered negligible.

- 9.4.156 The second potential deviation at the Castle is the proposed indicative cycleways and footpaths, which have a potential to move 100m, with no limitation in any particular direction. Deviation in these paths would be negligible to the setting of Westenhanger Castle, only through a change in how the open space south of the Castle is experienced.
- 9.4.157 Consequently, the flexibility in the Parameter Plans (ES Appendix 4.2) is not considered to result in any change in assessment to the Westenhanger Castle/Deerpark complex (**SM6, LB1, LB5, 149** and assets within).
- 9.4.158 Under the current proposals, those assets falling within the scheduled area of Westenhanger Castle (**SM6**) will be preserved in situ through the maintenance of open space around the Castle (**42/259, 45/285, 53, 54, 266, 267, 268, 269**). After the new development has been completed the views to the south will have been improved by landscaping and the re-instatement or reimagining of original Castle features i.e. the Tudor garden (**166**), causeway (**149**) and orchards.
- 9.4.159 The Heritage Strategy (ES Appendix 4.12) and the Castle CMP (ES Appendix 9.25) detail measures for the long-term management and operation of Westenhanger Castle and barns as well as for the open spaces which will be created within its deerpark.

#### *Additional Mitigation*

- 9.4.160 For many of the archaeological assets, permanent impacts from the construction phase would continue into the operational phase (as they are permanent) but would not give rise to additional effects. Therefore, no additional mitigation during operation is considered necessary for these assets.
- 9.4.161 For Westenhanger Castle there is no additional mitigation during operation under the current plans.

#### Post-Medieval

##### ***Post-Medieval settlement activity***

##### *Embedded Design Measures*

- 9.4.162 Much of the Post-medieval settlement activity in the OPA site and its immediate environs is houses and farms, some of which are listed. There are no Listed Buildings within the application site although the settings of certain Listed Buildings (**LB11, LB15, LB20, LB27, LB29** and **LB38**) do extend into the application site. Measures have been embedded into the scheme design to minimise the changes withing setting of listed buildings that will impact their significance within the site by careful arrangement of built form and use of green space. This will include maintaining hedgerows to create a buffer between the development and the listed buildings.
- 9.4.163 Upper Otterpool and Otterpool Manor (**LB38** and **LB20**) lie within the central area of the Proposed Development although both are outside the application boundary. Both have been afforded large areas of green space around them and the views between the two will be maintained as there will be public open space in the area between. Additionally, the historic footpath /bridleway connections from Otterpool Manor to the west will be reinforced as part of the design. Additionally, there will be opportunity to learn about these former manors and the farming history of the area in a Heritage Trail that will take people on a route close to them.
- 9.4.164 Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in any further alterations to the setting of Upper Otterpool (**LB20**), as changes to the presence of roadways within development areas south and east of Upper Otterpool and therefore

not intruding on the designed open space surrounding the asset. Any deviation in proposed cycleways and or bridleways will not change the understanding of the connection to Otterpool Manor (**LB38**), particularly with the limit of deviation to cycle paths north of **LB20** to maintain the preservation in situ of archaeological asset **167**.

- 9.4.165 For Otterpool Manor (**LB38**) there is the potential for roads to encroach on the setting of Otterpool Manor from the west, south and north, with potential deviation of up to 100m in places. Although the road from the north is not displayed as being limited in deviation in a southern direction, it could only move 65m to remain within the application site. As a result, roadways around Otterpool Manor would remain within the location of development areas and would not encroach on the designed green space around Otterpool Manor (**LB38**). Consequently, there is no change in assessment to the operational effect on Otterpool Manor (**LB38**) or Upper Otterpool (**LB20**) based on proposed flexibility within the Parameter Plans (ES Appendix 4.2).
- 9.4.166 The settings of **LB11** (Stream Cottage and Grove Bridge Cottage), **LB15** (Royal Oak), **LB27** (Little Berwick and **LB29** (Berwick House) which very lie very close to the application boundary have been protected by careful arrangement of green infrastructure. No proposed infrastructure, designed with flexibility, are located in close proximity to the site boundary at the location of any of the four listed buildings. Consequently, flexibility in the Parameter Plans (ES Appendix 4.2) would not result in any increased, or decreased intrusion to the setting of these buildings. The implementation of measures to safeguard historic buildings and their settings within the development will be secured by the time the development is operational.
- 9.4.167 Lymgne Conservation Area (**CA1**) lies close to the south east corner of the OPA site. The setting of Lymgne Conservation Area and its Listed Buildings will be preserved by gradating or otherwise limiting massing and form close to the south-east boundary of the application site. Due to location and distance, any flexibility in the Parameter Plans (ES Appendix 4.2) would not have an impact on the assessment of Lymgne Conservation Area's setting. Sandling Park Registered Park and Garden (**RPG2**) borders the application site. The Parameter Plans (ES Appendix 4.2) have been designed to preserve the views to and from Sandling Park by bolstering the boundary with Sandling Park, by planting a buffer of landscaping comprising a minimum 20 metres wide tree belt along its outside edge, upon the line of the old A20 (see Chapter 12: Landscape and Visual). Due to the proximity of the application boundary, any deviation in the roadway would be in a northward direction, away from Sandling Park. However, any deviation away would not decrease the impact of setting to the registered park and garden.
- 9.4.168 Harringe Court (**BH6**) may experience changes to its wider setting as a result of the construction and operation of the proposed scheme. Although the immediate setting of this asset will remain unchanged, the character of the wider setting may be altered by the proposed built development to the east and an electricity substation to the north. As Harringe Court is situated on an area of higher ground, the visual impact of the Proposed Development will be increased, however a landscape buffer is proposed between the asset and the development (as depicted on the Open Space and Vegetation Parameter Plan (ES Appendix 4.2)), and low height built development is proposed at the closest location (as shown on the Development Areas and Movement Corridors Parameter Plan (ES Appendix 4.2)). Views to the south and west will remain unchanged. Mitigation in the form of advanced planting, to a proposed depth of 20m south of the proposed waste water treatment works (development area HT.5 on the Parameter Plans (ES Appendix 4.2)) would screen the waste water treatment works from view, on the south facing slope opposite the location of Harringe Court.
- 9.4.169 In operation, the main Hillhurst Farmhouse (**BH32**) will be used for office space to support small business enterprises. The historic courtyard configuration will be kept



and adapted through the demolition of the Modern agricultural buildings which detract from the historic character. The courtyard configuration will help support light industry which will be able to utilise the historic brick-built barn space as workshop space, as part of the wider business park in the north east corner of Otterpool Park. Open space to the south of Hillhurst Farm will help maintain some of the historic setting of the building as part of a rural landscape. The operational adaptation of Hillhurst Farm (**BH32**) will allow for the maintenance of the historic fabric of the main farmhouse (**282**) and brick-built barn (**283**). The Heritage Strategy (ES Appendix 4.12) contains more detail on the strategy for preserving and enhancing Hillhurst Farm.

#### *Additional Mitigation*

9.4.170 For many of the Post-medieval built heritage assets, permanent impacts from the construction phase would continue into the operational phase (since they are permanent) but would not give rise to additional effects. Therefore, no additional mitigation during operation is considered necessary.

9.4.171 No additional mitigation is required for any of the other Post-medieval assets related to settlement activity.

### ***Folkestone Racecourse***

#### *Embedded Design Measures*

9.4.172 Folkestone Racecourse (**153**) will be developed with a mix of built development, high street, town centre, and public open space, including landscaping, SUDs (potentially) and a possible cricket pitch. This will result in the loss of its outline within the landscape, as well as associated structures such as the grandstand buildings (**273, 276, 277**). However, design will provide highlights of the former racecourse to acknowledge its former influence on the landscape and recreation around Westenhanger. Proposed design includes possibly incorporating smaller buildings associated with the racecourse, such as the judge's viewing boxes and towers (**271, 272, 274**) (or artistic representations of them) or the mobile viewing box and including them as points on the Heritage Trail. Additionally, the winners circle (**279**) and ornamental pond (**280**) will be maintained as part of the open recreational space around Westenhanger Castle.

Some interpretation of the former line of the racecourse is proposed within the parkland south of Westenhanger Castle and may include art interpretation, information boards and / or relics of the former white railings which marked the line of the racecourse. The Heritage Strategy (ES Appendix 4.12) contains more detail on the strategy for evoking and celebrating the history of the racecourse within the masterplan.

#### *Additional Mitigation*

9.4.173 Permanent impacts from the construction phase would continue into the operational phase (as they are permanent) but would not give rise to additional effects. Therefore, no additional mitigation during operation is considered necessary for the built assets at Folkestone racecourse proposed for demolition following building recording.

### **Modern**

#### ***Military Remains***

#### *Embedded Design Measures*

9.4.174 Certain military structures inside the application boundary will be preserved - the line of the civil runway of the airfield (**152**) will be preserved as a line of green infrastructure within the new built development. Military structures (**36, 37, 69, 126, 162/BH42**) lie at the extreme edge of the airfield within wooded or vegetated areas and will not be built on but will experience changes to their setting. The Battle HQ and Bunker (**28**)

currently lies in an arable field. Its original setting was at the edge of the airfield next to a no longer extant piece of woodland, hidden from view. The Battle HQ and bunker will be preserved in a strip of open space next to built development and divided from the built development by a line of structure planting.

- 9.4.175 The line formed by former pillboxes (**BH43, BH44, BH45, BH46, BH47**) will not be preserved, being partly under proposed new roads and development blocks. However, there will be interpretation to inform the public of their existence and to enhance their communal value, including inclusion on the Heritage Trail.
- 9.4.176 Possible Pickett Hamilton Fort (**60**) does not appear above ground. If archaeological investigations establish that it does survive then there is flexibility within the Parameter Plans (ES Appendix 4.2) to preserve it within open space. It will experience changes to its setting.
- 9.4.177 Due to distance, flexibility in the Parameter Plans (ES Appendix 4.2) will not result in any further encroachments in setting to the above assets.
- 9.4.178 The Heritage Strategy (ES Appendix 4.12) contains more detail on the strategy for preserving and enhancing the airfield and/or its surviving elements.

#### *Additional Mitigation*

- 9.4.179 Permanent impacts from the construction phase would continue into the operational phase (as they are permanent) but would not give rise to additional effects. Therefore, no additional mitigation during operation is considered necessary for these assets.

#### Historic Landscape (Figure 9.9. ES Appendix 9.1)

##### *Embedded Design Measures*

- 9.4.180 Embedded design measures will enable some legibility of the historic landscape within the new development. The general historic grain of the landscape as formed by the East River Stour and the alignment of fields has been reflected in the development design. As stated in the Strategic Design Principles (ES Appendix 4.3), the existing pattern of the wider landscape, with woodlands, tree belts (shaws) and hedgerows will help shape the layout of the town.
- 9.4.181 Retention of historic field boundaries is included in the development design across the application site where possible and no physical impact will occur to them apart from breaching them in certain areas to allow for new roads, cyclepaths and footpaths (see Section 9.3 and Construction Mitigation in Section 9.4). The original setting of these fields that these hedgerows enclose has either been lost already or will be impacted by the new development.
- 9.4.182 The historic woodland identified will be retained and not physically impacted. The original setting of these woodland assets has been lost over time due to farming and they will lose their current setting to the new development. However, no archaeological mitigation or investigation will be needed.
- 9.4.183 Other elements of the historic landscape including watercourses and historic routeways (Stone Street **5**, The Pound House Track **158** and The Castle's causeway **149**) will also be retained, or in some case reinstated, within the design.
- 9.4.184 Certain elements of the former designed landscape of Westenhanger Castle will be enhanced by the Proposed Development such as the recreation of a parkland-type public open space to the south of the Castle and a re-imagining of its Tudor Garden (**166**).

#### *Additional Mitigation*

- 9.4.185 No additional mitigation is required for historic landscape.

## 9.5 Assessment of Residual and Cumulative Effects

### Introduction

- 9.5.1 The following section sets out the residual effects following the implementation of the embedded measures and additional mitigation set out above.
- 9.5.2 The Proposed Development could be a source of effects on the cultural heritage value or significance of the site and surrounding area through:
- Ground disturbance for construction activities;
  - The removal of existing buildings, landscape elements or character;
  - The new built form, its scale, extent, appearance and character;
  - The new road layout, access and patterns of circulation; and
  - Changes to the visual qualities of the site.
- 9.5.3 Residual effects are discussed in detail below, from both construction and operation. The majority of residual effects have been assessed as non-significant, in EIA terms, following mitigation. This would equate to less than substantial harm in NPPF terms.
- 9.5.4 Table 9-5 below outlines the assets which have been assessed as having a significant adverse residual effect. This would equate to substantial harm in NPPF terms. These assets are discussed further, within their asset group context, below.

### Residual Effects from Construction

- 9.5.1 Residual impacts during construction would be permanent for most receptors which lie within the application site boundary if construction involves physical impact. Residual impacts from construction would be temporary for those whose setting would be affected by construction. All permanent impacts beginning in the construction phase would continue into the operation phase and are not repeated. This section addresses the residual impacts following mitigation for each asset.

#### Early Prehistoric: Palaeolithic to Neolithic

- 9.5.2 The following archaeological assets of **medium** value would experience a **major** adverse impact through complete or partial physical removal (**196, 289, 293**). However, mitigation in the form of excavation of those assets that would be removed or partially removed by the development would preserve them 'by record'. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **slight adverse** i.e. **no significant effects**.
- 9.5.3 The Neolithic Ditch (**196**) in Trenching area Field 4 is of **low** value and would experience a **major** adverse impact through complete or partial physical removal. Mitigation in the form of excavation would bring about a residual effect anticipated to be **neutral/ slight adverse** i.e. **no significant effects**.

#### Late Prehistoric: Bronze Age

##### **Barrows West of Barrow Hill**

- 9.5.4 The following barrows of **high** value would experience a **negligible** impact through change to their setting (**58, 113, 114, 115, 130, 131, 135**). This would give a **slight** adverse residual effect i.e. **no significant effects**.
- 9.5.5 Due to the group value of the barrows west of Barrow Hill (**58, 113, 114, 115, 130, 135**), any change in the magnitude of impact due to flexibility of the Parameter Plans (ES Appendix 4.2) would be experienced by them all. However, limitations to the

potential deviation of the bus, cycleway and emergency vehicle route have been designed to prevent any increase of the magnitude of impact for all barrows west of Barrow Hill.

- 9.5.6 This is achieved by preventing encroachment of the bus, cycleway and emergency vehicle route on the location of the scheduled area of barrows **115** and **130** to ensure all barrows remain part of the group preserved under open space at Barrow Hill Green and maintain a line of sight across the proposed Green. The bus, cycleway and emergency vehicle route is to be kept on the perimeter of Barrow Green, with no opportunity to encroach on the open space due to the limitations placed on flexible deviation.
- 9.5.7 Furthermore, the areas scheduled in May 2021 provide two areas of grouping - barrows **115** and **130**, are scheduled as one group, and **58, 113, 114, 135**, as the second. This has ensured appropriate space is afforded to the archaeological remains of the barrows. As a result of the scheduling, development area HT.1 has been reduced on its western side, to provide further space to the scheduled group of **58, 113, 114, 135**.
- 9.5.8 In places, deviation of the bus, cycleway and emergency vehicle routes is not limited and therefore has an assumed 100m flexibility of deviation. Where this assumed 100m deviation is not limited, the current illustrated location of the busway, cycle path and emergency route, is sufficiently located at least 100m away from Barrow Hill Green to not represent a threat to the open space through encroachment of Proposed Development outside of the development areas. As a result, no change in the magnitude of impact is anticipated from areas of the bus, cycleway and emergency routes, where flexibility in deviation is not limited and is at the assumed maximum 100m deviation.

