

OTTERPOOL PARK

Environmental Statement Appendix 9.8 – Otterpool Roman Villa Statement of Significance

December 2018



Otterpool Park ES – Otterpool Roman Villa Statement of Significance

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Executive Summary

The planning application seeks permission for a new garden settlement accommodating up to 8,500 homes (Use Classes C2 and C3) and Use Class E, F, B2, C1, Sui Generis development, including use of retained buildings as identified, with related infrastructure, highway works, green and blue infrastructure, with access, appearance, landscaping, layout and scale matters to be reserved.

This report presents an assessment of a former Roman Villa which was discovered by geophysical surveys and trial trenching east of Otterpool Quarry and south of Ashford Road in 2018. The archaeological investigations were carried out in advance of an outline planning application for Otterpool Park new garden settlement which covers an area of approximately 579ha and is centred on BGR 611239, 136507 ('the application site'). The Otterpool Park site comprises a large area of land between the M20 and the B2067 Aldington Road close to the village of Lympe, Kent and bisected by the A20 Ashford Road.

The former Villa is located approximately in the centre of the Otterpool Park development site and survives as limestone foundations as well as associated floor layers of varying preservation. A series of rooms were exposed but it has not been possible to establish the floor plan of the Villa. Rooms included a probable bath house. Heated floors are indicated by the survival of a hypocaust with the remains 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 boundary ditch can be dated to the first century, and a small amount of possible Conquest (43AD) period pottery was discovered. However, the majority of the features date to the middle Roman period. Little material dates to the fourth century, and no late Roman structural features were uncovered in the evaluation.

The Villa included a possible malting oven with a raised floor, the suggestion of a glass furnace and possible milling activity. Other features include a road, linear ditches and pits. Two structural phases were identified on many of the building remains, which were revealed approximately 0.5m below the ground surface. The southern and western extent of the complex has only been very approximately defined and there is no clear evidence that the Villa continues north of Ashford Road. The eastern boundary however appears to have been formed by a former watercourse.

Current knowledge of the Roman Villa at Otterpool indicates that it is of high regional importance. From what has been currently excavated the Villa does not appear to be particularly well preserved compared to other villas. It shows signs of extensive robbing; only one course of walling survives and the rest of the stonework comprises wall foundations. No plaster or mosaic floors were found which suggests truncation by ploughing. Despite this, environmental preservation was good and the pits and former stream channel to the east of the Villa buildings were shown to preserve organic remains such as wood and antler as well as charcoal. There is also the potential for pollen and plant remains that will provide information on the past Roman environment.

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. The proposed woodland country park that is proposed as part of the Otterpool Park application would keep open space around the Villa, despite not being agricultural, and it would still be intelligible as a Roman Villa; the setting makes a contribution to its significance but is not the most important factor.

The change to setting would have a negative effect on the appreciation of the Villa's significance but its significance derives to a much greater extent from its archaeological interest and its potential for architectural and artistic interest, from structural and decorative remains. Therefore, with preservation in situ and careful landscaping and interpretation, the significance of the setting of the Villa would not be greatly affected by the development.

1 Introduction

1.1 Project background

- 1.1.1 Arcadis Consulting (UK) Limited (Arcadis) was commissioned Otterpool Park LLP to prepare a Statement of Significance relating to a Roman Villa site at Otterpool, Kent. This Statement of Significance assesses the significance of the Roman Villa and its setting. This report responds to recommendations from Historic England and Kent County Council as statutory consultees to improve understanding of the significance of the Villa as heritage asset in order to inform master-planning, further assessment and mitigation for the proposed Otterpool Park development. It considers the contribution made to significance by the archaeological remains and their setting and views.
- 1.1.2 The planning application seeks permission for a new garden settlement accommodating up to 8,500 homes (Use Classes C2 and C3) and Use Class E, F, B2, C1, Sui Generis development, including use of retained buildings as identified, with related infrastructure, highway works, green and blue infrastructure, with access, appearance, landscaping, layout and scale matters to be reserved (the proposed Development).

1.2 The Site

- 1.2.1 The Villa site (hereafter 'the site') is located approximately at the centre of the proposed Otterpool Park Development site (Figures 1 and 2). It is located approximately 700m south-west of Westenhanger Castle and is centred on NGR TR 11595 36557. The site is located south of the A20 Ashford Road and Mink Farm is present opposite the Villa to the north. The area of the Villa buildings, as seen on geophysical survey results, measures approximately 1.6 ha, but the full extent of the building and any associated complex or features has not currently been defined (Plates 8 and 12). The Villa appears to extend across two modern fields with the potential to also extend north across the A20 into the area of Mink Farm. A tributary of the East Stour River runs north-south to the east of the site and the access track to the Grade II Listed Upper Otterpool House runs north-south to the west.

1.3 Aims and Objectives

- 1.3.1 This Statement of Significance has been produced to improve understanding of the significance of this recently discovered heritage asset in order to inform master-planning, further assessment and mitigation. It forms Appendix 9.8 to the Otterpool Park Environmental Statement that accompanies the outline planning application for the development proposals set out in Section 1.1. Its function is to determine, as far as is possible from existing information, the nature, extent and significance of the Otterpool Roman Villa and its setting, and to assess the parameters for acceptable development.
- 1.3.2 The specific aims of the statement are:
- To set out the historical background of the Villa site based on an appraisal of existing desk-based research, site visit and the results of recent archaeological fieldwork investigations;
 - To assess the nature and extent of the setting of the Roman Villa site and the features and assets which contribute to this;
 - To assess the significance of the Villa;
 - To review relevant local and national planning policy;
 - To identify the potential impact (positive or negative) of the proposed Development on the Villa and its setting; and
 - Provide recommendations for further investigations or mitigation.

1.3.3 This was achieved through:

- Research at the Kent History and Library Centre for historic mapping and other documentary information about the site and its context
- Review of designated and non-designated heritage assets within the study area of 1km from the site boundary;
- Review of the relevant local, strategic and national heritage planning policy and guidance;
- Site visit to assess the Villa site, its setting and the local and wider context, with photography to illustrate
- Preparation of baseline narrative setting out the history and chronological development of the site; its significance, and the way its significance has been previously impacted.

2 Methodology

2.1 Cartographic sources

2.1.1 The following cartographic sources have been reviewed as part of the historic map regression:

- 1596 Symonson's Map of Kent (British Library online gallery (maps) : <http://www.bl.uk/onlinegallery/onlineex/maps/index.html>).
- 1769 The Blatt map of Kent (a copy of which is held by Westehanger Castle owner- John Forge).
- 1797 OS drawing (Plate 4).
- 1839 Lympne Tithe Map (Plate 6).
- 1877 First Edition OS Map.
- 1889-99 OS Map (Plate 7).
- 1908 OS Map.
- 1933 OS Map.
- 1943 OS Map.
- 1961 OS Map.
- 1973-78 OS Map.
- 1990 OS Map.
- 2016 OS Map.

2.2 Documentary sources

2.2.1 The following documentary sources were reviewed as part of the assessment:

- Chartered Institute for Archaeologists, 2014: *Code of Conduct*
- Chartered Institute for Archaeologists, 2014: Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment
- Historic England 2008: Conservation Principles, Policies and Guidance (under review)
- Historic England 2015: Managing Significance in Decision-Taking in the Historic Environment; historic environment good practice advice in planning;:2
- Historic England, 2017: The setting of heritage assets; historic environment good practice advice in planning: 3
- Her Majesty's Stationery Office. 1997: *Hedgerow Regulations*
- Land Use Consultants, 2005: South Downs Integrated Landscape Character Assessment
- CAP: Conservation Architecture & Planning, 2006: Shepway District Council Conservation Area Appraisal: Lympne
- Oxford Archaeology Unit, 2001: Kent Historic Landscape Character Assessment
- Folkestone & Hythe District Council: District Local Plan Review (2006) Policies Applicable 2013 Onwards.
- Folkestone & Hythe District Council: Places and Policies Local Plan, Preferred Options (Emerging)
- Folkestone & Hythe District Council: Core Strategy Local Plan 2013 (Emerging)
- Folkestone & Hythe District Council Draft Heritage Plan (in prep)
- Kent County Council HER (Historic Environment Record), 2016: *HER Monuments Report*

2.3 Internet sources

2.3.1 The following internet sources were reviewed as part of the assessment:

- MOD: Ministry of Defence Estate – Guidance on Aviation Archaeology [<https://www.gov.uk/guidance/aviation-archaeology> accessed 17/10/2016]
- Folkestone & Hythe District Council Planning Portal [<https://www.folkestone-hythe.gov.uk/planning-policy> accessed 05/12/2018]
- BGS: British Geological Survey - Geology of Britain Viewer [<http://mapapps.bgs.ac.uk/geologyofbritain/home.html> accessed 17/10/2016]
- BLO: British Library Online – Ordnance Survey Drawings Collection [<http://www.bl.uk/onlinegallery/onlineex/ordsurvdraw/> accessed 10/10/2016]
- NLS: National Library of Scotland – Ordnance Survey Maps [<http://maps.nls.uk/os/> accessed 10/10/2016]

2.3.2 In the main report bold text numbers in parenthesis are project identification numbers assigned by Arcadis during the desk-based assessment (Arcadis 2016/17)(ES Appendix 9.2) and are listed in a gazetteer in **Appendix A**.

2.4 Assessment Criteria

2.4.1 Significance (for heritage) is defined in National Planning Policy Framework (NPPF) Annex 2 as:

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

2.4.2 Current national guidance on the assessment of the significance of heritage assets is provided by Historic England. This assessment has given due weight to the emerging document *Conservation Principles, Policies, and Guidance for the Sustainable Management of the Historic Environment (Draft)* (2018) in which significance is weighed by consideration of the potential for the asset to demonstrate the following historic interest criteria (Table 1).

Table 1 – Historic Interest Criteria of Heritage Assets

Value Type	Definition of Interest
Evidential value (Archaeological interest)	Deriving from the potential of a place to yield evidence about past human activity. This is sometimes called evidential or research value. There will be archaeological interest 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. Archaeological interest 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 (Historic interest)	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 historic interest – because of the way in which it can illustrate the story of past events, people, and aspects of life (illustrative value, or interest). Historic value also includes communal interest which derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values but tend to have added and specific aspects.
Aesthetic value and communal value. (Architectural and artistic interest)	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 innovation, or the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Architectural interest is an interest in the art or science of the design, construction, artistry and decoration of buildings and structures of all types. Artistic interest is derived from the use of human imagination and skill to convey meaning through all forms of creative expression.

