

CULTURAL HERITAGE DESK BASED ASSESSMENT

Land at rear of Bull Inn, Bethersden, Ashford, TN26 3LB

794-PLN-HER-00392
Land at the rear of Bull Inn,
Bull Lane
Bethersden
Kent
TN26 3LB
Version 02
09 July 2024

Quality Management					
Version	Status	Authored by	Reviewed by	Approved by	Review date
01	First issue	Serena Ranieri	Robert Masefield/ Thomas Copp	Duncan Hawkins	23.02.2024
02	Second Issue	Serena Ranieri	-	Duncan Hawkins	09.07.2024

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by RPS Consulting Services Ltd, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

Prepared by:

Prepared for:

RPS Consulting Services Ltd

Esquire Developments

Serena Ranieri BA MA MPhil
Associate Director

20 Farringdon Street
London, EC4A 4AB

M +447801967618

E serena.ranieri@rpsgroup.com

EXECUTIVE SUMMARY

The site of Land to the rear of Bull Inn, Bull Lane, Bethersden, Ashford, Kent, TN26 3LB has been assessed for its Cultural Heritage potential.

The current planning application proposes the redevelopment of the site comprising 40 residential dwellings, along with generous provision of garden space, areas of public open space and associated infrastructure.

In accordance with relevant government planning policy and guidance, a Cultural Heritage Desk Based Assessment has been undertaken to clarify the archaeological potential of the study site and assess any potential impacts on built heritage.

Archaeology

In terms of relevant, nationally significant designated heritage assets, no World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens, Protected Wrecks or Registered Battlefields lie within the study sites on in its immediate vicinity.

The site is located within two Areas of Archaeological Notification as defined by Ashford Borough Council and the Kent Historic Environment Record (Figure 2c): the southernmost end of study site lies within “Area of Prehistoric potential within alluvial and gravel deposits; Area of general Palaeolithic potential”; the remnant of the site, up to Bull Lane to the north, lies within “Background multiperiod archaeological potential; Area of general Palaeolithic potential”.

Based on almost total lack of archaeological evidence from the 1.5km study area, it can be concluded that the site is likely to have a general low archaeological potential for all periods of human activity. This, however, could also be the result of limited archaeological investigations undertaken over the years in areas in proximity of the site.

The proposed development, therefore, can be considered unlikely to have a significant, negative impact or cause significant harm on any potential, underlying archaeological assets. Design measure will also allow for all existing historic boundaries to be retained, and the southern plot of the site will not be development but maintained as an area of green space.

However, owing to the location of the study site within two Areas of Archaeological Notification as defined by Ashford Borough Council, it is likely that the KCC Archaeological Advisor will request a programme of archaeological work to determine the presence or absence of potential archaeological remains in advance of development works.

As remains of high significance that might preclude development or material consideration are not anticipated to be present at the site, it is considered that a proportionate response would be that any archaeological works that may be required by the Local Planning Authority, could follow the granting of planning consent and be secured by an appropriately worded condition.

Built Heritage

The study site lies *circa* 300m south of the Conservation Area of Bethersden and does not contain any statutorily or locally listed buildings. There are, however, four listed buildings located within 100m of the study site and that have the potential to be affected by the development proposals. These are:

- ‘The Bull Inn (List Entry 1070806) and the Stables of the Bull Inn (List Entry 1070807), both Grade II Listed Buildings located at the north-eastern end of the study site, one on each side of Ashford Road (TQ 93 NW 49 and TQ 93 NW 52; Figure 2b);
- Bridge Farmhouse (List Entry 1070803) and Weatherboarded Barn to south-west of bridge farmhouse (List Entry 1362970), also Grade II Listed Buildings (TQ 93 NW 17 and TQ 93 NW 74; Figure 2b), located next to each other, to the south-eastern end of the study site, also along Ashford Road.

The immediate settings of the listed structures is formed by surrounding agricultural land, and wider, generally rural landscape which make a positive contribution to the buildings' significance, while the extended settings, including Ashford Road, 20th century infill development and the study site, make a lesser contribution. As such, the proposed development on the study site, which conforms to the prevailing building heights, styles and densities proximate to the northern end of the study site, would result in no harm to the significance of the identified heritage assets. Furthermore, proposed design measures such as retaining the southern plot of the site as an area of green space will allow for complete retention of views and settings for Bridge Farmhouse (List Entry 1070803) and Weatherboarded Barn to south-west of bridge farmhouse (List Entry 1362970).

Contents

EXECUTIVE SUMMARY	1
1 INTRODUCTION AND SCOPE OF STUDY	1
2 PLANNING BACKGROUND AND DEVELOPMENT PLAN FRAMEWORK.....	2
National Planning Policy.....	2
Local Planning Policy	6
Relevant Designations	7
3 GEOLOGY AND TOPOGRAPHY	8
4 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND WITH ASSESSMENT OF SIGNIFICANCE.....	9
Timescales used in this report.....	9
Introduction	9
Previous Archaeological Work	9
Prehistoric.....	10
Roman	10
Saxon-Early Medieval/Medieval	10
Post Medieval & Modern (including map regression exercise)	11
Historic Landscape Plan.....	12
LIDAR	12
Assessment of Significance of Archaeologist Assets.....	12
5 SITE CONDITIONS, THE PROPOSED DEVELOPMENT & REVIEW OF POTENTIAL DEVELOPMENT IMPACTS ON ARCHAEOLOGICAL ASSETS	14
Site Conditions	14
Proposed Development.....	14
Review of Potential Development Impacts on Archaeological Assets	15
6 BUILT HERITAGE ASSESSMENT	16
Introduction	16
Assessment of Heritage Assets	16
7 SUMMARY AND CONCLUSIONS	26
Archaeology.....	26
Built Heritage	26
FIGURES	29

Figures

Figure 1: Site Location
 Figure 2a: HER Data (Kent HER)
 Figure 2b: Listed Buildings Data
 Figure 2c: Archaeological Notification Area Data
 Figure 2d: HLC Data
 Figure 3: 1769 Andrews and Drury Map of Kent
 Figure 4: 1797 Ordnance Survey Drawing
 Figure 5: 1839 Bethersden Parish Tithe Map
 Figure 6: 1871 Ordnance Survey (1:2,500)
 Figure 7: 1907 Ordnance Survey (1:2,500)
 Figure 8: 1960 Aerial Photograph (Google Earth)
 Figure 9: 1974 Ordnance Survey (1:2,500)

Figure 10: 1990 Aerial Photograph (Google Earth)

Figure 11: 2008 Aerial Photograph (Google Earth)

Figure 12: 2022 Aerial Photograph (Google Earth)

Figure 13: Proposed Development Plan

APPENDIX A: LIDAR PLOT

1 INTRODUCTION AND SCOPE OF STUDY

- 1.1 This Cultural Heritage Desk Based Assessment has been researched by James Wisher, prepared by Serena Ranieri and approved by Duncan Hawkins on behalf of Esquire Developments.
- 1.2 The subject of this assessment, also known as the study site, Land to the rear of Bull Inn, Bull Lane, Bethersden, Ashford, Kent, TN26 3LB. The site comprises two plots of land, south of Bull Lane and west of Ashford Road. The study site lies at the southern end of the settlement of Bethersden (Figures 1 and 12; Plate 1).
- 1.3 The site is centred at National Grid TQ 92233 39742 (Figure 1 and 2) within the administrative area of Ashford Borough Council. Ground level slopes southwards from 35.59m AOD, along Bull Lane, to *circa* 27.8mOD at the southern end of the site
- 1.4 The current planning application (Figure 13) proposes the redevelopment of the site comprising up to 40 residential new homes, along with generous provision of garden space, areas of open space, biodiversity and associated infrastructure.
- 1.5 Accordingly, Esquire Developments has commissioned RPS Heritage to provide guidance on ways to address the archaeological potential and assess any potential built heritage impacts of the study site.
- 1.6 In accordance with relevant policy and guidance on archaeology and planning, and in accordance with the 'Standard and Guidance for Historic Environment Desk-Based Assessments' (Chartered Institute for Archaeologists October 2020), this assessment draws together the available archaeological, topographic and land-use information in order to clarify the archaeological potential of the site.
- 1.7 This Cultural Heritage Desk Based Assessment comprises an examination of evidence on the Surrey Historic Environment Record, and other sources, and includes the results of a comprehensive map regression exercise.
- 1.8 This document seeks to clarify the Cultural Heritage potential of the study site, together with its likely significance, and to consider the need for design, civil engineering, and built heritage or archaeological solutions to any constraints identified.

2 PLANNING BACKGROUND AND DEVELOPMENT PLAN FRAMEWORK

- 2.14 National legislation regarding archaeology, including scheduled monuments, is contained in the Ancient Monuments and Archaeological Areas Act 1979, amended by the National Heritage Act 1983 and 2002, and updated in April 2014.
- 2.15 The relevant Built Heritage legislation in this case extends from section 16 of the 1990 Planning (Listed Buildings and Conservation Areas) Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving or enhancing listed buildings and their setting.
- 2.16 2.3 The meaning and effect of these duties have been considered by the courts in recent cases, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137.
- 2.17 2.4 The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.
- 2.18 In March 2012, the government published the National Planning Policy Framework (NPPF), and it was last updated 19 December 2023. The NPPF is supported by the National Planning Practice Guidance (NPPG), which was published online 6th March 2014, with the guidance on Conserving and Enhancing the Historic Environment last updated 23 September 2023. (<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>).
- 2.19 The NPPF and NPPG are additionally supported by three Good Practice Advice (GPA) documents published by Historic England: GPA 1: The Historic Environment in Local Plans; GPA 2: Managing Significance in Decision-Taking in the Historic Environment (both published March 2015). The second edition of GPA3: The Setting of Heritage Assets was published in December 2017.

National Planning Policy

- 2.20 Section 16 of the NPPF, entitled Conserving and enhancing the historic environment provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:
- Delivery of sustainable development;
 - Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
 - Conservation of England's heritage assets in a manner appropriate to their significance; and
 - Recognition that heritage makes to our knowledge and understanding of the past.
- 2.21 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. Paragraph 200 states that planning decisions should be based on the significance of the heritage asset and that level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to review the potential impact of the proposal upon the significance of that asset.
- 2.22 Under 'Considering potential impacts' the NPPF emphasises that 'great weight' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.

- 2.23 Paragraph 205 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 203 requires this harm to be weighed against the public benefits of the proposed development.
- 2.24 Paragraph 209 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 2.25 *Heritage Assets* are defined in Annex 2 of the NPPF as: a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. They include designated heritage assets (as defined in the NPPF) and assets identified by the local planning authority during the process of decision-making or through the plan-making process.
- 2.26 Annex 2 also defines *Archaeological Interest* as a heritage asset which holds or potentially could hold evidence of past human activity worthy of expert investigation at some point.
- 2.27 A *Nationally Important Designated Heritage Asset* comprises a: World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area.
- 2.28 *Significance* is defined as: The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 2.29 *Setting* is defined as: The surroundings in which a heritage asset 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.
- 2.30 In short, government policy provides a framework which:
- Protects nationally important designated Heritage Assets;
 - Protects the settings of such designations;
 - In appropriate circumstances seeks adequate information (from desk based assessment and field evaluation where necessary) to enable informed decisions;
 - Provides for the excavation and investigation of sites not significant enough to merit *in-situ* preservation.
- 2.31 The NPPG reiterates that the conservation of heritage assets in a manner appropriate to their significance is a core planning principle, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation. Importantly, the guidance states that if complete, or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset's significance and make the interpretation publicly available. Key elements of the guidance relate to assessing harm. An important consideration should be whether the proposed works adversely affect a key element of the heritage asset's special architectural or historic interest.
- 2.32 Additionally, It is the degree of harm, rather than the scale of development, that is to be assessed. The level of 'substantial harm' is considered to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the NPPF. Importantly, harm may arise from works to the asset or from development within its setting. Setting is defined as the surroundings in

which an asset is experienced and may be more extensive than the curtilage. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

- 2.33 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

Overview: Historic Environment Good Practice Advice in Planning

- 2.34 The PPS5 Practice Guide was withdrawn in March 2015 and replaced with three Good Practice Advice in Planning Notes (GPAs) published by Historic England. GPA1: The Historic Environment in Local Plans provides guidance to local planning authorities to help them make well informed and effective local plans. GPA2: Managing Significance in Decision-Making includes technical advice on the repair and restoration of historic buildings and alterations to heritage assets to guide local planning authorities, owners, practitioners and other interested parties. GPA 3: The Setting of Heritage Assets replaces guidance published in 2011. These are complemented by the Historic England Advice Notes in Planning which include HEA1: Understanding Place: Conservation Area Designation, Appraisal and Management (February 2016), HEA2: Making Changes to Heritage Assets (February 2016), HEA3: The Historic Environment and Site Allocations in Local Plans (October 2015), and HEA4: Tall Buildings (December 2015).

