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Phone: 03000 413448
 Ask for: Ms Wendy Rogers
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23 November 2018

For the attention of Mark Fewster

SENT BY EMAIL

Re: TM/18/02093 OA – Land off Lavenders Road Swan Street West Malling

Thank you for your letter consulting us on the above outline planning application for up to 80 dwellings and associated works.

The site of the application lies in a sensitive area for the historic environment and the proposed development may have an impact on several designated heritage assets and their settings. The proposed development is situated extremely close to the Scheduled Monument of St Mary's Abbey, an extensive walled religious complex, of early Medieval origins. As such I recommend consultation with Historic England.

The proposed scheme may also have an impact on nearby designated historic buildings including Lavenders, West Malling Station and Went House and their settings. It is also likely to have an impact on West Malling historic town. As such I recommend consultation with the District Conservation Officer.

With regard to the general heritage background for this site, there is potential for prehistoric remains on the basis of the location within a stream valley. Although no prehistoric remains have been located within the application site itself, Mesolithic, Neolithic, Bronze Age and Iron Age remains have been found in the nearby area. Roman remains are recorded from this area, including from within the abbey complex, and it is suggested that St Leonard Street is on the alignment of a Roman road which continues along the western side of the abbey complex.

St Mary's Abbey is considered to be of early Medieval origins but it is possible that an earlier Early Medieval religious complex was here prior to that and early buildings may survive below current ground levels. There is potential for Early Medieval remains to survive on the site, some of which could be sensitive, either include burials or significant remains directly associated with St Mary's Abbey. It is of particular interest that the abbey incorporates the

stream and there are key structures relating to the water. Understanding the origins of the Abbey is a fundamental part of its significance.

St Mary's Abbey is one of the key historic assets of West Malling. It is a walled complex containing several designated heritage assets, including church, towers, kitchens, burial ground, etc, and the Scheduled boundary includes the surrounding wall and gateways. The area immediately adjacent to the wall and gateways is of high sensitivity both in terms of archaeological remains and in terms of immediate setting of the scheduled site. There is an importance to the views of the Abbey and from the Abbey, especially to and from the high buildings within the walls.

The establishment of St Mary's Abbey is closely connected to the development of West Malling as a medieval market town. There is a strong historic relationship between the settlement and the Abbey and that relationship continues today, through the abbey still being an active religious hostel with church, burial ground and inclusion in community events. The understanding, awareness and appreciation of the Abbey is very strong and is part of its significance. The Abbey is currently on the edge of the historic settlement core and forms the visible entrance in to West Malling from the surrounding fields, farms, villages and routeways. This siting is also part of its historic character.

There are limited number of residences and farms to the east of the Abbey. It has been consistently open ground, except for Lavenders to the south east, dated to 19th century, and Eden Cottages, which is identifiable on the 1st Ed OS map as a collection of farm buildings. Eden House is a mid-20th century construction. There is the enclosure and tennis court associated with Wents House in the north west corner as well. There is speculation that this open ground may have been used for trading and market activities in the early times of the Abbey. There is a historic gateway in to the Abbey at the south west corner of the proposed development site, which suggests the need for movement from/to the Abbey from the East, across the application site. Gateways tend to attract traders and services, such as smithing.

The HER records the site of a crashed plane within the application site. The siting needs verifying as this should be a protected site and preferably not disturbed, especially if there are sensitivities around it, such as pilot still present.

On the basis of a quick review of current HER data, this proposed development may have an impact on sensitive and significant buried archaeological remains and may also have an impact on the setting and significance of designated heritage assets, especially St Mary's Abbey. There is a need to thoroughly assess all the heritage issues and to ensure that decisions are fully informed.

I note the application is supported by Heritage Statement and an Archaeological DBA. Both reports and assessments are detailed and do consider key heritage issues. I have no major comments on their content or structure. However, I do not agree with their conclusions.

I consider the impact on the setting of St Mary's Abbey to be of considerable significance. Historic England advice is crucial on this aspect and I strongly recommend HE advice is gained before any decision is made. I also consider that the potential for significant buried remains is extremely high and further assessment would be appropriate.

