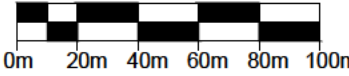
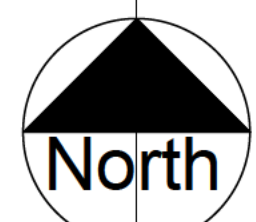


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due to the ongoing construction of developments.
Please note the information contained within this drawing is solely for the
benefit of the employer and should not be relied upon by third parties.
The CDM hazard management procedures for the Cheekwoods aspects of the
design of the project are to be found in the 'Cheekwoods' Hazard Analysis and
Design Risk Management' and/or drawings. The full project design team
comprehensive set of hazard management procedures are available from the
Principal Designer appointed for the project.



APPLICATION SITE
BOUNDARY
LAND OWNERSHIP
BOUNDARY

P01 PLANNING ISSUE
Rev: Revision Description
01/04/2025 LFS
Date: 01/04/2025
Author: LFS
Reviewer: JLL

PLANNING

32 Frederick Street,
Birmingham, B1 3BH
+44 (0)121 234 7500
www.cheekwoods.com

cheekwoods

Project
**SEVINGTON
INLAND BORDER FACILITY**

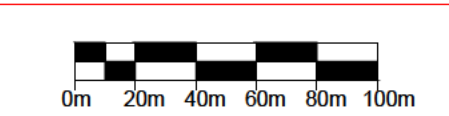
Client
JLL

Drawing Title
**SITE BOUNDARY &
LAND OWNERSHIP PLAN**

Scale: 1:2500
Size: A0
Drawn: SA
Checked: LF
Date: 01/04/2025

Project: 5861
Originator: CA
Zone: ZZ
Level: DR
Type: A
Revision: 00001
Date: P01

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The CHM hazard management procedures for the Chetwoods aspects of the design of the project are to be found on the "Chetwoods - Hazard Analysis and Design Risk Assessment" earlier drawings. The full project design team comprehensive set of hazard management procedures are available from the Project Designer appointed for the project.



SCALE 1:1250



Rev	Revision Description	Date	Author	Reviewed
P02	PLANNING ISSUE	01.04.25	JC	
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PLANNING

32 Frederick Street
Birmingham, B1 3EH

+44 (0)121 234 7500
www.chetwoods.com



Project
SEVINGTON IBF

Client
JLL

Drawing Title
EXISTING BLOCK PLAN

Scale	Size	Drawn	Checked	Date
1:100	A0	JC	SA	01/04/2025

Project	Originator	Functional	Spatial	Form	Discipline	Number	Rev
5861	CA	ZZ	ZZ	DR	A	00005	P01



Appendix 10.2

Archaeological Desk Based Assessment (ADBA)

Archaeological Statement

Sevington Inland Border Facility, Ashford



Archaeological Statement

Sevington Inland Border Facility, Ashford

Waterman Infrastructure & Environment Ltd

January 2025

(Updated June 2025)

Office Locations

Cambridge

1A Clifton Court, Clifton Road,
Cambridge, CB1 7BN
01223 776740

London

Moor Place, 1 Fore Street Avenue,
London, EC2Y 9DT
020 3011 0820

Norwich

Brettingham House, 98 Pottergate,
Norwich, NR2 1EQ
01603 631319

Bath

Newark Works, 2 Foundry Way,
South Quays Bath,
BA2 3DZ
01225 690119

Manchester

One St Peter's Square
Manchester
M2 3DE
01617 111740

Edinburgh

1 Lochrin Square
92-98 Fountainbridge
Edinburgh
EH3 9QA
01316 000319

York

Stanley Harrison House,
The Chocolate Works, Bishopthorpe Road,
York, YO23 1DE
01904 803800

Issue Sheet

Document Prepared for: Waterman Infrastructure & Environmental Ltd

Archaeological Statement:

5507H Sevington Inland Border Facility, Ashford

Prepared by:

Name: [REDACTED]

Title: Technical Director

Date: June 2025

Approved by:

Name: [REDACTED]

Title: Director (Historic Environment)

Date: June 2025

Revision: V1.0

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Non – Technical Summary

Lanpro Services Limited was commissioned by Waterman Infrastructure & Environment Ltd to produce an Archaeological Statement to support an application for full planning permission for the Sevington Inland Border Facility (IBF) in Sevington, Ashford (NGR 603926 140758). The existing IBF currently operates under a temporary planning permission which will expire on 31st December 2025 and the Development will seek full planning permission for the continued use and operation of the Sevington IBF. It is located within the administrative boundaries of Ashford Borough Council and Kent County Council.