- 2.4.3 In light of the emerging *Conservation Principles* document, the term interest has been used throughout this report when describing the significance ‘value’ of an asset (Table 1).
- 2.4.4 The assessment of cultural heritage assets and their significance has also been undertaken with reference to the methodology described in DMRB Volume 11 Section 3 Part 2 Cultural Heritage (HA 208/07). This methodology has been used despite the nature of the proposal due to a current lack of other formal guidance on the assessment of effects on heritage assets. DMRB provides guidance on the assessment and management of environmental effects. Within DMRB, the cultural heritage resource is split relating to the assessment of the value of the resource. Professional judgement and best practice has been applied and this methodology is deemed appropriate due to the linear nature of the proposed Development.
- 2.4.5 To understand the level of any effect that a proposed Development may have on a heritage asset, an understanding of the ‘heritage value’ or ‘importance’ (value) of that asset needs to be achieved. The following tables aid in the assessment of the value of heritage assets and historic landscape (Table 2, Table 3).
- 2.4.6 Potential effects from development can include changes to the setting of assets caused by visual 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 2 – Asset value table (heritage assets)

Value	Factors deciding value
Very High/National or International	<ul style="list-style-type: none"> World Heritage Sites Assets of recognised international importance Assets that contribute to international research goals
High/National	<ul style="list-style-type: none"> Scheduled monuments Grade I and grade II* Listed Buildings Grade I and grade II* Registered Parks and Gardens Certain Grade II Listed Buildings Grade II Registered Parks and Gardens Non-designated assets of the quality and importance to be designated Assets that contribute to national research agendas
Medium/Regional	<ul style="list-style-type: none"> Certain Grade II Listed Buildings Conservation Areas Assets that contribute to regional research goals
Low/Local	<ul style="list-style-type: none"> Locally Listed Buildings Assets compromised by poor preservation and/or poor contextual associations Assets with importance to local interest groups Assets that contribute to local research goals
Negligible/Local	<ul style="list-style-type: none"> Assets with little or no archaeological/historical interest
Unknown	<ul style="list-style-type: none"> The importance of the asset has not been ascertained from available evidence

Table 3-Asset value table (Historic Landscape)

Value	Factors deciding value
Very High/National or International	<ul style="list-style-type: none"> World Heritage Sites inscribed for their historic landscape qualities. Historic landscapes of international value, whether designated or not. Extremely well preserved historic landscapes with exceptional coherence, time depth or other critical factors.
High/Regional-National	<ul style="list-style-type: none"> Designated historic landscapes of outstanding interest. Non-designated landscapes of outstanding interest. Non-designated landscapes of high quality and significance, and of demonstrable national value. Well preserved historic landscapes, exhibiting considerable coherence, time-depth, or other critical factor(s).
Medium/Regional	<ul style="list-style-type: none"> Designated special historic landscapes. Non-designated historic landscapes that would justify special historic landscape designation, landscapes of regional value. Averagely well-preserved historic landscapes with reasonable coherence, time depth or critical factor(s).
Low/Local	<ul style="list-style-type: none"> Robust non-designated historic landscapes. Historic landscapes with importance to local interest groups. Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations.
Negligible/Local	<ul style="list-style-type: none"> Landscapes with little or no significant historical interest.

- 2.4.7 While the values set out in Tables 2 and 3 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.
- 2.4.8 The aim of this statement of significance is to contribute to meeting Principle 3 of the emerging *Conservation Principles* document by giving an understanding of the value and significance of heritage assets.
- 2.4.9 This assessment will also aid in meeting Principle 5 of the emerging *Conservation Principles* document which states that “decisions about change in the historic environment demand the application of expertise, experience and judgement, in a consistent and transparent process which is as accessible as possible. They need to take account of views of those who have an interest in the assets affected and/or the changes being proposed.”
- 2.4.10 Finally, the above historic interest 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* (GPA 2) (Historic England, 2017) and *The setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3 (second edition)* (GPA 3) (Historic England, 2017) which set out advice for robust assessment of heritage assets. Namely this assessment will satisfy steps 1 – 4 within GPA 3 *The setting of heritage assets*. These are:
- Step 1: Identify which heritage assets and their settings are affected (in this case, the Villa).
 - Step 2: Assess the degree to which these settings and views contribute to the significance of the heritage asset(s) or allow significance to be appreciated.
 - Step 3: Assess the effects of the proposed Development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
 - Step 4: Explore ways to maximise enhancement and avoid or minimise harm.
- 2.4.11 Archaeological potential
- 2.4.12 An assessment of the archaeological potential of the site has also be undertaken as part of this assessment.
- 2.4.13 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.
- 2.4.14 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.

2.5 Assumptions and Limitations

- 2.5.1 Data from 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 Statement of Significance. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably correct.
- 2.5.2 There is often an element of uncertainty over the nature, frequency, and extent of the archaeological resource that may be expected to survive. As explained in Section 5.6 below the archaeological work that has been done so far on the of the Villa has been partial.

Geophysical and trial trench evaluation has taken place but not full excavation. The results of these investigations have had limitations and it is possible that hitherto unrecorded remains may exist.

2.6 Consultation

- 2.6.1 Consultation and site visits have been undertaken with Peter Kendall at Historic England with regard to the structure of this report and whether the Villa or the barrows in the surrounding area are of Schedulable significance. The advice received was that the structure of the report was fit for purpose and must directly address the principles of selection as found in the DCMS policy statement about scheduled monuments and nationally important but non-scheduled monuments. Advice was also given to ensure a focus on the Villa setting.
- 2.6.2 Lis Dyson, Heritage Conservation Manager and Ben Found, Archaeological Advisor to Folkestone & Hythe District Council, both from Kent County Council, were also consulted and visited the site in April 2018 as part of the compilation of this report. They were happy to let Historic England take the lead on formal advice but were involved in the review process once a draft report was produced.

2.7 Walkover Survey

- 2.7.1 A walkover survey for this Statement of Significance was undertaken on 1st August 2018, to view the location of the Villa, its general surroundings and views to and from the wider area (See Section 4). The walkover survey was conducted on foot and a photographic record made of:
- The above ground condition of the area of the Villa
 - The settings of the Villa and view from it to the surrounding area
 - Views from the surrounding landscape towards the Villa.

3 Regulation and Policy

3.1 Legislation

- 3.1.1 This assessment has been undertaken in accordance with current legislation, national and local plans, and policies. Relevant legislation, policy and guidance are outlined below.
- 3.1.2 The Ancient Monuments and Archaeological Areas Act 1979
- 3.1.3 The piece of legislation protecting Scheduled Monuments is the Ancient Monuments and Archaeological Areas Act 1979. The Act gives statutory protection to any structure, building or work considered to be of particular historic or archaeological interest and regulates any activities which may affect such areas. Under the Act any work that is carried out on a Scheduled Monument must first obtain Scheduled Monument consent. The Act does not make the setting of monuments statutory however the National Planning Policy Framework (DCLG 2012) identifies that Scheduled Ancient Monuments and their setting are a material consideration for a planning application. Additionally, the DCMS Policy Statement on Scheduled Monuments and Nationally Important Monuments (2013) states that works impacting the setting of a SM but not the monument itself, do not require SMC but may require other consents (see below).
- 3.1.4 Scheduled Monument Consent would be required before any works that would affect an SM including archaeological works. Geophysical survey may be permissible under Section 42 of the Act; Section 42 licence being required rather than Scheduled Monument Consent.

3.2 Policy

National Policy

National Planning Policy Framework (NPPF 2018)

- 3.2.1 The NPPF provides a framework within which local and neighbourhood plans can be produced. Planning law requires that applications for planning permission must be determined in accordance with the development plan. The NPPF must be considered in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.
- 3.2.2 Section 16 of the NPPF 'Conserving and Enhancing the Historic Environment' contains the government's policies relating to the historic environment.
- 3.2.3 Paragraphs 184-187 states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. In doing so they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.
- 3.2.4 Paragraph 189 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate Desk-Based Assessment and, where necessary, a field evaluation.
- 3.2.5 Paragraph 190 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including development affecting the setting of a heritage asset). They should take this assessment into account

when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

- 3.2.6 Paragraph 197 states that the effect of an application on the significance of a non-designated heritage asset should be considered in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 3.2.7 Paragraph 198 states that local planning authorities should not permit the loss of the whole or part of a heritage asset, without taking all reasonable steps to ensure that the new development will proceed after the loss has occurred.
- 3.2.8 Paragraph 194 (b) states that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments are to be considered subject to the same policies as designated heritage assets.
- 3.2.9 Paragraph 199 states, in part, that local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost, whether wholly or in part in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible, in the relevant HER or local museum.

Local Policy

Draft Folkestone & Hythe Heritage Strategy

- 3.2.10 The Folkestone & Hythe Heritage Strategy is currently being drafted. It was requested by FHDC to ensure that the heritage of the district plays a clear and positive role in its future. While the primary purpose of it is to address local planning needs it has also been written to explain the substantial benefits of and real value that conservation of the Historic Environment and Heritage Assets can bring to the District. Reference is made to part of the Heritage Strategy entitled 'Vulnerabilities of the Heritage Assets' has been forwarded by KCC. It contains a statement about vulnerabilities of archaeological sites to development *'Construction activities can directly affect buried archaeological remains through the excavation of new foundations, services, remodelling of land, stripping of sites in advance of development, piling works and from the operation of plant. Development can also involve the demolition of or damage to historic structures, buildings or features. Impacts that affect the setting of historic assets or the character of historic areas can result from the built form of new development, from activities through the process of construction and from the resultant use of the new development... development may affect the character of the historic landscape, removing features or going against the historic grain'*.

The Folkestone & Hythe District Council Core Strategy (2013)

- 3.2.11 The Folkestone and Hythe District Council Core Strategy (2013) is currently emerging and has not yet fully replaced the Local Plan 2006. In addition, the Places and Policies Plan is also emerging and covers which policies will be lost and which will be saved moving forward. Below are the policies which are applicable to the proposed Development. If an issue is not covered by a local policy or the local policy is not in line with current national policy, then national policy will take precedence.

Policy HE1 Heritage Assets

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

Policy HE2 Archaeology

3.2.13 Important archaeological sites, together with their settings, will be protected and, where possible, enhanced. Development which would adversely affect them will not be permitted. In areas where there is known archaeological interest, the district council will require appropriate desk-based assessment of the asset has been provided as part of the planning application. In addition, where important or potentially significant archaeological heritage assets may exist, developers will be required to arrange for field evaluations to be carried out in advance of the determination of planning applications. Where the case for development affecting a heritage asset of archaeological interest is accepted, the archaeological remains should be preserved in situ as the preferred approach. Where this is not possible or justified, appropriate provision for preservation by record may be an acceptable alternative. Any archaeological recording should be by an approved archaeological body and take place in accordance with a specification and programme of work to be submitted to and approved by the district council in advance of development commencing.

The Folkestone & Hythe Core Strategy Review (2019)

3.2.14 The Core Strategy 2013 is currently being reviewed in order to update the 2013 plan. The Core Strategy Review (2019) is an emerging document which has been given due consideration in this assessment. Relevant policies are:

3.2.15 SS7 (5) Enhanced heritage assets:

A) A heritage strategy shall be agreed that identifies how the development will conserve and enhance local heritage assets and their setting, including the Grade I listed Scheduled Monument of Westenhanger Castle (and its associated barns, stables and outbuildings), the Grade II listed Otterpool Manor Farm and Upper Otterpool and any other designated or non-designated heritage assets identified. The application shall be supported by a detailed heritage strategy, setting out how the long term, viable use of heritage assets will be established and where necessary providing mechanisms for their integration into the development...;

B) The heritage strategy should include an archaeology strategy, with an initial archaeological assessment guiding archaeological works and to inform discussions about preservation in situ or investigation. The archaeology strategy should be kept under active review...;

C) Other archaeological and heritage assets will be evaluated, conserved and, where appropriate, enhanced. Proposals must include an appropriate description of the significance of any heritage assets that may be affected, including the contribution of their setting...;

D) Proposals should explore the potential for: Enhancing and positively contributing to the conservation of all relevant heritage assets both within and outside the allocation boundary, such as the setting of Lympne Castle and the Lympne Conservation Area where appropriate

3.3 Guidance

Setting and Historic Views

3.3.1 Historic England has also published three Good Practice in Planning Advice (GPA) notes of which GPA 2 – *Managing Significance in Decision-Taking in the Historic Environment* (HE 2015) and GPA 3 - *The Setting of Heritage Assets* (HE 2017) are very relevant to this study. GPA 3 sets out guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

3.3.2 Setting is defined as “The surroundings in which a heritage receptor is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral”.

