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14 September 2021

SENT BY EMAIL

Re: TM/21/01911 – Land rear of 182 High Street Tonbridge

Thank you for your letter consulting us on the above planning application for redevelopment to form 34 Retirement Living apartments with associated works.

The site of the proposed development includes the Scheduled Monument of the Fosse. This is a linear bank and ditch system which enclosed the Medieval town of Tonbridge, including the castle and settlement core. This is an archaeologically sensitive area and the consideration of heritage needs to be robust.

In view of the proximity of the Scheduled Monument, Historic England should be consulted. I note the submitted Conservation Management Plan is being drawn up with Historic England but it seems HE have not submitted formal comments yet. As such my comments are subject to HE views.

I note the application is supported by several heritage reports including an Archaeological letter statement from RPS. I do not agree with the conclusions of the letter. This is because the proposed development is a different shape and on a different footprint to the previous scheme agreed with Historic England and consented. So the concerns regarding archaeology and possible mitigation for archaeology for this new scheme may need to be very different to the earlier scheme. I do not accept that no further archaeological works are needed and a more informed approach to heritage assessment is needed.

I recommend that no decision is made on this scheme until Historic England have provided comments, especially in view of the different shaped building footprint. I would also recommend that there is an assessment of the impact on archaeology from this scheme, although I am happy to recommend a condition covering archaeological work.

I recommend the following condition is placed on any forthcoming consent, subject to comments from Historic England:

AR1b Prior to commencement of development, the applicant, or their agents or successors in title, will secure the implementation of a phased programme of archaeological work in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.

Reason: To ensure that features of archaeological interest are properly examined and recorded in accordance with NPPF

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

Yours sincerely

Wendy Rogers
Senior Archaeological Officer
Heritage Conservation