GPA1: The Historic Environment in Local Plans (March 2015)

- 2.35 This advice note focuses on the importance of identifying heritage policies within Local Plans. The advice echoes the NPPF by stressing the importance of formulating Local Plans based on up-to-date and relevant evidence on economic, social and environmental characteristics and prospects of the area, including the historic environment.

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

- 2.36 This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance.
- 2.37 In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
6. Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

GPA3: The Setting of Heritage Assets (Second Edition; December 2017)

- 2.38 This advice note focuses on the management of change within the setting of heritage assets. This document replaces GPA3: The Setting of Heritage Assets (March 2017) and Seeing History in the View (English Heritage, 2011) in order to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2011 and 2015 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.
- 2.39 As with the NPPF the document defines setting as *'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'*. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.
- 2.40 While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset.
- 2.41 This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.
- 2.42 The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.
- 2.43 Historic England recommends using a series of detailed steps in order to assess the potential effect of a proposed development on significance of a heritage asset. The 5-step process is as follows:
1. Identify which heritage assets and their settings are affected;
 2. Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
 3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
 4. Explore ways to maximise enhancement and avoid or minimise harm; and
 5. Make and document the decision and monitor outcome.

HEAN12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (October 2019)

- 2.44 The purpose of this advice note is to provide information on how to assess the significance of a heritage asset. It also explores how this should be used as part of a staged approach to decision making in which assessing significance precedes designing the proposal(s).
- 2.45 Historic England notes that the first stage in identifying the significance of a heritage asset is by understanding its form and history. This includes the historical development, an analysis of its surviving fabric and an analysis of the setting, including the contribution setting makes to the significance of a heritage asset

- 2.46 To assess the significance of the heritage asset, Historic England advise to describe various interests. These follow the heritage interest identified in the NPPF and PPG and are: archaeological interest, architectural interest, artistic interest and historic interest.
- 2.47 To assess the impact to the significance of a heritage asset Historic England state that it is necessary to understand if there will be impacts to built fabric or the setting of a heritage asset and how these contribute to the heritage asset's overall significance. Where the proposal affects the setting, and related views, of a heritage asset, or assets, it is necessary to clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated.
- 2.48 This enables an assessment of how proposals will affect significance, whether beneficial or harmful. It also states that efforts should be made to minimise harm to significance through the design process, with justification given to any residual harm.

Local Planning Policy

- 2.49 The relevant Local Plan framework is provided the Ashford Borough Local Plan 2030, which was adopted in February 2019 and now forms the main statutory development plan for the borough to 2030. Policy relating to the historic environment consists of:

Policy ENV13 - Conservation and Enhancement of Heritage Assets

Proposals which preserve or enhance the heritage assets of the Borough, sustaining and enhancing their significance and the contribution they make to local character and distinctiveness, will be supported. Proposals that make sensitive use of heritage assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate and viable use consistent with their conservation, will be encouraged.

Development will not be permitted where it will cause loss or substantial harm to the significance of heritage assets or their settings unless it can be demonstrated that substantial public benefits will be delivered that outweigh the harm or loss. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, or where a non-designated heritage asset is likely to be impacted, harm will be weighed against the public benefits of the proposal, including securing the optimum viable use of the heritage asset.

All applications with potential to affect a heritage asset or its setting should be supported by a description of the asset's historic, architectural or archaeological significance with an appropriate level of detail relating to the asset and the likely impact of the proposals on its significance.

Policy ENV15 – Archaeology

The archaeological and historic integrity of Scheduled Monuments and other important archaeological sites, together with their settings, will be protected and where possible enhanced. Development which would adversely affect such designated heritage assets will be assessed in line with Policy ENV13.

In addition, where the assessment outlined in Policy ENV13 reveals that 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 site of archaeological interest is accepted, any 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 dependent upon their significance. 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 Borough Council in advance of development commencing.

Relevant Designations

- 2.50 In terms of relevant designated archaeological heritage assets, no World Heritage Sites, Scheduled Monument, Historic Battlefields, Registered Parks and Gardens or Protected Wreck sites lie within the site or in its proximity.
- 2.51 The study site lies *circa* 300m south of the Conservation Area of Bethersden and does not contain any statutorily or locally listed buildings. The site currently comprises two plots of land used for horse grazing, located south of Bull Lane and west of Ashford Road.
- 2.52 There are four listed buildings located within 100m of the study site (Figure 2a):
- The Bull Inn (List Entry 1070806) and the Stables of the Bull Inn (List Entry 1070807), both Grade II Listed Buildings are located immediately at the north-eastern end of the site, one on each side of Ashford Road;
 - Bridge Farmhouse (List Entry 1070803) and Weatherboarded Barn to south-west of bridge farmhouse (List Entry 1362970), are also Grade II Listed Buildings.
- 2.53 It is considered that the study site falls within the settings of these listed buildings and therefore, these heritage assets have the potential to be affected by the development proposals. The potential impacts on these heritage assets are assessed in detail in **Section 6** of this report.
- 2.54 In line with relevant planning policy and guidance, this desk-based assessment seeks to clarify the Cultural Heritage potential of the study site and the likely significance of that potential and the need or otherwise for additional mitigation measures.

3 GEOLOGY AND TOPOGRAPHY

- 3.14 The study site currently covers two plots of land in use for grazing, located the southernmost end of Bethersden town. The site's ground level slope southwards from 35.59m AOD, along Bull Lane, to *circa* 27.8mOD at the southern end of the site. Here, the site's border is defined by an un-named streamlet.
- 3.15 The Geology for the site is provided by the British Geological Survey (BGS Online 2023). This shows the Bedrock Geology as part of the Weald Clay Formation- Mudstone, a Sedimentary bedrock formed between 133.9 and 126.3 million years ago during the Cretaceous period. There are currently no Superficial deposits recorded for most of the site's footprint, however at the site's southern boundary, along the un-named streamlet, the BGS record evidence of Superficial deposits of Alluvium (Silt, Clay and Gravel) and localised survival of River Terrace Deposits.
- 3.16 The Stour Basin Palaeolithic Project (Kent County Council 2015), which has been funded by English Heritage to improve curation of the Palaeolithic historic environment in the Stour Basin Area, has created a map known as "Map of Palaeolithic Character Areas" based on the final results of this comprehensive project. The study site falls within the "Wealden drainage systems, Beult terrace outcrops" (Figure 2d, SP 27) which formed between 500,000 and 10,000BP and are considered to have "uncertain" potential for Palaeolithic remains. To date, only two surface findspots have been recovered within this character area and none within the 1.5km study area.
- 3.17 No SI (Site investigations) works have been undertaken at the site to date, so no borehole logs are currently available.

4 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND WITH ASSESSMENT OF SIGNIFICANCE

Timescales used in this report

Prehistoric

Palaeolithic	900,000 -	12,000 BC
Mesolithic	12,000 -	4,000 BC
Neolithic	4,000 -	1,800 BC
Bronze Age	1,800 -	600 BC
Iron Age	600 -	AD 43

Historic

Roman	AD 43 -	410
Saxon/Early Medieval	AD 410 -	1066
Medieval	AD 1066 -	1485
Post Medieval	AD 1486 -	1799
Modern	AD 1800 -	Present

Introduction

- 4.14 This chapter reviews the available archaeological evidence for the study site and the archaeological/historical background of the general area, and, in accordance with NPPF, considers the potential for any as yet to be discovered archaeological evidence on the study site.
- 4.15 What follows comprises a review of known archaeological assets within a 1.5km radius of the study site (Figure 2a), also referred to as the study area, held on Kent Historic Environment Record, together with a historic map regression exercise charting the development of the study area from the eighteenth century onwards until the present day.
- 4.16 The site is located within two Areas of Archaeological Notification as defined by Ashford Borough Council and the Kent Historic Environment Record (Figure 2c): the southernmost end of study site (in blue) lies within “Area of Prehistoric potential within alluvial and gravel deposits; Area of general Palaeolithic potential”; the remnant of the site, up to Bull Lane to the north, lies within “Background multiperiod archaeological potential; Area of general Palaeolithic potential” (in pink).
- 4.17 Chapter 5 subsequently considers the site conditions and whether the proposed development will impact the theoretical archaeological potential identified below.

Previous Archaeological Work

- 4.18 No archaeological investigations have been undertaken at the site to date.
- 4.19 With the exception of a Watching brief carried out at St Margaret's Church (EKE10863; Figure 2a) in 2007, which revealed evidence of an earlier Norman wall and an earlier Medieval church, the HER contain no evidence of other archaeological investigations carried out within the 1.5km study area.

Prehistoric

- 4.20 The HER contains no records of deposits or findings associated with the Palaeolithic, Mesolithic, Neolithic, Bronze Age and Iron Age period within 1.5km of the study site.
- 4.21 As previously discussed in Section 3.3 of this report, the study site falls within the Stour Basin Project Character Area known as “Wealden drainage systems, Beult terrace outcrops” (Figure 2d, SP 27) which formed between 500,000 and 10,000BP. Such deposits are considered to have an “uncertain” potential for the Palaeolithic as a results of almost total absence of finds from this period recovered within the character area. This outcome is also reflected in the Areas of Archaeological Notifications, as defined by Ashford Borough and the Kent Historic Environment Record, which define a “general” archaeological potential at the site for evidence of the Prehistory, including the Palaeolithic.
- 4.22 Furthermore, the study site lies within the Kent Weald, a heavily forested area between the North Downs and the South Downs. Forest clearance of the Weald slowly commenced during the Neolithic period but appears not to have been on a large scale and may have favoured better drained geologies. During the Iron Age, forest clearance accelerated as the Weald became a centre for the iron industry. In general, evidence for prehistoric activity in the Weald is sparse and none is recorded in the HER for the study area. This may be a reflection on the limited number of archaeological investigations undertaken within the vicinity of the site, although historic maps from the mid-18th century (Figure 3) show that large areas in proximity of the site, at that time, were still largely covered in woodland.
- 4.23 As a result of this, we can conclude that the potential of the study site for archaeological evidence of the Prehistory, can reasonably be regarded as low.

Roman

- 4.24 The HER contains only one record for the Roman period within the whole 1.5km study area. This is associated with a findspot, a coin of Emperor Domitian, found within a private garden *circa* 600m north-east of the study site (TQ 93 NW 2; Figure 2a).
- 4.25 The study site is located *circa* 2.60km north-west of the projected Roman road from Canterbury to Benenden, passing through Ashford (Margary 1948). There are no known Roman settlements in proximity of the study area.
- 4.26 As a result of this, we can conclude that the potential of the study site for archaeological evidence of the Roman period can reasonably be regarded as low. It is highly possible that the study site may have lain in open fields or more likely, within a wooded landscape.

Saxon-Early Medieval/Medieval

- 4.27 There is no mention of Bethersden in the 1086 Domesday Book. During the Medieval period, it was known as the “Manor of Old Surrenden”, as it formed the original seat of the family of Surrenden, from where it gained the name of “Old Surrenden” before it was moved to Puckley. During the reign of King John and Henry III, between the end of the 12th century and the beginning of the 13th century, Adam de Surrenden was owner of this Manor and resided here, as did his descendant Robert de Surrenden in the reign of King Edward II.
- 4.28 Bethersden stayed with the Surrenden family until the beginning of the 15th century when it was given to Cardinal Archbishop Kempe who owned it until the dissolution, when it came into possession of the Crown.
- 4.29 The Church of St Mary (TQ 94 SW 47; Figure 2a), located *circa* 550m north of the study site, is believed to have existed at least from the 12th century, with the earliest visible remains likely to date at least to the 14th century. The majority of the structural alterations to the original building were

carried out between the 15th and the 18th century. Evidence of Early Medieval walls, likely to be part of the original church, were found during an archaeological watching brief carried out at St Margaret's Church in 2007 (EKE10863; Figure 2a).

- 4.30 With the exception of a few timber framed houses dating to Medieval period (TQ 93 NW 64, TQ 93 NW 57, TQ 94 SW 59, TQ 94 SW 136, TQ 94 SW 114; Figure 2b), there is no other evidence of Medieval activity within the study area.
- 4.31 Based on evidence, it is plausible to say that during the Early Medieval and Medieval period, the study site was likely to have lain outside the core settlement of Bethersden (or Old Surrenden), and possibly across open fields, although large areas in proximity of the study site were still covered in woodland up the mid-18th century (Figure 3). Accordingly, it is anticipated that the archaeological potential of the study site for settlement evidence of the Saxon/Early Medieval – Medieval period can be reasonably regarded as low, although evidence of Early Medieval field boundaries and plough soil cannot be completely excluded.