4 Walkover Survey

4.1 Location

- 4.1.1 When the walkover survey was undertaken on the 1st August 2018 the weather was very dry and hot with bright sunshine and had been preceded by several weeks of hot and dry weather. The results of the survey are detailed below.
- 4.1.2 The Villa site is on private agricultural land which is accessed from the north via a gateway from the A20 Ashford Road. The Villa features, as currently known, extend across two fields separated by a low bank topped by a post and wire fence (Plate 5). The western, smaller field is under pasture and is being grazed by sheep, it contains the channel of a former stream running north-south through its centre, visible in both aerial photography and on the ground. A single mature tree is present on the south-eastern corner of the boundary bank. The larger Villa field was under an unharvested crop of wheat, which had the potential to obscure some landscape features. A trial trench evaluation had recently been carried out and the scars of these backfilled trenches were visible. The surface of the backfilled material also contained Roman finds, such as imbrex and tegula fragments, tile and pottery. The eastern boundary of the larger Villa field is formed of a stream and a row of mature trees. The western boundary of the smaller Villa field is formed of a stream, access track, and row of trees.
- 4.1.3 The ground slopes gently upward toward the south and there is a visible pair of curved banks and a probable prehistoric barrow c. 100m to the south of the Villa site. These banks are visible on the ground and in historic mapping and the potential barrow, discovered through LiDAR analysis and trial trenching, is slightly discernible on the ground.

4.2 Setting and Views

- 4.2.1 There is limited visibility to the south, due to the elevation in topography (Plate 1).



Plate 1 View from the Villa looking south (scar of Trench 257 in foreground).

4.2.2 The Villa field is just visible from the rise to the south where geophysics (ES Appendix 9.10. Headland Archaeology 2018) detected the remains of a system of likely Romano-British enclosures (Plates 2 & 3). This probable Romano-British agricultural and settlement site (situated east of Link Park Industrial Estate) was likely to have been contemporary with the Villa and may have been part of its territory.

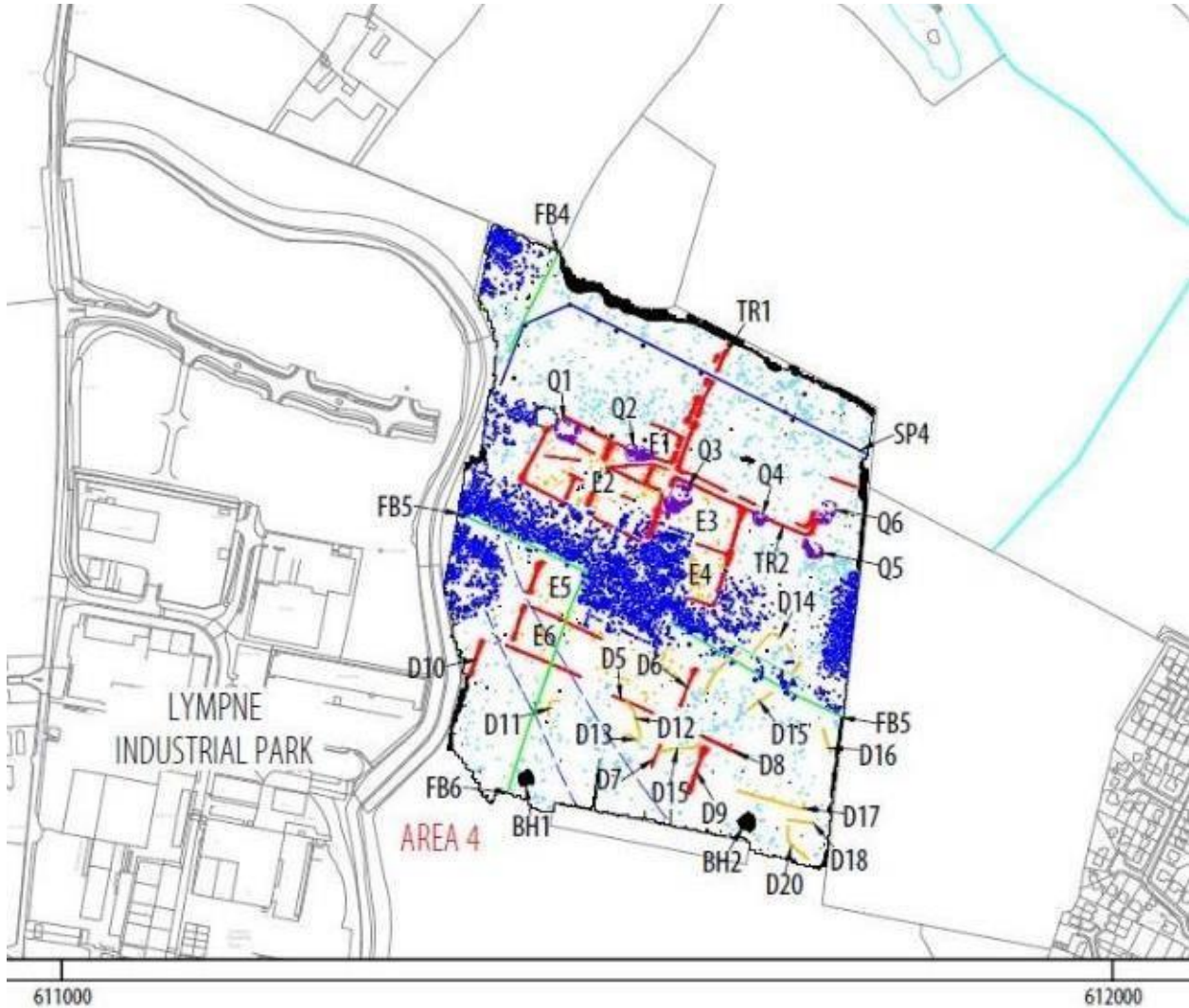


Plate 2: The Romano-British enclosures east of Link Park Industrial Estate which are 750m to the south of the Villa site.



Plate 3: View from the Romano-British enclosures east of Link Park Industrial Estate looking north toward the Villa site (Mink Farm visible as white building in centre of image).

- 4.2.3 To the north of the Villa site the ground slopes very gently downward and a line of hills, the southern edge of the North Downs, is visible on the horizon. Between 500m and 1km north-west of the Villa site are three barrows (44) (46) (116) which would have been in the Villa's contemporary landscape, but the rise in topography to the west means that they are not easily discernable, especially with dense tree cover. The barrow within the Villa field itself (136) may well have been more less eroded and more prominent as it would not have been subject to centuries of agricultural activity. The large Romano-British occupation site 1.5km to the west is not intervisible with the Villa site, but it is likely that it was contemporary and may have had some interaction or even association with the Villa.
- 4.2.4 Within the wider Roman landscape the site of the Villa is not particularly visible from the Roman Road of Stone Steet to the east, due to the slight dip in the landscape in which it sits and the level of current vegetation between the road and the Villa field.

5 Baseline Resource

5.1 Development of the Site

- 5.1.1 The 1596 Symondson's Map of Kent is not very detailed therefore not reproduced here, but it shows a group of trees in what would be the location of the Villa site.
- 5.1.2 The 1769 Map of Kent (not reproduced here) shows the road that is currently the A20 north of the Villa following the same route as modern day. The access to Westenhanger is off this road and runs north-east towards the Castle. The site of the Villa has no detail on land use but shows the stream immediately east of the Villa site and the former line of the stream which runs north-south through the eastern side of the Villa site. This stream was found during the 2018 trench investigations. To the east there is a label of 'Aster pool or Hardey Pool'. The houses of Upper Otterpool and Otterpool Manor are shown but are labelled with their former names 'Great Otterpool' and 'Little Otterpool' respectively.
- 5.1.3 The 1797 OS map shows no discernible change in road layout or structures but has more detail on land use. The current field boundaries are present but with more internal subdivisions. The southern part of Field 5 (Plate 4) is divided by a curved field boundary which follows the line of the eastern stream.



Plate 4: The 1797 OS drawing showing former field boundaries. Red circle indicates approximate Villa location.

- 5.1.4 The southern part of Field 5 is also shown as a different land use, most likely trees or woodland. There is a linear belt of trees extending north-west toward the western part of Field 5. The boundary of this woodland can be seen on some aerial images (Plate 5). The field boundaries north of the A20 are the same as present day.

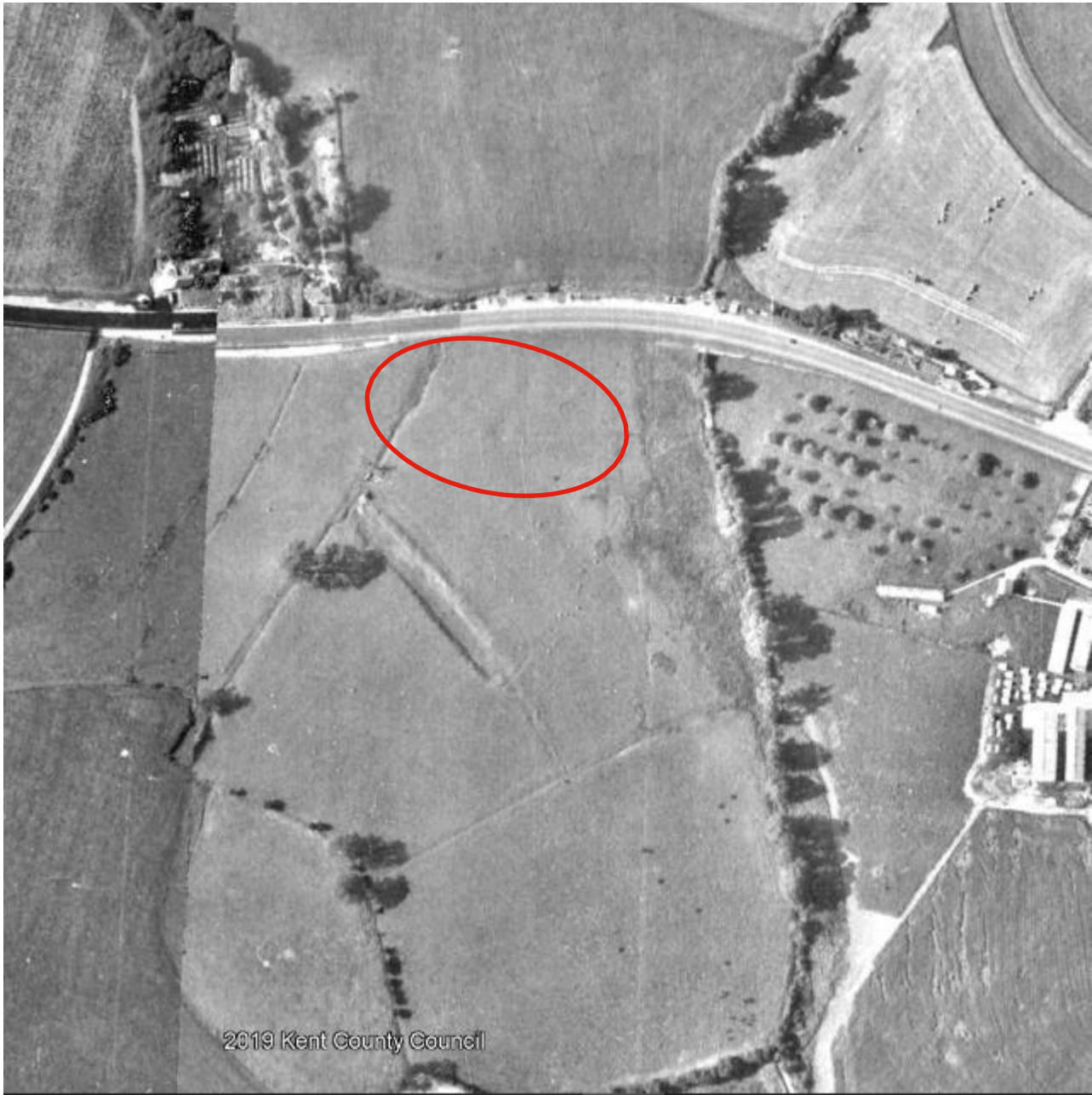


Plate 5: The 1961 Aerial photo of the Villa two fields. Red circle indicates approximate Villa location.