#### ***Barrows East of Barrow Hill***

- 9.5.9 The **high** value barrow (**44**) to the east of Barrow Hill Sellindge would experience a **moderate** adverse magnitude of impact through a change to its setting. The barrow will not be physically impacted but it would be closely surrounded by high built development and would lose its open setting. Additionally, the key (pre)historic view between it and barrow (**136**) to the south would not be able to be maintained within the development due to the creation of intervening high and medium height built development. This would result in a **moderate/large** significance of effect for barrow **44** which would be a **significant effect**. Flexibility in the Parameter Plans (ES Appendix 4.2) would not result in any change in the magnitude of impact to barrow **44**.
- 9.5.10 The **high** value barrow (**136**) would experience a **negligible** impact through change to their setting. This would give a **slight** adverse residual effect i.e. **no significant effects**.
- 9.5.11 **Medium** value barrows (**253, 263, 284**) would experience a **major** adverse impact through complete or partial physical removal. However, mitigation in the form of excavation would preserve them 'by record'. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **slight adverse** i.e. **no significant effects**.
- 9.5.12 The following barrows (**46** and **116**) of **medium** value would not experience a change either physically or to their settings being outside the OPA boundary and in enclosed settings. Therefore no mitigation will be applied. The residual effects would be **neutral** i.e. **no significant effects**.

### ***Remaining Bronze Age Assets***

- 9.5.13 The following non-designated archaeological assets of **low** value would experience a **major** adverse impact through complete or partial physical removal (**195, 198, 203, 298, 302**). However, mitigation in the form of excavation would preserve them 'by record'. After mitigation the residual effect would be **neutral/slight adverse** i.e. **no significant effects**.
- 9.5.14 The following non-designated archaeological assets of **medium** value would experience a **major** adverse impact through complete or partial physical removal or through a major change to their settings (**26, 64, 112, 121, 185, 189, 200, 239, 270**). However, mitigation in the form of excavation, and fieldwalking and metal detector survey (for asset **270** only) would preserve them 'by record'. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **slight adverse** i.e. **no significant effects**.

### **Iron Age to Romano-British**

#### ***Iron Age to Romano-British Settlement Activity***

- 9.5.15 The following non-designated archaeological assets of **medium** value would experience a **major** adverse impact through complete or partial physical removal or through a major change to their settings (**132, 178, 191, 193, 214, 216, 218**). However, mitigation in the form of excavation would preserve them 'by record'. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **slight adverse** i.e. **no significant effects**.

#### ***Romano-British Industrial Activity***

- 9.5.16 The following non-designated archaeological assets of **medium** value would experience a **major** adverse magnitude of impact through complete or partial physical removal or through a major change to their settings (**225, 226, 258**). However, mitigation in the form of excavation would preserve them 'by record'. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **slight adverse** i.e. **no significant effects**.

#### ***Romano-British Villa***

- 9.5.17 The Roman villa (**167, 168**) which is of **medium** value would experience a minor adverse magnitude of impact as it would be preserved in situ and interpreted for the public. Any new paths that cross the villa would be subject to an archaeological watching brief as mitigation. While not mitigation as such, there is likely to be further geophysics of the villa for research purposes and this work will enhance understanding of the asset. As such a **neutral** significance of effects are anticipated i.e. **no significant effects**.
- 9.5.18 The stretch of villa ditch (**168**) that will be in open space but affected potentially by SUDs (according to the Illustrative Masterplan (ES Appendix 4.5)) will be mitigated by archaeological excavation which will result in a **slight adverse** residual effect i.e. **no significant effects**.

#### ***Remaining Iron Age and Romano-British Activity***

- 9.5.19 The following non-designated archaeological assets of **medium** value would experience a **major** adverse magnitude of impact through complete or partial physical removal (**175, 177, 180, 182, 183, 190, 192, 194, 210, 212, 213, 215, 217, 238, 287**). However, mitigation in the form of excavation would preserve them 'by record'. This

would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **slight adverse** i.e. **no significant effects**.

- 9.5.20 Ditch (237) of **low** value would experience a **major** adverse magnitude of impact through complete or partial physical removal. However, mitigation in the form of excavation would preserve it 'by record'. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **neutral/slight adverse** i.e. **no significant effects**.
- 9.5.21 Ditch 230 would benefit from being preserved under the reimagined Tudor Garden. There may be some physical impact resulting from recreation e.g. from planting. This **low** value asset would experience a **negligible** magnitude of impact through partial removal. If required, mitigation in the form of excavation would be carried out and the residual affect would be **neutral** i.e. **no significant effects**.
- 9.5.22 Late Iron Age to Romano-British Quarry Pit (208) will be preserved in situ by virtue of being within an area of open space that has been designed to preserve the western barrow group at Barrow Hill Green. It would experience a **neutral** significance of effect i.e. **no significant effects**.

#### Early Medieval

- 9.5.23 The group of Early Medieval rubbish pits (295) found by geophysics and trial trenching at the southern end of the causeway which are of **medium** value would experience **no change**. They would be preserved in situ as part of the open space buffer to the causeway (149). Thus, the residual effects are anticipated to be **neutral** i.e. **no significant effects**.
- 9.5.24 The charcoal -filled pits (174) are of **low** value and would experience a **major** adverse magnitude of impact through complete or partial physical removal. Mitigation in the form of excavation would preserve them 'by record'. After mitigation the residual effect would be **slight adverse** i.e. **no significant effects**.
- 9.5.25 Cropmarks north of the racecourse lake (52) are of **negligible** value as they do not seem to exist anymore, or if the features do exist, there is no evidence that they are Early Medieval in date. No mitigation is proposed. Any residual effects would be **slight adverse**, i.e. **not significant**.

#### Medieval

##### ***Westenhanger Castle and Deerpark***

- 9.5.26 As described in section 9.4, there will be a combination of positive and adverse effects to Westenhanger Castle (**SM6**, **LB1** and **LB5**) through changes to its setting. The Castle will benefit from the removal of Modern intrusion to its setting from buildings associated with Folkestone Racecourse, as well as a reconnection with its immediate setting to the south through enhancement of historic features such as the causeway and reconstruction of the Tudor Garden. It's inclusion within the development is considered a benefit in securing the long-term longevity of the asset, through the Castle masterplan (Ref 9.27) and opening it up for wider public enjoyment.
- 9.5.27 Changes to the setting of the Castle and its former deerpark include the loss of a large expanse of open space (former deerpark) around the Castle. New development will mean that the historic view of the Castle and barns from the A20 Ashford Road (the Medieval route from which the Castle would have been accessed and viewed) will no longer be afforded. Only glimpsed views will be possible from this point.
- 9.5.28 It will not be possible to appreciate the full backdrop of the Downs against the Castle from this point due to the height of the new buildings either side of the causeway.

Views of the Castle will instead open up as one travels along the causeway and it will be possible to appreciate the backdrop of the Downs as the development blocks splay out. It is considered that these **high** value assets (**SM6, LB1** and **LB5**) will experience a **negligible** magnitude of impact, taking into account the enhancements and public benefit gained, which will result in a **slight adverse** significance of effect during the operation of the development which is considered **not-significant**.

- 9.5.29 The causeway (**149**) will be largely preserved in situ and enhanced, however with some negligible physical impacts where infrastructure will cross it. It will experience a **minor beneficial** magnitude of impact once the design mitigation is applied. Following additional mitigation (watching brief) the residual effect to this **high** value asset will be **moderate beneficial** i.e. a **significant beneficial effect**.
- 9.5.30 The Tudor Garden (**166**) will be largely preserved in situ and enhanced. It will not be built over but will be re-imagined. Any disturbance to the below ground deposits will come from this re-design/re-interpretation e.g. tree planting and will be minor physical impacts. These impacts will be mitigated by means of excavation. It will experience a **minor beneficial** magnitude of impact once the design mitigation is applied. The residual effect to this **medium** value asset would be **slight beneficial** i.e. **no significant effects**.
- 9.5.31 The Pound House Track (**158**) will be preserved in situ and enhanced. There may be negligible physical impacts during creation of a cyclepath/footpath over it. The magnitude of impact will be **negligible**. After mitigation (watching brief) the residual effect to this **low** value asset would be **neutral** i.e. **no significant effects**.
- 9.5.32 **High** value assets, which lie within the scheduled area of Westenhanger Castle would experience a **negligible** impact to their setting and would not be physically impacted due to being preserved in situ through open space (under the Parameter Plans (ES Appendix 4.2)). These include the site of the former Church of St Mary (**45/285**), walled building (**266/267**), rectilinear anomaly (**268**) and Tower structure (**269**) - all identified through GPR at the Castle. This would result in a **slight adverse** residual effect i.e. **no significant effects**.
- 9.5.33 The deerpark to Westenhanger Castle (**154**) would experience impact through development within the deerpark. The line of the deerpark along the northern edge of the A20 would not change. There are enhancement proposals for known surviving section of ditch (**222**) to become a prominent field boundary in the landscape, whereas currently, there are no legible parts of the deerpark within the application boundary. Additionally the creation of 'Castle Park' will seek to reinforce the former deerpark landscape and preserve and interpret certain of its features. The deerpark has already been impacted through the imposition of the Racecourse and by severance caused by the HS1 and the M20. Further development by Otterpool Park will therefore have a **moderate adverse** magnitude of impact. After mitigation, through study of individual deerpark features, recording through landscape studies (ES Appendix 9.22), and enhancement of its western line at **222**, the residual effect to this **low** value asset will be **neutral** which is **not significant**.
- 9.5.34 The following non-designated archaeological assets of **medium** value would experience a **major** adverse magnitude impact through complete or partial physical removal or through a major change to their settings: **128, 137, 138, 139, 292**. However, mitigation in the form of excavation would preserve them 'by record'. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **slight adverse** i.e. **no significant effects**.
- 9.5.35 The following non-designated archaeological assets of **low** value would experience a **major** adverse magnitude of impact through complete or partial physical removal: **299**,



**301.** However, mitigation in the form of excavation would preserve them ‘by record’. After mitigation the residual effect would be **neutral/slight adverse** i.e. **no significant effects**.

### ***Remaining Medieval Assets***

- 9.5.36 The following non-designated archaeological assets of **medium** value: **294** and **42** would experience a **major** adverse magnitude of impact through complete or partial physical removal (**294** and part of **42**) or through a major change to their settings (part of **42**). However, mitigation in the form of excavation of those assets that would be removed or partially removed by the development would preserve them ‘by record’. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **slight adverse** i.e. **no significant effects**.
- 9.5.37 The following non-designated archaeological assets of **low** value would experience a **major** adverse magnitude of impact through complete or partial physical removal: **179, 188, 201, 265**. However, mitigation in the form of excavation would preserve them ‘by record’. After mitigation the residual effect would be **neutral/slight adverse** i.e. **no significant effects**.

### Post-Medieval

#### ***Folkestone Racecourse***

- 9.5.38 Folkestone Racecourse (**153**) is a non-designated archaeological asset of **low** value. It would experience a **major** adverse magnitude of impact through complete or partial physical removal or through a major change to its setting. However, mitigation in the form of excavation or building recording of those assets that would be removed or partially removed by the development would preserve them ‘by record’. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **slight adverse** i.e. **no significant effects**.
- 9.5.39 The following non-designated assets associated with Folkestone Racecourse are of **low** value and would experience a **major** adverse magnitude of impact through complete or partial physical removal or through a major change to their settings: **271, 272, 273, 274, 275, 276, 277, 278, 281**. However, mitigation in the form of building recording would preserve them ‘by record’. After mitigation the residual effect would be **neutral/slight adverse** i.e. **no significant effects**.
- 9.5.40 The winner’s circle (**279**) and the ornamental pond in the paddock (**280**) will be preserved and designed into the open space of the new Castle Park. These low value assets will experience a **minor** adverse magnitude of impact to their setting. No additional mitigation will be applied and the residual effects to setting are anticipated to be **neutral/slight adverse** i.e. **no significant effects**.

#### ***Post-Medieval Settlement Activity***

- 9.5.41 Stream Cottage and Grove Bridge Cottage (**LB11**) will experience changes to their setting as a result of the new built form of the development. The character of the wider setting will remain immediately green, with urban development as a backdrop, 300m south west of the asset. However, the immediate setting of this asset will still comprise the village settlement of Barrow Hill, Sellindge and there will be green space retained to the south-west. Therefore, this **medium** value asset is anticipated to experience a **negligible** adverse magnitude of impact, which will result in a **neutral/slight adverse** significance of effect i.e. **no significant effects**.
- 9.5.42 The Royal Oak Public House (**LB15**) will experience changes to its setting as a result of the visual changes to the surrounding landscape. The character of the wider setting

will change from rural fields, and Folkestone Racecourse to the northwest, to an area of high built development. The asset does face away from the site, which limits its potential to be impacted, and its immediate setting will be unchanged. Therefore, this **medium** value asset will experience a **negligible** adverse magnitude of impact, which once mitigated will result in a **neutral/slight** adverse significance of effect i.e. **no significant effects**.

- 9.5.43 Upper Otterpool (**LB20**) and its barns and pigsty (**BH20**) sit centrally within the application area and, although the buildings will not be physically impacted, their setting will be altered. Both historically and currently the farmhouse's setting is largely agricultural and this informs its significance. Green infrastructure and woodland (The 'Country Park') are proposed to the west, north and north-west, and a potential play area to the east (according to the Illustrative Masterplan (ES Appendix 4.5)). An area of built development up to 12m high, screened by an area of advanced planting is proposed to the east (beyond the play area) and north-east. These proposed changes will change the predominately rural character of the wider landscape to a mixed use, sub-urban and public open space setting. Although already disrupted, it will no longer be possible to appreciate the asset within its remaining historical context and its visual connections to the past agricultural uses of the landscape will be lost. Visual changes to the immediate setting will be minimised by the proposed green infrastructure and the views between Upper Otterpool and Otterpool Manor will be preserved. The **medium** value asset of **LB20** will experience a **minor adverse** impact magnitude which will result in a **slight** adverse significance of effect. This would be considered **not significant**. The **low** value barns and pigsty (**BH20**) will experience a **minor adverse** magnitude of impact which will result in a **neutral/slight** significance of effect i.e. **not significant**.
- 9.5.44 Belle Vue House (**LB21/BH11**) will experience changes to its wider setting as a result of changes to the character of the surrounding landscape. The setting of this asset has already been changed by the Lympe Industrial Estate which effectively severs it from most of the site. However, the proposed built development to the northwest will alter the remaining rural areas, resulting in a **negligible** adverse impact magnitude to this **medium** value asset, which is anticipated to result in a **neutral/slight** adverse significance of effect i.e. **no significant effects**.
- 9.5.45 Little Berwick (**LB27/BH27**) and Berwick House (**LB29**) will experience changes to their setting to the west. Green infrastructure and open space (potentially sports pitches and allotments according to the Illustrative Masterplan (ES Appendix 4.5)) are proposed to the west, on the opposite side of Stone Street, with built development beyond. Although these proposals will change the character of the agricultural fields, the overall visual change to the immediate setting of these **medium** value assets will be limited. Therefore, they will experience a **minor** adverse impact magnitude, which is anticipated to result in a **slight adverse** significance of effect i.e. **no significant effects**.
- 9.5.46 Otterpool Manor (**LB38**) and its Medieval barns (**WS8**) will experience changes to its setting as a result of visual changes to the surrounding landscape. Open space (potentially sports pitches and allotments according to the Illustrative Masterplan (ES Appendix 4.5)) are proposed to the west, a primary school to the south-west and an electricity sub-station to the north. Beyond this will be built development of varying densities and new roads. To the east, on the other side of Otterpool Lane, there will be a belt of advanced planting and the new Country Park beyond that. Views will be maintained to Upper Otterpool. To the north east, the area of Otterpool Quarry that until recently housed a lorry park will be built development. The character of its wider setting will change from a rural, agricultural landscape to a mixed used urban and public open space environment. It will be more difficult to appreciate the asset within its historical context as the farmstead will no longer sit within the wider agricultural

landscape with which it has a functional and historical connection. Although this connection has already been partially disrupted by the introduction of different land uses, for example Lympne Industrial Estate and the lorry park at the site of Otterpool Quarry, the Proposed Development will increase this disruption. However, the application boundary in this location has been drawn to preserve some agricultural land to the south of the asset so the connection will not be completely severed. These **medium** value assets will experience a **negligible** impact magnitude, which will result in a **neutral/slight** adverse significance of effect. This would be considered **not significant**.