Post Medieval & Modern (including map regression exercise)

- 4.32 A number of the HER records within the study area refer to Post Medieval and Modern archaeological remains which are not discussed in detail here unless relevant to the study site.
- 4.33 During the later Post Medieval and Modern periods, our understanding of settlement, land-use and the utilisation of the landscape is enhanced by cartographic and documentary sources, which can give additional detail to data contained within the HER.
- 4.34 The earliest map shown in this assessment is the 1769 Andrews and Drury Map of Kent (Figure 3) which identifies the study site within open land, south of the settlement of Bethersden. The 1797 Ordnance Survey Drawing (Figure 4) portrays a very similar picture, with Bull Lane clearly defining the northern end of the site.
- 4.35 The 1839 Bethersden Parish Tithe Map (Figure 5) is the first detailed survey of the site undertaken to modern cartographic standards. The site comprised of two main land parcels used as pasture, with a small third parcel located along Ashford Road (731*). The associated Tithe Award described those land parcels as follows:

Land Parcel	Landowner	Occupant	Description	Land Use/Cultivation
726	Robert Chalmers	Stephen Vane	House and Garden	Garden
727	Robert Chalmers	Stephen Vale	Gate Field	Pasture
728	Robert Chalmers	Stephen Vale	Meadow	Meadow
731	James Mann Earl Of Cornwallis (Rectorial Glebe)	Stephen Vale	Bull field and Slip	Pasture
*731	James Mann Earl Of Cornwallis (Rectorial Glebe)	Stephen Vale	Bull field and Slip	-

Table 1: 1839 Tithe Apportionments, Bethersden - Kent

- 4.36 Limited change is shown within the study site to the 1871 Ordnance Survey plan (Figure 7) and 2022 (Figure 12).
- 4.37 Three German Second World War planes are recorded to have crashed within a couple of hundred meters of the study site (TQ 93 NW 80; TQ 93 NW 99 and TQ 93 NW 100; Figure 2a).
- 4.38 The map regression exercise has demonstrated that the study site comprised generally open land, likely to have been used for pasture, throughout the Post Medieval and Modern period, to the present

day. As a result of this, aside to known land division, the site is believed to have a low potential for evidence of the Post Medieval and Modern period.

Historic Landscape Plan

- 4.39 The Kent Historic Landscape Characterisation (HLC) data records the study site within an area of small rectilinear with wavy boundaries and ponds (Fig. 2e).
- 4.40 There is one internal field boundary shown within the study site on the 1839 Bethersden Parish Tithe Map (Figure 5) that still appear extant at the present day. The site is bounded to the north and to west by the historic routeway of Bull Lane to the north and Ashford Road to the east.
- 4.41 The field boundaries of the site have remained unchanged since 1839 (Figure 5).

LIDAR

- 4.42 There is no clear evidence of archaeological anomalies is shown within the study site on available Environment Agency LiDAR data. However, evidence for agricultural activity and land division can be observed (Appendix A).

Assessment of Significance of Archaeologist Assets

- 4.43 Existing national policy guidance for archaeology (the NPPF as referenced in section 2) enshrines the concept of the 'significance' of heritage assets. Significance as defined in the NPPF centres on the value of an archaeological or historic asset for its 'heritage interest' to this or future generations.
- 4.44 The site is located within two Areas of Archaeological Notification, as defined by Ashford Borough and the Kent Historic Environment Record (Figure 2c): the southernmost end of study site (in blue) lies within "Area of Prehistoric potential within alluvial and gravel deposits; Area of general Palaeolithic potential"; the remnant of the site, up to Bull Lane to the north, lies within "Background multiperiod archaeological potential; Area of general Palaeolithic potential" (in pink).
- 4.45 Based on almost total lack of archaeological evidence from the 1.5km study area, it can be concluded that the site is likely to have a low archaeological potential for all periods of human activity. This, however, could also be the results of limited archaeological investigations undertaken within the immediate and larger surrounds of the site.
- 4.46 The study site lies within the Kent Weald, a heavily forested area between the North Downs and the South Downs, where forest clearance slowly commenced during the Neolithic period but appears not to have been on a large scale until the Medieval-Early Post Medieval period. Historic Map evidence from the 18th century show the study site lying within open fields during this period, but large areas in its close proximity were still largely covered in woodland.
- 4.47 The significance of any archaeological remains which may be present would be derived from their evidential value and contributions that could be made towards local and regional research agendas.
- 4.48 Whilst it is possible that archaeological remains could be present within the site, on the basis of the above, any remains, should they occur on the study site, would in the context of the Secretary of State's non-statutory criteria for Scheduled Monuments (DCMS 2013) most likely be of local significance.
- 4.49 As identified by desk based work, archaeological potential by period and the likely significance of any archaeological remains which may be present is summarised in table form below:

Period:	Identified Archaeological Potential	Identified Archaeological Significance
Prehistoric	Low	Low (Local)

CULTURAL HERITAGE DESK BASED ASSESSMENT

Roman	Low	Low (Local)
Saxon to Medieval	Low	Low (Local)
Post Medieval to modern	Low	Low (Local)

5 SITE CONDITIONS, THE PROPOSED DEVELOPMENT & REVIEW OF POTENTIAL DEVELOPMENT IMPACTS ON ARCHAEOLOGICAL ASSETS

Site Conditions

- 5.14 The study site currently covers two plots of land in use for grazing, located the southernmost end of Bethersden town (Plate 1). The site's ground level slope southwards from 35.59m AOD, along Bull Lane, to *circa* 27.8mOD at the southern end of the site. Here, the site is bordered to the south by an un-named streamlet.
- 5.15 The site appears to have been utilised as pasture from at least the 18th century into modern times, therefore, negative impacts from historic activity at the site on any underlying archaeological remains, if present, is likely to be limited.



Plates 1. View of the study site from Bull Lane (photo looking south)

Proposed Development

- 5.16 The current planning application (Figure 13) proposes the redevelopment of the site comprising up to 40 residential new homes, along with generous provision of garden space, areas of public open space and associated infrastructure. All existing historic boundaries will be retained, and the southern plot of the site will not be development but maintained as an area of green space, with enhancement for biodiversity.

- 5.17 The proposed development, therefore, can be considered unlikely to have a significant negative impact or cause significant harm on any potential, underlying archaeological assets.

Review of Potential Development Impacts on Archaeological Assets

- 5.18 Based on current evidence, this assessment has identified a low potential for archaeological remains of low (local) significance for all periods. If any archaeological remains were to be present, the available information indicates that they are considered likely to be of low, local significance.
- 5.19 The proposed development (Figure 13) is considered unlikely to have a significant negative impact upon potential, underlying archaeological assets. Historic field boundary will be retained and the southern plot forming the site will not be developed but retained as an area of green space.
- 5.20 However, owing to the location of the study site within two Areas of Archaeological Notification as defined by Ashford Borough Council, it is likely that the KCC Archaeological Advisor will request a programme of archaeological work to determine the presence or absence of potential archaeological remains in advance of development works.
- 5.21 As remains of high significance that might preclude development or material consideration are not anticipated to be present at the site, it is considered that a proportionate response would be that any archaeological works that may be required by the Local Planning Authority, could follow the granting of planning consent and be secured by an appropriately worded condition.

6 BUILT HERITAGE ASSESSMENT

Introduction

- 6.14 This report satisfies the requirements of paragraph 200 of the National Planning Policy Framework (NPPF), which requires an applicant to describe the significance of any heritage assets affected by an application, including any contributions made by their setting. The assessment was carried out in accordance with the methodologies set out in Historic England's 'Historic Environment Good Practice Advice (GPA) in Planning Notes 2 Managing Significance in Decision-Taking in the Historic Environment (March 2015) and GPA3: The Setting of Heritage Assets (December 2017).
- 6.15 Historic England recommends using a series of detailed steps in order to assess the potential effects of proposed development on significance of a heritage asset. The 5-step process is as follows:
1. Identify which heritage assets and their settings are affected;
 2. Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
 3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
 4. Explore ways to maximise enhancement and avoid or minimise harm; and
 5. Make and document the decision and monitor outcomes.
- 6.16 Setting is thereby defined as the surroundings in which an asset is experienced and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.
- 6.17 Figure 2b of this report illustrates all designated heritage assets that fall within the 1.5km search radius. The study site lies *circa* 300m south of the Conservation Area of Bethersden and does not contain any statutorily or locally listed buildings. The site currently comprises two roughly square plots of land used for horse grazing, located south of Bull Lane and west of Ashford Road.
- 6.18 It is considered that the study site falls within the settings of four listed buildings located within 100m from the study site and therefore, these heritage assets have the potential to be affected by the development proposals. The listed buildings are (Figure 2b):
- The Bull Inn (List Entry 1070806) and the Stables of the Bull Inn (List Entry 1070807), both Grade II Listed Buildings located at the north-eastern end of the study site, one on each side of Ashford Road (TQ 93 NW 49 and TQ 93 NW 52; Figure 2b);
 - Bridge Farmhouse (List Entry 1070803) and Weatherboarded Barn to south-west of bridge farmhouse (List Entry 1362970), are also Grade II Listed Buildings (TQ 93 NW 17 and TQ 93 NW 74; Figure 2b), located to the south-eastern end of the study site, also along Ashford Road.
- 6.19 The built heritage assets will be assessed as a pair (as per above), and not individually. This is due primarily to their historic connection and to the proximity to each other which allows them to be experienced in a similar way relative to the study site.

Assessment of Heritage Assets

6.1.4 The Bull Inn (List Entry 1070806) and the Stables of the Bull Inn (List Entry 1070807)

Heritage assets and their settings

- 6.14 The Historic England list entry describe both the Bull Inn (List Entry 1070806; Plates 2 and 3) and the Stable of the Bull Inn (List entry 1070807; Plate 4) as dating back to the 18th century. The 1839

Bethersden Parish Tithe Map (Figure 5 and Table 1, pp. 11), the first detailed survey of the site area, represents both buildings under the same Tithe Award (726), with the same occupant and under the same description “House and Gardens”. The Bull Inn is also featured on the 1797 Ordnance Survey Drawing (Figure 4), but not the stables.



Plates 2. The Bull Inn (List Entry 1070806) fronting onto Ashford Road (photo looking south-west)



Photo 3. Modern extension at the rear of The Bull Inn (List Entry 1070806) with view of the surrounding car park from the outer edge of study site (photo looking north-east)

- 6.15 The Bull Inn lies along Ashford Road at the corner with Bull Lane and can be described as a two storey building with attics and painted facades (Plates 2, 3 and 5). The building has a tiled roof with two hipped dormers, brick eaves and a cornice with modillions. Three casement windows with pointed Gothic heads can be found on the first floor, along with two large bay windows on the ground floor, placed each on the side of a double doorcase.
- 6.16 Historic maps from 1871 to 1960 (Figures 6 to 8) show that over the course of this period a series of additional buildings were erected at the back of the Bull Inn. By 1974 (Figure 9) these had all been demolished and a car park, along with an extension at the rear of the building, was created. It is likely that such alterations were carried out as result of a change in use of the property from a residential dwelling into a pub (Photo 3).
- 6.17 The Stable of the Bull Inn (List entry 1070807), as previously mentioned, lies opposite the Bull Inn on Ashford Road (Photo 4) and was once part of the Bull Inn farmhouse. It is a two storey painted brick building with a hipped tiled roof and two windows with pointed Gothic head at the first floor, located in alignment with two single doorways at the ground floor. Internally it presents a timber frame structure.
- 6.18 The building appears to have been vacant for a number of years and currently lies in a state of disrepair, although presence of scaffolding seems to suggest that repair works to the existing structure are now taking place, especially to the roof.
- 6.19 The Bull Inn and the Stables of the Bull Inn lie *circa* 300m south of the Conservation Area of Bethersden, from which they are separated by a 20th century infill development. Both buildings, located opposite each other, front onto Ashford Road which is a major transit route subject to very heavy, fast-moving traffic. The Stables of the Bull Inn is primarily surrounded by fields, along with a few isolated private properties located to its south. The Bull Inn is flanked to the north by Bull Lane, along which a few 19th -20th century cottages are located (Plates 5 and 6).



Plate 4. The Stable of the Bull Inn (List entry 1070807) fronting onto Ashford Road

- 6.20 The study site is located to the south of Bull Lane, on a southward slope and is separated by the Bull Inn via a thick tree line and the pub's car park. The study site has historically served as fields for pasture for the Bull Inn "House and Gardens" (The 1839 Bethersden Parish Tithe Map describe the two plot of land forming the site as "Bull field and Slip" and "Gate Field"); however, such relationship has now been lost, as the farmhouse is currently used as a pub.
- 6.21 The Significance of the Bull Inn and the Stables of the Bull Inn is drawn primarily from their architectural and historic interest derived from their surviving 18th century built fabric and the evidential value thereof for the design and construction of farmhouses and ancillary buildings in the area in that period. However, structural alterations to the original fabric of the Bull Inn in relation with its conversion from a private dwelling into a pub over the course the 20th century has not only impacted on its architectural significance, but it has also severed any historic relationship with the Stable of the Bull Inn and the surrounding landscape.