The Archaeological Statement addresses the information requirements set out in the NPPF and provides the proportionate response sought by the NPPF.

The Development would result in permanent operation phase impacts, including:

- Goods vehicle parking for up to 855 vehicles, resulting in permanent visual and noise impacts as a result of increased vehicle traffic,
- Permanent hardstanding, buildings and lighting, and
- Permanent timber barrier walls and security fencing.

The Development does not physically impact any designated or non-designated archaeological asset. There is one non-designated heritage asset located within the Application Site, the Royal Observer Corps underground monitoring post, Sevington (MKE18070). However, this remains in situ as part of the Development and the scheme results in no harm to the asset.

Within the wider 500m search area there is one Scheduled Monument which would not be impacted by the Development.

This assessment has established that a programme of archaeological mitigation fieldwork was undertaken in advance of the construction of the temporary IBF, and subsequent post-excavation reporting, publication and archiving is currently being undertaken. The Royal Observer Corps post has been preserved in situ. No ongoing impacts will occur to archaeological assets on the Application Site.

Due to the implementation of the programme of archaeological mitigation, the operation of the Development will have no impact to archaeological assets on the Application and will have no impact the setting and significance of any archaeological within the surroundings.

1 Introduction

1.1 Summary

- 1.1.1 This Archaeological Statement (AS) has been prepared by Lanpro Services Limited on behalf of Waterman Infrastructure & Environment Ltd to support a planning application for full planning permission for the Sevington Inland Border Facility (IBF) in Ashford (NGR 603926 140758). The existing IBF currently benefits from a temporary planning permission which will expire on 31st December 2025 and the Development will seek full planning permission for the continued use and operation of the Sevington IBF. It is located within the administrative boundary of Ashford Borough Council and Kent County Council.
- 1.1.2 This Archaeological Statement has been prepared following a meeting with Wendy Rogers on 16 October (KCC Heritage Conservation Officer) to confirm there will be no ongoing proposed groundworks and impacts to heritage assets resulting from construction can be scoped out of further assessment.
- 1.1.3 This Archaeological Statement has been prepared in compliance with the National Planning Policy Framework (NPPF 2024).

2 Legislation, Policy and Guidance

2.1 General

- 2.1.1 In considering any planning application for development, the Planning Inspectorate (PINS) will be guided by current legislation, the policy framework set by government planning policy, by current Local Plan policy and by other material considerations.
- 2.1.2 The national policy framework (NPPF, DLUHC 2024) states that planning applications should consider the potential impact of the development upon heritage assets which includes both designated heritage assets (for example listed buildings and Conservation Areas) and non-designated heritage assets usually comprising assets recorded on a Local List or the Historic Environment Record.

2.2 Current Legislation

- 2.2.1 The applicable legislative framework for this archaeological desk-based assessment relates to the Ancient Monuments and Archaeological Areas Act (AMAAA) 1979.
- 2.2.2 The applicable legislative framework is summarised as follows:
- Ancient Monuments and Archaeological Areas Act (AMAAA) 1979;
 - Planning (Listed Buildings and Conservation Areas) (P(LBCA)) Act 1990.
- 2.2.3 The AMAAA largely concerns to Scheduled Monuments (SMs) and designated archaeological areas, detailing in particular what can and cannot be undertaken on archaeological grounds.
- 2.2.4 The Planning (Listed Buildings and Conservation Areas) Act 1990 (the 1990 Act) provides for the protection of listed buildings and Conservation Areas and is largely expressed in the planning process through policies in regional and local planning guidance, as outlined below. This act is the primary legislative instrument addressing the treatment of listed buildings and Conservation Areas through the planning process.
- 2.2.5 Section 66 of the 1990 Act states that *'...in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'*.
- 2.2.6 Section 72 then adds that *'..with respect to any buildings or other land in a Conservation Area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'*.
- 2.2.7 As far as Section 72 is concerned, it has previously been established by the Courts that development which does not detract from the character or appearance of a Conservation

Area is deemed to be in accordance with the legislation. In other words, there is no statutory requirement to actively 'enhance'.