- 9.5.47 Listed Buildings in Sellindge, on the other site of the M20 (**LB10, LB17, LB28, LB33, LB35**), will experience temporary changes to their setting through construction traffic moving through Sellindge. There are not considered to be any further effects to setting during construction due to intervening transport infrastructure and the topography preventing any intervisibility between this group of buildings and the Proposed Development. These **medium** value assets will experience a **negligible** adverse impact magnitude, which once mitigated through traffic management is anticipated to result in a **neutral/slight** adverse significance of effect, which is **not significant**.
- 9.5.48 Sandling Park Registered Park and Garden (**RPG2**) will experience some changes to its setting as a result of the Proposed Development. The views from Sandling Park Registered Park and Garden are mainly to the south and east and are well screened from the Development. There will be further vegetation screening as part of the Proposed Development. Therefore, this **medium** value asset will experience a **negligible** impact magnitude, which once mitigated is anticipated to result in a **neutral/slight** adverse significance of effect i.e. **no significant effects**.
- 9.5.49 Lympne Conservation Area (**CA1**) will experience indirect changes to its wider setting during operation. The Conservation Area is well screened to the north and west from the site by treelines and recent development in Lympne. There is anticipated to be only limited impacts from the introduction of new built form into the background of the village. The Conservation Area lies to the south of the Aldington Road and is quite divorced from the Proposed Development. This **medium** value asset is anticipated to experience a **negligible** impact magnitude resulting in a **neutral/slight** adverse significance of effect i.e. **no significant effects**.
- 9.5.50 Several assets were identified in the Historic Buildings and Structures Appraisal report (ES Appendix 9.5) as meeting criteria that gives them greater significance than most non-designated built heritage assets. These buildings will experience impacts from the Proposed Development and are assessed below.
- 9.5.51 Twin (Tin) Chimney Farm (**BH24**) lies just outside the application site and is now Listed. It will not be physically impacted but will experience changes to its setting and views. Its immediate setting will be changed as a result of low to medium height built development proposed on three sides of the asset. Its wider setting to the west will be less changed and will retain its character, although the wider setting to the east will be changed from rural fields to built development. Views from the asset out across the landscape will be altered. An area of land immediately to the west of the asset, however, will remain unchanged and traffic flows on Stone Street will be kept low as it will become a cul-de-sac. With mitigation i.e. careful screening through vegetation, enabled by having low height built development in the vicinity, this **medium** value asset will experience a **minor** adverse magnitude of impact. This gives rise to a **slight** adverse significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.
- 9.5.52 Newingreen Farm (**BH25**) lies outside the application site and is now Listed. It will not be directly physically impacted during operation but is anticipated to experience slight changes to its wider setting and increased noise from traffic. The setting of the asset

to the east, north-west and south will remain unchanged. To the west an area of open space (allotments according to the Illustrative Masterplan (ES Appendix 4.5)) is proposed, with a primary school and potential sports pitches beyond. Although these proposals will change the character of the agricultural fields, the overall visual impact on the immediate setting of the asset will be limited. There will likely be an increase in the volume of traffic using the adjacent A20 road during operation, resulting in increased disturbance from noise. This **medium** value asset will experience a **negligible** magnitude of impact, resulting in a **neutral/slight** adverse significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.

- 9.5.53 Berwick Manor (**BH28**) is outside the application site. It anticipated to experience impacts due to changes to its wider setting and increased noise from traffic. The setting of the asset to the east, south and west will remain unaltered. However, the wider setting of the asset to the north will be changed to public open space (potentially sports pitches and to the west will potentially be community orchards and allotments according to the Illustrative Masterplan (ES Appendix 4.5)). This **medium** value asset is anticipated to experience a **negligible** magnitude of impact which is anticipated to result in a **neutral/slight** adverse significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.
- 9.5.54 Westenhanger Station (**BH3**) is within the application site. It will experience changes to its setting. A mixed-use space and public square is proposed directly to the south and built development to west and south-west. A primary road is also proposed to the south and south-west of the asset. The setting of this asset is informed by its location adjacent to the rail line, a relationship which will not be altered by the Proposed Development. The character of its setting to the south will be considerably changed, however this part of its setting contributes little to its value and overall it is anticipated that there is potential to enhance the setting of the station building through proposals to create upgraded facilities and public realm in the vicinity. This **medium** value asset will experience a **minor** beneficial impact magnitude, resulting in a **slight beneficial** significance of effect which is **not significant**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.
- 9.5.55 The Oast House and Barn (**WS10**) at Barrow Hill Farm are just outside the application site. They are anticipated to experience changes to their setting as a result of the construction and operation of the Proposed Development. An increase in traffic may result in increased noise and disrupt its setting. Built development is proposed to the north-east, east and further away to the south-east, although its immediate setting will remain unchanged. Public open space (potentially sports pitches according to the Illustrative Masterplan (ES Appendix 4.5)) are proposed to the immediate east and south and potentially a secondary school further to the south-east. Its relationship and historical associations with the surrounding agricultural landscape will be reduced as a result of the change in character from rural to semi-urban. This **medium** value asset is anticipated to experience a **minor** adverse impact magnitude resulting in a **slight** adverse significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.
- 9.5.56 The Arts and Crafts Cottages on Stone Street (**WS9**) are just outside the application site. They anticipated to experience changes to their setting as a result of the operation of the Proposed Development. Low to medium height built development is proposed to the east and west of the cottages. This will impact on the visual ties between the cottages and the rural landscape, although there is proposed green space either side. However, the setting of this asset is also informed by its relationship with the village of Westenhanger. As noted in ES Appendix 9.5, the setting of **WS9** is principally influenced by its location on Stone Street and does not contribute hugely to the

significance of the asset which is principally borne from its architectural value. This **medium** value asset is expected (with Embedded Design Measures) to experience a **negligible** magnitude of impact resulting in a **slight** adverse significance of effect i.e. **no significant effects**.

- 9.5.57 Flexibility in the Parameter Plans (ES Appendix 4.2) has the potential to change the location of two roads, one to be located to the north of the Arts and Crafts Cottages (**WS9**) and a second to the east and south-east of the building. Both have flexibility to move 100m although this would be limited to the site boundary, which omits **WS9** from the application site. The encroachment of the roads has the potential to encroach on the asset's location, increasing the urban character around the asset in Otterpool Park development. However, due to the significance of the asset principally being borne from its architectural value and not setting, the flexibility of the Parameter Plans (ES Appendix 4.2) would not result in a change of assessment.
- 9.5.58 Barrow Hill Farm (**BH13**) will experience changes to its setting. An increase in traffic may result in increased noise. Built development is proposed to the immediate north with public open space to the east and south (potentially sports pitches according to the Illustrative Masterplan (ES Appendix 4.5)), although its immediate setting will remain unchanged. Its relationship and historical associations with the surrounding agricultural landscape will be affected as a result of the change in character from rural to semi-urban. This **low** value asset is anticipated to experience a **minor adverse** impact magnitude which would result in a **slight adverse** significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.
- 9.5.59 The farmstead south-east of Railway Cottage in Barrow Hill Sellindge (**BH17**) is anticipated to experience changes to its wider setting. The character of the wider landscape will be noticeably changed from rural fields to built development. Although its immediate setting will be unchanged, its proximity to the Ashford Road could determine that it experiences increased noise and disruption from greater volumes of traffic. This **low** value asset is expected to experience a **minor** adverse magnitude impact resulting in a **slight** adverse significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.
- 9.5.60 Harringe Court (**BH6**) may experience changes to its wider setting as a result of the construction and operation of the proposed scheme. Although the immediate setting of this asset will remain unchanged, the character of the wider setting may be altered by the proposed built development to the east and north. As Harringe Court is situated on an area of higher ground, the visual impact of the Proposed Development will be increased, however a landscape buffer is proposed between the asset and the development, and low height built development is proposed at the closest location. Views to the south and west will remain unchanged. The built development in development block HT-5 may present increased noise and traffic during construction, however this would be mitigated through appropriate routing of construction vehicles to the site. Mitigation in the form of advanced planting, to a proposed depth of 20m south of the development block would screen it from view, on the south facing slope opposite the location of Harringe Court. This **low** value asset would experience **neutral** impact magnitude, resulting in a **neutral** significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.
- 9.5.61 Harringe Court Cottages (**WS18**) is a **low** value built heritage asset on Harringe Lane just north of Harringe Court. It would be adjacent to the green infrastructure of the new development and potentially close to a new electricity sub-station (proposed on the Illustrative Masterplan (ES Appendix 4.5)). Harringe Court Cottages (**WS18**) will

experience a **negligible** change to its setting during construction and operation due to increased traffic, noise and dust, resulting in a **neutral** significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.

- 9.5.62 Several non-designated built heritage assets in Barrow Hill, Sellindge, identified from walkover surveys, may experience impacts during the construction and operation phase. A milestone on the A20 at the southern end of Barrow Hill (**WS4**) will experience a slight change in its setting, as a result of the changing character of the surrounding landscape. However, as the immediate setting of this asset, and its relationship with the Ashford Road, will remain unchanged, the overall magnitude of impact to this **low** value asset will be **negligible**, resulting in a **neutral** significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) could result in two roadways, one heading north towards the western arm of the current Folkestone Racecourse track, and a second heading south west, at the northern end of Otterpool Manor, could result in an encroachment to the setting through additional noise. However, **WS4**'s association with the A20 would remain unchanged despite flexibility and therefore no change in the magnitude of impact will occur as a result of flexibility.
- 9.5.63 Several cottages (**WS5, WS21, WS22, WS23, WS25, WS26, WS27, WS28, WS29, WS13**) and Humble Bee Hall (**WS11**), all located in Barrow Hill, Sellindge, will experience changes to their settings during the construction and operation of the site. Open space and structural planting are proposed to the west with low height built development beyond this. This will change the character of the landscape to the west of these assets from rural fields to semi-urban. A proposed new road to the west could also increase noise and traffic, further disrupting the setting of these assets. To the east, medium and high built development will further change the character of the landscape. All of these **low** value assets will experience **minor** adverse impact magnitude resulting in a **neutral/slight** significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) has the potential to bring a bridleway to the edge of the application boundary, and therefore closer to the rear boundaries of the properties of the above assets. However, the bridleway forms part of the green infrastructure, noted above and is not anticipated to alter the setting at construction or operation through increase in noise.
- 9.5.64 Three non-designated built heritage assets (**WS2, WS3, WS15**), all houses or cottages on the southern side of Aldington Road and identified from walkover survey, will experience changes to their setting during the construction and operation of the site. Although the southern setting of these assets lies outside of the site and will remain unchanged, the land to the north will become community orchards, allotments and green space with some structural planting and some mitigation areas for Great Crested Newts. These proposals will only introduce slight changes, as the land is already occupied by rural fields. Low height built development further to the north will change the character of the wider landscape and will be visible in the distance from these assets. Furthermore, as these assets are situated on Aldington Road, they could experience disruption from increased traffic and noise. Overall these **low** value assets will experience **negligible** magnitude of impact resulting in **neutral/slight** significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.
- 9.5.65 Two cottages (**WS7, WS24**) and two outbuildings at Belle Vue (**WS6**) will experience slight changes to their setting during the construction and operation of the site. Their immediate settings will not be altered by the Proposed Development, due to the intervening Lympne Industrial Park, although there will be minor changes to their wider settings. Although quite a distance from the assets, the proposed built development to the east of the Industrial Park, and to the north, will change the character of the area

from predominately rural to mixed use sub-urban. These assets will also be affected by some increases in traffic and noise disruption. These **low** value assets will experience **negligible** magnitude of impact resulting in **neutral/slight** significance of effects i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.

- 9.5.66 The **low** value asset of the demolished outfarm south west of Newingreen (**BH26**) is expected to experience impact magnitudes of **no change** resulting in **neutral** significance of effects. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact i.e. **no significant effects**.
- 9.5.67 An outfarm southeast of Railway Cottages (**BH19**), an outfarm south-east of Westenhanger (**BH23**) and Little Sandling (**BH38**) are three farmsteads which no longer survive above ground. However, it is possible that remains of these assets survive below ground, and as such, all three could experience direct physical impacts during construction. These **low** value assets would experience a **moderate** adverse magnitude of impact and which once mitigated through excavation would result in a neutral/slight adverse significance of effect i.e. **no significant effects**.
- 9.5.68 Tollgate Cottage (**WS36**) on Stone Street will be retained. Its immediate settings will be changed by the Proposed Development, due to the intervening Lympe Industrial Park, although there will be minor changes to their wider settings. Although quite a distance from the assets, the proposed built development to the east of the Industrial Park, and to the north, will change the character of the area from predominately rural to mixed use sub-urban. These assets will also be affected by some increases in traffic and noise disruption. This **low** value asset will experience a **moderate** magnitude of impact. No mitigation is to be applied and it will result in a **slight adverse** residual effect i.e. **no significant effects**.
- 9.5.69 The Proposed Development will include the demolition or partial demolition of several known built heritage assets. As these buildings will be removed at construction, flexibility in the Parameter Plans (ES Appendix 4.2) is irrelevant. These buildings are:
- Hillhurst Farm (**BH32**)’s modern farm buildings (outbuildings and sheds) will be demolished during the construction of the proposed scheme. Those buildings within Hillhurst Farm with (**low**) heritage value (the farmhouse and two storey brick-built barn – **282** and **283**) will be retained and will become part of a mixed use complex. Changes to the setting of these two **low** value assets will result in a **minor** adverse magnitude of impact. With mitigation this will result in a **neutral/slight** adverse significance of effect i.e. **no significant effects**. However, there will also be some benefits to removing modern intrusive farm buildings.
  - Somerfield Court Farm (**FS1**), Mink Farm (**FS2**) are proposed for demolition. These **negligible** value assets would experience a **major** adverse impact magnitude, result in a **slight** adverse significance of effect i.e. **no significant effects**.
  - Rose Cottage (**WS12**) is a built heritage asset proposed for demolition which will be completely removed. This **low** value asset (i.e. the land on which Rose Cottage lies not the property itself) will experience a major adverse impact magnitude, which once mitigated through archaeological watching brief to record the site of an earlier cottage, will result in a slight adverse significance of effect i.e. **no significant effects**.
- 9.5.70 The following built heritage assets will either be demolished or retained. The flexibility is there to retain them, however this assessment takes a worst case approach and assumes that they will be demolished:
- Benham Water Farm (House) (**FS4**).
  - Elms Farm (**FS5**).