Photo 5. View of Bull Lane from the site entrance (photo looking east)

Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

- 6.22 The surrounding agricultural land, and wider, generally rural landscape contribute to the moderate significance of the 18th century buildings. The agricultural-natural character elements of what once was the farmstead's surrounds contribute to the legibility of its historic function within the landscape and the historic character of that landscape.
- 6.23 The proximity of Ashford road help to illustrate the changing function of the farmstead's buildings over the course of the centuries, in particular in the case of the Bull Inn from a farmhouse into a pub. The visual and audible impacts of the fast moving traffic of this road, together with the 20th century development infill at the northern end of the listed building is an unavoidable element of way in which The Bull Inn and the Stables of the Bull Inn are experienced. Therefore, if the surrounding agricultural

land makes a positive contribution through providing historic context, the road helps to illustrate the evolution of the buildings and their change in use (or disuse in case of the Stables of the Bull Inn).

- 6.24 The study site forms parts of the setting of these assets, although intervisibility between these and the study site is limited. The Bull Inn is located at the north-eastern end of the study site, beyond the car park and beer garden, separated by a thick line of trees that defines the whole study site's perimeter (Plates 8). Interaction between the Stables of the Bull Inn and the study site is further reduced by the presence of Ashford Road and the Bull Inn building in between. There is no direct view from the Stables of the Bull Inn into the study site, except for the outline of the tree line that borders the study site along Ashford Road (Plate 7). Therefore, while the study site did historically form part of the Bull Inn landholding, the change in use of the building, from agricultural to pub, along with the changes to its immediate setting and tree planting, now mean that this historic relationship is no longer appreciable and so the contribution of the site to the significance of this asset can be considered as low.
- 6.25 The same can be said in the case of the contribution of the study site in relation to the Stables of the Bull Inn. The historic relationship between this building and the Bull Inn, now a pub, can no longer be appreciated due to change of use and settings, plus the absence of no direct view from the listed building into the study site as a result of tree planting (Plate 11) mean that the site makes a limited contribution to the significance of this asset as this now forms part of its general rural surrounds.



Photo 6. View of Bull Lane showing the site entrance to the south and the Bull Inn to the east, at the crossing with Ashford Road (photo looking west)

Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it and ways to maximise enhancement and avoid or minimise harm

- 6.26 The study site is only partially appreciated in views southwards from the Stables of the Bull Inn (Plate 7) and, in the case of the Bull Inn, it can only be viewed from the rear of the building, nearby the car

park and outdoor gardens (Plates 3 and 8). The study site is experienced as an enclosed field as part of the wider agricultural landscape context, which can be approached along Bull Lane from the north (Plate 6). The contribution of the study site to the significance of the Bull Inn and the Stable of the Bull Inn is considered to be low.

- 6.27 The development (Figure 13) includes design measures such as the provision of extensive open space within the southern part of the site which will not be developed. Furthermore, the enhanced planting to the northern boundary and presence of open space between each building and the existing site's boundary will also ensure that the sense of rurality on this approach is retained and strengthened, further filtering or restricting views of the development. Building heights within the development have been arranged so that these reflect those of the adjacent existing built form, allowing for the retention of other views from within the study site. As a result of this, there is no harm to the significance of these heritage assets, because the relationship between the two buildings and their immediate settings will not be changed and therefore, there will be no reduction in their architectural or historic interest.

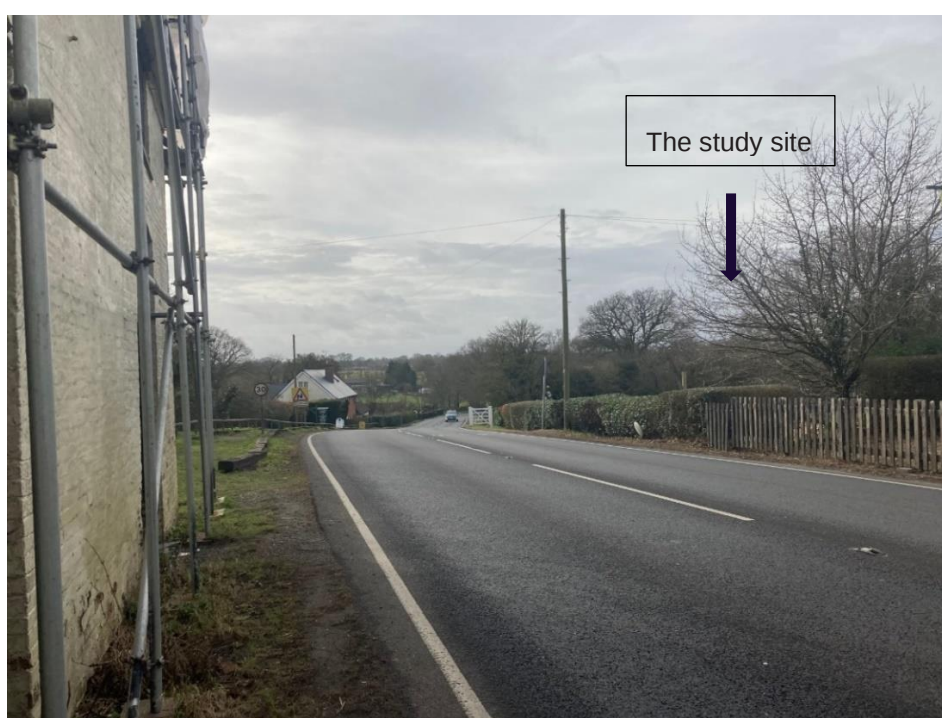


Plate 7. The Stable of the Bull Inn (List entry 1070807) looking south onto Ashford Road

6.1.5 Bridge Farmhouse (List Entry 1070803) and Weatherboarded Barn to south-west of bridge farmhouse (List Entry 1362970), are also Grade II Listed Buildings.

Heritage assets and their settings

- 6.15 Bridge Farmhouse (List Entry 1070803) and Weatherboarded Barn to south-west of bridge farmhouse (List Entry 1362970), both Grade II Listed Buildings (TQ 93 NW 17 and TQ 93 NW 74; Figure 2b), are located within 100m of the south-east of the study site.
- 6.16 The Bridge Farmhouse is formed of two separate structures, one at the rear and one at the front. The one at the rear, a hall house, dates back to the Late Mediaeval period and presents a steep pitched tiled roof with smoke louvres (Plate 9). The front structure dates to *circa* 18th century, a two storey house, built with red brick and grey headers (Plate 10). The latter is believed to be

contemporary with the construction of Weatherboarded Barn to south-west of bridge farmhouse (List Entry 1362970) to which it was once related, as being part of the same farmhouse (TQ 93 NW 17 and TQ 93 NW 74; Figure 2b).



Plate 8. The Bull Inn's beer garden looking south towards the study site



Plate 9. View of Bridge Farmhouse (List Entry 1070803) from Ashford Road looking south-east

- 6.17 Both buildings are located along Ashford Road which is a major transit route subject to very heavy, fast-moving traffic. The buildings are primarily surrounded by fields, along with a few isolated private properties located to the north, south of the Stables of the Bull Inn. The town of Bethersden lies *circa* 600m to the north, at the top of a hill and its view is obscured by trees flanking the nearby road and farms.
- 6.18 The significance of such buildings is drawn primarily by their architectural and historic interest derived from their surviving Late Medieval and Post Medieval built fabric, although both went through alterations over the course of the 18th century and the Weatherboarded Barn to south-west of bridge farmhouse (List Entry 1362970) was also subject to a red-brick extension over the course of the 19th century and potentially, further internal works for its conversion into an hotel.
- 6.19 Structural alterations to their original fabric and change of use over the centuries has not only impacted on their architectural significance, but it has also partially affected any historic relationship between the Bridge Farmhouse and its barn, which now stands as a separate property.



Plate 10. View of Weatherboarded Barn to south of Bridge farmhouse (List Entry 1362970) looking south-east

Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

- 6.20 The surrounding agricultural land, and wider, generally rural landscape contribute to the moderate significance of the historic buildings. The agricultural-natural character elements of what once was the farmstead's surrounds contribute to the legibility of its historic function within the landscape and the historic character of that landscape.
- 6.21 The proximity of Ashford road detracts significantly from the overall rural character of the building's wider western setting. The visual and audible impacts of the fastmoving traffic of this road is an unavoidable element of way in which Bridge Farmhouse (List Entry 1070803) and Weatherboarded Barn to south-west of bridge farmhouse (List Entry 1362970) are experienced. This element of the setting of these assets do not contribute to their significance.

- 6.22 The study site forms parts of the setting of these built heritage assets, although intervisibility between these and the study site is reduced by the presence of a thick tree line that borders the site along its southern border. There is no direct view from the listed buildings into the study site (Plate 11). Therefore, the study site makes a limited contribution to the significance of these assets as this forms part of their general rural surrounds.

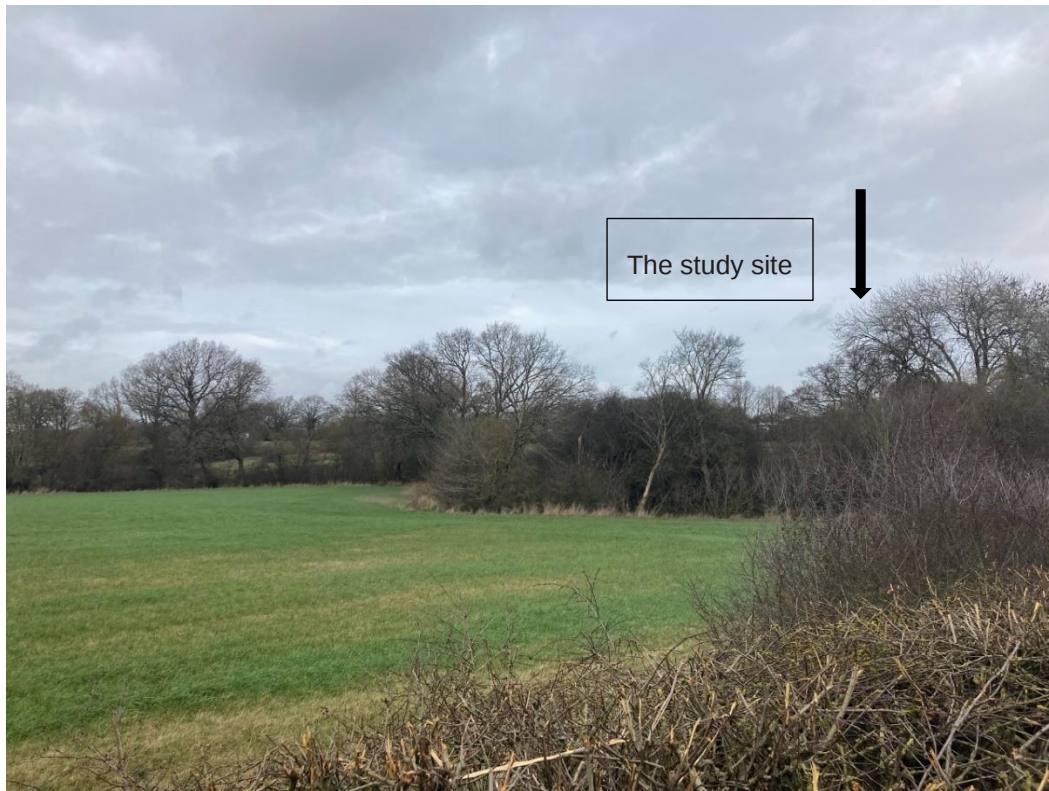


Plate 11. View of the study site from Bridge Farmhouse and the Weatherboarded Barn to south-west of bridge farmhouse (photo looking north).

Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it and ways to maximise enhancement and avoid or minimise harm

- 6.23 The study site is experienced as an enclosed field as part of the wider agricultural landscape context, which can be approached along Bull Lane from the north. Intervisibility between these and the study site is limited by the presence of a thick tree line that borders the site along its southern border. There is no direct view from listed building into the study site (Plate 11). The contribution of the study site to the significance of the Bridge Farmhouse (List Entry 1070803) and Weatherboarded Barn to south-west of bridge farmhouse is therefore considered to be limited
- 6.24 As already described, the proposed development (Figure 13) includes design measures which will enhance planting to the northern boundary and presence of open space between each building and the existing site's boundary to ensure that the sense of rurality on this approach is retained and strengthened, further filtering or restricting views of the development. Building heights within the development have been arranged so that these reflect those of the adjacent existing built form. Furthermore, proposed design measures will allow for retention of some existing views including those from the Bridge Farmhouse (List Entry 1070803) and Weatherboarded Barn to south-west of bridge farmhouse. There is no development proposed across the southern half of the site which will

be retained as area of open space and enhanced for biodiversity, therefore there will be no impact or change to the setting of the listed heritage assets.