In view of the potential for significant buried archaeological remains, some of which may be associated with the Scheduled St Marys Abbey or with the protected wreck, I recommend that prior to determination of this application further assessment through fieldwork is

undertaken. I recommend a geophysical survey and possibly targeted trial trenching is essential to ensure informed decisions are made.

I therefore recommend pre-determination evaluation work is undertaken. This work should be in agreement with the County Archaeologist in accordance with specifications agreed with the County Archaeologist, LPA and Historic England.

I would be pleased to discuss any of the above further.

Yours sincerely

Wendy Rogers
Senior Archaeological Officer
Heritage Conservation



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8 February 2019

For the attention of Mark Fewster

SENT BY EMAIL

Re: TM/18/02093 OA – Land off Lavenders Road Swan Street West Malling

Further to my letter of 23 November, I note there have been several additional comments and a Geophysical Report provided. I would like to provide brief comments replying to the applicant's Heritage Rebuttal statement and on the Archaeological Geophysical Report.

Firstly, I welcome the Geophysical Report. The geophysical survey is part of some pre-determination archaeological works being undertaken by the applicant. I am pleased with this approach and agree with the applicant's statement, that a phased programme of archaeological fieldworks is being discussed. The geophysical survey did highlight several anomalies which could be representative of buried archaeological remains. I am now in discussions regarding some targeted trial trenching to clarify the date, nature, character and significance of these buried remains.

With regard to Heritage Collective's heritage rebuttal statement, I would like to provide a brief response to some elements of this. This Rebuttal mainly focuses on the comments from Historic England and the District Conservation Officer. In my original comments of 23 November I too highlighted concerns regarding impact on the character and setting of the Scheduled Abbey complex. I therefore support the comments of Historic England and the District Conservation Officer.

The Rebuttal refers to my comments in sections 33 to 35. Heritage Collective agree with some of my comments but they do not feel that the application proposals threaten the historical dynamic between the abbey and the town. I do not agree with this view because the proposed housing will become the new outskirts of the town of West Malling. Instead of the easterly entrance to the settlement being highlighted as the Abbey walls, which has been the case since the Medieval Period or before, the entrance to West Malling will be marked

by the new housing estate. As such I consider that the application proposals will fundamentally change the historic perception.

I would urge the applicant to progress the targeted archaeological evaluation which may provide some clarification of the presence/absence of significant buried remains.

I would be pleased to discuss any of the above further.

Yours sincerely

Wendy Rogers
Senior Archaeological Officer
Heritage Conservation



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12 April 2019

For the attention of Emma Keefe

SENT BY EMAIL

Re: TM/18/02093 OA – Land off Lavenders Road Swan Street West Malling

Further to my letter of 8 February, the applicant has arranged for some additional research on the archaeological potential, has met Historic England on site, and has submitted a revised scheme layout.

The additional research has provided useful data on the potential crash site. Archaeology Collective has liaised direct with the MoD and according to the MoD research information, there is no aircraft in the proposed development site. I welcome this additional research and useful clarification. However, the information from the MoD is very brief and I suggest this confirmation is not definitive and there is still some potential for some crash remains to be within the proposed development site. The potential is low but should not be discounted completely.

I welcome the illustrative revised layout. This places much of the built layout away from the sensitive environs of St Mary's Abbey and it provides landscaping to decrease detrimental impact on the designated heritage assets.

However, I still have a few concerns:

Firstly, I would prefer any re-design of the layout to reflect the buried archaeological sensitivities as well. The geophysical survey highlighted several anomalies which could represent sensitive and significant buried archaeology, particularly under the smaller western block of new build. I therefore recommend that re-design should be appropriately informed. For potential buried archaeology this should include targeted trial trenching. Such pre-determination evaluation fieldwork, in accordance with NPPF, should provide clarification of the nature, date and ultimately the significance of archaeology impacted by the scheme and

thereby ensure that detailed mitigation is informed, including appropriate consideration of preservation in situ of significant buried archaeology.