5.1.5 The 1839 Lympne Tithe map shows similar field sub-divisions, but with what appears to be a pond in the south-western corner of what was the woodland on the 1797 map. The linear belt of trees is a relic feature, shown as a dashed line in the western part of Field 5 (Plate 6). However, the apportionment listings detail the 'pond' illustrated as an area of woodland. The 1877 OS map shows the area as woodland, with a few isolated trees along the line of the linear belt of trees.



Plate 6: The 1839 Lympne Tithe Map. Red circle indicates approximate Villa location.

5.1.6 The 1899 OS map (Plate 7) shows the woodland but the field boundary in the west of Field 5 is no longer present. Along the line of the western field boundary is labelled 'Hydraulic Ram' (a cyclic water pump). This layout remains unchanged until 1945 when an aerial photo shows the area of woodland as only a few isolated trees. A few trees also remain along the field boundary which disappeared from mapping in 1899. The linear belt of trees is clearly visible as a large, trench feature. This was picked up by the trench evaluation in 2018 which found it to be a large ditch (Context 24712) which contained three fills which contained no cultural material and is therefore undated.

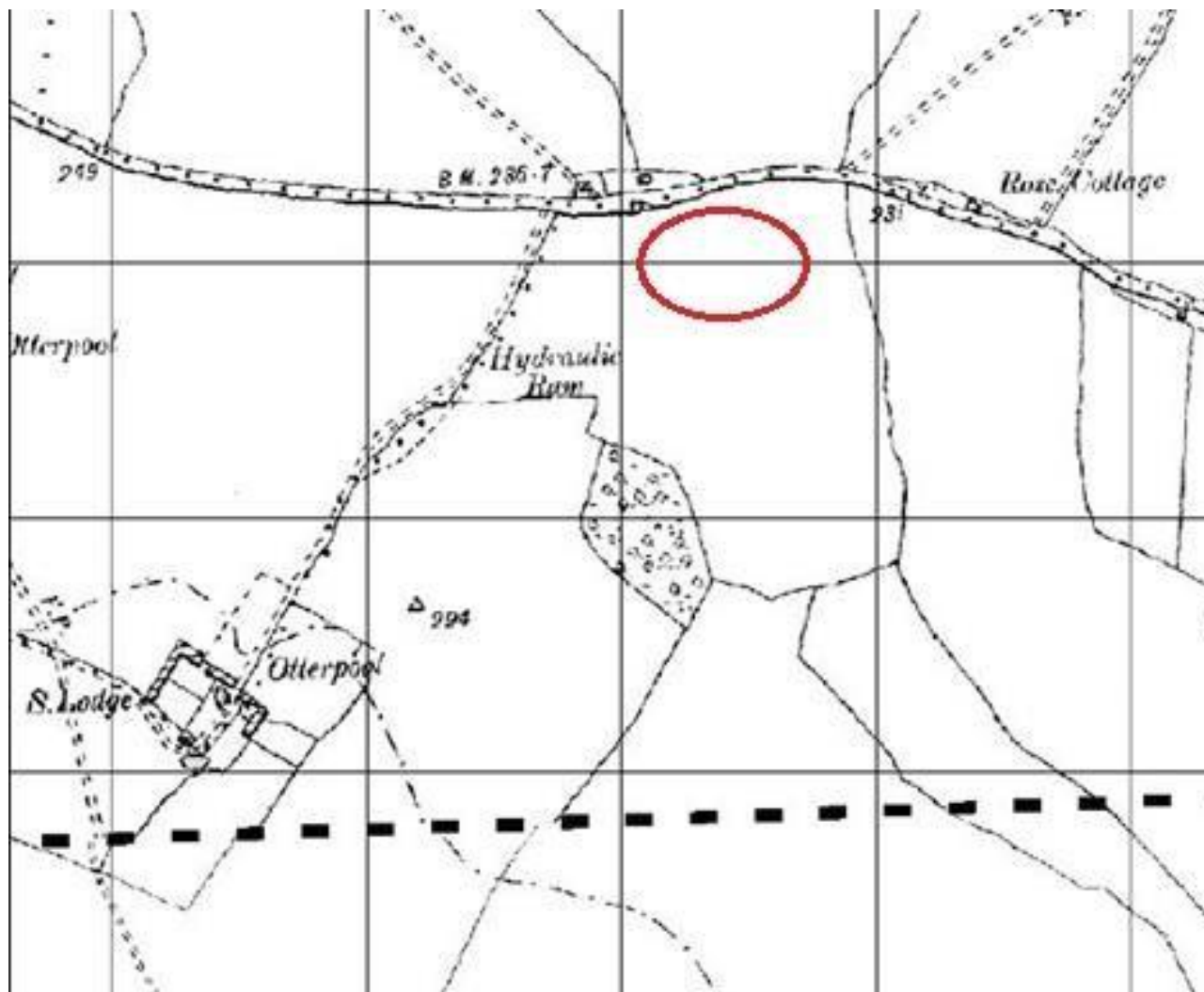


Plate 7: The 1899 OS Map. Red circle indicates approximate Villa location.

5.1.7 The area of former woodland remains on mapping until 2006 when the field layout changes to the modern layout. The hydraulic ram is not labelled on OS mapping after 1938.

5.2 The Villa within the Otterpool Park application site

5.2.1 The Villa spans the northern part of two fields located to the south of the A20 in the centre of the proposed Otterpool Park development site (Plate 5). It was first identified by geophysical survey in 2017 (magnetometry) (ES Appendix 9.12. Sumo 2018) as a series of rectilinear features and ditches and was not previously known before that (Plate 8). In the small western field that is part of the Villa site there was a well-defined length of ditch that may form one side of an enclosure, with the other side lying within the larger eastern field. In the western field there were also several short ditch lengths and other features that appeared to be part of the Villa complex and these extended into the larger eastern field (*ibid.*, 4). The magnetometry survey report interpreted this as indication of a small farmstead or settlement and noted that the magnetic responses were similar to small Roman villa sites, but they considered the lack of magnetic enhancement unusual for a villa site (*ibid.*). The Villa was then investigated by a trial trenching evaluation undertaken for the project by Oxford Archaeology in April 2018 (Plate 8) and the area in which it is located is referred to as Field 5 in the trial trenching report. (ES Appendix 9.18: Oxford Archaeology, Field 5, 2018).

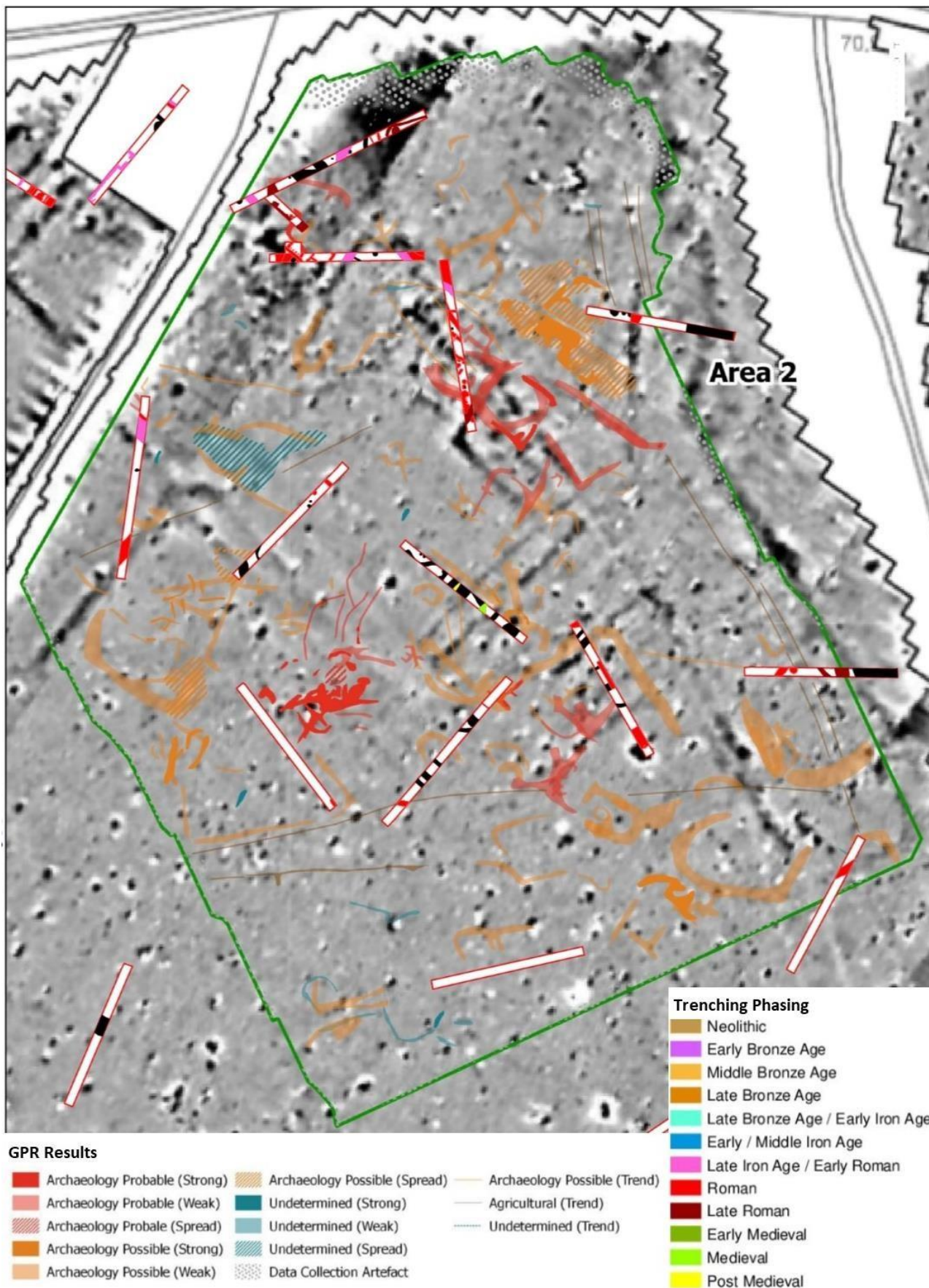


Plate 8: Magnetometry, GPR and Trenching within the Villa Fields.

5.2.2 In the field to the north of the A20 and immediately north of the Villa site a further phase of magnetometry survey was undertaken (Plate 9). This was carried out in order to establish if the Villa extended to the north of Ashford Road. In the west and south of this area were several anomalies of undetermined origin, comprising irregular shapes and small rounded discrete anomalies (Magnitude Surveys 2018, 15). Despite these anomalies being present, there are no features from the survey that indicate that the Villa continues into this area (*ibid.*).