7 SUMMARY AND CONCLUSIONS

- 7.14 The site of Land to the rear of Bull Inn, Bull Lane, Bethersden, Ashford, Kent, TN26 3LB has been assessed for its Cultural Heritage potential.
- 7.15 The current planning application proposes the redevelopment of the site comprising up to 40 residential new homes, along with generous provision of garden space, areas of public open space and associated infrastructure.
- 7.16 In accordance with relevant government planning policy and guidance, a Cultural Heritage Desk Based Assessment has been undertaken to clarify the archaeological potential of the study site and assess any potential impacts on built heritage.

Archaeology

- 7.17 In terms of relevant, nationally significant designated heritage assets, no World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens, Protected Wrecks or Registered Battlefields lie within the study sites or in its immediate vicinity.
- 7.18 The site is located within two Areas of Archaeological Notification as defined by Ashford Borough Council and the Kent Historic Environment Record (Figure 2c): the southernmost end of study site lies within "Area of Prehistoric potential within alluvial and gravel deposits; Area of general Palaeolithic potential"; the remnant of the site, up to Bull Lane to the north, lies within "Background multiperiod archaeological potential; Area of general Palaeolithic potential".
- 7.19 Based on almost total lack of archaeological evidence from the 1.5km study area, it can be concluded that the site is likely to have a general low archaeological potential for all periods of human activity. This, however, could also be the result of limited archaeological investigations undertaken over the years in areas in proximity of the site.
- 7.20 The proposed development, therefore, can be considered unlikely to have a significant, negative impact or cause significant harm on any potential, underlying archaeological assets. Design measure will also allow for all existing historic boundaries to be retained, and the southern plot of the site will not be development but maintained as an area of green space.
- 7.21 However, owing to the location of the study site within two Areas of Archaeological Notification as defined by Ashford Borough Council, it is likely that the KCC Archaeological Advisor will request a programme of archaeological work to determine the presence or absence of potential archaeological remains in advance of development works.
- 7.22 As remains of high significance that might preclude development or material consideration are not anticipated to be present at the site, it is considered that a proportionate response would be that any archaeological works that may be required by the Local Planning Authority, could follow the granting of planning consent and be secured by an appropriately worded condition.

Built Heritage

- 7.23 The study site lies *circa* 300m south of the Conservation Area of Bethersden and does not contain any statutorily or locally listed buildings. There are, however, four listed buildings located within 100m of the study site and that have the potential to be affected by the development proposals. These are:
- The Bull Inn (List Entry 1070806) and the Stables of the Bull Inn (List Entry 1070807), both Grade II Listed Buildings located at the north-eastern end of the study site, one on each side of Ashford Road (TQ 93 NW 49 and TQ 93 NW 52; Figure 2b);

- Bridge Farmhouse (List Entry 1070803) and Weatherboarded Barn to south-west of bridge farmhouse (List Entry 1362970), also Grade II Listed Buildings (TQ 93 NW 17 and TQ 93 NW 74; Figure 2b), located next to each other, to the south-eastern end of the study site, also along Ashford Road.

7.24 The immediate settings of the listed structures is formed by surrounding agricultural land, and wider, generally rural landscape which make a positive contribution to the buildings' significance, while the extended settings, including Ashford Road, 20th century infill development and the study site, make a lesser contribution. As such, the proposed development on the study site, which conforms to the prevailing building heights, styles and densities proximate to the northern end of the study site, would result in no harm to the significance of the identified heritage assets. Furthermore, proposed design measures such as retaining the southern plot of the site as an area of green space will allow for complete retention of views and settings for Bridge Farmhouse (List Entry 1070803) and Weatherboarded Barn to south-west of bridge farmhouse (List Entry 1362970).

Sources Consulted

General

Kent Historic Environment Record

Internet

British Geological Survey – <http://www.bgs.ac.uk/discoveringGeology/geologyOfBritain/viewer.html>

British History Online – <http://www.british-history.ac.uk/>

Domesday Online – <http://www.domesdaybook.co.uk/>

Historic England: The National Heritage List for England – <http://www.historicengland.org.uk/listing/the-list/>

Portable Antiquities Scheme – www.finds.org.uk

Bibliographic

Chartered Institute for Archaeologists Standard & Guidance for historic environment desk based assessment 2014, updated 2020.

Department of Communities and Local Government *National Planning Policy Framework* 2012 (revised September 2023)

Department of Communities and Local Government/Department of Culture Media and Sport/English Heritage *PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide* 2010

Historic England (formerly English Heritage) Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment 2008 (new draft 2017)

Historic England Historic Environment Good Practice Advice in Planning: 1 The Historic Environment in Local Plans July 2015 unpublished document

Historic England Historic Environment Good Practice Advice in Planning: 3 The Setting of Heritage Assets December 2017 unpublished document

Kent County Council (Heritage Conservation), *Stour Basin Palaeolithic Project*, 2015

Margary I. D. *Roman Roads of Britain* 1955

Cartographic

1769 Andrews and Drury Map of Kent

1797 Ordnance Survey Drawing

1839 Bethersden Parish Tithe Map

1871 Ordnance Survey (1:2,500)

1907 Ordnance Survey (1:2,500)

1960 Aerial Photograph (Google Earth)

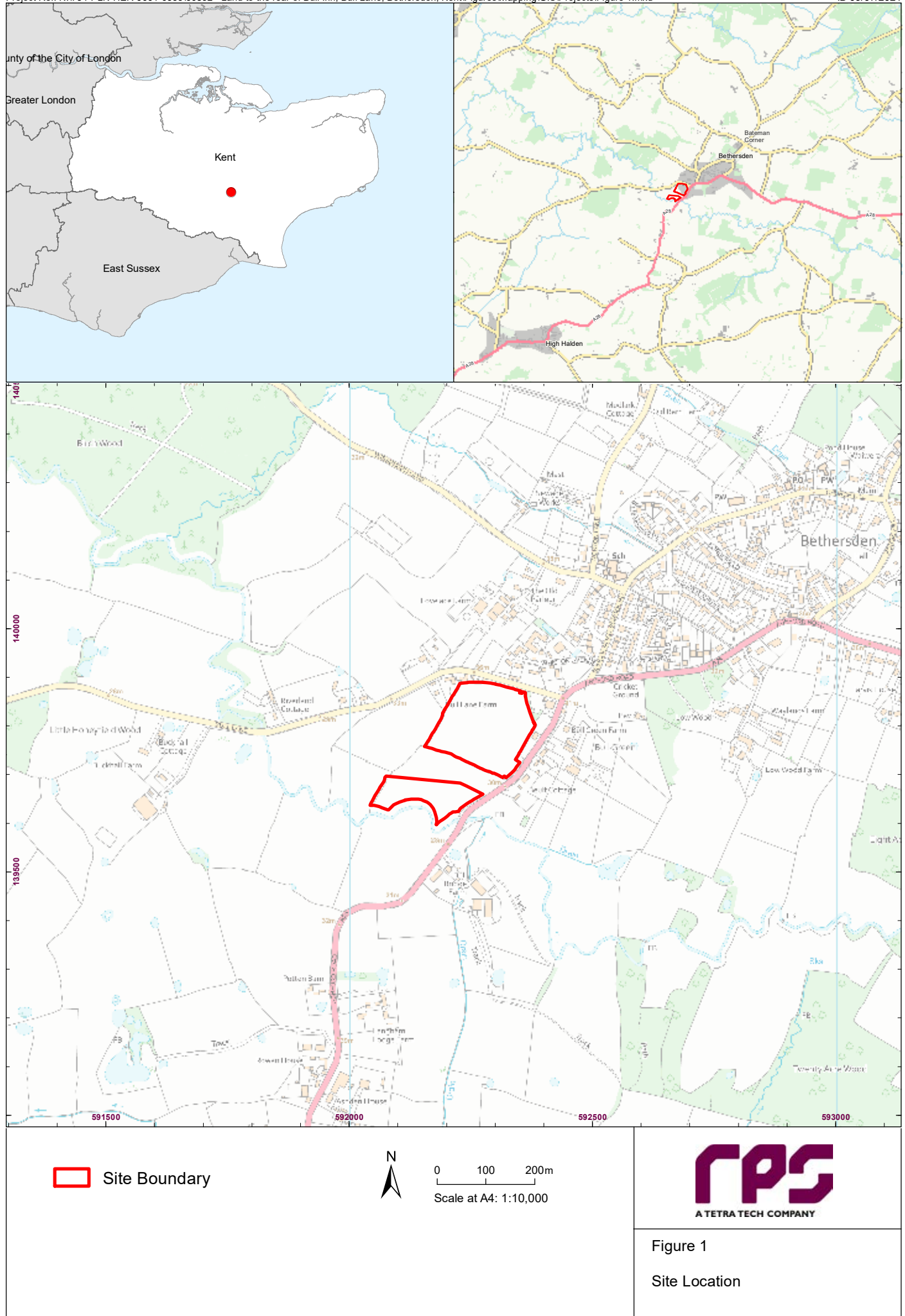
1974 Ordnance Survey (1:2,500)

1990 Aerial Photograph (Google Earth)

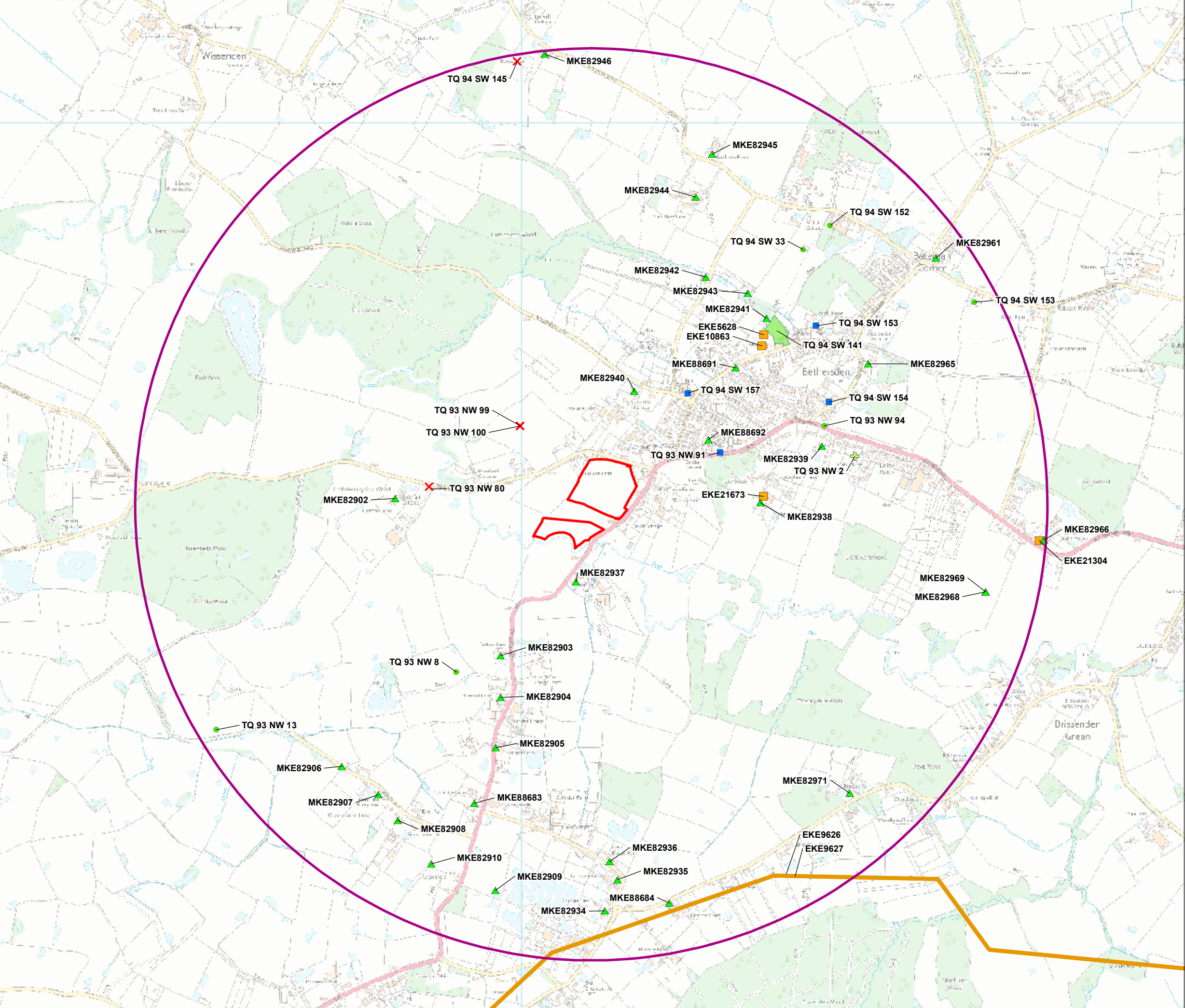
2008 Aerial Photograph (Google Earth)