Secondly, the geophysical survey highlighted a possible trackway and feature anomalies which may be associated with St Mary's Abbey and medieval activity. If these are archaeological remains and are associated with the abbey, it may be preferable to preserve them in situ and to reflect them in the final layout design. At present the revised layout does not reflect the possible trackway leading from the south east gateway of the Abbey, nor does it seem to take in to account the other geophysical anomalies.

In summary, although I welcome the clarification on the crash site and the amendments to the housing layout, I recommend the need for decisions to be appropriately informed by the results of an agreed pre-determination trial trench investigation. I urge the applicant to progress the targeted archaeological evaluation which may provide some clarification of the presence/absence of significant buried remains.

I recommend this application is still not determined until there is appropriate information from a phase of targeted trial trenching in accordance with the specification agreed with the County Archaeologist and with Historic England.

I would be pleased to discuss any of the above further.

Yours sincerely

Wendy Rogers
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29 April 2019

For the attention of Emma Keefe

SENT BY EMAIL

Re: TM/18/02093 OA – Land off Lavenders Road Swan Street West Malling

Further to my letter of 12 April, the applicant has provided an amended site layout and parameter plan and the applicant's heritage adviser has undertaken assessment of setting and views to and from St Mary's Abbey; the results of which are set out in a Heritage Statement Addendum.

The additional assessment of the views from and towards St Mary's Abbey and the potential impact from the proposed development are welcome and I have reviewed with interest. For this issue, Historic England's comments would take the lead and I will not comment in detail on this matter. However, I would like to comment briefly on the Addendum for the Heritage Statement: the assessment seems to have focused on views. It would have been helpful to have more assessment regarding the potential impact on the significance of St Mary's Abbey from light pollution, noise pollution, additional traffic and as mentioned before, the impact of the Abbey no longer forming the historic edge of settlement.

My letter of 12 April commented on the revised parameter plan and layout but I repeat them here for convenience: I welcome the illustrative revised layout. This places much of the built layout further from the sensitive environs of St Mary's Abbey and it proposes landscaping to decrease detrimental impact on the designated heritage assets.

However, I still have a few concerns:

Firstly, I would prefer any re-design of the layout to reflect the buried archaeological sensitivities as well. The geophysical survey highlighted several anomalies which could represent sensitive and significant buried archaeology, particularly under the smaller western block of new build. I therefore recommend that any re-design should be appropriately informed. For potential buried archaeology this should include targeted trial trenching. Such

pre-determination evaluation fieldwork, in accordance with NPPF, should provide clarification of the nature, date and ultimately the significance of archaeology impacted by the scheme and thereby ensure that detailed mitigation is informed, including appropriate consideration of preservation in situ of significant buried archaeology.

Secondly, the geophysical survey highlighted a possible trackway and feature anomalies which may be associated with St Mary's Abbey and medieval activity. If these are archaeological remains and are associated with the medieval abbey, it may be preferable to preserve them in situ and to reflect them in the final layout design. At present the revised layout does not reflect the possible trackway leading from the south east gateway of the Abbey, nor does it seem to take in to account the other geophysical anomalies.

In summary, I welcome the additional assessment of views in and out of St Mary's Abbey but assessing significance and impact on that significance is complex and involves many issues. With regard to buried archaeology, I recommend the need for decisions to be appropriately informed by the results of an agreed pre-determination trial trench investigation. I urge the applicant to progress the targeted archaeological evaluation which may provide some clarification of the presence/absence of significant buried remains. Such trenching may also provide information on the historic environs of the Abbey and the contribution of the environs to the significance of the medieval abbey complex in relation to the historic town of West Malling.

I recommend this application is still not determined until there is clear understanding of the impact of the scheme on the significance of St Mary's Abbey and there is the opportunity to assess appropriate information from a phase of targeted trial trenching in accordance with the specification agreed with the County Archaeologist and with Historic England.

I would be pleased to discuss any of the above further.

Yours sincerely

Wendy Rogers
Senior Archaeological Officer
Heritage Conservation