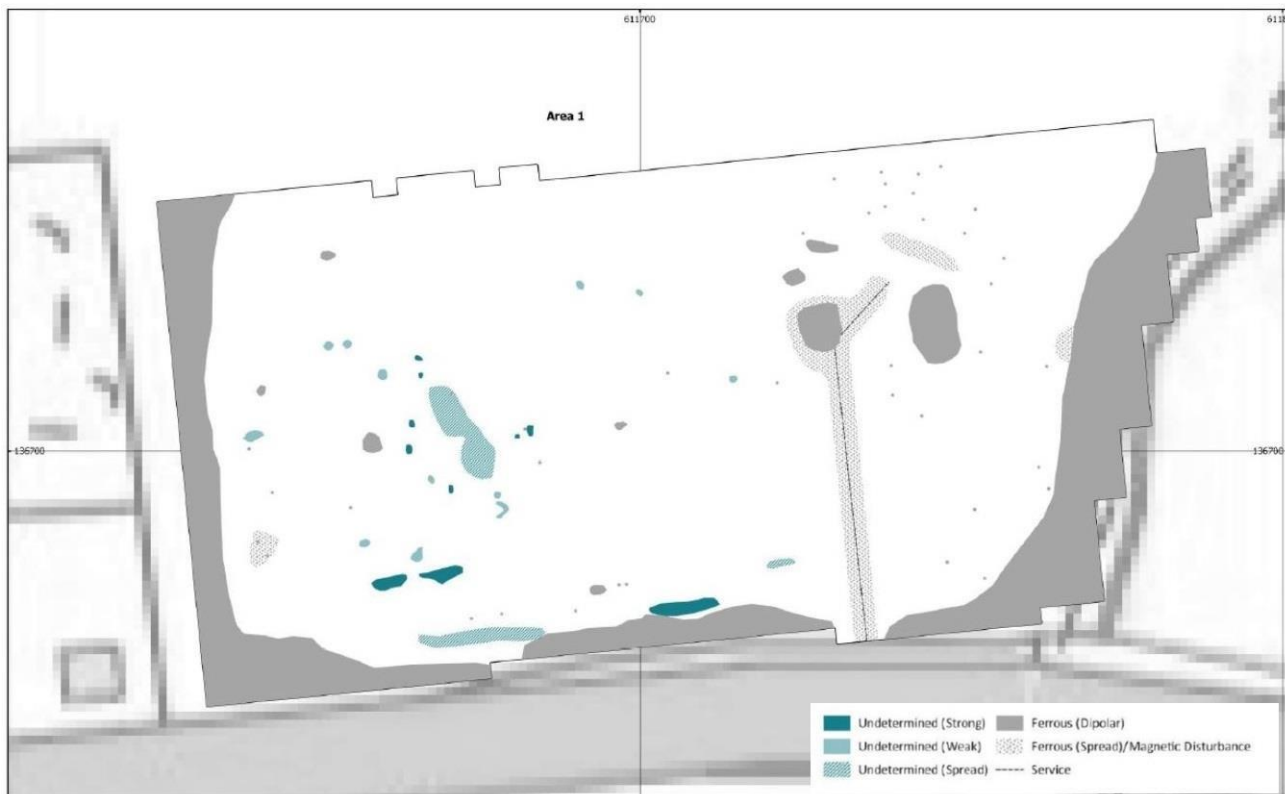


Plate 9: Magnetometry undertaken north of the A20 (Magnitude, 2018).

5.2.3 The trial trenching of the Villa site was undertaken in April and early May 2018 and recorded the foundations, and in some trenches, and lowest courses of limestone walls (Plate 10). The walls were primarily in the trenches at the northern end of the two fields, along with associated stone spreads and ground surfaces in varying states of preservation (ES Appendix 9.18. Oxford Archaeology, Field 5, 2018, i).



Plate 10: The Roman Villa in Trench 242, looking south-west(OA 2018, Field 5, Plate 4).

5.2.4 Two structural phases were identified on many of the building remains, which were revealed approximately 0.5m below the ground surface. The buildings included a hypocaust (Plate 11), with infilling including painted wall plaster and mortar, a possible malting oven, a substantial boundary ditch and associated wall and a large posthole that may indicate the location of a timber building (*ibid.*). A probable road, ditches and pits were also recorded. The wall plaster from the fill of the hypocaust was painted with a limited range of colours and no complex designs were identifiable, however, it is thought that the plaster and mortar probably derive from a bath house (ES Appendix 9.18. Oxford Archaeology, Field 5, 2018, 25).



Plate 11: Hypocaust from Trench 243 (OA, 2018, Field 5, Plate 9).

5.2.5 The buildings and ditches were predominantly oriented north west – south east / north east – south west. The dating, by artefact association, of the structural features indicates that some of the structural features and the large boundary ditch date to the first century, with a small amount of possible conquest-period pottery, but the majority of the features date to the middle Roman period. Late Roman period coins and pottery were recovered but no late Roman structural features were discovered in the trial trenching (Oxford Archaeology, Field 5, 2018, i). The Roman pottery includes imported vessels that are indicative of moderate to high status activity (ES Appendix 9.18. Oxford Archaeology, Field 5, 2018, 25). Some of the ditches and pits were waterlogged and contained preserved wooden objects, including a worked wooden plug, antler and environmental material (*ibid*, 26). This material has potential to provide information about the environmental conditions contemporary with construction and use of the Villa (*ibid* i).



Plate 12: Villa features within Field 5 superimposed onto magnetometry greyscale (OA, Field 5, 2018, Figure 12)

5.2.6 Within the trenches two stone column bases of imported limestone from Boulogne (Plate 12) were identified, although not in situ, along with other stone of the same provenance. Column bases are very rare from rural sites in Britain and are indicative of a very high-status building in the vicinity (ES Appendix 9.18. Oxford Archaeology, Field 5, 2018, 25). There was also a large quantity of ceramic building material, consisting of Roman roof, floor and hypocaust flue tiles. Fragments of fired clay with vitrified green glaze were recovered from multiple contexts, indicating a glass furnace on the site presumably for production of window glass, and a piece of Roman window glass was also recovered (*ibid*, 26). These finds, alongside the structural remains, support the interpretation of a high-status building.



Plate 13: Column Bases (OA, Field 5, 2018, Plate 10).

- 5.2.7 In terms of the Roman period development of the Villa site, the north west part of the larger field contained the earliest evidence of activity, with one trench containing walls that enclosed two adjacent areas and one possible internal floor, all of possible later 1st century date. In the adjacent trench were parallel walls with two phases of construction, the earliest was undated but the second phase contained early/middle Roman period pottery and therefore the first phase may be contemporary with the earliest activity on the site (ES Appendix 9.18. Oxford Archaeology, Field 5, 2018, 29). The structures indicated by the walls in these trenches were aligned north east – south west/north west – south east and this alignment is followed by all the later structural elements observed during trial trenching and visible through geophysical survey, indicating that the later features were probably a development of the earliest activity on the site (*ibid.*). The substantial boundary ditch also appears to have been constructed in the early Roman period and remained in use throughout the period. Other early Roman period features include smaller ditches and pits, extending over an area of approximately 1ha in the north east and east of the field (*ibid.*)
- 5.2.8 The majority of the features excavated on the Villa site date between the early/mid-2nd century and mid-3rd century with features of this date covering an area of 2.25ha. More than one phase of middle Roman period activity was identified, including external floor/yard surfaces of varying preservation and the hypocaust that was infilled with painted plaster and the two imported stone column bases. The masonry buildings that were evaluated had been extensively robbed, with the best preservation found in a wall that survived to three courses above contemporary ground level and most only evidenced by foundation deposits (ES Appendix 9.18. Oxford Archaeology, Field 5, 2018, 30). In one case the foundations were also robbed out. It is possible that some of the excavated foundations were footings for timber rather than masonry buildings, and there is some evidence to support this in the form of the large post hole. The possible malting oven and the fired clay with a vitrified surface date to the middle Roman period of activity, along with the probable road in the north eastern part of the Villa site (*ibid.*). In the eastern part of the site was a substantial, wide linear feature and

other ditches to the west of that containing sequences of waterlogged deposits with waterlogged plant and insect remains and probably pollen. Wood and wooden objects were also preserved, and examples were recovered from these deposits. These ditches may have served a drainage purpose although the straight alignment of the large eastern one may indicate purposeful channelling of the adjacent stream. Millstone fragments were recovered and together this may indicate that a mill was associated with the site (*ibid*, 31).

- 5.2.9 The middle Roman phase of activity covered an identified area of 2.25ha. This area encompasses the minimum area covered by the Villa complex, as the southern extent of the complex was approximately identified by trial trenching but the extents in other directions have not been definitely determined (ES Appendix 9.18. Oxford Archaeology, Field 5, 2018, 30). It is possible that the tributary of the East Stour River on the east side of the field formed the eastern boundary and the magnetometry survey in the field to the north of the A20 did not find any substantial features. In addition, the conditions in the northerly trenches, nearest to the A20, were increasingly wet with ground water at a very shallow depth in one of these. Consequently, it is thought to be unlikely that further Roman buildings would have been present north or north east of this (*ibid*, 28).
- 5.2.10 No later Roman period structural remains were identified by the evaluation trenching, although they may exist within the complex and were not sampled by the trenches. Two pits and three ditches were dated to the second half of the 3rd century and 4th century coins were found in topsoil, subsoil and an upper ditch fill (*ibid*, 31). Evidence in the form of medieval pottery within ruts on the probable Roman road may indicate that this feature remained in use for a considerable period of time after the Villa had fallen out of use (*ibid*.)
- 5.2.11 A ground penetrating radar (GPR) geophysical survey was undertaken in September 2018 (ES Appendix 9.15. Magnitude, 2018) in the larger of the two Villa fields with the aim to establish the layout and extent of the Villa. Unfortunately, the presence of clayey silt natural across most of the area (as identified by the OA trench evaluation) gave poor signal penetration beyond the layers of topsoil. Despite this, the survey successfully identified a number of features previously excavated during trial trenching by OA, including two wall features, three ditch features and a pit, all of which have been dated to the Roman period or are undated (Plate 8). The survey also detected additional anomalies of probable and possible archaeological origin which were not identified by the previous geophysical survey on the site, but these have not been investigated further.

5.3 The Villa within its Local and Regional Context

- 5.3.1 The Villa lies within a wider Roman landscape, demonstrating occupation and utilisation throughout the Roman period. Stone Street Roman Road (5) lies east of the Villa site and runs north-south from Canterbury to Lympne for 16 miles (Margary 1955) and passes through the north-eastern corner of the Otterpool Park development site through the village of Westenhanger. The route of the road then either follows the line of the site boundary from Newingreen down to Lympne, and the Roman fort (SM4) beyond, or diverges to head for West Hythe and the Roman port of Portus Lemanis. The Kent HER maps both routes with one, Stone Street, still in use and the other having dropped out of use between Newingreen and the Aldington Road. The Aldington Road is itself a Roman Road (8) which runs east-west from Dover to Maidstone via Lympne and marks the southern boundary of the site. The road has been in use since this time to the present day and this stretch, which runs along the Aldington Ridge, is thought to have earlier origins (Margary 1955).
- 5.3.2 At Westenhanger, away from the site of the Villa, to the east of Stone Street (5) evidence of Roman settlement (9, 67) has been found during excavations. This activity is described as pits (9) and field systems (67) and is recorded close to the M20, to the north of the Villa site. This occupation activity contributes to our general understanding of the use of the landscape in the Roman period along with the fort at Lympne (SM4), the Villa at Burch's Rough to the south-west of the site (SM1) (See Figure 1), the Roman Roads (5, 8) and the possible port at West Hythe. These provide an image of a broadly rural landscape close to the coast and

with good access to the large towns of the region. It is likely this would have been an active area during the Roman period.

- 5.3.3 In addition, casual finds of Roman date have been found in the area. A copper alloy weight (118) and a copper alloy bead (88) have been found within the application site while further copper alloy finds (89, 95) including a coin have been found beyond the application site. Further, there have been several finds of Roman pottery or tile (12, 14, 15, 16, 49) within 500m of the application site.
- 5.3.4 The geophysical survey that has been undertaken in 2017 (ES Appendix 9.10. Headland Archaeology 2018) and 2018 (ES Appendix 9.12. Sumo 2018; ES Appendix 9.15. Magnitude 2018) and the trial trenching carried out in 2017-18 (ES Appendix 9.18. Oxford Archaeology, Fields 1-5 and 10, 2018) has revealed evidence for further Roman period activity within the Otterpool Park site. In Field 1, in the western area of the application site, late Iron Age ditches were identified that may have continued in use into the Roman period. (ES Appendix 9.18. Oxford Archaeology, Field 1, 2018). Field 3 is located north east of Field 1 and a group of small early Roman (1st-2nd century) enclosures were identified in the south east of the field, some of which contained whole or nearly whole pottery vessels. These formed a system of enclosures with those in Field 1. This system of enclosures is visible from geophysical survey in the field to the south (and east of Field 1) but was not excavated. In the centre of Field 4, to the south of Field 1, a rectilinear enclosure was identified by geophysical survey and was further investigated by trial trench excavation, which identified ditches containing pottery and tile of middle Roman date. The ditches were associated with pits and this activity was clearly domestic in character. These features indicate a concentration of lower status domestic activity on the gently sloping north facing ground between Harringe Brooks Wood and the B2067, in a broadly similar topographic position to the Villa site.
- 5.3.5 In Field 10, in the western part of the application site and north west of Field 1 there are long curving ditches that have been confirmed to be Roman but with late Iron Age antecedents. In between these ditches is a dense scatter of pits of middle Iron Age or late Iron Age and Roman date. To the north and south of the linear ditches are Late Iron Age and Roman period enclosures, which contain evidence of domestic activity (ES Appendix 9.18. Oxford Archaeology, 2018, Field 10). At this time the dating evidence available is not refined enough to determine whether these foci of Roman period activity were in use contemporaneously or if they represent a changing focus of activity in different areas within this landscape over time.
- 5.3.6 In the area to the east of Link Park Industrial Park, over part of the site of the former airfield, geophysical survey identified anomalies of possible Roman date (ES Appendix 9.10. Headland 2018). However, these have not yet been evaluated due to the risk of unexploded ordnance on this part of the application site. These features are located uphill and to the south of the Villa site.