- Farm Cottage (**WS35**), west of Westenhanger Castle
- Red House Farm (House) (**FS3**)

9.5.71 If demolished, these **negligible** value assets (**FS3, FS5, FS5** and **WS35**) would experience a **major adverse** impact magnitude, resulting in a **slight adverse** significance of effect i.e. **no significant effects**

#### ***Post-Medieval Archaeological Resource***

9.5.72 The following non-designated archaeological assets of **low** value would experience a **major** adverse magnitude of impact through complete or partial physical removal or through a major change to their settings (**199, 209**). However, mitigation in the form of excavation would preserve them 'by record'. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **neutral/slight adverse** i.e. **no significant effects**.

9.5.73 The following non-designated archaeological assets of **low** value would experience a **major** adverse magnitude of impact through complete or partial physical removal or through a major change to their settings (**228, 229, 261, 288, WS16, WS17**). However, mitigation in the form of excavation or earthwork survey of those assets that would be removed or partially removed by the development would preserve them 'by record'. After mitigation the residual effect would be **neutral/slight adverse** i.e. **no significant effects**.

9.5.74 The earthworks South of Harringe Court (**WS1**) are just outside the OPA boundary and do not extend into the application site. There are of **low** value and would not be physically impacted. They would experience a **moderate adverse** magnitude of magnitude of impact to their setting. After mitigation by CoCP (ES Appendix 4.17) and traffic management measures during construction the significance of effect would be **neutral/slight adverse** i.e. **no significant effects**.

#### **Modern**

##### ***Military Remains***

9.5.75 The following non-designated archaeological assets of **low** and **medium** value would experience a **major** adverse magnitude of impact through complete or partial physical removal or through a major change to their settings (**4, 27, 150, 151, MR1, MR2, MR3, MR4**). However, mitigation in the form of excavation would preserve them 'by record'. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **slight adverse** i.e. **no significant effects**.

9.5.76 The Battle HQ (**28**) and the retracted possible Pickett Hamilton Fort in Link Park (**60**) and the air raid shelter (**BH42**) are within the application site. The other Pickett Hamilton Fort, to the west of Otterpool Lane, (**32**) is outside the application site. All are of **medium** value and will be preserved in situ. These assets will experience change to their settings but will not be impacted physically. They would experience a **minor adverse** magnitude of impact. As such a **slight** significance of effect is anticipated i.e. **no significant effects**.

9.5.77 The line of the civilian runway (**152**) would be preserved in situ as a line of open space. This **low** value asset would experience a **minor adverse** magnitude of magnitude of impact to its setting resulting in a **neutral/slight** significance of effect i.e. no significant effects.

9.5.78 The following non-designated archaeological assets of **low** value would experience a **major adverse** magnitude of magnitude of impact through complete or partial physical removal or through a major change to their settings (**40, 127, 129, 231, 232, 233, 236,**

- 286, WS20, WS30, WS31, WS32, WS33, WS34**). However, mitigation in the form of excavation or building recording of those assets that would be removed or partially removed by the development would preserve them ‘by record’. After mitigation the residual effect would be **neutral/slight adverse** i.e. **no significant effects**.
- 9.5.79 Five former pillboxes (**BH43, BH44, BH45, BH46, BH47**) are known within the site. Although all above ground evidence of these structures appears to have been removed, some below ground remains could survive, most likely in the form of concrete foundations. Any below ground remains would be physically impacted by proposed roads or built development and would be completely removed. These **low** value assets would experience a **major adverse** impact magnitude, and which once mitigated by archaeological survey or building recording and by research and interpretation would be anticipated to result in a **neutral/slight adverse** significance of effect i.e. **no significant effects**.
- 9.5.80 The following military assets which fall outside the application boundary will experience **no change** (**33, 34, 142, 143**) therefore the residual effects will be neutral i.e. **no significant effects**.
- 9.5.81 The following military assets which fall outside the application boundary will experience a minor change to their settings (**30, 31, 32, 35**). With mitigation the residual effect to these **low** and **medium** value assets would be **slight** or **neutral/slight adverse** i.e. **no significant effects**.
- 9.5.82 Flexibility in the Parameter Plans (ES Appendix 4.2) would not have an impact on the Picket Hamilton Fort (**32**) which is located outside of the application site. Change in the location of roads located west and south of the Battle Headquarters (**28**) would not result in the roads leaving the development areas to the west and south of asset **28** and therefore, not change the mitigation in place for the Battle Headquarters. As a result, there is no change in assessment for either asset (**28, 32**) to account for flexibility in the Parameter Plans (ES Appendix 4.2).
- 9.5.83 The following other assets would experience an impact to their setting during construction and operation. They all lie outside the application site:
- A WWII Munitions Store, at Farmead Farm (BH1), is screened from the site by a dense tree line and the HS1 to the south and therefore no change is anticipated to its immediate setting. Therefore, this **low** to **medium** value asset is anticipated to experience no change, resulting in a **neutral** significance of effect i.e. **no significant effects**. Flexibility in the Parameter Plans (ES Appendix 4.2) will not result in a change of magnitude of impact.
- 9.5.84 The impact of construction of the proposed scheme will include the potential demolition of several modern built heritage assets. There is flexibility to preserve them, however this assessment takes a worst case scenario and assumes they will be demolished. As these buildings will be removed at construction, flexibility in the Parameter Plans (ES Appendix 4.2) is irrelevant. These buildings are:
- A possible military building/deport at Westenhanger (**WS19**).
  - A munitions store south of Ashford Road within Red House Farm and Benham Business Park (**WS20** incorporating **WS30, WS31, WS32, WS33** and **WS34**).
- 9.5.85 All of these **low** value assets are assumed to be completely removed and will therefore experience **major adverse** magnitude of impact, which once mitigated by building

recording would result in **slight adverse** significance of effects i.e. **no significant effects**.

#### Undated Assets

- 9.5.86 The following non-designated archaeological assets of **medium** value would experience a **major adverse** magnitude of impact through complete or partial physical removal or through a major change to their settings (**186, 221, 308, 309, 310, 311, 312**). However, mitigation in the form of excavation would preserve them ‘by record’. This would allow valuable information to be gained about the historic development of the Otterpool Park site and this would feed into regional research objectives. Thus, the residual effects are anticipated to be **slight adverse** i.e. **no significant effects**.
- 9.5.87 The following Non-Designated archaeological assets of **unknown** or **low** value would experience a **major adverse** magnitude of impact through complete or partial physical removal or through a major change to their settings (**111, 123, 125, 144, 169, 170, 171, 172, 173, 207, 224, 240, 242, 243, 244, 245, 246, 247, 251, 252, 260, 291, 296, 297, 300, 303, 304, 305, 306, 307**). However, mitigation in the form of excavation of those assets that would be removed or partially removed by the development would preserve them ‘by record’. After mitigation the residual effect would be **neutral/slight** i.e. **no significant effects**.
- 9.5.88 Undated, probably prehistoric, ditch (**219**) will be preserved under open space with the western barrow group. This **medium** value asset will experience a **negligible** magnitude of impact. There will be no additional mitigation and the significance of effect will be **Neutral** i.e. **no significant effects**.

Table 9-5: Cultural Heritage Assets assessed as experiencing a significant residual effect.

Project ID	Asset	Assessment of residual effect
44	Bronze Age Barrow (part of eastern barrow asset grouping)	Although this scheduled barrow will be preserved in situ, the change in setting to the barrow would result in a <b>moderate/large adverse</b> significance of effect which is considered <b>significant</b> .
149	The causeway - the southern approach to Westenhanger Castle	This will experience a <b>moderate beneficial</b> significance of effect which is considered <b>significant</b> .

#### Historic Landscape

- 9.5.89 This historic landscape has been assessed as being of **medium** value. Key features within the landscape include the river corridors, historic field boundaries and field patterns as well as historic woodland. The landscape will experience a **major adverse** magnitude of impact from the development. However, embedded design mitigation measures have been included to preserve and enhance elements of the historic landscape (e.g. hedgerows and woodland) which will allow some legibility of the historic landscape to remain. In addition, not all of the landscape will be impacted by the development and some (the former designed landscape south of Westenhanger Castle and its causeway) will be enhanced. Construction mitigation of hedges will also be implemented. With mitigation therefore, the historic landscape will experience **slight adverse** impacts i.e. **no significant effects**.

## Cumulative Effects

9.5.90 The cumulative impacts assessment considers the cumulative impacts on the historic environment of the Proposed Development in combination with a number of consented and planned schemes near to the development area (ES Appendix 2.5). Those schemes considered relevant are included in Table 9-6.

Table 9-6: Proposed Committed Developments for Inclusion in Cumulative Assessment

LPA Ref No.	Reason for inclusion in cumulative assessment
Y14/0873/SH	Land adjacent to the surgery, Main Road, Sellindge -the 200 dwelling Proposed Development in Sellindge lies outside the application site's boundary and close to several listed buildings (particularly Somerfield Court Farm).
Y16/1122/SH	Land rear of Rhodes House, Main Road, Sellindge -162 homes and 929 sq.m. of business space located just to the north of the M20. This was approved by FHDC Planning and Licencing Committee on 3rd April 2018 subject to the completion of a S106 agreement. It lies outside the application site's boundary and close to several listed buildings (particularly Rhodes House).
Y15/0175/SH	This is a consented scheme for 1,415sqm extension to the existing Holiday Extras office building at Newingreen, together with an extension to the car park to provide 80 additional parking spaces and formation of new vehicular access to Stone Street. It lies outside but adjacent to the application site boundary.
N/A	Additional development of Otterpool Park comprising the further 1,500 homes as contained within the Framework Masterplan boundary. Framework Masterplan to include 1500 more homes.
Y09/0145/SH, Y06/0552/SH, Y15/0880/SH	The proposals to extend Lypne Industrial Park and construct 52000 sq metres (Y06/0552/SH) of employment space was approved by F&HDC in March 2007, with extension to the planning approved with conditions in February 2016 (see reference Y15/0880/SH). Proposals for the 30,668sq metres (Y09/0145/SH) of employment space was approved by FHDC in November 2009, with extension to the planning approved with conditions in September 2017 (see reference Y17/0105/SH).  The proposals at Lypne Industrial Park are located within the Otterpool Park application boundary, east of Otterpool Lane and south of Upper Otterpool.
SH/08/124	Otterpool quarry, Ashford Road. Construction and operation of a materials recycling facility, anaerobic digestion plant and associated office and parking facilities
20/2024/FH	Spicers of Hythe, Lypne Industrial Estate, Otterpool Lane, Lypne. Reconfigure the existing truck wash site to create a 24-hour truck parking facility and associated welfare building.

### Cumulative Effects with other Developments

9.5.91 The 200 dwelling Proposed Development in Sellindge (Y14/0873/SH) - the heritage assets that are likely to interact with this proposed development and the Otterpool OPA are Listed Buildings north of the M20, in Sellindge. Their settings will experience temporary changes due to an increase in construction traffic. Although there will be an increase in construction traffic it is not considered to be significantly greater than that for the OPA and will not cause a more than negligible adverse magnitude of impact to

their significance which will not be significant. For these reasons there are not likely to be any cumulative effects.

- 9.5.92 The 162 dwelling approved development to the rear of Rhodes House, Sellindge (Y16/1122/SH) - for the same reasons as those stated above (for Y14/0873/SH) there are not likely to be any cumulative effects.
- 9.5.93 The extension to the existing Holiday Extras office building at Newingreen, (Y15/0175/SH) - there are two heritage assets that would interact with both the OPA and the Holiday Extras site; The adjacent The Royal Oak Public House (a Listed Building) and the adjacent Sandling Park (a Registered Park and Garden). The construction of the extension would introduce more construction traffic on top of what is predicted for the OPA but this would result in a negligible and temporary change to the setting of both designated heritage assets. The actual presence of the extension once built is not likely to introduce any serious changes to the setting of these two designated assets and therefore there will be nothing more than negligible impacts and so no likely cumulative effects.
- 9.5.94 Proposals at Link Park, Lympe Industrial Estate including 52,000sq metres of employment development (Y06/0552/SH) and an area of 30,668sqm (Y09/0145/SH) - the proposed developments at Link Park are located within the site boundary. As both developments (Link Park and Otterpool Park) cannot happen at the same time, it is not possible to give a combined assessment of effects. Therefore, they cannot be assessed for cumulative impacts.
- 9.5.95 The Spicers of Hythe proposed truck parking facility (20/2024/FH) is adjacent to the south western boundary of the OPA, within Lympe Industrial Estate, in an area already used as a truck wash. The primary heritage asset in this area that would interact with both proposals is the former Lympe Airfield. The industrial estate has been built over part of the airfield and it is not likely that this reconfiguration would present any change to the setting of the airfield which has already been impacted by the industrial estate. Neither is it considered that any physical remains (either of the airfield or earlier remains) would survive here. Therefore, there are not considered to be any cumulative effects.

#### Cumulative Effects with the Framework Masterplan

- 9.5.96 The additional 1,500 homes and associated infrastructure that are planned within the Otterpool Park Framework Masterplan (FM) area have also been considered. The FM is indicative and has not been subject to any planning application, therefore the built development area, heights and other information aside from the development quantum are not certain or fixed. For the purposes of assessment the development footprint is shown on drawing OPM(P)3016\_YY 'Framework Masterplan' in ES Appendix 4.5.
- 9.5.97 There is little design information to assess the FM plans in terms of how they may affect the settings of any heritage assets and more assessment would need to be carried out to test the estimates of significance of effect given below.
- 9.5.98 There are not likely to be any cumulative effects to below ground archaeology. Although there are archaeological remains in the footprint of the FM boundary (namely probably Prehistoric barrows -**155, 156** - south of Harringe Brooks Wood; an area of filled in military slit trenches – **33** -located just west of the former Lympe Airfield; two possible former pillbox locations – **142** and **143**; and two undated pimple-like features – **140** and **141** - showing on Lidar west of Otterpool Lane) these do not interact with the OPA boundary and are not affected by it, so there would be no cumulative effects.
- 9.5.99 The FM could impact a group of above ground military structures that are within the south-western part of the former Lympe Airfield (**27**) and that fall within the FM boundary. The group of WW2 military buildings (all non-designated) - **30, 31, 32, 34,**

**35** and **38** - include a Pickett Hamilton Fort (**32**). If they were to be demolished as part of the FM proposals (not the preferred option from a heritage perspective) there would be no cumulative effects for the same reasons as the archaeological assets discussed above. If they were to be preserved there would be changes to their settings resulting from both the FM and OPA proposals. Effectively they would experience more temporary effects due to increased construction traffic and, during operation, they would be surrounded on all sides by modern built development. Effectively the last remaining open area of this south-western part of the former airfield would be built over which would change their setting to a greater degree than the OPA proposals. This would increase the magnitude of impact on them from minor to **moderate**. As some of these assets are medium value this could result in **significant** effects if the changes to setting cannot be mitigated by design.