2.3 National Planning Policy Framework

2.3.1 Section 16 of the NPPF (DLUHC 2024), 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.

2.3.2 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, and
- Conservation of England's heritage assets in a manner appropriate to their significance.

2.3.3 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 207 states that planning decisions should be based on the significance of the heritage asset (and any contribution made by its setting), and that the '*level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal upon their significance*'. This is supported by paragraph 208 which states that LPAs should take this into account when considering applications.

2.3.4 Paragraphs 212-215 consider the impact of development proposals upon the significance of designated heritage assets. Paragraph 212 states that where a development is proposed that would affect the significance of a designated heritage asset '*great weight should be given to the asset's conservation (and the more important the asset, the greater this weight should be)*'. Paragraph 215 emphasises that '*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits*' of the scheme, bearing in mind the great weight highlighted in Paragraph 212.

2.3.5 Heritage Assets are defined in Annex 2 of the NPPF as: '*a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*'.

2.3.6 A Designated Heritage Asset comprises a '*World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.*'

2.3.7 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, and
- Provides for the recording of sites not significant enough to merit in situ preservation.

2.4 Planning Practice Guidance

- 2.4.1 The Planning Practice Guidance (MHCLG 2024) is a web-based resource which is to be used in conjunction with the NPPF. It is aimed at planning professionals and prescribes best practice within the planning sector. The relevant section is entitled 'Conserving and enhancing the historic environment'. The guidance given in this section sets out the best practice to applying government policy in the NPPF. It provides an interpretation for each of the interests assigned to heritage assets in understanding significance: archaeological, architectural and artistic, and historic (Paragraph: 006 Reference ID: 18a-006-20190723).

2.5 Local Planning Policy

Ashford Borough Local Plan 2030

- 2.5.1 Ashford Borough Council adopted the Ashford Borough Local Plan 2030 in February 2019. The following policies are considered relevant to heritage.

Policy SP1 – Strategic Objectives

c. To conserve and enhance designated and non-designated heritage assets and the relationship between them and their settings in a way that promotes distinctive places, proportionate to their significance. Place-based heritage will be a key principle underpinning design and spatial form of development...

Policy ENV13 – Conserving 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.

2.6 Professional Guidance

- 2.6.1 The ClfA *Standard and Guidance for Historic Environment Desk-based Assessment (2020)* provides guidelines and recommendations for best practice in undertaking archaeological desk-based research and assessment.
- 2.6.2 This document has also been prepared in accordance with the general guidelines set out in British Standard 7913:2013 *Guide to the Conservation of Historic Buildings*.
- 2.6.3 Guidance on the implementation and interpretation of historic environment policy has been provided by the Historic England publications *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment (GPA2, 2015)* and the *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets (GPA3, 2017)*.
- 2.6.4 Historic England's GPA2 outlines a seven-stage process for the assembly and analysis of relevant information relating to heritage assets potentially affected by a proposed development:
- Understand the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment,
 - Understand the significance of the affected assets,
 - Understand the impact of the proposal on that significance,
 - Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF,
 - Look for opportunities to better reveal or enhance significance,
 - Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change, and
 - Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.
- 2.6.5 In order to understand the nature, extent and level of significance GPA2 advocates considering the four types of heritage value an asset may hold, as identified in *Conservation Principles* (English Heritage 2008): *aesthetic, communal, historic* and *evidential*. However, NPPF (2024) has since provided a definition of significance dependant on the following four interests: archaeological, architectural and artistic, or

historic (para 2.4.1, above). The following assessment of significance results from a combination of any, some or all of these values and interests.

- 2.6.6 Historic England's GPA3 recognises that whilst setting is not a heritage asset, 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*' (para. 4). Setting is described as being distinct to curtilage, character and context. This guidance also notes that the contribution of setting to the significance of a heritage asset is often expressed by reference to views, although the importance of setting lies in what it contributes to the significance of the heritage asset, and this can be influenced by a number of other factors.
- 2.6.7 The Historic England advice note, *Statement of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12* (HEAN 12, 2019), brings together all of the above guidance in an analysis of an appropriate approach for applicants for heritage and other consents in providing an understanding of the significance of heritage assets in line with NPPF. It emphasises the level of detail required in support of both planning and listed building consent applications, which should be no more than is necessary, i.e. proportionate to the significance of the heritage asset affected, to reach an informed decision.