Other villas in the region (see Figure 1)

Romano-British building South of Burch's Rough (SM 1004216), 2.8km west of the Villa site

- 5.3.7 Evidence of a high-status Romano-British building was discovered in 1972. This included substantial wall foundations, many marble tesserae, pottery and coins dating to 289-350 AD. The full nature and extent of the building has not been fully established as only a single 2m x 1.5m trial trench was dug. The site was scheduled due to the evidence of high-status features and the good state of preservation. It will contain archaeological and environmental information relating to the construction, use and history of the Villa, and to the landscape in which it was constructed.

Harp Wood possible Roman villa in Saltwood, south of Sandling Park

- 5.3.8 The Kent HER records a 'substantial Roman Building' at the south-east corner of Harp Wood comprising foundations, bricks and tiles which was discovered in the mid-nineteenth century (TR 13 NW 8). The record states that subsequent geophysical surveys were inconclusive but did show potential for the area.

Marwood Farm, Aldington

5.3.9 Marwood Farm villa, around 4km to the south-west of the Otterpool Villa, is a relatively recent discovery. This low lying villa at the foot of the escarpment has just recently been excavated by a local group, rather than for planning or development control purposes, the results of which are discussed in *Archaeologia Cantiana* (CXXXIX, 2018 pages 269-79). It was not possible to consult this report at the time of compilation of this statement of significance.

East Cliff Villa in Folkestone. (SM 1005158)

5.3.10 The East Cliff Roman Villa is a scheduled monument and was built on the site of an Iron Age urnfield, a nationally important type of cemetery which are found exclusively in south-east England of which there are less than 50 examples. Despite some damage and disturbance in the past, particularly during the Second World War, the Roman villa survives well. The walls survive to a substantial height and the masonry remains are among the best preserved at any Roman villa site in Britain. The villa also contains a Roman mosaic with a unique tessellated design. The site retains potential for further archaeological investigation, which will improve our understanding of the phasing of the buildings and the history of the villa.

Otterpool Villa, Field 5, Otterpool Park Site

5.3.11 The Otterpool Roman Villa appears to be a high status building, but, unlike those above, no tesserae have been found in any of the trenches, suggesting the building did not have mosaic floors. Despite this, the presence of a hypocaust, painted wall plaster, carved column bases and evidence of glass windows demonstrates its status. The Villa may have housed a high status individual or official associated with the port and heavily defended coastal area.

Regional Research Framework

5.3.12 The South East Research Framework (SERF) for the Roman period has not yet been formally drafted but several of the headings are relevant to the Otterpool Villa site and its environs. The principal applicable topic is the relationship of villa and non-villa rural settlements as there are both of these at Otterpool. The main discussions within this have been identified as:

- **The physical layout of the landscape** - how is it articulated? Where are the settlement sites? Are villas surrounded by groups of smaller farmsteads? Are there landscapes dominated solely by villas or are settlements of all types typically integrated in areas where villas occur?
 - The Otterpool Park development, due to its large size, provides an excellent opportunity to analyse this as there are both villa and non- villa settlements within the application site, as well as the port and Roman road to the south and the east (outside the application site boundary).
- Does absence of villas relate to soil type? Are there genuine empty spaces?
 - The Otterpool Villa could contribute to this research aim. The soil type within the Villa site is clayey silt and the underlying geology is silty clay although natural was sandier on the higher ground to the south. The natural geology was overlain by alluvial clays along the eastern edge of the site. The Otterpool Park application site, due to its large size, offers the opportunity to analyse the relationship of Roman settlement type to soil type
- **Land tenure.** A problem not readily addressed with archaeological evidence, but arguably the biggest single problem that confronts us in attempting to understand how the Romano-British countryside of our region operated. The challenge is to move beyond the speculative assumptions about the relationship of villas and non-villa settlements and to use all our evidence, and perhaps particularly the environmental components that characterise and define agricultural production, to refine understanding of the complex interrelationships of our varied rural communities

- There is very good preservation of organic and palaeoenvironmental evidence, especially in the Villa field. This would aid further research into land use, vegetation cover, types of land management and agriculture.
- **Other social characteristics.** Apart from architecture, what does our other evidence tell us about the differences between the people of the villas and those of other settlement types? Considered use of the full range of artefactual material is required, and again quantified data are the key, and can surely yield insights into this question and allow us better to people the landscape.
 - Ensuring the reporting, analysis of the artefact/ecofact assemblages and the final data are produced with comparability in mind will aid further research on this topic.
- **What is the relationship between society and environment?** Can we suggest that the radically different settlement patterns that we observe across parts of the region and correlate with particular topographies and environments (and in particular, the extent of woodland) also reflect distinct differences in local social arrangements – reflected in settlement type, economy and (less tangible archaeologically) patterns of landholding?
 - The Otterpool Villa (and the wider Otterpool Park application site) could contribute to this research aim. The Otterpool Villa occupies a fairly low lying topographic position next to a water course and may have had links with the *Portus Lemanis*

5.4 Setting and Views

- 5.4.1 The Villa is located between two water courses and the land to the south rises which protects it from adverse coastal weather, but also reduces visibility to the south. The aspects to the west, north and east take in several features which would have been either contemporary with or would have pre-dated the Villa.
- 5.4.2 Just to the south of the Villa site lies a prehistoric barrow (136), most likely Bronze Age in date, which would have been visible to the Villa inhabitants. Another barrow to the north (44) would also have been inter-visible with the Villa site and would likely have formed a recognisable feature on the skyline. To the north-west of the Villa lies a concentration of barrows, also likely Bronze Age in date (131, 58, 113, 135, 114, 115 and 130), but these are not inter-visible with the Villa Site. The presence of so many barrows within the surrounding landscape does suggest that the area was utilised and occupied by prehistoric peoples, which is supported by the spot finds of flint tools and early metalwork recorded on the HER within the application site boundary.
- 5.4.3 Excavation to the north-west, geophysical survey to the south and trial trenching work to the north-west, west and south-west also shows that the immediate vicinity of the Villa site was being farmed and settled during the late Prehistoric period, into the Roman period. The Villa site was evidently in use for a long period during the early and middle Roman period, with potentially some activity on the application site continuing into the late Roman period. Therefore, it is likely that while the Villa site was in use there was contemporary activity in the surrounding area, with the closest to the south and west/north west. This appears to have been rural settlement of a lower status than that at the Villa site, and while it may not all have been inter-visible with the Villa there would have been knowledge of the proximity of other settlement.
- 5.4.4 To the east of the Villa is the route of the Roman Stone Street, which is aligned north – south, and to the south is the route of another probable Roman road. Stone Street is approximately 1km to the east of the Villa, and although it is unlikely to have been visible it would definitely have been within the knowledge of the Villa inhabitants. It is believed to have provided access from and to *Portus Lemanis* on the contemporary coast and so it is highly likely that its proximity to the Villa means it would have been regularly used by the inhabitants. To road to the south is approximately 1.5km from the Villa and is aligned east – west. The Villa location in such close proximity to both of these roads is significant as they would have facilitated travel in all directions, including longer-distance travel by water from the port. Although the relative dating of the Villa and roads is unknown, roads are often an early feature of Roman occupation and so they are likely to predate the main Villa construction. Consequently, their presence may have influenced the siting of the Villa. The relationship between the Villa and the roads informs the Villa's setting and contributes to its significance due to their historical association.
- 5.4.5 Within the wider landscape the other villa sites, including three within 5km of the Otterpool Villa and one further away on the eastern side of Folkestone, form a broad cluster of villas in eastern Kent, which are some distance from the larger distribution of villas in northern Kent (Figure 1). The comparatively small distance between these villas, easily travelled on foot in a day, indicates that contact between them is likely and was possibly a regular part of life for the inhabitants. Although there would have been no visual relationship between the villas their proximity would have made them part of the experience of the area during the Roman period. Consequently, the relationship between the Otterpool Villa and the sites of others in the wider area informs the Villa's setting and contributes to its significance due to their historical associations.
- 5.4.6 The Villa site is currently located within both arable and pasture fields and the overall character of the landscape visible from the Villa is rural in character, although a large industrial park and modern settlement are located within approximately 800m of the Villa. It is no longer possible to distinguish the prehistoric features in the landscape that are

theoretically visible from the Villa or the contemporary Roman features within the application site and surrounding area. Therefore, 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.

5.5 Sensitivity

5.5.1 The Villa site is sensitive to physical impacts that would affect the surviving buried archaeological features that represent the remains of the Villa. There are no visible above ground remains that could experience a physical impact. The waterlogged deposits within the Villa site are also sensitive to changes in water levels that could lead to dewatering of the deposits. The Villa is also sensitive to change to its setting that affects its significance. This could come about either through a change of land use away from agricultural activity, which has a long history within the application site, or through a removal of the ability to appreciate its topographic location and geographical relationship with other areas of Roman period activity within and adjoining the application site.

5.6 Archaeological Potential

5.6.1 The Villa site has high potential for the preservation of further archaeological remains, including foundational structural remains and waterlogged deposits with associated potential for preservation of organic remains. The potential for structural remains exists across the Villa site, while the potential for waterlogged remains is focused along the northern and eastern edges of the site where the water table was found to be high or close to the tributary of the East Stour River. The full nature of the activity on the Villa site has yet to be established, due to the limited nature of the evaluation undertaken to date.

5.6.2 The extent of the Villa buildings is not definitively known. The magnetometry survey showed clear linear anomalies corresponding to foundation trenches for walls and these lie within the northern part of the two fields, south of the A20 (Plate 12). The trial trenching did not find any features of Roman date south of Trench 259 (Plate 12). The aim of the subsequent GPR survey was to further elucidate the ground plan of the Villa and to show up any other walls or other villa-related features to the south. However, (as discussed in Section 5.2) the results were inconclusive due to ground conditions. While further archaeological anomalies were found by the GPR survey (Plate 8) they are at the current time poorly understood. It is assumed that rising ground to the south forms a natural southern boundary to the former Villa complex.

5.6.3 The A20 is a likely medieval route, not thought to be in existence in the Roman period therefore there is a possibility that the Villa complex straddles this road and extends to the north of it. The magnetometry survey carried out in the field immediately north of the A20 (Plate 9) was carried out to establish if this is the case. It did not show any evidence of the Villa continuing into the surveyed field therefore for now, we are assuming that it does not extend north of the A20. However, it cannot be ruled out that the Villa may extend underneath the complex of buildings at Mink Farm (Figure 2).

5.6.4 To the east of the Villa, on the other side of the stream forming the eastern field boundary, magnetometry survey carried out at Red House Farm did not show any villa-like anomalies. It would appear therefore that Villa complex does not extend beyond the eastern field boundary/stream.