2022 Aerial Photograph (Google Earth)

FIGURES



Project Ref: N1794-PLN-HER-0001-0999/00392 - Land to the rear of Bull Inn, Bull Lane, Bethersden, Kent\Figures\Mapping\GIS\Projects\Figure 2.mxd



Legend

- Site Boundary
- 1.5km Search Radius

Non-designated Heritage Assets:

HER Monument Points

- Monument
- Findspot
- Building
- Crash Site
- Farmstead

HER Monument Polygons

- HER Monument Polygons

Previous Archaeological Work:

- Event Points
- Event Lines



0 100 200m

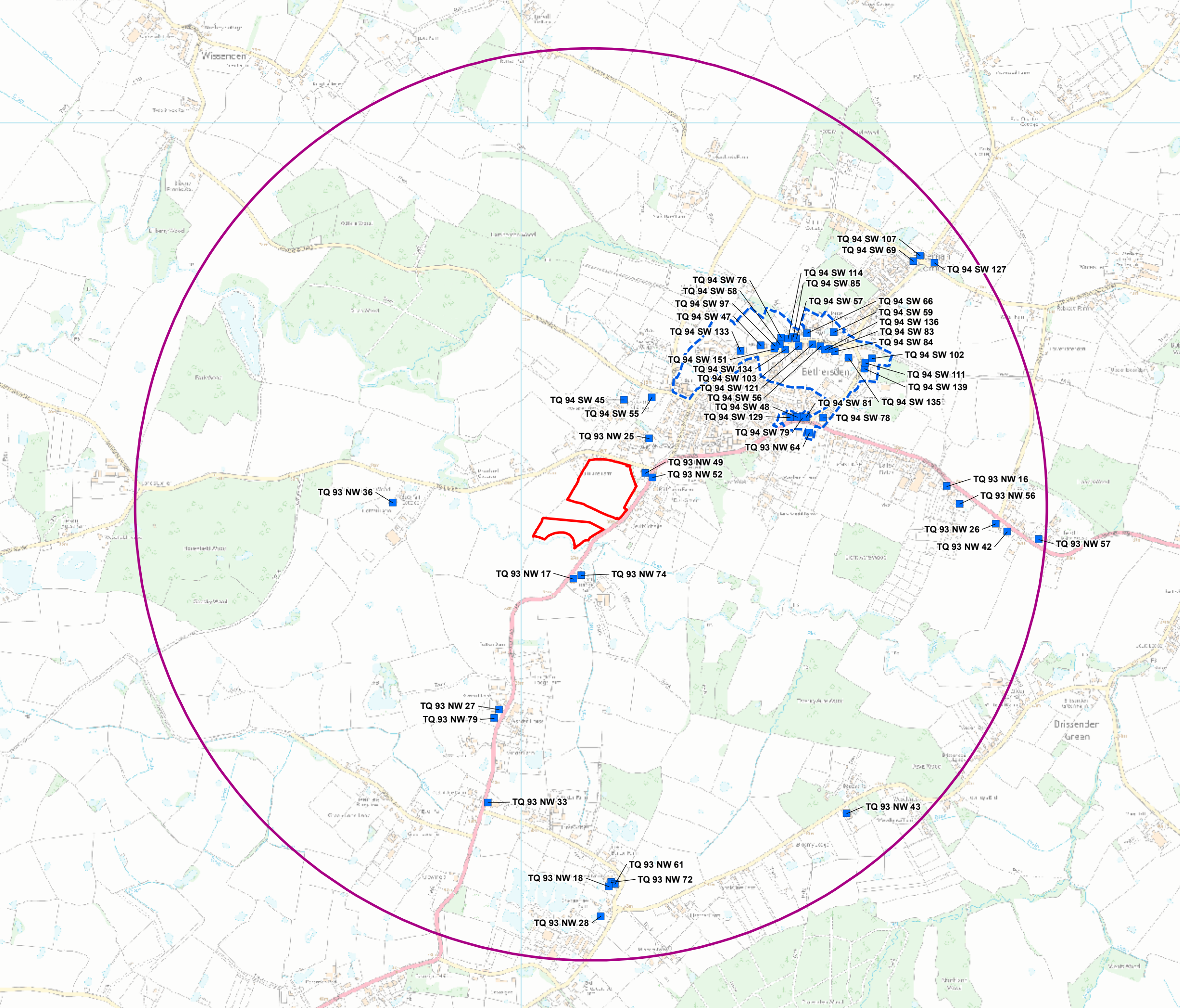
Scale at A3: 1:12,000



Figure 2a

HER Data

Project Ref: N1794-PLN-HER-0001-0999/00392 - Land to the rear of Bull Inn, Bull Lane, Bethersden, Kent\Figures\Mapping\GIS\Projects\Listed Buildings.mxd



Legend

- Site Boundary
- 1.5km Search Radius

Designated Heritage Assets:

- Listed Building
- Conservation Area

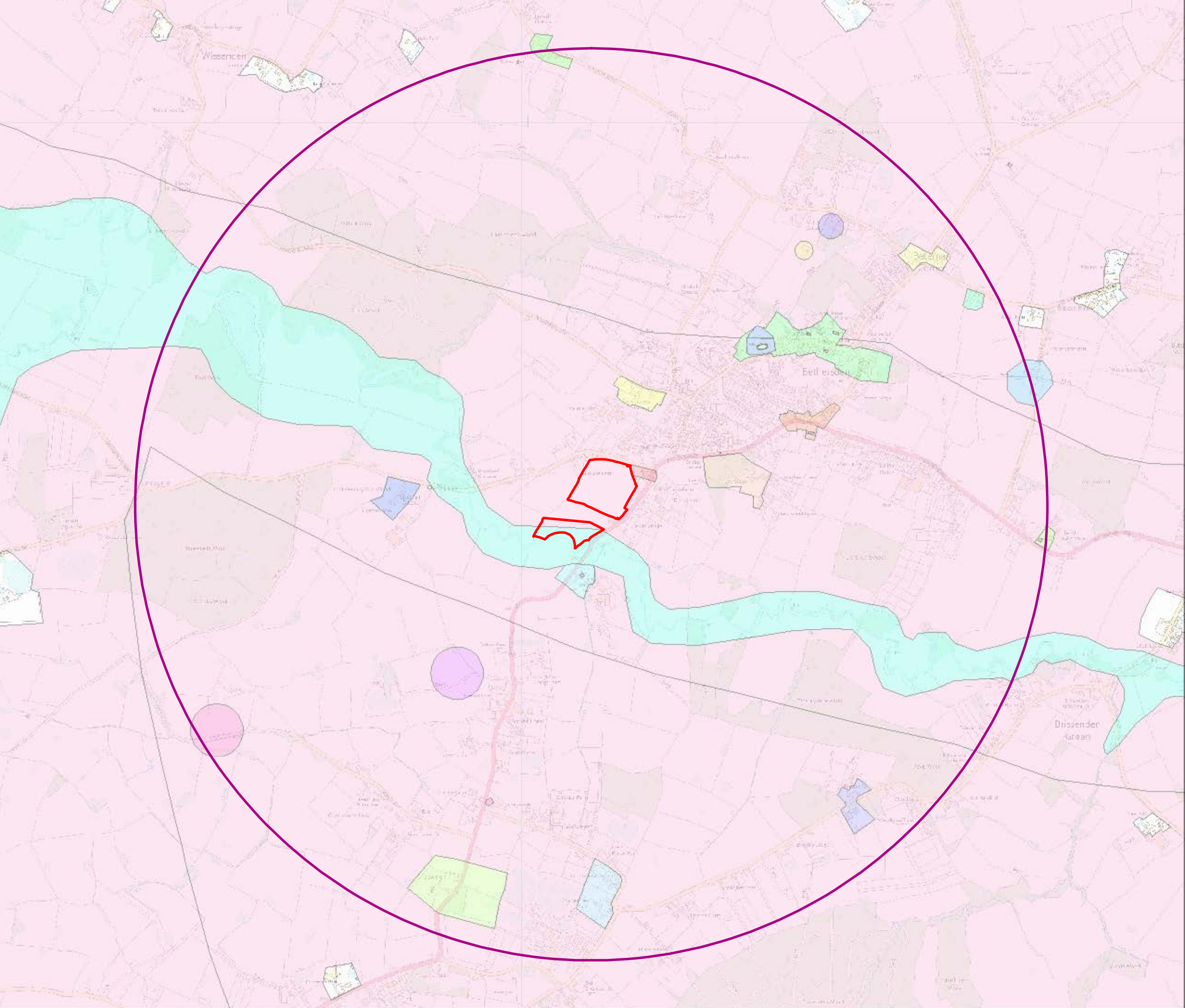


0 100 200m
Scale at A3: 1:12,000



Figure 2b
Listed Buildings Data

Project Ref: N1794-PLN-HER-0001-0999/00392 - Land to the rear of Bull Inn, Bull Lane, Bethersden, Kent\Figures\Mapping\GIS\Projects\ANA Plot.mxd



Legend

- Site Boundary
- 1.5km Search Radius
- Non-designated Heritage Assets:
- Archaeological Notification Areas
 - Area of prehistoric potential within alluvial and grave deposits ; Area of general palaeolithic potential
 - Background multiperiod archaeological potential ; Area of general palaeolithic potential
 - Churchyard surrounding Medieval Church of St Margaret ; Area of general palaeolithic potential
 - Crownfield House - Historic house and gardens with outfarm ; Area of general palaeolithic potential
 - Former site of post medieval mill (Black Mill) ; Area of general palaeolithic potential
 - Group of cottages visible on 1st Ed OS (and possible site of Kiln) ; Area of general palaeolithic potential
 - Historic Core of Bethersden ; Area of general palaeolithic potential
 - Historic Farmstead - Bridge Farm ; Area of general palaeolithic potential
 - Historic Farmstead - Buckhall ; Area of general palaeolithic potential
 - Historic Farmstead - Island Farm ; Area of general palaeolithic potential
 - Historic Farmstead - Lovelace ; Area of general palaeolithic potential
 - Historic Farmstead - Potters Farm ; Area of general palaeolithic potential
 - Historic Farmstead - Ramsden abd Dury Farm ; Area of general palaeolithic potential
 - Historic Farmstead - Runsell ; Area of general palaeolithic potential
 - Historic House and gardens visible on 1st Ed OS ; Area of general palaeolithic potential
 - Historic Public House The Royal Standard ; Area of general palaeolithic potential
 - Historic public House and associated stables ; Area of general palaeolithic potential
 - Medieval Building - Forge Dene ; Area of general palaeolithic potential
 - Medieval Building - Rose Court ; Area of general palaeolithic potential
 - Medieval Building - Sunny Side ; Area of general palaeolithic potential
 - Medieval building - Bridge Farmhouse ; Area of general palaeolithic potential
 - Medieval building - Island Farmhouse ; Area of general palaeolithic potential
 - Medieval church of St Margaret ; Area of general palaeolithic potential
 - Meideval Building - Elizabeth House ; Area of general palaeolithic potential
 - Milestone on Ashford Road ; Area of general palaeolithic potential
 - Nuclear underground monitoring post ; Area of general palaeolithic potential
 - Possible site of Auxillery operational base ; Area of general palaeolithic potential
 - Post Medieval Mill Complex - including cottages and farm ; Area of general palaeolithic potential
 - Post medieval community close to Forge Farm ; Area of general palaeolithic potential
 - Site of Historic Cornmill including former site of windmill ; Area of general palaeolithic potential
 - WWII Aircraft Crash site ; Area of general palaeolithic potential
 - WWII Aircraft crash site ; Area of general palaeolithic potential
 - WWII Auxillery hide ; Area of general palaeolithic potential