3 Methodology

3.1 Information sources

- 3.1.1 Records held on the Kent Historic Environment Record (HER) and the Historic England National Heritage List for England (NHLE) for within a 500m search area have been assessed and their locations illustrated on Figure 1.
- 3.1.2 On-line repositories for historical maps, plans and relevant documentary sources were consulted in accordance with guidelines laid down by the ClfA (2020).
- 3.1.3 A range of published and unpublished material has been consulted, in particular reports detailing the results of archaeological assessment and archaeological fieldwork investigations on the Application Site.

3.2 Site Visit

- 3.2.1 A site visit was undertaken Thursday 24th October 2024 in clear weather conditions to provide an assessment of the character of the Application Site and surrounding search area and appraise the potential impact of the Development on any heritage assets.

3.3 Assessment Criteria

Significance

- 3.3.1 NPPF defines significance as:
- The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.*
- 3.3.2 Historic England's *Conservation Principles* (previously English Heritage, 2008) identified four high level values: evidential, historic, aesthetic and communal. NPPF (2024) defines significance in the planning context as resulting from the heritage interest of an asset determined by the following:
- Archaeological Interest: the potential of an asset to yield evidence of past human activity that could be revealed through future investigation. Archaeological interest includes above-ground structures, as well as earthworks and buried or submerged remains.
 - Architectural and Artistic Interest: derives from a contemporary appreciation of an asset's aesthetics. Architectural interest is an interest in design, construction, craftsmanship and decoration of buildings and structures. Artistic interest can include the use, representation or influence of historic places or buildings in

artwork. It can also include the skill and emotional impact of works of art that are part of heritage assets or assets in their own right

- Historic Interest: the way in which an asset can illustrate the story of past events, people and aspects of life (illustrative value, or interest). It can be said to hold communal value when associated with the identity of a community.

3.3.3 These values or interests encompass the criteria that Historic England are obliged to consider when statutorily designating heritage assets.

3.3.4 There are no single defining criteria that dictates the overall asset significance; each asset has to be evaluated against the range of criteria listed above on a case-by-case basis. These values are not intended to be restrictive but are identified in order to help establish a method for thinking systematically and consistently about the heritage values that can be ascribed to a place and contribute to a heritage asset's significance.

3.3.5 In relation to a recognised heritage asset, the production of this HS also takes into account the contribution which the historic character and setting makes to the overall significance of the asset.

3.3.6 The relative contribution of the heritage values to the significance of the heritage asset(s) are graded as either high, medium, low, neutral/negligible (informed by ICOMOS (2011) and Historic England guidance) and illustrated in Table 2, below.

Table 2: Significance of a heritage asset

Heritage significance	Description
Very High	World Heritage Sites (WHS)
High	Scheduled Monuments (SM), Grade I and II* Listed Buildings, Grade I and II* Registered Historic Parks and Gardens
Medium	Grade II Listed Buildings Grade II Registered Historic Parks and Gardens Conservation Areas
Low	Locally Listed Buildings Non-designated heritage assets
Negligible/nil	Heritage assets with very little or no surviving research value

Setting

3.3.7 The NPPF defines the setting of a heritage asset 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.

3.3.8 Historic England's GPA3, The Setting of Heritage Assets Setting (2017), was used to inform the methodology for this assessment. The guidance recommends that a systematic and staged '5-step process' to assessment should be adopted, to which this HS has adopted steps i) to iv):

- i. *identify which heritage assets and their settings are affected,*
- ii. *assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated,*
- iii. *assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it,*
- iv. *explore the way to maximise enhancement and avoid or minimise harm,*
- v. *make and document the decision and monitor outcomes.*

3.3.9 The production of this HS has taken into account the physical and sensory surroundings of the asset, in order to understand the contribution 'setting' makes to the heritage significance of the asset(s). This has included topography and intervening development and vegetation. It also considers how the asset is currently experienced and understood through its setting, in particular views to and from the asset and the Application Site, along with key views, and the extent to which setting may have already been compromised.

3.3.10 The relative contribution of the heritage values to the significance of the asset(s) are graded as either high, medium, low, neutral or detrimental.

Definition of Harm

3.3.11 Current guidance by Historic England is that 'change' does not equate to 'harm'. The NPPF and its accompanying PPG effectively distinguish between two degrees of harm to heritage assets – substantial and less than substantial (paragraphs 214 and 215).