6 Assessment of Significance

6.1 Evidential Value (Archaeological Interest)

6.1.1 The geophysical surveys and trial trenching have demonstrated that the Villa site has high archaeological potential and this indicates that it has a significant degree of archaeological interest. This interest is what provides the majority of its significance, especially due to the presence of high status features such as the hypocaust and painted wall plaster. However, much is still to be learnt about the Villa as geophysics has not been able to establish its full nature and extent. The Villa's context, however, indicates it was part of an active and utilised landscape during the Roman period and may have been connected with the agricultural and settlement activity identified to the south, south-west and north-west. Villas were often at the centre of estates which farmed the surrounding land and it is possible that these recorded agricultural sites were part of the Villa's estate.

6.2 Historic Value (Historic Interest)

6.2.1 Although we currently do not understand how all the Roman sites, both high status and low, in this area interacted with each other – both in terms of phasing and contemporary interactions – the proximity of a number of Roman period sites, including an important port on what was the south east coast, mean that there is potential for this to enhance our understanding of the conquest and settlement of this area of Kent. In particular the strategic location of the Villa site close to the coast, and close to the fort, possibly indicates that this was an early Villa as it could rely on the protection of the military presence at the Fort. The original occupier (and potentially subsequent ones) may have held high status through connections with the coast, either as military or trade.

6.2.2 However, this is conjecture and so the historic interest is potential at the moment without further investigation and research.

6.3 Aesthetic and Communal Value (Architectural and Artistic Interest)

6.3.1 Architectural features of the Villa, such as column bases, and decorative aspects, such as painted wall plaster are of architectural and artistic interest. However, they only make a small contribution to the overall significance due to the small amount of material, but given the date of the site, this is still of interest. There is no evidence of tesserae indicating mosaic decoration from the evaluation, although there is some potential this could be present in unsampled areas, but unlikely given complete lack of these finds even in unstratified contexts.

6.4 Overall Assessment of Significance

6.4.1 From the above analysis the Otterpool Villa is assessed as being of high regional significance, which could increase to national significance should further investigation and/or excavation reveal further evidence to support this.

6.4.2 ES Appendix 9.18 - Oxford Archaeology 2018. Field 5, Otterpool Park, Sellindge, Kent. Archaeological Evaluation Report, p44

6.4.3 Significance (Roman)

6.4.4 The Roman Villa within Field 5 was previously unrecognised. A fair number of villas are already known in Kent (Millett 2007, Fig. 5.9), but the majority are in north Kent, and only a few are known as far south as Lympne, although another villa has recently been discovered no more than 5km distant (Found pers. Comm.) This makes the Villa in Field 5 a significant addition, and suggests a group clustered in the vicinity of Lympne.

6.4.5 Many of the villas in Kent (like that in Field 5) have only been partly investigated, and some a long time ago, so that the information retrieved was partial or poorly-dated, and

comparisons of significance are therefore difficult. There are, however, certain aspects of the Villa at Field 5 that heighten the significance of this example.

- 6.4.6 The earliest masonry building found, that in Trenches 242 (and possibly Trench 241) appears on current evidence to be of later 1st century date. If so, it belongs to a much smaller group of early villas in the south-east of England with such early origins. Millett claims only eleven in Kent (Millett 2007, 152), most of which are in west Kent. Like the Villa in Field 5, some of the other early sites in Kent such as Thurnham were also located close to the coast. An imported sherd of terra rubra and other continental pottery also support the view of a site of moderate or high status at this date.
- 6.4.7 The discovery of two middle Roman stone column bases, both of stone imported from Boulogne, is particularly noteworthy. Columns are relatively rare in Roman villas, and ones built of imported stone even more so. The columns here were also towards the upper end of the size range for those on villa sites, suggesting that they adorned a building of some size and high status. While they were found in the backfill of a hypocaust on the site and could possibly have been brought in from elsewhere as rubble, other fragments of stone from Boulogne were found across the site, strengthening the likelihood that they were erected and used on this site.
- 6.4.8 The presence of slag from a glass furnace is also of note, although it is probable that this material indicates that, as might be expected, such furnaces were built solely for the construction of villa buildings and fell into disuse or were dismantled thereafter. The presence of an oven, possibly relating to the malting process, is also significant, as few structures definitely associated with malting have been identified in Roman Britain. Waterlogged Roman features have already produced preserved wood and wooden objects.
- 6.4.9 There is also significant potential for reconstruction of the contemporary environment from waterlogged plant and insect remains, and from pollen. Overall, the Villa in Field 5 is of regional significance.
- 6.4.10 The Historic England criteria for listing (Historic England, 2018) states that 'where they retain reasonable archaeological potential, Roman settlement sites will be deemed to have national importance. However, in some areas, both upland and lowland, certain types of settlement are sufficiently common to require discrimination in terms of scheduling recommendations. The Otterpool Villa demonstrates evidence of at least two phases of occupation and has group value with the surrounding Roman and Romano-British settlement and agricultural activity.
- 6.4.11 The Otterpool Villa is representative of the Roman period activity in the wider area but is not unique. Villas are not exceptionally rare and although this example has evidence for early Roman occupation it does not contain all the features of a very high-status site, such as tesserae from mosaic floors. Therefore, its period and rarity contribute to its significance but are representative rather than exceptional. The Villa was not previously known and there are no records of antiquarian investigations on the site, nor does it appear to have been of such high status as to have been mentioned in any of the surviving Roman documents from the period, although this lack of documentary evidence is typical of most villas. Consequently, it has no significance due to associated documentary records. It does have group value due to its association with other Roman period activity in the application site, which contributes to its significance.
- 6.4.12 The Villa has also displayed a fairly poor state of preservation, with the upper layers likely mostly ploughed out and evidence of extensive robbing (deliberate removal of stone by later generations for use in buildings elsewhere). This lack of good preservation decreases its significance somewhat in comparison with other villas. There is also a lack of evidence providing information on the nature and extent of the Villa. It is acknowledged that there is high potential for more evidence to be found at the Villa site, but the state of preservation of

this evidence is not likely to be very good, taking into consideration the results of the recent excavations.

- 6.4.13 However, within the Villa site there is evidence for preservation of waterlogged remains, which is rarer and therefore increases its significance.
- 6.4.14 Overall, based on current knowledge, the Otterpool Villa is considered to be of high regional rather than national significance. This assessment could change based on further investigation, in particular further understanding the layout and use of the Villa buildings and the nature and extent of waterlogged deposits along the eastern edge of the Villa site. It may also be that further investigation would reveal better preserved walls with less robbing or that unique features would be uncovered which would increase its archaeological interest. Based on current knowledge it is unlikely to meet the criteria for scheduling.

7 Parameters for Acceptable Impact

7.1 Recommendations for Preservation in Situ and Preservation by Record

- 7.1.1 Following national policy, there is always a presumption in favour of preservation of archaeological remains in situ.
- 7.1.2 At this time, based on current knowledge, the significance of the Villa is at least regional and this could increase based on further investigation, in particular further understanding the layout and use of the Villa buildings and the nature and extent of waterlogged deposits along the eastern edge of the Villa site.
- 7.1.3 On the policy basis that non-designated assets of equal value to designated should be afforded the same protection, the archaeological potential and high regional significance of the Villa mean that preservation in situ is the preferred approach, as would be the case for a scheduled villa.
- 7.1.4 The masterplan includes provision for preservation of the Villa in situ within a Woodland country park. The Villa site needs to be fully excluded from the working area for construction.
- 7.1.5 Landscaping of the Villa needs to be approached with careful planning to ensure that small scale activities do not have a negative impact on the buried Villa remains.
- 7.1.6 The area of the Villa buildings would need to be kept free of trees so as to avoid damage to buried remains from their roots
- 7.1.7 Careful siting of cycle paths would be required so as to avoid rutting and therefore damage to shallow archaeological remains.
- 7.1.8 Consideration of the hydrogeological modelling should be given to ensure that no changes will occur that could lead to dewatering of the waterlogged deposits, especially in relation to any adjacent ecological mitigation for water voles.

7.2 Defining Parameters for Acceptable Change to Setting

- 7.2.1 Given the current Otterpool Park masterplan (September 2018) includes provision for preservation in situ, the greater concern is the acceptable parameters for change to setting so that the significance of the Villa is not harmed.
- 7.2.2 The surroundings of the Villa to the immediate south-west and west would retain a rural character through the creation of a Woodland country park, although this would change from the current predominantly arable character of the landscape to rough grassland and scattered trees.
- 7.2.3 In the other directions there would be residential development, although this would be separated from the Villa by trees and hedgerows and, to the north, by the route of the A20.
- 7.2.4 The stream east of the Villa is proposed within the proposed Development to be subject to ecological mitigation for the protection of water voles and the enhancement of their habitat. This may take the form of water channels running north to south. The proposed water vole mitigation bank and ditches would need to be sensitively designed so as not to impact significantly on the setting of the Villa. A risk would be the potential for the works to remove archaeological evidence, a risk which could be mitigated through further investigations and monitoring.
- 7.2.5 There would be change to character of landscape but some understanding of topographic location would be retained. The proposed Woodland country park would keep open space around the Villa, despite not being agricultural, and it would still be intelligible as a Roman Villa; the setting makes a contribution to its significance but is not the most important factor.

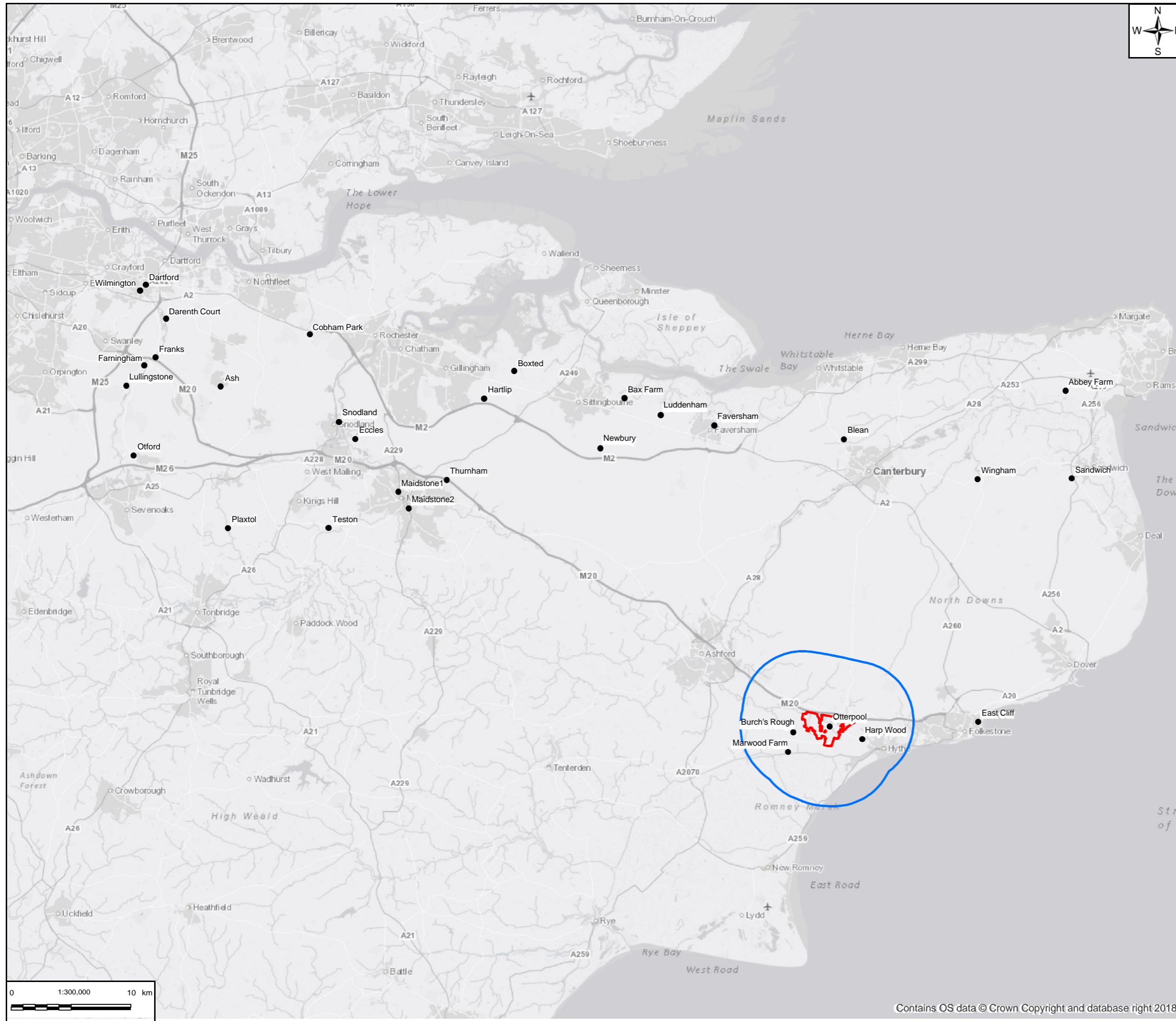
- 7.2.6 Careful interpretation and appropriate signage could assist the public understanding of the relationship of the Villa to the wider Roman (and pre-Roman) period landscape. At the moment there are no visible markers in the landscape to illustrate this and so this knowledge is only available to a very small number of people.
- 7.2.7 Whilst a change to setting could have a negative effect on the appreciation of the Villa's significance, its significance derives to a much greater extent from its archaeological interest and its potential for architectural and artistic interest, from structural and decorative remains. Therefore, with preservation in situ and careful landscaping and interpretation, the significance of the setting of the Villa could be enhanced by the proposed Otterpool Park Development.