9.5.100 Proposed development in this FM area to the south and south-west of the OPA boundary would bring built development very close to the Listed Building of Belle Vue (**LB21, BH11, 51**) and its un- Listed ancillary buildings (**66, WS6**) as well as Otterpool Cottage (**WS24**) (Figures 9.1 and 9.5). However, these assets are already bordered by the industrial buildings of Lypne Park and are shielded by hedges therefore the planned built development to the north west of these assets is unlikely to introduce much change. The FM plans also show open space to the east, west and north-west of these assets which would maintain their setting. Thus the change to their setting with this embedded design is likely stay as **negligible** and the significance of effect to remain as **neutral/slight adverse**, so no cumulative effects.

9.5.101 The listed buildings (**LB22, LB23**) at the Aldington Road entrance of Port Lypne Registered Park and Garden (**RPG1**) have been scoped out of the OPA assessment however they would be adjacent to FM boundary. The Listed House (**LB7**), and associated features (**LB24, LB36**) within the park lie further away from the proposed FM. The significance of all these assets is primarily their group value as a designed landscape with contemporary gardens and house by the same designer. The setting of these assets is contained within the bounds of the Registered Park and Garden itself which is surrounded on all sides by woodland. The setting of the designed gardens and the built aspects has also been partially altered by the installation of the wild animal park infrastructure across the park and to the east. Views from the park (**RPG1**) and house (**LB7**) are described as lying to the south, south-east, and south-west, across Romney Marsh and towards the sea (Figure 9.1). Due to its enclosed nature, the topography of the steep slope south of Aldington Road and the nature of the designed views from the park and house (**RPG1, LB7**) it is considered that the FM Development in combination with the OPA would have **negligible** significance of effect setting of the assets at Port Lypne if mitigation was applied, for example by screening and by drawing back the new built form so that a buffer of green space is left between the RPG and the new development.

9.5.102 Proposed development in this FM area to the south-west of the OPA boundary would bring built development closer to several other designated assets which have been scoped out of the OPA assessment:

- The Burch's Rough Romano-British building which is a scheduled monument (List Entry number 1004216)
- Medieval Chapel at Court-at-Street which is a Scheduled Monument south of Aldington Road (List Entry number 1005148)
- Grade 2 listed Forge Cottage and other Cottage at Court-at-Street (List Entry number 1347810),
- Manor Farm Cottage Grade 2 Listed Building at Court-at Street (List Entry number 1061117)



- Aldington Church Conservation Area (CA2), see Figure 1 of the DBA Addendum – (ES Appendix 9.2).

9.5.103 For all of the above four assets, their settings do not extend to within the OPA boundary. This is to do with topography, intervening woodland/screening, the direction the assets face, the source of their significance and what their historic setting would have been. Additionally, it is not likely that OPA construction traffic would impact them, hence why they have been scoped out of the OPA assessment. Although the FM boundary would move built development closer to these assets it is not likely that it would bring any changes to their settings. The only exception to this would be the combination of OPA construction traffic and FM construction traffic along Aldington Road which would likely bring about a **negligible adverse** magnitude of impact which would likely result in a **slight or neutral/slight adverse** significance of effect which is **not significant**.

#### Cumulative Effects with the Permitted Waste Facility

9.5.104 Approval for the construction of a Permitted Waste Facility, anaerobic digestion plant and associated office and parking facilities at Otterpool Quarry, Ashford Road Sellindge was granted in March 2011 (planning reference SH/08/124). The approved development is located within the site boundary for Otterpool Park, at the south-eastern corner of the T-Junction to Ashford Road and Otterpool Lane.

9.5.105 The Parameter Plans (ES Appendix 4.2) for Otterpool Park provide flexibility for two scenarios for the Permitted Waste Facility: construction of the facility or no construction of the facility. If the Permitted Waste Facility is not constructed, then it would not be possible for cumulative effects to be experienced. The land for the proposed Permitted Waste Facility would instead be developed as part of the Proposed Otterpool Park Development. Should the Permitted Waste Facility be constructed then the following cumulative effects have been identified.

9.5.106 There are no cumulative effects to archaeology within the footprint of the Permitted Waste Facility as this is an area of former quarry which will have removed any archaeological remains. Consideration of the impacts to archaeology within the Permitted Waste Facility development have been assessed as the same as the OPA i.e. no change.

9.5.107 Should the Permitted Waste Facility be constructed then there will a 250m area around it in which there can be no built development and the land would instead be maintained as either arable field or open space - see the Open Space and Vegetation Parameter Plan of Otterpool Park (OPM(P)4002\_revYY, Appendix 4.2) and that of the Permitted Waste Facility (OPM(P)5002\_revWW in ES Appendix 2.8). As a result, archaeological remains located within this area would not be impacted by development. Heritage receptors located within this area include linear anomalies identified through geophysical survey (**243, 244, 245, 246**). As a result, these assets would experience a **minor** significance of effect from the loss of associated features although they themselves would be preserved in situ. Therefore there would be no cumulative effects to these archaeological assets.

9.5.108 No further cumulative effects are identified. Both the Parameter Plans (ES Appendix 4.2) of Otterpool Park and the proposed Design of the Permitted Waste Facility include landscaped planting between the Proposed Developments and Otterpool Manor (**LB38**) to the west, to mitigate changes to setting. Therefore, there is no change to this assessment.



## 9.6 Monitoring

- 9.6.1 Requirements for site-wide monitoring are identified in the Heritage Strategy (ES Appendix 4.12).

## 9.7 Assessment Summary

- 9.7.1 The following section presents a summary of the baseline conditions, pre-(additional) mitigation impact assessment and residual effects of the proposed Development on cultural heritage assets. Table 9-7 provides an assessment summary with respect to cultural heritage, including the potential significant effect with embedded design measures in place, and additional measures required to reach the residual significance of effect.
- 9.7.2 The ES chapter has assessed 288 heritage assets – seven Scheduled Monuments (including the newly scheduled Westenhanger Castle causeway and the barrows), 16 Listed Buildings, one Conservation Area, one Registered Park and Garden, four military crash sites and 259 non-designated Heritage Assets. These range from **negligible** to **high** value. The application site has the potential to reveal further archaeological remains, potentially of **high** value.
- 9.7.3 Overall, most residual effects to heritage assets are **non-significant**.
- 9.7.4 Despite the flexibility in the masterplan, through deviation of proposed movement corridors including bus, cycleway and emergency vehicle route, limitations in the potential deviation of these design features have been implemented to prevent potential further significant adverse effects arising due to a change in the magnitude of impact.
- 9.7.5 Table 9-7 provides an assessment summary with respect to cultural heritage and how the significance of effects has been addressed.
- 9.7.6 One heritage asset (**44**) would experience **significant adverse** residual effects. This is a newly-scheduled Prehistoric barrow (burial mound) east of Barrow Hill, Sellindge and north of the racecourse straight, and marked as ‘Tumulus’ on OS maps. The assessment has concluded that this barrow would experience a **Moderate/ Large adverse** effect to its setting which would be **Significant** in EIA terms. Barrow (**44**) has been ploughed almost flat. However, initial archaeological investigation has revealed that it preserves features which would make it unusual and of national significance, therefore of **high** value. This asset will not be physically impacted by the development as it will be preserved under open space and it will in fact experience some benefit by being taken out of a ploughing regime. However, the barrow will be surrounded by high built development and the open space will only be large enough to preserve the barrow itself and a narrow buffer and not any of its setting. In addition, this barrow appears to have had a visual link to another scheduled barrow to the south of Ashford Road (**136**) and this visual relationship will not be maintained once the scheme is operational. The impact to the setting of this one barrow should be balanced against the benefit that the development will bring to the group of barrows west of Barrow Hill Sellindge which will be preserved under public open space and interpreted for the public. Additionally, this barrow will be interpreted (by a sign board) and by inclusion on a Heritage Trail which will link it to the other barrows within the OPA site and to those to the north.
- 9.7.7 One heritage asset - the causeway to the Castle (**149**) - would experience a **moderate beneficial** significance of effect which would be **Significant** in EIA terms. This earthwork would be preserved in situ and brought back into use as the Castle’s main (non-vehicular) access route through its former deerpark, providing a pleasant path and cycleway from which to enjoy views to the Castle and barns and wider landscape of the Downs to behind. It is proposed that the causeway is lined both sides in trees

(as it would have been). At the south end of the causeway where it meets the A20 Ashford Road there will be an arrival point provided by carefully configured built development, open space and from public art. This will provide a sense of a threshold to the former deerpark and will encourage views to towards the Castle and the Downs beyond.

#### Assessment of NPPF substantial/less than substantial harm

- 9.7.8 According to the methodology set out in Section 9.2 (Methodology for Assessing Impacts) only those assets assessed to experience a large or very large significance of effect in EIA terms would suffer 'substantial harm' in NPPF terms. There are no heritage assets that would experience that level of effect. The effect on the setting of Barrow 44, as noted at 9.7.6 above, is considered to be large/moderate in EIA terms. However, by virtue of the retention of the asset and mitigation provided the residual effect would not lead to a total loss of significance, and therefore would not constitute substantial harm in NPPF terms.

Table 9-7: Assessment Summary

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
SM6, LB1, LB5, BH34 (Westenhanger Castle and Barns)	High	<p>The flow of construction traffic would be controlled through and around the Proposed Development site using traffic management as set out in the Construction Traffic Management Plan (secured through the CoCP (ES Appendix 4.17)).</p> <p>Use of designed hoarding and bunding, damping down of the construction area, and control of vehicle movement through site speed limits and defined routes as set out in the CoCP (ES Appendix 4.17).</p> <p>Enhancements brought through recreating part of its landscape and improving views. Public benefit resulting from increased accessibility and understanding. Secured through Heritage Strategy (ES Appendix 4.12) and Castle CMP (ES Appendix 9.25).</p> <p>Timescales for the delivery of these heritage benefits to</p>	Negligible	Slight adverse	C, O	Watching brief during removal of modern Racecourse stables and offices in order to record any archaeological remains of the Outer Court of the Castle that might be exposed	N/A	<p>Slight adverse (temporary) during construction- not significant</p> <p>Slight adverse during operation – not significant</p>

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
		the Castle and its setting will be within 6-10 years of outline planning permission being given.						
LB11-Stream Cottage and Grove Bridge Cottage	Medium	Use of hoarding and bunding, damping down of the construction area, and control of vehicle movement through site speed limits and defined routes as set out in the Outline CoCP (ES Appendix 4.17)	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse – Not significant
LB15-Royal Oak	Medium		Negligible	Neutral/Slight adverse	C, O			Neutral/Slight adverse – Not significant
LB20 -Upper Otterpool	Medium	Keep existing buffers provided by hedgerows and trees as set out in the Parameter Plans (ES Appendix 4.2).  Use of Structural planting to act as screening as secured on the structural planting plan in the Green Infrastructure Strategy (ES Appendix 4.11)	Minor	Slight adverse	C, O		Slight Adverse – not Significant	
LB21/BH11-Belle Vue	Medium		Negligible	Neutral/Slight adverse	C, O		Neutral/Slight adverse – Not significant	
LB27/BH27-Little Berwick	Medium		Negligible	Neutral/Slight adverse	C, O		Neutral/Slight adverse – Not significant	
LB29 – Berwick House	Medium		Keep visual links between Upper Otterpool and	Minor	Slight adverse		C, O	Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
LB38 - Otterpool Manor	Medium	Otterpool Manor as secured in the Heritage Strategy (ES Appendix 4.12) and the Green Infrastructure Strategy (ES Appendix 4.11)	Negligible	Neutral/Slight adverse	C, O			Neutral/Slight adverse – Not significant
LB10- Little Rhodes	Medium	Construction traffic through Sellindge will be controlled through defined times and routes through the CTMP.	Negligible	Neutral/Slight adverse	C	No additional mitigation required	N/A	Neutral/Slight adverse - Not Significant
LB17- Railway Cottages	Medium		Negligible					
LB28- Somerfield Court	Medium		Negligible					
LB33- Barn Complex about 66 metres west of Somerfield Court	Medium		Negligible					
LB35- Rhodes House	Medium		Negligible					

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
RPG2-Sandling Park	Medium	Bolster the boundary with Sandling Park, by planting a 20m wide tree belt along its outside edge – upon the line of the old A20 as secured on the Proposed Structural Planting Plan.  Outline COCP (ES APPENDIX 4.17) and traffic management measures	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse – Not significant
CA1-Lympne Conservation Area	Medium	Use of open space and vegetation buffers  Use of hoarding and bunding, damping down of the construction area, and control of vehicle movement through site speed limits and defined routes as set out in the Outline CoCP (ES Appendix 4.17) and CTMP.	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse – Not significant
MR1-Crash site	Medium	None. Avoidance if possible	Major	Moderate /Large adverse	C	Evaluation and Excavation. Documentary research if found to extend into site.	Planning condition	Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
MR2-Crash site	Medium	None. Avoidance if possible	Major	Moderate /Large adverse	C	Evaluation and Excavation. Documentary research if found to extend into site.	Planning condition	Slight adverse – Not significant
MR3-Crash site	Medium	None. Avoidance if possible	Major	Moderate /Large adverse	C	Evaluation and Excavation. Documentary research if found to extend into site.	Planning condition	Slight adverse – Not significant
MR4-crash site	Medium	None. Avoidance if possible	Major	Moderate /Large adverse	C	Evaluation and Excavation. Documentary research if found to extend into site.	Planning condition	Slight adverse - Not significant
2-London and Dover Railway	Low	N/A	No Change	Neutral	C	No additional mitigation required	N/A	Neutral - Not significant



Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
4-Auxillary Unit Operational Base	Medium	None	Major	Moderate /Large adverse	C	Evaluation and Excavation. Documentary research if found to extend into site.. Possible Building recording	Planning condition	Slight adverse – Not significant
5-Stone Street (Romano-British Road)	Medium	Preserved in situ as a road	Minor	Slight adverse	C	Watching brief during ground/road improvement works, trial trenching or excavation if remains found	Planning condition	Neutral - Not Significant
7- Pimple	Low	N/A	No Change	Neutral	C	None	N/A	Neutral - Not significant
8- Aldington Road (Romano-British Road)	Medium	N/A	No Change	Neutral	C	None	N/A	Neutral - Not significant
20-Medieval features north of Westenhanger Castle	Low	N/A	No Change	Neutral	C	None	N/A	Neutral - Not significant
26-Bronze Age Occupation site	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
27-Lympe Airfield	Medium	Preservation of certain airfield features or echoing them in the design, as secured in the Heritage Strategy (ES Appendix 4.12)	Major	Moderate/ Large adverse	C	Geophysical survey, Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2, building recording	Planning condition	Slight adverse – Not significant
28-Battle HQ and shelter	Medium	Preservation in situ as secured through the Heritage Strategy (ES Appendix 4.12)	Minor	Slight adverse	C, O	No additional mitigation required	N/A	Neutral - Not significant (possibly slight positive)
29-aircraft dispersal pen	Low	None	Major	Slight/ Moderate adverse	C	Geophysical survey, Excavation. informed by future trial trenching, trial trenching to be completed prior to Tier 2,	Planning condition	Neutral - Not Significant
30-gas decontamination building	Medium	Outline COCP (ES Appendix 4.17) and traffic management measures	Minor	Slight adverse	C	None	N/A	Slight- Not Significant
31-air raid shelters	Medium	Outline COCP and traffic management measures	Minor	Slight adverse	C	None	N/A	Slight - Not Significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
32-Pickett Hamilton Fort west of Otterpool Lane	Medium	Outline COCP and traffic management measures	Minor	Slight adverse	C, O	None	N/A	slight- Not significant
33-slit trenches	Low	N/A	No Change	Neutral	C	Trial trenching close to area within application site boundary to establish if asset continues into site, excavation if required	Planning condition	Neutral - Not significant
34-slit trenches	Low	N/A	No Change	Neutral	C	None	N/A	Neutral - Not significant
35-barrack huts	Low	Outline COCP and traffic management measures	Minor	Neutral/Slight adverse	C	None	N/A	Neutral/Slight adverse- Not significant
36-overblister hanger and trackway	Low to Medium	Preservation in situ under open space/trees to be retained as secured through Heritage Strategy (ES Appendix 4.12). Outline COCP and traffic management measures	Moderate	Moderate adverse	C	Any extant remains archaeologically recorded	Planning condition	Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
37-machine gun testing range	Low	Preservation in situ under open space/trees to be retained as secured through the Heritage Strategy (ES Appendix 4.12). Outline COCP and traffic management measures	Moderate	Slight/Moderate adverse	C	Any extant remains archaeologically evaluated and recorded	Planning condition	Slight adverse – Not significant
38-bulk fuel installation	Medium	Outline COCP and traffic management measures	Minor	Slight adverse	C	None	N/A	Neutral - Not significant
39-taxiway to civil runway of the airfield	Low	None	Major	Slight/Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse – Not significant
40-aircraft dispersal pen	Low	None	Major	Slight/Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse - Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
42-cropmarks of Medieval trackway and field system north of the Castle	Medium	Partial preservation in situ and partially built over Outline COCP and traffic management measures	Major (for the part that will be built over)	Moderate/Large adverse	C	Excavation for the length that will be built over	N/A	Slight adverse – Not significant
44-Barrow (Scheduled)	High	Preservation under small area of open space and long term stewardship secured by Heritage Strategy (ES Appendix 4.12) Outline COCP and traffic management measures	Moderate	Moderate/Large adverse	C	No additional mitigation	N/A	<b>Moderate/ Large adverse – Significant</b>
45/285-site of St Marys Church within Westenhanger (WH) Castle grounds	High	Preserved Outline COCP and traffic management measures	Negligible	Slight adverse	C	None	Castle CMP (ES Appendix 9.25)	Slight adverse - Not significant
46-barrow	High	N/A	No change	Neutral	C	None	N/A	Neutral - Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
48-cropmark of a ring ditch	Low	N/A	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse - Not significant
51-moated site at Belle Vue	Medium	N/A	No Change	Neutral	C	None	N/A	Neutral - Not significant
52-putative Anglo- Saxon palace site, south of WH Castle	Negligible	None	Major	Slight adverse	C	None	N/A	Slight adverse – Not significant
53-putative deserted Medieval village site within WH Castle Grounds	Low	Construction and traffic management as secured through the CTMP	Moderate	Slight adverse	C	No additional mitigation required	Castle CMP (ES Appendix 9.25)	Slight adverse – Not significant
54-putative deserted Medieval village site within WH Castle Grounds	Low	Construction and traffic management as secured through the CTMP	Moderate	Slight adverse	C	No additional mitigation required	Castle CMP (ES Appendix 9.25)	Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
58-barrow (Scheduled)	High	<p>Preservation in situ in public open space as secured through the Parameter Plans (ES Appendix 4.2).</p> <p>Long term stewardship secured by Heritage Strategy (ES Appendix 4.12)</p> <p>Outline COCP and traffic management measures</p>	Negligible	Slight adverse	O	No additional mitigation required	N/A	Slight adverse Not significant
59-site of former medieval Harringe Court	Negligible	N/A	No Change	Neutral	C	None	N/A	Neutral - Not significant
60- possible Pickett Hamilton fort in Link Park	Medium	<p>Preservation under open space and long term stewardship as secured in the Heritage Strategy (ES Appendix 4.12) (if found to survive)</p>	Minor	Slight adverse	C	If extant, excavation and/or building recording,	Planning Condition	Neutral – Not significant (possibly slight positive)
61-concrete base in Link Park, likely military	Low	None	Major	Slight/ Moderate adverse	C	Building recording, Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral - Not significant



Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
64-Prehistoric and Medieval finds at Link Park	Medium	None	Major	Moderate/ Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse - Not significant
66-aisled barn at Belle Vue	Medium	N/A	No Change	Neutral	C	None	N/A	Neutral - Not significant
69-ammunitions store in south-east part of airfield	Low	Preservation in situ under open space/ trees to be retained as secured through The Heritage Strategy (ES Appendix 4.12). Outline COCP and traffic management measures	Minor	Neutral/ Slight adverse	C	No additional mitigation	N/A	Neutral - Not significant
75-Medieval ditch	Low	None	Major	Slight/ Moderate adverse if on site	C	Geophysical survey, Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2 (only within the development boundary)	Planning condition	Slight adverse - Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
76-Medieval 11 <sup>th</sup> -12 <sup>th</sup> century settlement remains	Low	N/A	No Change	Neutral	C	None	N/A	Neutral - Not significant
77-Medieval 14 <sup>th</sup> -15 <sup>th</sup> century ditches and enclosures	Low	N/A	No Change	Neutral	C	None	N/A	Neutral - Not significant
79-?16 <sup>th</sup> century ditches	Low	N/A	No Change	Neutral	C	None	N/A	Neutral - Not significant
107-Medieval Holloway, enclosure and buildings	Medium	N/A	No Change	Neutral	C	None	N/A	Neutral - Not significant
111-Geophysical anomalies from Harringe Court	Low	None	Major	Slight/ Moderate adverse	C	Trial Trenching and excavation.	Planning Condition	Neutral - Not significant
112-cropmark of an enclosure	Medium	None	Major	Moderate/ Large adverse	C	Geophysical survey, Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning Condition	Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
113-barrow (Scheduled)	High	<p>Preservation in situ in public open space as secured through the Parameter Plans (ES Appendix 4.2). Long term stewardship secured through Heritage Strategy (ES Appendix 4.12)</p> <p>Outline COCP and traffic management measures</p>	Negligible	Slight adverse	O	No additional mitigation required	N/A	Slight adverse -Not significant
114-barrow (Scheduled)	High	<p>Preservation in situ in public open space as secured through the Parameter Plans (ES Appendix 4.2). Long term stewardship secured through Heritage Strategy (ES Appendix 4.12)</p> <p>Outline COCP and traffic management measures</p>	Negligible	Slight adverse	O	No additional mitigation required	N/A	Slight adverse - Not significant
115-barrow (Scheduled)	High	<p>Preservation in situ in public open space as secured through the Parameter Plans (ES Appendix 4.2). Long term stewardship secured through Heritage Strategy (ES Appendix 4.12)</p> <p>Outline COCP and traffic management measures</p>	Negligible	Slight adverse	O	No additional mitigation required	N/A	Slight adverse - Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
116-barrow	Medium	N/A	No Change	Neutral	O	None	N/A	Neutral - Not significant
121-Prehistoric ditch and postholes	Medium	None	Major	Moderate/Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse - not significant
122-ridge and furrow	Low	Preserved in an area of woodland	No Change	Neutral	C	No additional mitigation	N/A	Neutral - Not significant
123-LiDAR feature	Negligible	None	Major	Slight adverse	C	Earthwork survey, Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral - Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
124-LiDAR feature	Negligible	None	Major	Slight adverse	C	Earthwork survey, Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral - Not significant
125-LiDAR feature	Negligible	None	Major	Slight adverse	C	Earthwork survey, Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral - Not significant
126-wall of rifle range	Medium	Preservation in situ in trees Outline COCP and traffic management measures	Minor	Slight adverse	C	No additional mitigation	N/A	Slight adverse – Not significant
127-former narrow-gauge railway	Low	None	Major	Slight/Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
128-field boundary	Medium	None	Major	Moderate/ Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse – Not significant
129-possible aircraft dispersal pen	Medium	None	Moderate	Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse -Not significant
130-barrow (Scheduled)	High	Preservation in situ in public open space and long term stewardship and interpretation secured via the Heritage Strategy (ES Appendix 4.12)  Outline COCP and traffic management measures	Negligible	Slight adverse	O	No additional mitigation required	N/A	Slight adverse -Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
131-barrow (Scheduled)	High	Preservation in situ in public open space and long term stewardship and interpretation secured via the Heritage Strategy (ES Appendix 4.12)  Outline COCP and traffic management measures	Negligible	Slight adverse	O	No additional mitigation required	N/A	Slight adverse – Not Significant
132-Late Iron Age ring ditch	Medium	None	Major	Moderate/Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse – Not significant
133-geophysical anomaly of a ring ditch thought to be barrow but by trial trenching proved inconclusive	Medium if Prehistoric barrow, low if post-Medieval feature	None	Major	Moderate/Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse - Not significant



Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
134- LiDAR feature thought to be barrow but not proved by trial trenching	Negligible	None	Major	Slight adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral – Not significant
135-barrow (Scheduled)	High	Preservation in situ in public open space as secured through the Parameter Plans (ES Appendix 4.2). Long term stewardship and interpretation secured via the Heritage Strategy (ES Appendix 4.12)  Outline COCP and traffic management measures	Negligible	Slight adverse	O	No additional mitigation required	N/A	Slight adverse (Not significant)
136-barrow (Scheduled)	High	Preservation in situ in public open space as secured through the Parameter Plans (ES Appendix 4.2). Long term stewardship and interpretation secured via the Heritage Strategy (ES Appendix 4.12)  Outline COCP and traffic management measures	Negligible	Slight adverse	O	No additional mitigation required	N/A	Slight adverse - Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
137-field boundary	Medium	None	Major	Moderate/Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse - Not significant
138-field boundary	Medium	None	Major	Moderate/Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse - Not significant
139-field boundary	Medium	None	Major	Moderate/Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse - Not significant
140-LiDAR feature	Low	N/A	No Change	Neutral	C, O	None	N/A	Neutral – Not significant
141-LiDAR feature	Low	N/A	No Change	Neutral	C, O	None	N/A	Neutral – Not significant
142-possible pillbox location	Medium	N/A	No Change	Neutral	C	None	N/A	Neutral – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
143-possible pillbox location	Medium	N/A	No Change	Neutral	C	None	N/A	Neutral – Not significant
144-unknown feature, probably military	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral - Not significant
147-water/drainage feature or pond south of WH Castle	Medium	Preserved as wetland habitat area as secured through The Green Infrastructure Strategy (ES Appendix 4.11) and Heritage Strategy (ES Appendix 4.12). Rewatering of this area is secured via the Surface Water Drainage Strategy Outline COCP and traffic management measures	Minor	Slight adverse	C	If groundworks required to re-flood the area a watching brief would be needed  No additional mitigation required	Planning Condition	Slight adverse - Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
148-water feature south of WH Castle	Medium	<p>Preserved as wetland habitat area as secured through The Green Infrastructure Strategy (ES Appendix 4.11) and Heritage Strategy (ES Appendix 4.12).</p> <p>Rewatering of this area is secured via the Surface Water Drainage Strategy</p> <p>Outline COCP and traffic management measures</p>	Minor	Slight adverse	C	<p>If groundworks required to re-flood the area a watching brief will be needed</p> <p>No additional mitigation required</p>	Planning Condition	Slight adverse - Not significant
149-causeway to the Castle (Scheduled)	High	<p>Preserved in situ and brought back into use. Connection with Castle restored. Secured through the Parameter Plans (ES Appendix 4.2), Strategic Design Principles (ES Appendix 4.3) and the Heritage Strategy (ES Appendix 4.12). Long term stewardship secured through Heritage Strategy (ES Appendix 4.12)</p> <p>Outline COCP and traffic management measures</p>	Minor beneficial	Moderate/ Slight beneficial	C	Watching brief required on groundworks to create new surface and crossing points	Planning condition	Moderate beneficial – a <b>significant beneficial effect</b>

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
150-unknown building, probably military	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral – Not significant
151-possible site of gun emplacement	Low to Medium	None	Major	Moderate/ Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse - Not significant
152-line of civil runway of airfield	Low	Will be preserved in situ, where possible, as secured through the Heritage Strategy (ES Appendix 4.12)	Minor	Neutral/ Slight adverse	C	No additional mitigation required	N/A	Neutral/Slight adverse - Not significant
153-Folkestone racecourse	Low	Certain racecourse elements to be retained. Elements of racecourse evoked in design. Secured by Heritage Strategy (ES Appendix 4.12)	Major	Slight/ Moderate adverse	C, O	Building recording of grandstand buildings or excavation of below ground features	Planning condition	Slight adverse – Not Significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
154-deerpark including its boundary	Low	Ditch/hedge 222 (line of western boundary) to be preserved and reinforced. Certain other elements of the deerpark to be retained. Design to evoke deerpark landscape.	Moderate	Slight adverse	C	Excavation. Recording. Documentary research into the deerpark  Also See 222- where boundary is confirmed within site.	Planning condition. Also See 222	Neutral – Not significant
155-barrow	Medium	N/A	No Change	Neutral	C	None	N/A	Neutral – Not significant
156-barrow	Medium	N/A	No Change	Neutral	C	None	N/A	Neutral – Not significant
157-Former Pound House	Low	N/A	No Change	Neutral	C	None	N/A	Neutral – Not significant
158-former track to Pound House	Low	Route preserved in situ as a footpath/cycle path. Secured through the Parameter Plan (Movement and Access) and the Heritage Strategy (ES Appendix 4.12)	Negligible	Neutral/Slight adverse	C	Watching brief during creation of path.	N/A	Neutral – Not significant
162- earthwork-possible dispersal pen (possibly the same as BH42)	Low	Preserved within trees to be retained as secured through the Parameter Plans (ES Appendix 4.2) and Heritage Strategy (ES Appendix 4.12)	Minor	Slight adverse	C	No additional mitigation required	N/A	Slight– Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
166-site of Tudor Garden immediately south of Westenhanger Castle moat	Medium	Preserved largely in situ within green infrastructure and enhanced for the public. Secured via Green Infrastructure Strategy (ES Appendix 4.11) and Heritage Strategy (ES Appendix 4.12).  Outline COCP and traffic management measures	Minor beneficial	Slight beneficial	C	Mitigation in the form of excavation will be undertaken if the re-creation of the garden requires groundworks or tree planting which might damage the buried archaeological remains. It to be informed by trial trenching. Trenching to completed prior to Tier 2	Planning condition	Slight beneficial – Not significant
167-Romano-British Villa	Medium	Preservation in situ under open space as secured via Green Infrastructure Strategy (ES Appendix 4.11) and Heritage Strategy (ES Appendix 4.12)  Long term stewardship and interpretation for the public secured via the Heritage Strategy (ES Appendix 4.12)	Minor	Slight adverse	C	Further geophysics and possible excavation for research purposes only,  Watching brief on any path or water vole ditch creation	Planning condition	Neutral - Not significant



Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
168-undated ditches probably part of Romano-British Villa	Medium	Partial preservation in situ under open space as secured by Heritage Strategy (ES Appendix 4.12). Partial removal through SUDs  Long term stewardship and interpretation for the public secured via the Heritage Strategy (ES Appendix 4.12)	Major	Moderate/Large adverse	C	Excavation of the stretch of ditch that will be removed by SUDS	Planning condition	Slight adverse– Not significant
169-undated ditch	Unknown	None	Major	Slight/Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral – Not significant
170-undated semi-circular feature	Unknown	None	Major	Slight/Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
171-undated features	Unknown	None	Major	Slight/Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral – Not significant
172-undated enclosures	Unknown	None	Major	Slight /Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral – Not significant
173-undated ditches and enclosures	Unknown	None	Major	Slight/Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral– Not significant
174-two burnt pits of middle Saxon date	Low	None	Major	Slight/Moderate adverse	C	Excavation	Planning condition	Neutral – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
175-Bronze Age to Iron Age circular enclosure and nearby ditch and pit	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - not significant
176-Early Romano-British linear ditches. Probably a trackway approaching 175	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse – not significant
177-Early to Middle Iron Age enclosure	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not significant
178-early Romano-British field system	Medium	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Slight adverse – Not significant
179-medieval ditches	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/slight adverse – Not significant
180-Early to Middle Iron Age ditch	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
181-undated double ditched enclosure	Medium	None	Major	Moderate/ Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse – Not significant
182-Early to Middle Iron Age hollow	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant
183-hollow containing Prehistoric artefacts	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not Significant
184-Four Late Bronze Age cremations cutting a Middle <b>Bronze</b> Age ditch	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/slight adverse– Not significant
185-Middle Bronze Age enclosure and ring ditch	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant
186-undated ditches and enclosures	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
187-middle Bronze Age field system	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant
188-Medieval enclosure	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse – Not significant
189-Late Bronze Age to Early Romano-British ditch	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant
190-Late Bronze Age to Early Iron Age curvilinear enclosure and 3 Iron Age pits	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not Significant
191-Early Romano-British field system, ditches and farmstead	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not Significant
192-Early to Middle Iron Age enclosure	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
193-Romano-British settlement enclosure with further building within	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not Significant
194-Early Iron Age to Early Romano-British ditches	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant
195-Middle Bronze Age ditch and pit	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse – Not significant
196-Neolithic ditch	Medium	None	Major	Moderate/ Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse - Not Significant
197-Medieval field boundary ditches	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
198-Late Iron Age to Early Romano-British field boundary ditches	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse – Not significant
199-Early 19th century brick clamp	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse – Not significant
200-Middle Bronze Age field system ditches	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant
201-Medieval pond in the corner of the hollow left by the Middle Bronze Age enclosure	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse – Not significant
202-Undated ditches, enclosure ditches and linear ditches	Unknown	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
203-Undated cremation (possibly Late Bronze Age)	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse – Not significant
204-Undated curvilinear ditch	Unknown	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse – Not significant
205-undated ditch	Unknown	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse – Not significant
206-Late Iron Age to Early Romano-British enclosure with ditches and pits	Medium	Preservation in situ in open space as secured through the Parameter Plans (ES Appendix 4.2)	No change	Neutral	C	No additional mitigation required	N/A	Neutral - Not Significant



Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
207-undated ditches	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse – Not significant
208-Late Iron Age to Romano-British Quarry Pit	Medium	Preservation in situ as secured through the Parameter Plans (ES Appendix 4.2)	No change	Neutral	C	No additional mitigation required	N/A	neutral - Not Significant
209-Post Medieval cobbled track	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse – Not significant
210-Prehistoric enclosure	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not Significant
211-Undated ditches, possibly a trackway	Unknown	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
212-Late Iron Age to Romano-British enclosure	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not Significant
213-Late Iron Age - Romano-British settlement enclosure with post-built Romano-British building	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not Significant
214-Romano-British ditch	Medium	None	Major	Moderate/ Slight adverse	C	Excavation	Planning condition	Slight adverse – Not significant
215-Late Iron Age ring ditch	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant
216-Romano-British enclosure with Romano-British ditches inside	Medium	None	Major	Moderate/ Slight adverse	C	Excavation	Planning condition	Slight adverse – Not significant
217-Area of Middle Iron Age to Late Iron Age and Romano-British pits bordered by lengths of ditch	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not Significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
218-Romano-British ditches	Medium	None	Major	Moderate/ Slight adverse	C	Excavation	Planning condition	Slight adverse – Not significant
219-undated ditches	Medium	Preservation in situ as secured through the Parameter Plans (ES Appendix 4.2)	Negligible	Neutral/ Slight adverse	C	No additional mitigation required	N/A	Neutral/Slight adverse – Not significant
220-Buried land surface sealed beneath barrow (Asset 136), a sizeable assemblage of Mesolithic flint	Medium	Preservation in situ as secured through the Parameter Plans (ES Appendix 4.2)	Negligible	Neutral/ Slight adverse	C	No additional mitigation required	N/A	Neutral/Slight adverse – Not significant
221-undated ditches	Medium	None	Major	Moderate/ Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse – Not significant
222-post-Medieval ditches including a length that corresponds to the western boundary of the deerpark (154)	Low	Preservation in situ. Enhancement as landscape feature through advanced planting. Secured through the Parameter Plans (ES Appendix 4.2).	Negligible	Neutral/ Slight adverse	C	No additional mitigation required	N/A	Neutral/Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
223-Ring ditch east of Barrow Hill. Mixed dating.	Low	None	Major	Slight/Moderate adverse	C	Excavation	Planning Condition	Slight adverse – Not significant
224-undated features	Low	None	Major	Slight/Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse – Not significant
225-Rectilinear system of enclosure ditches, Romano-British. Includes 2 trackways, pits, postholes and quarry pits	Medium	None	Major	Moderate/Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant
226-Prehistoric or Romano-British ditches (could be geological features)	Medium	None	Major	Moderate/Large adverse	C	Excavation	Planning condition	Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
227-Post Medieval ditch and robbed out wall of Tudor Garden	Medium	Preserved in situ although there may be some physical impact in re-imagining the Tudor Garden 166	Minor	Slight adverse	C	Excavation, if required.	Planning condition	Slight adverse – Not significant
228-Post Medieval ditches	Low	None	Major	Slight/Moderate adverse	C	Excavation	Planning condition	Neutral – Not significant
229-Ditches either sides of a layer of cobbles forming hardstanding or path, probably part of a track (Asset 158)	Low	None	Major	Slight/Moderate adverse	C	Excavation	Planning condition	Neutral – Not significant
230-Romano-British ditch	Low	Preservation in open space created for the reimagined Tudor Garden. Secured through the Heritage Strategy (ES Appendix 4.12)	Negligible	Neutral/ Slight adverse	C	No additional mitigation required unless damage from planting in which case excavation	N/A	Neutral adverse – Not significant
231-Z-shaped feature. Possible airfield related	Low	None	Major	Slight/Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
232-Airfield activity (part of taxiway?)	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse – Not significant
233-Airfield activity (part of taxiway?)	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse – Not significant
234-Airfield wind tee	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse – Not significant
235-aircraft dispersal pen	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
236-Enclosures, possibly airfield related	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse – Not significant
237-Area of Romano-British or Prehistoric field system	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse – Not significant
238-Early to Middle Iron Age ditches of a possible settlement enclosure. Includes at least one Middle Iron Age pit	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not Significant
239-Middle Bronze Age ditches of a field system	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse - Not Significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
240- Irregular anomalies of possible ditch features or geomorphological features.	Unknown	None	Major	Slight /Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse - Not significant
241- Modern isolated ditch-like anomaly	Negligible	None	Major	Slight adverse	C	No additional mitigation required	N/A	Neutral/Slight adverse -Not significant
242- Two linear anomalies likely relate to ditch-cut features of unknown origin.	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse -Not significant
243- Undated weak geophysical linear anomaly - may relate to ditch feature.	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse -Not significant



Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
244- Undated curving linear anomaly likely relating to a ditch-like feature. Possibly Roman	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse -Not significant
245- Undated weak linear anomalies, likely relating to ditch-like features of unknown origin, possibly Roman	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse -Not significant
246- Undated weak linear anomaly likely relating to ditch-like features of unknown origin.	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse -Not significant
247- Undated curving linear anomaly and two sub-circular anomalies likely represent ditch a pit feature	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse -Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
249- Undated Rectilinear anomaly representing possible structure or enclosure.	Low	None	Major	Slight/ Moderate adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Neutral/Slight adverse -Not significant
251- Two undated curvilinear ditches	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse -Not significant
252- Undated Linear anomalies	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse -Not significant
253- ring ditch of possible Bronze Age barrow	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse-Not significant
258- Romano-British quarry/extraction pits from geophysical survey.	Medium	None	Major	Moderate/ Large adverse	C	Excavation informed by future trial trenching, trial trenching to be completed prior to Tier 2	Planning condition	Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
259- Rectilinear L-shaped anomaly of ditch like feature from geophysics, possibly part of Castle water management system.	Medium	Preservation in situ in open space around the Castle under the current Parameter Plans (ES Appendix 4.2)	Minor	Slight adverse	O	No additional mitigation required	N/A	Slight adverse-Not significant
260- Linear geophysical anomalies, partly identified in trenching but remain undated.	Low	None	Major	Moderate/ Large adverse	C	Excavation. Mitigation through archaeological recording if warranted	Planning condition	Neutral/Slight adverse -Not significant
261- Post Medieval extraction pits	Low	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse-Not significant
263- ring ditch of possible Barrow	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse-Not significant
265- Extraction pit with Medieval finds assemblage	Low	None	Major	Moderate/ Large adverse	C	Further Trial Trenching in Tier 2. Mitigation through archaeological recording if warranted	Planning condition	Neutral/Slight adverse -Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
266- Walled building 12m x 11m in size with internal features identified through GPR within SM6.	High	Preservation in situ in open space within the Castle grounds as secured through Parameter Plans (ES Appendix 4.2).	Negligible	Slight adverse	O	No additional mitigation required	N/A	Slight adverse-Not significant
267- North south orientated walls representing possible continuation of 266 identified through GPR.	High		Negligible					
268- Rectilinear anomaly identified through GPR.	High		Negligible					
269- Tower structure associated with Westenhanger Castle, identified through GPR.	High		Negligible					

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
270- Bronze Age hoard (removed from site)	Medium	None	Major	Moderate/ Large adverse	C	Archaeological fieldwalking and metal detector survey to locate remaining fragments in the ploughsoil	Planning condition	Slight adverse-Not significant
271- Small brick watch building at Folkestone Racecourse	Low	None- demolished – see plans in support. May be echoed/reimagined as part of ‘Castle Park’	Major	Moderate/ Large adverse	C	Building recording if warranted	Planning condition	Neutral/Slight adverse -Not significant
272- Viewing box at Folkestone Racecourse	Low	None- demolished – see plans in support. May be echoed/reimagined as part of ‘Castle Park’	Major	Moderate/ Large adverse	C	Building recording if warranted	Planning condition	Neutral/Slight adverse- Not significant
273- Central grandstand at Folkestone Racecourse	Low	None - demolished – see plans in support.	Major	Moderate/ Large adverse	C	Building recording if warranted	Planning condition	Neutral/Slight adverse- Not significant
274- Judges viewing box at Folkestone Racecourse	Low	None - demolished – see plans in support. May be echoed/reimagined as part of ‘Castle Park’	Major	Moderate/ Large adverse	C	Building recording if warranted	Planning condition	Neutral/Slight adverse- Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
275- Possible storage or stables building at Folkestone Racecourse	Low	None - demolished – see plans in support.	Major	Moderate/ Large adverse	C	Building recording if warranted	Planning Condition	Neutral/Slight adverse- Not significant
276- Eastern grandstand at Folkestone Racecourse	Low	None -demolished – see plans in support.	Major	Moderate/ Large adverse	C	Building recording	Planning condition	Neutral/Slight adverse- Not significant
277- Western grandstand at Folkestone Racecourse	Low	None- demolished – see plans in support.	Major	Moderate/ Large adverse	C	Building recording if warranted	Planning condition	Neutral/Slight adverse- Not significant
278- Single-storey weatherboarded building, white painted, at Folkestone Racecourse	Low	None - demolished – see plans in support.	Major	Moderate/ Large adverse	C	Building recording if warranted	Planning condition	Neutral/Slight adverse- Not significant
279- Winner's Circle at Folkestone Racecourse	Low	Preservation in situ in open space as secured through the Heritage Strategy (ES Appendix 4.12)	Minor	Neutral/ Slight adverse	C	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
280- Ornamental pond feature in paddock at Folkestone Racecourse	Low	Preservation in situ in open space as secured through the Heritage Strategy (ES Appendix 4.12)	Minor	Neutral/ slight adverse	C	No additional mitigation required	N/A	Slight adverse-Not significant
281- Two storey brick building at Folkestone Racecourse	Low	None - demolished – see plans in support.	Major	Moderate/ Large adverse	C	Building recording if warranted	Planning condition	Neutral/Slight adverse-Not significant
282- Farmhouse at Hillhurst Farm (BH32)	Low	Preservation and sensitive adaption as part of Hillhurst Farm Long term conservation Secured by Heritage Strategy (ES Appendix 4.12)	Minor	Neutral/Slight adverse	C, O	Building recording prior to any changes to the building's fabric to incorporate into masterplan.	Planning condition	Neutral/Slight adverse-Not significant
283- L-shaped brick-built barn at Hillhurst Farm (BH32)	Low	Preservation and sensitive adaption as part of Hillhurst Farm Long term conservation Secured by Heritage Strategy (ES Appendix 4.12)	Minor	Neutral/Slight adverse	C, O	Building recording prior to any changes to the building's fabric to incorporate into masterplan.	Planning condition	Neutral/Slight adverse-Not significant
284- Barrow	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
285 – rectangular geophysical anomaly - Church of St Mary within outer court of Westenhanger Castle (same as 45)	High	Preserved in situ in open space within the Castle grounds via the Parameter Plans (ES Appendix 4.2)	Negligible	Slight	O	None required	N/A	Slight adverse – Not significant
286- Modern pit with discarded waste material from railway	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
287- large Iron Age- possible boundary marker of part of a monument	Medium	None	Major	Moderate/ Large adverse	C	Excavation.	Planning condition	Slight adverse-Not significant
288- Tudor brick wall identified through trenching.	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
289- Pit with Neolithic material	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse-Not significant



Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
291- Cluster of pits	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
292- Possible deerpark ditch associated with the former deerpark at Westenhanger Castle	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse-Not significant
293- Possible Neolithic occupation/transitional site. Includes a pit	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse-Not significant
294- Edge of Medieval occupational area	Medium	None	Major	Moderate/ Large adverse	C	Excavation	Planning condition	Slight adverse-Not significant
295- Concentration of Anglo-Saxon pits of possible waste area	Medium	Preserved in situ in green buffer to causeway as secured through the Parameter Plans (ES Appendix 4.2)	No change	Neutral	C	No additional mitigation required	N/A	Neutral
296- Possible intersecting linear ditches	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
297- Undated field system identified through trenching	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
298- Prehistoric ditches	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
299- Medieval ditches and pit with possible association to deerpark activity.	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
300- Possible concentration of undated activity in the south of the racecourse	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
301- LiDAR feature trenched and possible deerpark activity.	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
302- Perpendicular ditches with Bronze Age pottery	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
303- Possible Romano-British ditch feature	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
304- Undated ditches	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
305- Undated ditch and pit	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
306- Undated features	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant
307- Undated features	Low	None	Major	Slight/ Moderate adverse	C	Excavation	Planning condition	Neutral/Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
308/309/310/311/312- series of geophysical anomalies from survey of Land at Lyveden, Stone Street	Medium	None	Major	Moderate/ Large adverse	C	Trial Trenching in Tier 2. Mitigation through excavation if warranted	Planning condition	Slight adverse- Not significant.
BH1-WWII munitions store at Farmed Farm outside OPA	Low to Medium	COCP and traffic control measures	No change	Neutral	C, O	No additional mitigation	N/A	Neutral – Not significant
BH3-Westenhager Station	Medium	COCP and traffic control measures. Will be upgraded and public realm will be improved around it. Secured in the Strategic Design Principles (ES Appendix 4.3)	Minor beneficial	Slight beneficial	C, O	No additional mitigation	N/A	Slight beneficial-Not significant
BH6-Harringe Court	Negligible	Landscape buffer, advanced planting COCP and traffic control measures.	No Change	Neutral	C, O	No additional mitigation	N/A	Neutral – Not significant
BH13-Barrow Hill Farm	Low	COCP and traffic control measures.	Minor	Neutral/Slight adverse	C, O	No additional mitigation	N/A	Neutral/Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
BH17- Farmstead south east of Railway Cottage	Low	COCP and traffic control measures.	Minor	Neutral/Slight adverse	C, O	No additional mitigation	N/A	Neutral/Slight adverse-Not significant
BH19- demolished outfarm north west of Berwick House	Low	None	Moderate	Slight adverse	C, O	Trial Trenching in Tier 2. Mitigation through excavation if warranted	Planning condition	Slight adverse-Not significant
BH20 – barn and pigsty at Upper Otterpool (LB20)	Low	See LB20	Minor	Neutral/ slight adverse	C, O	Not additional mitigation	N/A	Neutral/slight adverse
BH23- demolished outfarm south east of Westenhanger	Low	None	Moderate	Slight adverse	C, O	Trial Trenching in Tier 2. Mitigation through excavation if warranted	Planning condition	Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
BH24-Twin Chimney Farm (Listed -Grade II)	Medium	Embedded design through screening and low height built development. Secured on the Parameter Plans (ES Appendix 4.2) COCP and Traffic management plan will address general noise and traffic impacts as secured through the CTMP	Minor	Slight adverse	C, O	No additional mitigation required	N/A	Slight adverse-Not significant
BH25- New Inn Green Farm (Listed Grade II)	Medium	Embedded design through COCP and Traffic management plan which will address general noise and traffic impacts	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
BH26-demolished outfarm south west of Newingreen	Low	none	No Change	Neutral	C, O	No additional mitigation required	N/A	Neutral – Not significant
BH28-Berwick Manor	Medium	COCP and Traffic management plan will address general noise and traffic impacts as secured through the CTMP	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
BH32-Hillhurst Farm	Low	COCP and Traffic management plan will address general noise and traffic impacts as secured through the CTMP  Preservation of historic parts i- 282 and 283. Sensitive adaption as part of Hillhurst Farm  Long term conservation  Secured by Heritage Strategy (ES Appendix 4.12)	Minor	Neutral/slight adverse	C, O	Building recording	Planning condition	Neutral/Slight adverse-Not significant
BH38-Demolished Little Sandling Farmstead	Low	None	Moderate	Neutral/Slight adverse	C, O	Geophysical survey and trial trenching evaluation to be carried out prior to Tier 2. This will inform mitigation (possibly excavation if needed)	Planning condition	Neutral – Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
BH42-Air raid shelter (possibly the same as 162)	Medium	COCP and Traffic management plan will address general noise and traffic impacts as secured through the CTMP  Preservation in situ among trees to be retained. Secured through the Parameter Plans (ES Appendix 4.2)  Long term stewardship secured through Heritage Strategy (ES Appendix 4.12)	Minor	Slight adverse	C, O	No additional mitigation required	N/A	Slight adverse-Not significant
BH43, BH44, BH45, BH46, BH47-locatoin of former pillboxes	Low	This line of former pillboxes will be built over but there will be interpretation for the public as well as some sort of referencing of them in the layout  Secured by the Heritage Strategy (ES Appendix 4.12)	Major	Slight/ Moderate adverse	C, O	Building recording  Archaeological survey combined with documentary research	Planning condition	Neutral/Slight adverse-Not significant
FS1-Somerfield Court Farm (House)	Negligible	None – to be demolished. See plans in support	Major	Slight adverse	C, O	No additional mitigation	N/A	Slight adverse-Not significant
FS2-Mink Farm including the White House	Negligible	None – to be demolished. See plans in support	Major	Slight adverse	C, O	No additional mitigation	N/A	Slight adverse-Not significant



Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
FS3-Red House Farm	Negligible	None – to be either retained or demolished. Secured on the plans in support Assume demolition	Major	Slight adverse	C, O	No additional mitigation	N/A	Slight adverse-Not significant
FS4-Benham Water Farm	Negligible	None – to be either retained or demolished. secured on the plans in support. Assume demolition	Major	Slight adverse	C, O	No additional mitigation	N/A	Slight - Not significant
FS5-Elms Farm	Negligible	None – to be either retained or demolished. secured on the plans in support. Assume demolition	Major	Slight adverse	C, O	No additional mitigation	N/A	Slight - Not significant
WS1-earthwork features South of Harringe Court	Low	Traffic management plan will address general noise and traffic impacts.	Moderate	Slight adverse	C, O	No additional mitigation required	N/A	Neutral/slight – Not significant
WS2-The Lodge, Aldington Road	Low	Traffic management plan will address general noise and traffic impacts	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral /slight– Not significant
WS3-Old Mill Cottage, Aldington Road	Low	Traffic management plan will address general noise and traffic impacts	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS4-Milestone on A20	Low	Traffic management plan will address general noise and traffic impacts	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
WS5-Group of 1840s/Victorian Cottages/Railway cottages	Low	Traffic management plan will address general noise and traffic impacts	Minor	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS6-Two outbuildings at Belle Vue	Low	Traffic management plan will address general noise and traffic impacts	Negligible	Neutral/ Slight adverse	C, O	No additional mitigation required	N/A	Neutral/slight – Not significant
WS7-Cliff Cottage	Low	Traffic management plan will address general noise and traffic impacts	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS8-Medieval Barn at Otterpool Manor	Medium	Use of hoarding and bunding, damping down of the construction area, and control of vehicle movement through site speed limits and defined routes as set out in the Outline CoCP (ES Appendix 4.17) Keep existing buffers provided by hedgerows and trees as set out in the Parameter Plans (ES Appendix 4.2). Keep visual links between Upper Otterpool and Otterpool Manor	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
WS10-Oast House and Barn at Barrowhill Farm	Medium	Traffic management plan will address general noise and traffic impacts.	Minor	Slight adverse	C, O	No additional mitigation required	N/A	Slight adverse-Not significant
WS11-Humble Bee Hall '1763'	Low	Traffic management plan will address general noise and traffic impacts.	Minor	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS12-Rose Cottage - possible site of early cottage	Low	None – to be either retained or demolished. secured on the plans in support. Assume demolition	Major	Slight/Moderate adverse	C, O	Archaeological watching brief	Planning condition	Slight adverse-Not significant
WS13-Humble Bee Cottage	Low	Traffic management plan will address general noise and traffic impacts.	Minor	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS14-Military Buildings west of Otterpool Lane	See 30, 31, 32, 33, 34 and 35							
WS15-Nowell Cottage	Low	Traffic management plan will address general noise and traffic impacts	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse – Not significant
WS16-Earthwork features at Upper Otterpool	Low	None	Major	Slight/Moderate adverse	C	Earthwork survey and watching brief	Planning condition	Neutral/slight adverse - not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
WS17-holloway adjacent to Stone Street.	Low	None	Major	Slight/ Moderate adverse	C	Earthwork survey and/or excavation, if warranted	Planning Condition	Neutral/Slight adverse-Not significant
WS18-Harringe Cottages	Low	Traffic management plan will address general noise and traffic impacts	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/slight – Not significant
WS19-Possible Military Depot Building on Stone Street	Low	None – to be either retained or demolished. Secured on the plans in support. Assume demolition	Major	Slight/ Moderate adverse	C, O	Building recording	Planning condition	Neutral/Slight adverse-Not significant
WS20-Munitions Store south of Ashford Road including individual buildings WS30-WS34.	Low	None – to be either retained or demolished. Secured on the plans in support. Assume demolition	Major	Slight/ Moderate adverse	C, O	Building recording	Planning condition	Neutral/Slight adverse-Not significant
WS21-Bernhurst, Barrow Hill	Low	Traffic management plan will address general noise and traffic impact	Minor	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
WS22-Grove Bridge House – Foreman’s Cottage, Barrow Hill	Low	Traffic management plan will address general noise and traffic impacts	Minor	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS23-Klondyke Villas, Barrow Hill	Low	Traffic management plan will address general noise and traffic impacts	Minor	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS24-Otterpool Cottage, Belle Vue	Low	Traffic management plan will address general noise and traffic impacts	Negligible	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS25-St Johns Cottages	Low	Traffic management plan will address general noise and traffic impacts	Minor	Neutral/ Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS26-Zulu Cottage and Ottermere	Low	Traffic management plan will address general noise and traffic impacts	Minor	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS27-Merlin Cottage	Low	Traffic management plan will address general noise and traffic impacts	Minor	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS28-Chapel Cottages	Low	Traffic management plan will address general noise and traffic impacts	Minor	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
WS29-Gables East and West	Low	Traffic management plan will address general noise and traffic impacts	Minor	Neutral/Slight adverse	C, O	No additional mitigation required	N/A	Neutral/Slight adverse-Not significant
WS30 – hut at Red House Farm, made of a row of conjoined Nissen huts. Part of WS20	Low	None – to be demolished. Secured on the plans in support	Major	Slight/Moderate adverse	C, O	Building recording	Planning condition	Neutral/Slight adverse-Not significant
WS31 and WS32- a group of four, probably relocated, military huts.at Benham Business Park. Part of WS20	Low	None – to be either retained or demolished. secured on the plans in support. Assume demolition	Major	Slight/Moderate adverse	C, O	Building recording	Planning condition	Neutral/Slight adverse-Not significant
WS33 and WS34- a pair of buildings at Benham Business Park identified as in-situ elements of the munitions store. Part of WS20	Low	None – to be either retained or demolished. secured on the plans in support. Assume demolition	Major	Slight/Moderate adverse	C, O	Building recording	Planning condition	Neutral/Slight adverse-Not significant

Receptor	Value	Embedded Design Measures	Magnitude of Impact Pre-Additional Mitigation	Significance of Effect (pre-additional mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Significance of Effect
WS35 – Farm Cottage, west of WH Castle	Negligible	Retained or Demolished– secured on the plans in support. Assumed demolished	Major	Slight adverse	C, O	No additional mitigation	N/A	Slight adverse
WS36 – Tollgate Cottage, Stone Street	Low	Retained – secured on the plans in support Traffic management plan will address general noise and traffic impacts	Moderate	Slight adverse	C, O	No additional mitigation	N/A	Slight adverse

## 9.8 References

Reference	Title
Ref 9.1	<i>The Town and Country Planning Act 1990 c.8</i>
Ref 9.2	<i>The Planning (Listed Buildings and Conservation Areas) Regulations Act 1990 No.1519</i>
Ref 9.3	<i>The Ancient Monuments and Archaeological Areas Act 1979 c.46</i>
Ref 9.4	Reference not used
Ref 9.5	Reference not used
Ref 9.6	Folkestone & Hythe District Council (2006) Local Plan Review <i>Local plan - Folkestone &amp; Hythe District Council (folkestone-hythe.gov.uk)</i>
Ref 9.7	Kent Downs AONB Unit; <i>Landscape Design Handbook</i> ; <a href="https://s3-eu-west-1.amazonaws.com/explore-kent-bucket/uploads/sites/7/2018/04/18113859/Landscape-Design-Handbook.pdf">https://s3-eu-west-1.amazonaws.com/explore-kent-bucket/uploads/sites/7/2018/04/18113859/Landscape-Design-Handbook.pdf</a> ; Accessed 18 October 2018
Ref 9.8	Folkestone & Hythe District Council (2020); <i>Folkestone &amp; Hythe District Council Places and Policies Local Plan</i> <a href="https://www.folkestone-hythe.gov.uk/media/2969/Places-and-Policies-Local-Plan-2020/pdf/Places_and_Policies_Local_Plan_2020.pdf?m=637370773065900000">https://www.folkestone-hythe.gov.uk/media/2969/Places-and-Policies-Local-Plan-2020/pdf/Places_and_Policies_Local_Plan_2020.pdf?m=637370773065900000</a>
Ref 9.9	Folkestone & Hythe District Council (2020); <i>Folkestone and Hythe District Council Core Strategy Review 2022</i>
Ref 9.10	Ministry of Built development, Communities & Local Government (2018); <i>National Planning Policy Framework, Annex 2: Glossary</i> ; <a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a> ; Accessed: 18 October 2018
Ref 9.11	Historic England (2008); <i>Conservation Principles, Policies, and Guidance for the Sustainable Management of the Historic Environment</i> . Historic England.
Ref 9.12	Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS 2011), <a href="https://www.icomos.org/world_heritage/HIA_20110201.pdf">https://www.icomos.org/world_heritage/HIA_20110201.pdf</a>
Ref 9.13	Reference not used
Ref 9.14	Historic England (2015); <i>Historic Environment Good Practice Advice in Planning 2: Managing significance in decision taking in the historic environment</i> . Historic England.
Ref 9.15	Historic England (2017); <i>Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition)</i> ; Historic England.
Ref 9.16	Reference not used
Ref 9.17	Department for Culture Media and Sport 2013 <i>Policy Paper 'Scheduled Monuments &amp; nationally important but non-scheduled monuments'</i>



Reference	Title
Ref 9.18	Folkestone & Hythe District Council 201 <i>Folkestone &amp; Hythe District Heritage Strategy – Appendix 2: Case Study - Folkestone Racecourse</i>
Ref 9.19	Zetica UXO 2017 <i>Otterpool Park, Lympne, Kent - UXO Desk Study &amp; Risk Assessment</i>
Ref 9.20	Legislation.gov 1997 <i>The Hedgerows Regulations</i>
Ref 9.21	Historic England 2016 <i>Understanding Historic Buildings: A Guide to Good Recording Practice</i>
Ref 9.22	Legislation.gov <i>The Town and Country Planning (EIA) Regulations 2017</i>
Ref 9.23	Reference not used
Ref 9.24	Richard James, 2004, An Archaeological Earthwork Survey at Westenhanger Castle, Kent (Archaeology South-East Report)
Ref 9.25	Jake Weekes, 2012 revised 2019, South East Research Framework: Resource Assessment and Research Agenda for the Medieval Period.
Ref 9.26	Darnley Archaeological Services, April 2020, Geophysical Survey by Magnetometry, Land near Shepway Cross, Lympne, Kent.
Ref 9.27	Purcell, 2020, Westenhanger Castle Proposed Use and Redevelopment Masterplan.
Ref 9.28	Martyn Allen, David Bird and Ben Croxford, 2013 with additions in 2018 and 2019, South East Research Framework Resource Assessment and Research Agenda for the Roman Period
Ref. 9.29	<a href="http://www.turnpikes.org.uk/Tollhouses%20of%20Kent.htm">www.turnpikes.org.uk/Tollhouses of Kent.htm</a>

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