3.3.12 In determining the effects of the proposed scheme this assessment is cognisant of case law. In particular, that for Flag Station, Mansel Lacy, Herefordshire [22/09/2015] Case Number EWHC 2688, wherein it emphasised the primacy of the 1990 Planning Act and the fact that it is up to the decision makers in the planning system to 'have special regard to the desirability of preserving the [listed] building or its setting'. HH Judge David Cooke stated, in regards to an impact on the setting of a listed building, (Court of Appeal (PALMER and HEREFORDSHIRE COUNCIL & ANR) in 2016 (Case No: C1/2015/3383) para.34):

It is still plainly the case that it is for the decision taker to assess the nature and degree of harm caused, and in the case of harm to setting rather than directly to a listed building itself, the degree to which the impact on the setting affects the reasons why it is listed.

3.3.13 The judgment was agreed by Lord Justice Lewison at the Court of Appeal, who stated that:

It is also clear as a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to be paid to the desirability of not harming the setting of a listed building, that cannot mean that any harm, however minor, would necessarily require planning permission to be refused.

3.4 Planning history

Extant Application

3.4.1 Much of the land, covered by the Application Site, was subject to an outline planning application (reference 14/00906/AS), which was accompanied by an ES. Outline planning consent was granted in September 2017:

'Development to provide an employment led mixed use scheme, to include site clearance, the alteration of highways, engineering works and construction of new buildings and structures of up to 157,616 sq m comprising: up to 140,000 sq m Class B8 (storage and distribution) use; up to 23,500 sq m of B1a/B1c Business (of which a maximum of 20,000 sq m of B1a); up to 15,000 sq m of B2 (general industry); up to 250 sq m of A1 (retail shops) and 5,500 sq m of sui generis to accommodate Kent Wool Growers together with ancillary and associated development including utilities and transport infrastructure, car parking and landscaping.'

3.4.2 To discharge Condition 1A of the outline permission, a Reserved Matters Application for Phase 1A (reference 19/00579/AS) was submitted and works implemented in 2019:

'Approval of the appearance, landscaping, layout and scale of the 'Phase 1A works' being the works comprising the estate roads, the sustainable drainage system embedded within open space and the landscaping and layout of that open space (including measures specifically designed for ecological/biodiversity enhancement purposes within that open space)'

4 Site Description

- 4.1.1 The Application Site comprises the existing temporary Sevington IBF located on the western side of Highfield Lane, Kent. It lies between Sevington, on the eastern edge of Ashford, and the village of Mersham (NGR 603926 140758).
- 4.1.2 To the north and west of the Application Site the character of the search area is largely defined by modern developments. The expansion of Ashford comprising housing estates, Ashford Retail Park and Waterbrook Park now dominate this part of the settlement. In addition, the M20 and the junction 10A are located to the north of the Application Site. To the south of the Application Site is Church Road, a semi-rural street lined with residences, beyond which lies the route of High Speed Rail 1 (HS1) into Ashford. The A2070 Bad Munstereifel Road is located c.150m west of the order land boundary.
- 4.1.3 The site is relatively flat, with the centre at a height of c. 55m OD, rising slightly towards the south-east to a maximum level of c. 61m OD. A slight ridge also existed across the northern side of the site on a north-east-south-west orientation with the ground falling gradually away towards the north and west to a minimum level of c. 50.5m OD to the north and c. 49.5m OD to the west (AOC, 2022). The British Geological Survey records the bedrock geology across much of the site as Hythe Formation. Atherfield Clay Formation was also present in the southern part of the site.

5 Archaeological Background

5.1 Introduction

- 5.1.1 This section reviews existing archaeological evidence for the study site and the archaeological and historical background of the surrounding area, based on a consideration of evidence in the Kent Historic Environment Record (HER) and the Historic England National Heritage List for England (NHLE) and the surrounding 500m search area (Figure 1).

5.2 Designated Heritage Assets

- 5.2.1 There are no designated heritage assets within or bounding the study site. Built heritage assets are not assessed within this report.
- 5.2.2 There is one medieval scheduled monument within the surrounding 500m search area. This is the asset known as, 'A moated site and associated garden earthworks 460m south east of Boys Hall' located 380m west of the Application Site (NHLE 1009006) (Figure 1). It is completely enclosed on all sides by an industrial park and by High Speed Rail 1 (HS1) to the north east. Its significance will remain unaffected by the Development and it has not been taken forward for assessment.