8 References

Reference	Title
Ref 1	ES Appendix 9.2. Arcadis 2016/17/18. Cultural Heritage Desk-based Assessment and Addendum Otterpool Park, Lympe, Kent
Ref 2	Chartered Institute for Archaeologists (CIfA) 2014. Code of Conduct
Ref 3	Chartered Institute for Archaeologists (CIfA) 2014. Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment
Ref 4	Chartered Institute for Archaeologists (CIfA) 2017. Standard and Guidance for Archaeological Desk-Based Assessments
Ref 5	Department for Culture Media and Sport 2013. Scheduled Monuments and Nationally Important but Non-Scheduled Monuments
Ref 6	Folkestone and Hythe District Council Planning Policy Website (Accessed 2018) (https://www.folkestone-hythe.gov.uk/planning-policy/local-plan-previous-studies)
Ref 7	Highways England 2007. Design Manual for Roads and Bridges Volume 11, Section 3, Part 2 HA208/07 Cultural Heritage
Ref 8	Historic England 2011. Introductions to Heritage Assets, Prehistoric and Romano-British Settlements with Structures
Ref 9	Historic England 2015. Managing Significance in Decision Taking in the Historic Environment. Historic Environment Good Practice Advice in Planning: 2
Ref 10	Historic England 2017. The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)
Ref 11	Historic England 2008/2017. Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment
Ref 12	Historic England 2018. Settlement Sites to 1500 Scheduling Selection Guide
Ref 13	HMSO 1979. Ancient Monuments and Archaeological Areas Act 1979
Ref 14	Margary, I. 1955. Roman Roads in Britain, Vol. 1.
Ref 15	Millet, M. 2007. Roman Kent, in Williams, J. (ed) The Archaeology of Kent to AD 800, Boydell Press, 135-184
Ref 16	Ministry of Housing, Communities and Local Government 2018. National Planning Policy Framework
Ref 17	Ministry of Housing, Communities and Local Government Planning Practice Guidance Website (accessed 2018) (https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment)
Ref 18	ES Appendix 9.12. Sumo Survey 2018. Geophysical Survey Report, Otterpool, Kent (Survey Report 11903)
Ref 19	ES Appendix 9.10. Headland Archaeology 2018. Geophysical Survey, Otterpool Park, Kent (OPHK17)
Ref 20	ES Appendix 9.15 Magnitude Surveys 2018. Ground Penetrating radar and Magnetometry Survey of the Roman Villa at Otterpool, near Hythe, Kent (MSTR375)

Reference	Title
Ref 21	ES Appendix 9.18. Oxford Archaeology 2018. Fields 1,2,3,4,5,10 Otterpool Park, Sellindge, Kent. Archaeological Evaluation Report (STOT17).

9 Figures



- Legend**
- Roamn Villas
 - ▭ Site Boundary
 - ▭ 5 km Buffer

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REV	Date	Description	Drawn	Check	Approv
Rev 0	11/22/2018	FIRST ISSUE			PN

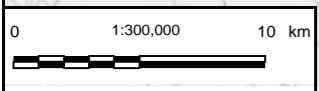
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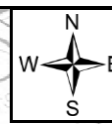
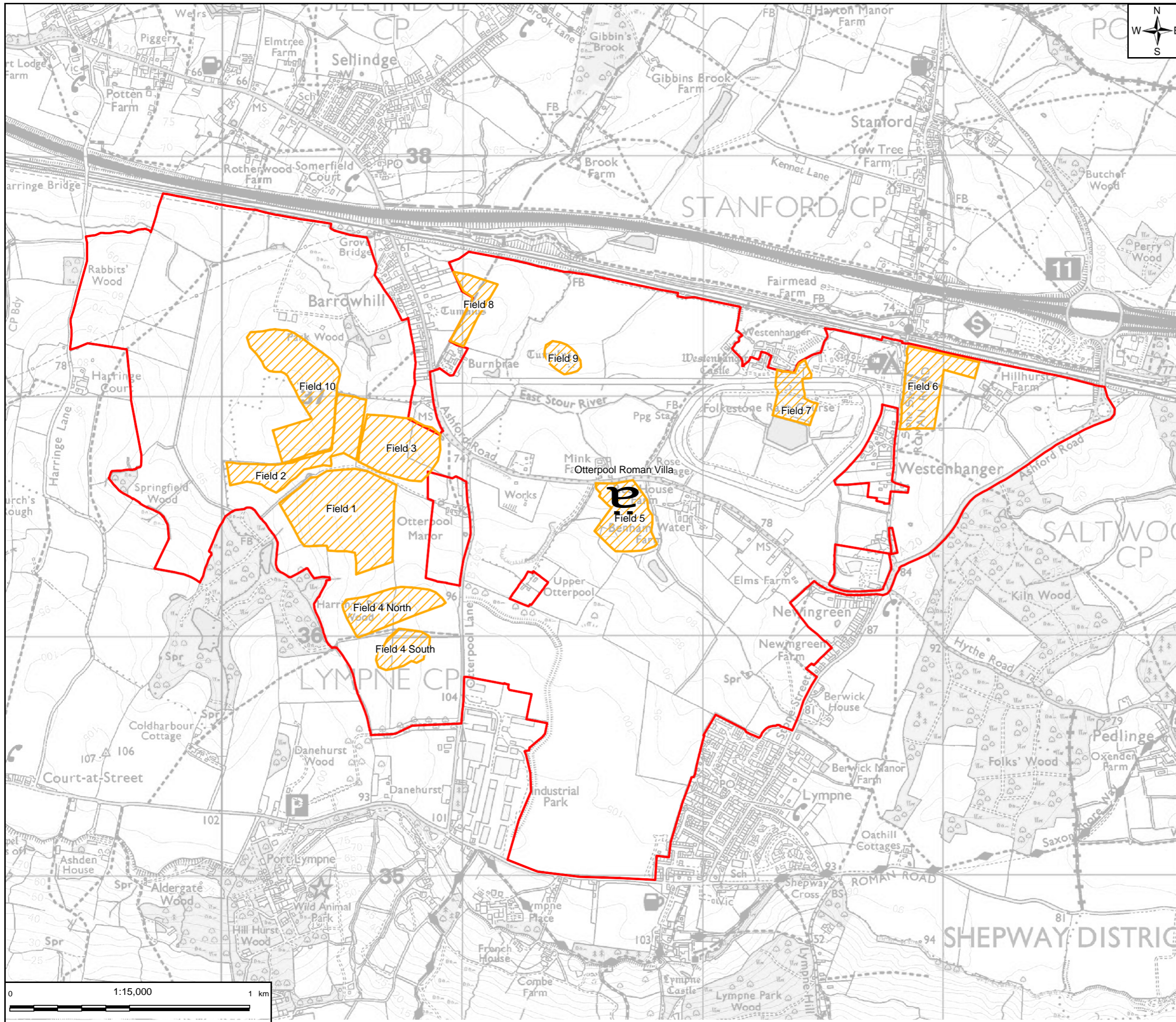
OTTERPOOL PARK

Figure 1
Site Location in relation to other Roman Villas in Kent



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scale	original size	datum	grid
1:300,000	A3	Sx	OS



Legend

- Outline Planning Application Boundary
- Areas Investigated by Trenching

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Figure 2
Field Locations

scale	original size	datum	grid
1:15,000	A3	Sx	BNG

10 Appendix A

10.1 Gazetteer of Designated Romano-British Heritage Assets within 1km of the Villa site

Project ID Number	List Entry Number	Name	Scheduled Date	Legacy UID	NGR	Capture Scale	Easting	Northing	Area (ha)
SM1	1004216	Romano-British building S of Burch's Rough	25/04/1977 00:00	KE 307	TR 08687 36130	1:10000	608679	136118	2.757
SM4	1005179	'Saxon' Shore fort of Roman date now called Stutfall Castle, 468m south-west of St Stephen's Church	18/08/1938 00:00	KE 74	TR 11764 34244	1:10000	611769	134233	5.691

10.2

10.3 Gazetteer of Non-Designated Romano-British Heritage Assets within 1km of the Villa site

Project ID Number	HER Preferred Reference Number	Name	Monument Type	Period Range	Easting	Northing
9	TR 13 NW 45	Roman site at Hillhurst Farm	PIT	Roman	613180	137200
12	TR 13 NW 48	Roman pottery and tile, Lypne	FINDSPOT	Roman	612700	135300
14	TR 13 NW 50	Roman pottery, tile, coins, Lypne	FINDSPOT	Roman	612600	135200
15	TR 13 NW 51	Roman pottery, Stanford	FINDSPOT	Roman	612750	136150
16	TR 03 NE 55	Roman tile found near Burch's Rough,	FINDSPOT	Roman	608900	136500
49	TR 13 NW 14	Romano-British pottery; Roman coins	FINDSPOT	Roman	612500	135030

Otterpool Park Environmental Statement
Appendix 9.8: Otterpool Roman Villa Statement of Significance

Project ID Number	HER Preferred Reference Number	Name	Monument Type	Period Range	Easting	Northing
67	TR 13 NW 153	Roman field systems at Junction 11, M20	FIELD SYSTEM	Roman	613166	137270
74	TR 13 NW 161	Late Iron Age - Roman pits and ditches, Stanford and Sandling	DITCH, PIT	Late Iron Age to Roman	613156	137199
83	MKE67791	Iron Age gold coin	FINDSPOT	Late Iron Age to Roman	610400	137900
88	MKE67991	Roman copper alloy bead	FINDSPOT	Roman to Early Medieval or Anglo-Saxon	610390	137600
89	MKE69025	Roman copper alloy mount	FINDSPOT	Roman to Early Medieval or Anglo-Saxon	609080	136300
95	MKE69547	Roman copper alloy coin	FINDSPOT	Roman	611980	134667
104	TR 03 NE 223	Iron Age/Roman pottery, Harringe Court	FINDSPOT	Middle Iron Age to Roman	609278	137876
118	MKE96596	Roman Copper alloy steelyard weight	FINDSPOT	Roman	609670	137110
5	TR 14 NW 53	Stone Street (Roman Road)	ROAD	Roman	613455	144064
8	TR 04 SE 120	Roman road	ROAD	Roman	605128	137564

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