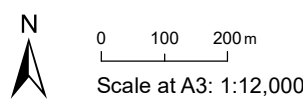
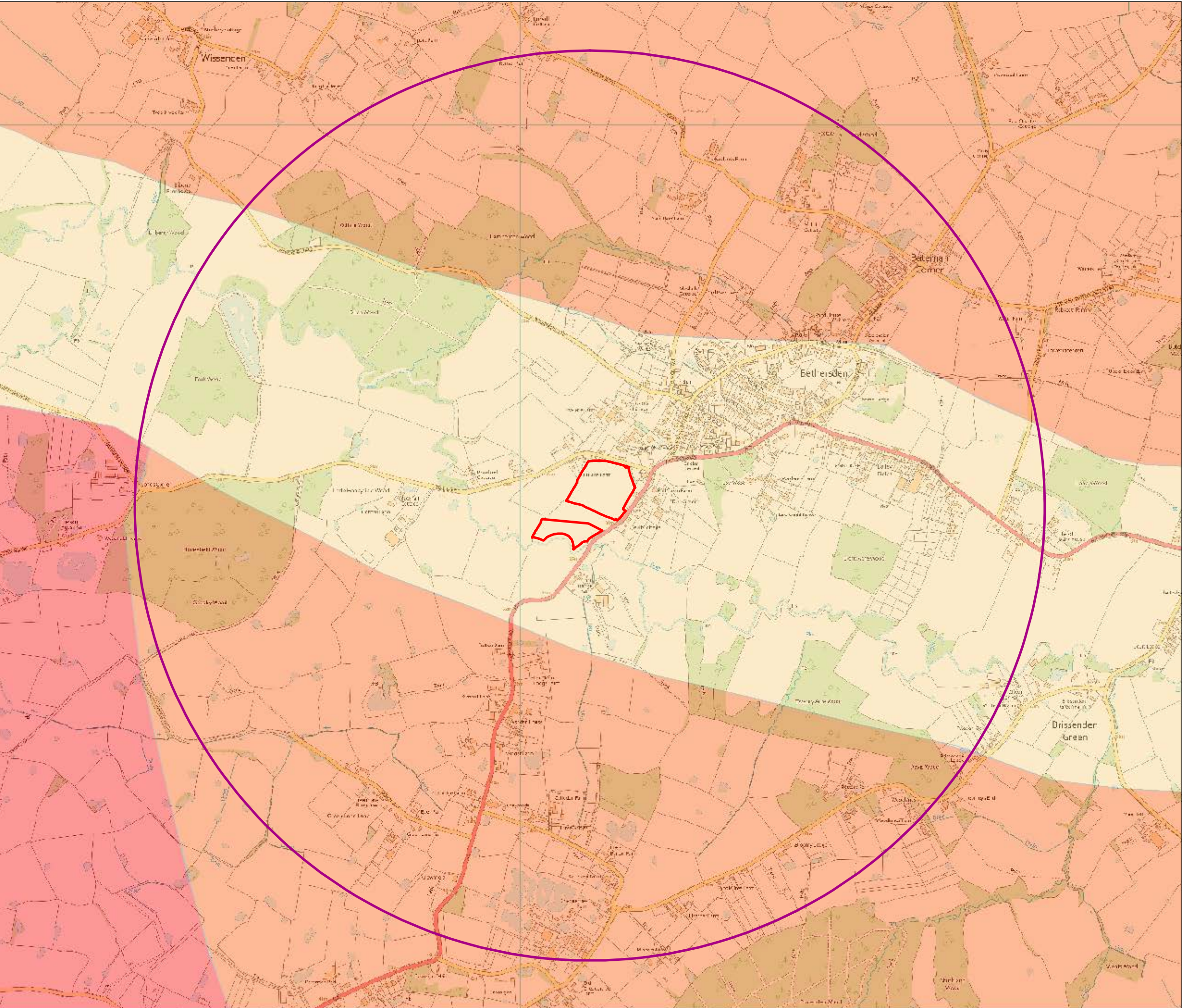


Figure 2c
Archaeological Notification Area
Data

Project Ref: N1794-PLN-HER-0001-0999/00392 - Land to the rear of Bull Inn, Bull Lane, Behersden, Kent\Figures\Mapping\GIS\Projects\Figure 2d PCA.mxd



Legend

- Site Boundary
- 1.5km Search Radius

Stour Palaeolithic Character Areas

- General Weald, without mapped Pleistocene deposits
- Wealden drainage systems, Beult terrace outcrops
- Wealden drainage systems, Hammer Stream and Tiffenden Manor Farm terrace outcrops

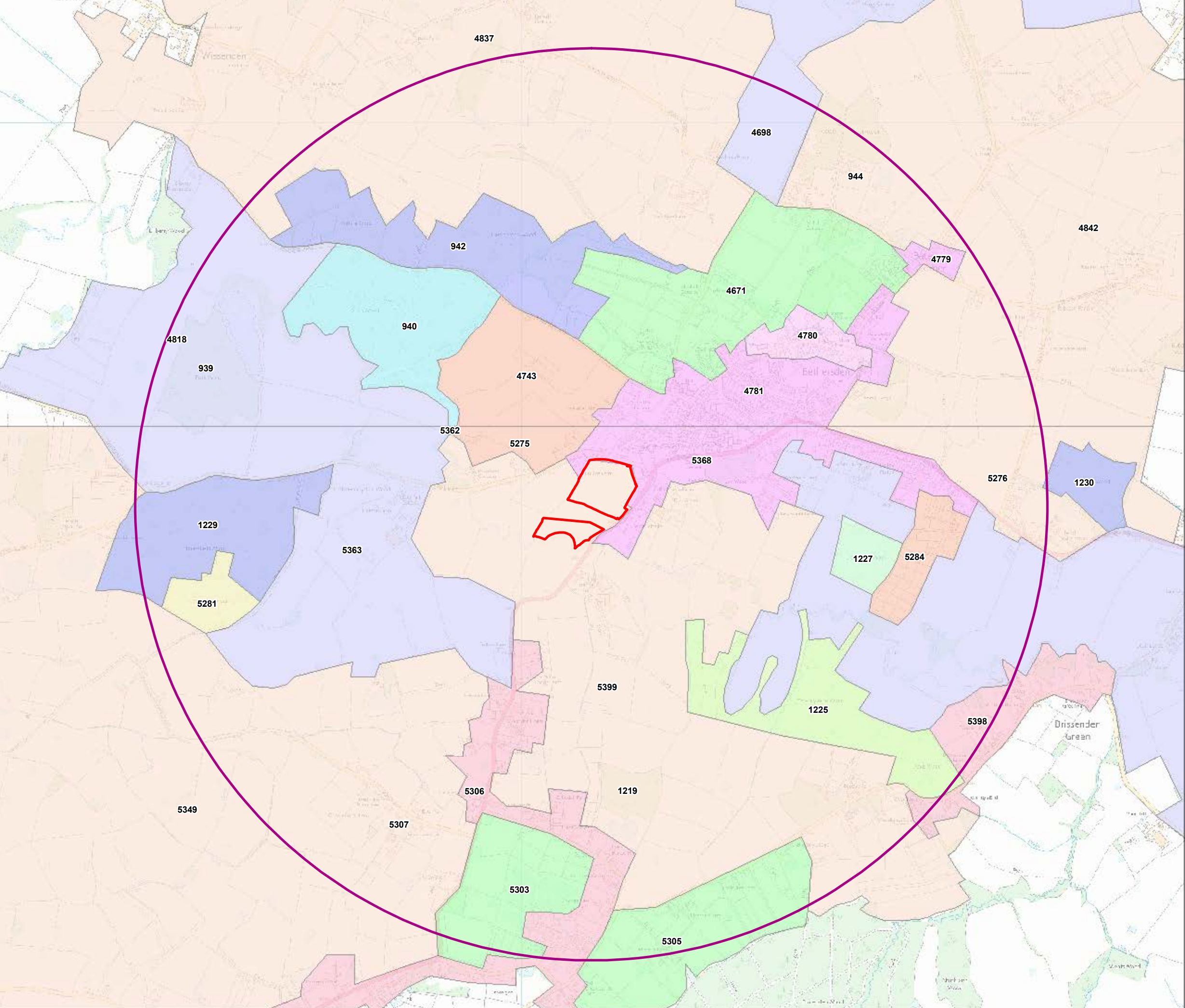


0 100 200m
Scale at A3: 1:12,000



Figure 2d
The Stour Basin Palaeolithic Project

Project Ref: N1794-PLN-HER-0001-0999/00392 - Land to the rear of Bull Inn, Bull Lane, Bethersden, Kent\Figures\Mapping\GIS\Projects\HLC Plot.mxd



Legend

- Site Boundary
- 1.5km Search Radius

Historic Landscape Characterisation:

HLC

- 19th century Coppices
- Assarted pre-1810 Woodland
- Other pre-1810 Woodland
- Post 1810 settlement (general)
- Pre 19th century Coppices
- Rectilinear with wavy boundaries and ponds
- Replanted other pre-1810 Woodland
- Scattered settlement with paddocks (post 1800 extent)
- Small rectilinear with wavy boundaries
- Small rectilinear with wavy boundaries and ponds
- Small regular with straight boundaries (parliamentary type enclosure)
- Village/hamlet 1810 extent



0 100 200m
Scale at A3: 1:12,000



Figure 2e
HLC Data



Site Boundary (approximate)