5.3 Non-designated Heritage Assets

- 5.3.1 The HER holds records of three 'monuments' within the Application Site, recorded prior to the construction of the temporary IBF (Figure 1). The records comprise; the 20th century Royal Observer Corps underground monitoring post (MKE18070) in the east of the site, post-medieval field system cropmarks in the west of the site (MKE44349), and a possible medieval occupation site on the western boundary of the Application Site (MKE 97858).
- 5.3.2 The Application Site has been subject to a number of phases of archaeological assessment, fieldwork and reporting exercises which are detailed below.

5.4 Previous Archaeological Investigations

- 5.4.1 An Historic Environment Desk Based Assessment (HEDBA) was undertaken in support of a planning application for the Application Site (Waterman, 2014).
- 5.4.2 Archaeological excavations were undertaken in advance of the Channel Tunnel Rail Link (CTRL) to the west of Blind Lane including immediately south-east of the Site (EKE5132) in 1999. Two parallel Bronze Age ditches were recorded as well as ditches representing a late Iron Age to Roman field system, and a medieval ditch and posthole.
- 5.4.3 A site walkover survey, metal detecting survey and archaeological field evaluation over the majority of the Application Site were undertaken in 2012 (CgMs/Wessex 2012) (EKE14899) and (EKE14901). The archaeological evaluation comprised the mechanical excavation of 101 trenches measuring 30m by 2m, comprising a 2% sample of the area of proposed development. Only a small number of the trenches contained archaeological remains and the majority of those features appeared to be small scale undated field boundaries, drainage ditches or discrete features. Trench 145 contained the densest collection of archaeological features observed on the site. The presence of a mortared ragstone wall

alongside two other features represented possible structures, perhaps associated with a medieval occupation site. The majority of the finds recovered dated to the 12th-14th century. Together the walkover survey and the subsequent evaluation suggested a low level of archaeological activity across the majority of the site, with the exception of the aforementioned zone of medieval activity in the southern part of the site.

- 5.4.4 An Historic Environment Desk Based Assessment (HEDBA) was undertaken in support of a planning application for the Application Site (Waterman, 2014). Written Schemes of Investigation were prepared for a trial trenching evaluation and strip, map and sample exercise on the Application Site (WSP 2019a and 2019b), and a Cultural Heritage Assessment was prepared for the Application Site in November 2020a (Mott MacDonald).
- 5.4.5 A further phase of trial trenching was subsequently undertaken in 2020 to target areas unavailable during the 2012 phase of archaeological fieldwork (AOC, 2022). The supplementary archaeological evaluation consisted of 26 trial trenches measuring 1.80m by 30.00m, representing a c. 3% sample of the area that was inaccessible during the 2012 evaluation (CgMs / Wessex 2012) (Figure 2).
- 5.4.6 A geophysical survey and subsequent archaeological trial trenching were undertaken on land to the east of the Inland Border Facility in 2022 (AOC, 2022b), comprising 60 trenches. The evaluation recorded isolated activity dating to the Neolithic period, and late Iron Age and Roman activity. A large ring ditch and possible north-south aligned trackway recorded on the geophysical survey, were identified within evaluation trenches in the east of the site.
- 5.4.7 Archaeological strip, map and sample areas on the Application Site, corresponded with the former locations of evaluation Trenches 25, 32, 52, 73, 145, 104, 105 and 106, which were excavated during the 2012 evaluation (Wessex / CGMS 2012) (Appendix 1 (AOC 2022, Figure 2)).

5.5 Historic Landscape Assessment

- 5.5.1 The Kent Historic Landscape Characterisation Record identifies the majority of the Site as lying within Parliamentary type enclosure, medium regular with straight boundaries. The south-eastern corner of the Site is recorded as Parliamentary type enclosure, small regular with straight boundaries.
- 5.5.2 The East Stour River flows c. 1.10km to the south-west of the site and the Old Mill Stream flows c. 90m to the north. Beyond the site boundary, the ground slopes marginally downwards in the direction of these watercourses to the north, west and south-west. The slightly higher elevation of the Site would have largely reduced the historic risk of flooding, thus encouraging human activity that perhaps included settlement on and in the vicinity of the site. The proximity of the Site to the abundant resources that a marshy area could provide, coupled with the nearby presence of waterways that were perhaps navigable in antiquity, would have further increased the desirability of the area to past populations (AOC, 2022).
- 5.5.3 Later prehistoric landscape features recorded during the archaeological excavation of the Site include a north-south aligned driveway in Area 2, and an Iron Age north-west to south-east aligned road in Area 6. The roadway runs a short distance to the north of the

former north-west to south-east aligned footpath on the Site. Two late Iron Age to Roman inhumations appeared to respect the orientation of the roadway. Additionally an undated north-south aligned trackway was recorded in Area 4 (Appendix 1) running parallel to Highfield Lane. The remains of a mid-Saxon cemetery were recorded in Area 6 (Appendix 2) to the south of the intersection of the north-west to south-east aligned historic footpath and Iron Age roadway and north-south aligned Highfield Lane. On land east of Highfield Lane a possible Bronze Age round barrow has been recorded from geophysical survey and trial trenching to the north of the historic north-west to south-east aligned footpath.

- 5.5.4 Historic mapping shows Highfield Lane along the eastern boundary of the Site from at least the early 19th century (Mersham Tithe Map of 1838), and the former north-west to south-east aligned footpath crossing the site and connecting the settlements of Sevington in the west and Mersham in the east. The intersection of the historic footpath and Highfield Lane is located in the centre of the eastern boundary of the Application Site.

5.6 Prehistoric and Roman Periods (c. 9500 BC – c. AD 410)

- 5.6.1 The Application Site was determined as having low to moderate potential for prehistoric remains (Mott MacDonald, 2020a).
- 5.6.2 The Application Site lies within an area in which prehistoric activity ranging in date from the Neolithic through to the late Iron Age. Extensive remains of prehistoric settlement have been uncovered to the south of the Application Site, while an evaluation undertaken in 2012 on the site itself recorded prehistoric remains. The evidence was interpreted as limited to agricultural activity in the form of a later prehistoric field system, situated in the north-western portion of the Application Site (CgMs/Wessex 2012). The distribution of these remains led to the conclusion that the potential for prehistoric activity within the confines of the site was moderate towards the north-west and low across all other areas (AOC, 2022).
- 5.6.3 The Kent HER records prehistoric activity within and adjacent to the site. In particular, Bronze Age features are located outside the south-east of the site including a trackway (HER: TR 04 SW 115, report reference: MM129) and enclosure (HER: TR 04 SW 112, MM132). Ditches and gullies south of the site contained Iron Age and Romano British artefacts (HER: TR 04 SW 115, MM129). Remains of an earlier Iron Age settlement have been identified underneath the medieval moated site 460m south-east of Boys Hall (NHLE: 1009006, Report reference: MM092) . Initial trial trenching of the area north-west of Highfield Lane was undertaken in 2012 and identified limited prehistoric activity. The features that were identified were dated to the late prehistoric and did not appear to relate to substantial settlement within the site .
- 5.6.4 Late Bronze Age to middle Iron Age activity was recorded within excavation Areas 2,7,9 and 10 (Appendix 1) on the Site itself, comprising occupation evidence including pits, a possible roundhouse, cremated bone and post-built structures. A second phase of activity was recorded in Area 10 only when a rectangular enclosure was established (AOC, 2022).