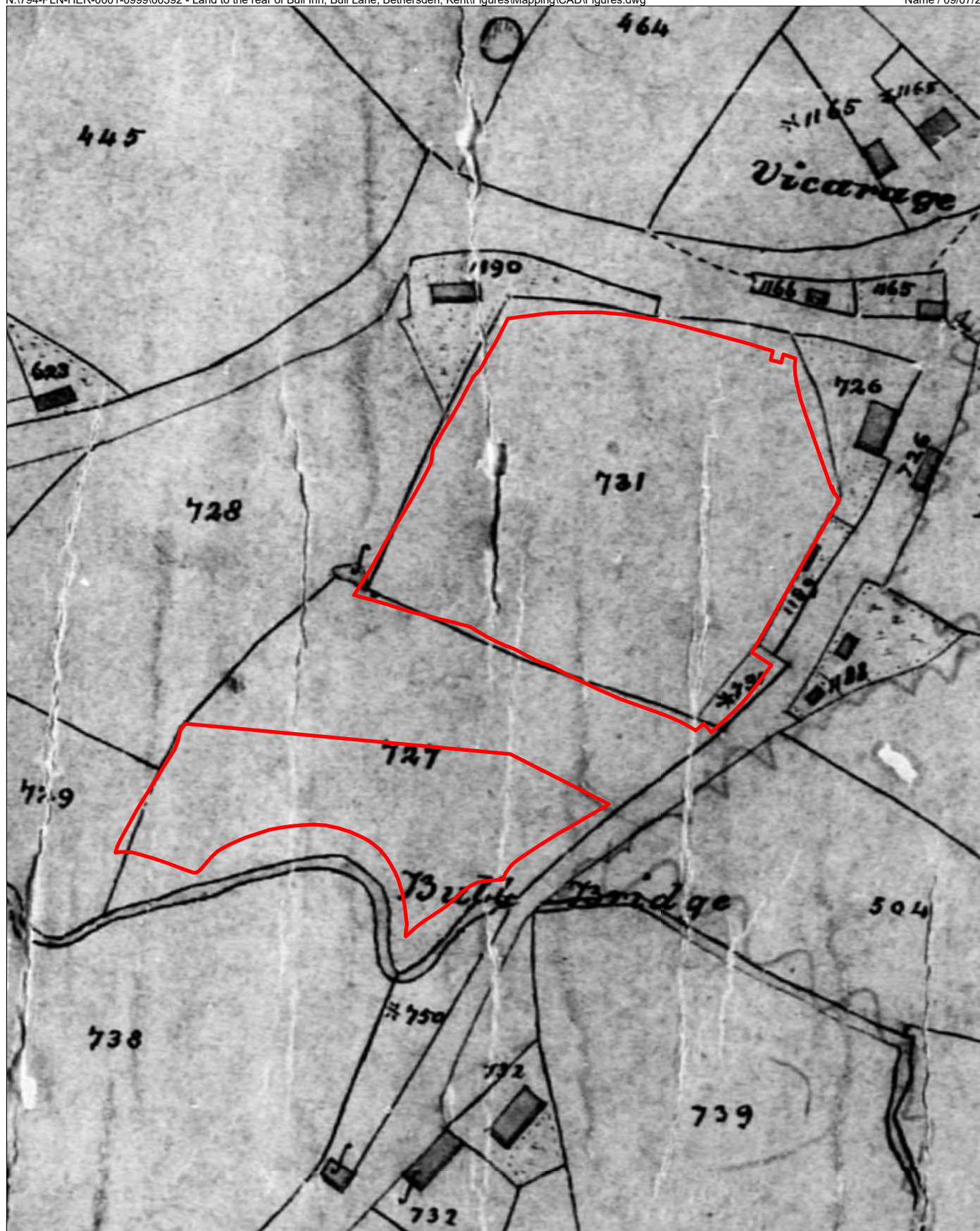


Not to Scale:
Illustrative Only



Figure 4

1797 Ordnance Survey Drawing



 Site Boundary

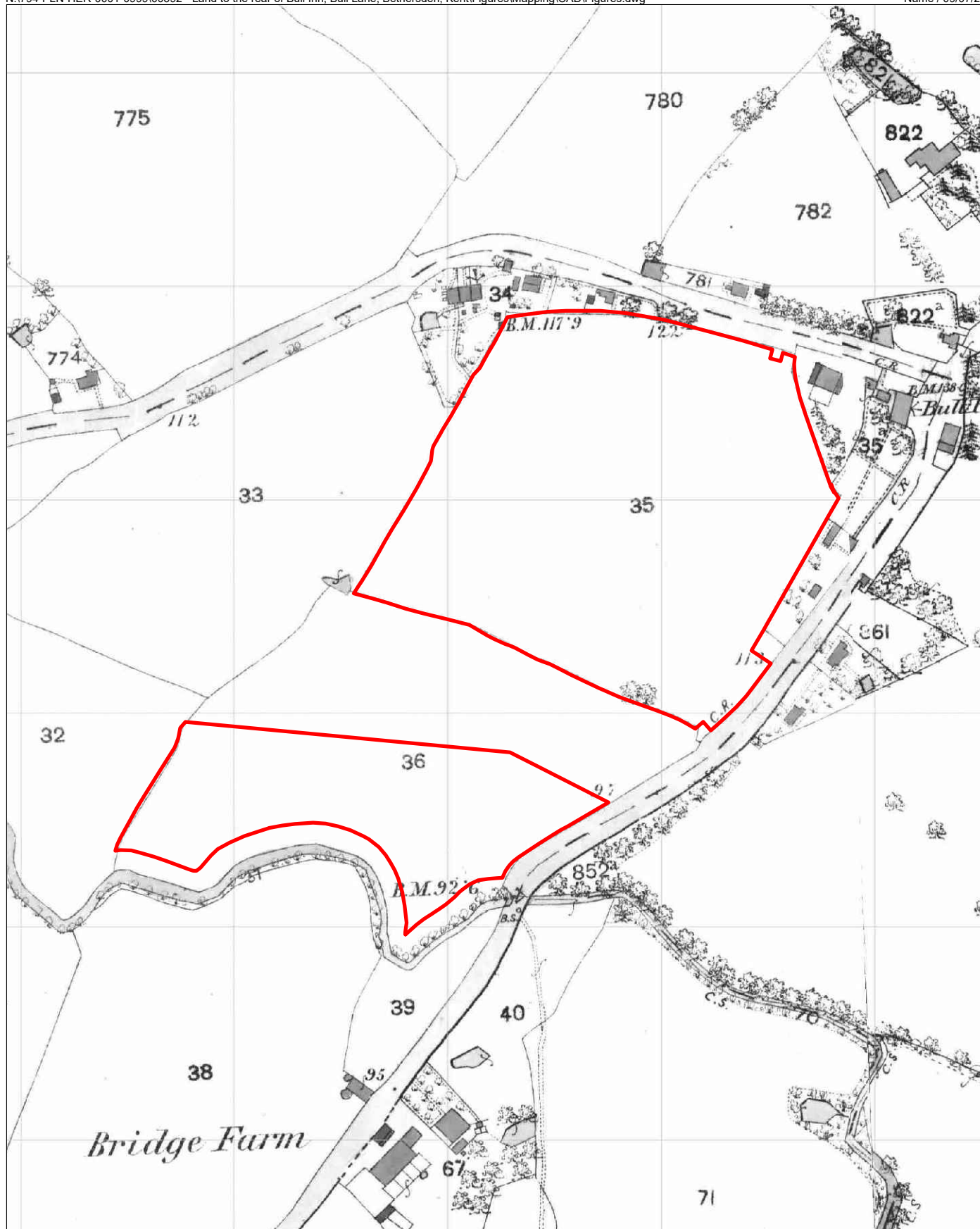


0 50 100m
Scale at A4: 1:5,000

rps
A TETRA TECH COMPANY

Figure 5

1839 Bethersden Parish Tithe
Map



 Site Boundary

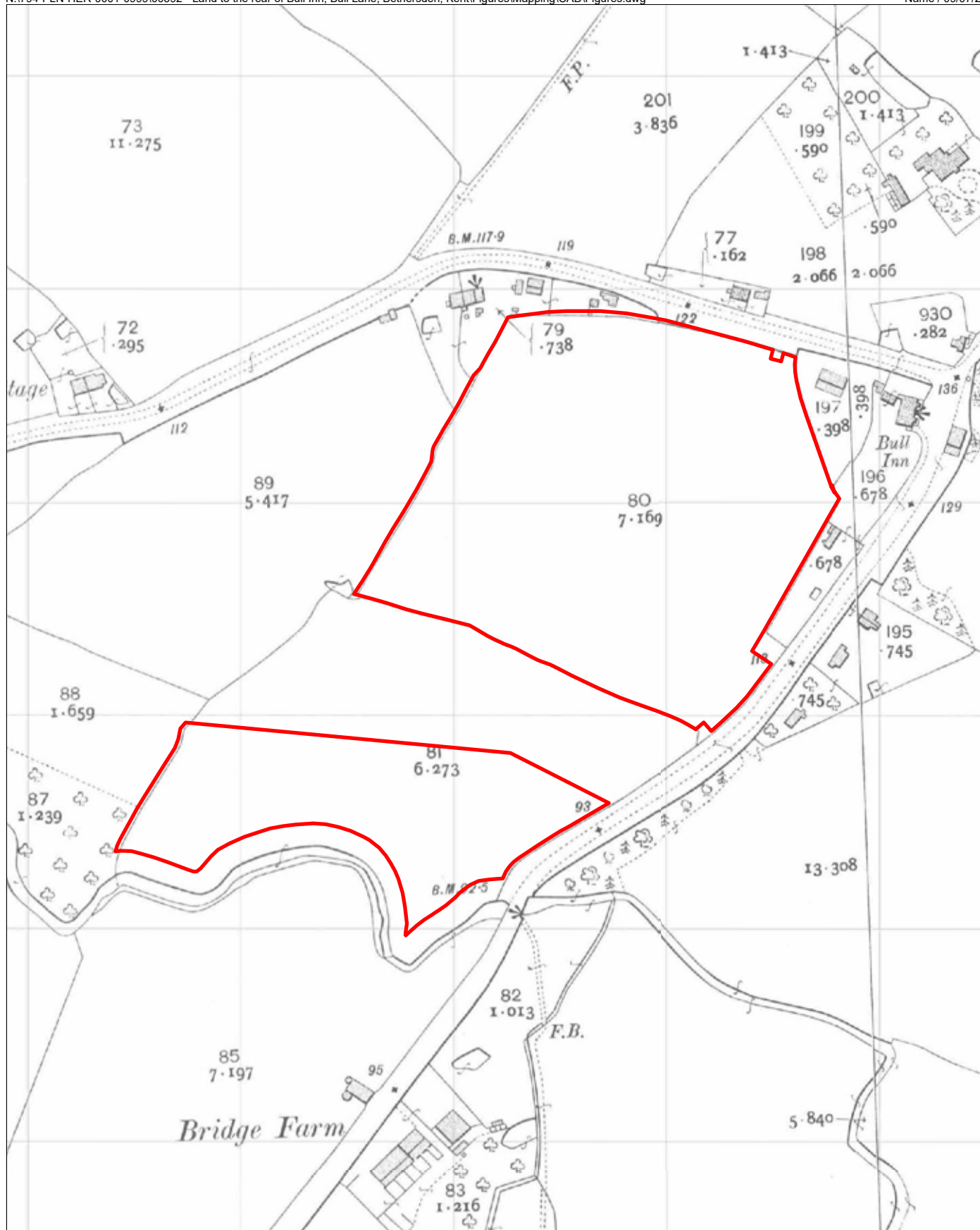


0 50 100m
Scale at A4: 1:5,000

rps
A TETRA TECH COMPANY

Figure 6

1871 Ordnance Survey



 Site Boundary



0 50 100m
Scale at A4: 1:5,000



Figure 7

1907 Ordnance Survey



 Site Boundary



Not to Scale:
Illustrative Only



Figure 8

1960 Aerial Photograph
(Google Earth)



© Crown Copyright and database right 2024. All rights reserved. Licence number 100035207



A TETRA TECH COMPANY

1990 Aerial Photograph
(Google Earth)



 Site Boundary



Not to Scale:
Illustrative Only



Figure 11

2008 Aerial Photograph
(Google Earth)



 Site Boundary



Not to Scale:
Illustrative Only



Figure 12

2022 Aerial Photograph
(Google Earth)

N:\794-PLN-HER-0001-0999\00392 - Land to the rear of Bull Inn, Bull Lane, Bethersden, Kent\Figures\Mapping\CAD\Figures.dwg

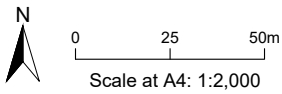
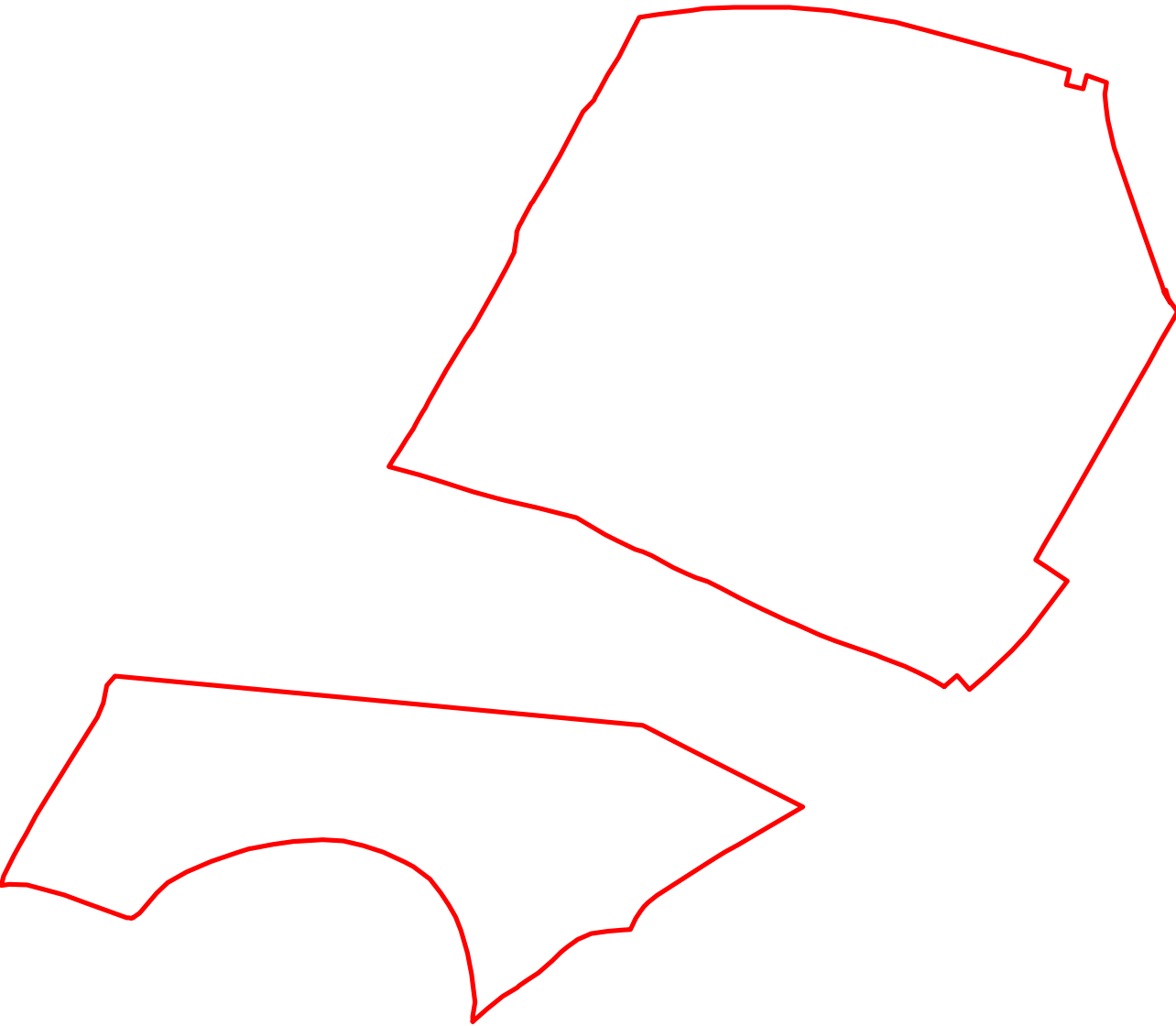


Figure 13
Proposed Development Plan

Appendix A: LIDAR PLOT



Legend

 Site Boundary

LiDAR DATA

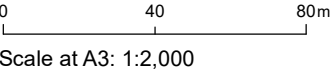
Source:
Environment Agency

Data Type: DTM

Resolution: 1m

Date Captured:
16/04/2018

Processing:
Multi-direction Hillshade overlaid on
simple Local Relief Model



Scale at A3: 1:2,000



Appendix A

LiDAR Plot



rpsgroup.com