- 5.6.5 A low potential for Romano-British evidence had been identified due to the absence of recorded Roman activity (Waterman, 2014).
- 5.6.6 There is little record of Roman archaeology within the search area, however Roman occupation of the wider Kent landscape is well understood. Sevington is not located in proximity to key Roman settlements, such as Dover and Canterbury, or on the route of any known Roman roads. However, there are known Roman routes around Ashford and settlement has previously been identified on the fringes of Ashford, such as at Westhawk Farm to the south (outside the search area for this report). Adjacent to HS1, south of the site, some Roman material was recovered alongside Iron Age artefacts from a series of pits and gullies (HER: TR 04 SW 115, MM129).
- 5.6.7 Late Iron Age to Early Roman features were identified in seven areas during the strip, map and sample exercises on the Site, namely Areas 2, 3, 6, 7, 9, 10 and 12, with the greatest concentration of activity being in the eastern half of the site. Several land uses were identified during this period including roads and trackways, two inhumations, boundary ditches and possible roundhouses (AOC, 2022). A second phase of Roman activity was identified in Area 12.
- 5.7 Early Medieval (Anglo-Saxon) (c. AD 410– c. 1066)**
- 5.7.1 The settlement at Sevington was established prior to the Domesday Survey (AD 1086), however little archaeological evidence of this settlement had been identified. Previous archaeological work undertaken on the Site itself suggested that it possessed low potential for Saxon remains (Waterman 2014).
- 5.7.2 There is limited archaeological evidence within the search area relating to the early medieval period or Anglo-Saxon inhabitation. However, the grade II* listed Church of St Mary the Virgin (NHLE: 1071042, MM009), and grade I listed churches of St Mary, Sevington (NHLE: 1233902, MM002) and St John, Mersham (NHLE: 1276693, MM003) may have origins in this period. Therefore, some of their related settlements may have emerged in the early medieval period.
- 5.7.3 The 2020 excavation on the Site itself recorded early to middle Saxon activity in Area 6, in the form of a small inhumation cemetery of 11 individuals, one containing grave goods (Appendix 2). The cemetery was contained within the excavation area so no outliers are anticipated beyond the limit of excavation Area 6. The collection of 11 graves were discovered in the southern part of Area 6. All the graves contained inhumations that had been buried in supine positions. Nine were aligned north-west–south-east, while two, [6203] and [6200], trended east–west. Overall the graves did not form a coherent pattern, but did express some elements of organisation, one of the features intercut and they were fairly evenly spaced. The small inhumation cemetery of 11 individuals could represent an extended family group or the occupants of a small settlement. Grave goods accompanying a young to middle aged male including a spear, a knife and a buckle may inform on the cultural affinities of the group (AOC, 2022).
- 5.7.4 Late Saxon activity was recorded in Areas 7 and 10 including six corn drying kilns, with a probable field boundary ditch in Area 11.

5.8 Medieval Period (c. AD 1066 – c. 1540)

- 5.8.1 Sevington existed as a small village throughout these periods. Its historic core was presumably centred around the parish church of St Mary's to the west of the Application Site, the earliest surviving portions of which date back to the 12th century (AOC, 2022).
- 5.8.2 By the medieval period there were established settlements in Mersham, Sevington and Willington/Ashford, with settlements recorded in the Domesday Survey of 1086 . The Church of St Mary in Sevington (MM002) was constructed as the parish church in the 12th century and gradually extended over the next two centuries . The settlement, much as today, was small and centred on the church which served the farming community. The Church of St John the Baptist (MM003) in neighbouring Mersham followed the same pattern of constriction in the 12th century and expansion in the 13th and 14th centuries. The existing view between the church spires, along the historic north-west to south-east footpath which follows this route, is likely intentional.
- 5.8.3 Medieval field systems (e.g. HER: TR 04 SW 369, MM104) are recorded within the search area, and a possible occupation site adjacent to Church Road has been identified (HER: TR 04 SW 454, MM105). Settlement gradually grew around the Church of St Mary the Virgin (MM009) into the post-medieval period and this group survives as the historic core of Willesborough in east Ashford. The surrounding rural landscape in this period was agricultural, interspersed with small settlements and large manors, including the two moated sites within the study area (MM092 and MM093).
- 5.8.4 The 2012 trial trenching discovered only limited evidence relating to the medieval period.
- 5.8.5 The 2022 excavation recorded medieval to early post-medieval activity nucleated in Area 8 in the south-west corner of the Application Site. land use in Area 8 comprised a dense array of field or property boundaries recut between the 12th and 17th centuries (AOC, 2022).

5.9 Post-Medieval (c. AD 1540- c.1800)

- 5.9.1 The 2022 excavation recorded two farmland boundary ditches of 17th – 19th century date in Area 8 (AOC, 2022).
- 5.9.2 The settlements surrounding the Site expanded in the post-medieval period, whilst the area within the Site itself remained in agricultural use. In Sevington individual farmhouses were constructed and restored along Church Lane, mostly in the 16th-18th centuries. The church was also repaired and restored, however settlement remained comparatively small. Conversely, the settlement at Mersham grew more substantially, especially along Kingsford Street and The Street.

5.10 Modern (c. AD 1800 – present)

- 5.10.1 The HER search area is shaped by its role as a key defensive location in the 1st and 2nd World Wars. The remains of second world war defences are recorded in the search area with a heavy anti-aircraft battery (HER: TR 04 SW 434, MM116). The former Royal Observer

Corps (ROC) underground monitoring post is located within the Application Site boundary (HER MKE18070, TR04SW126, MM110).

- 5.10.2 The ROC was a civil defence organisation, active from 1925-1995, who constructed over 1500 underground monitoring posts during the Cold War. The purpose of these standard plan posts was to fulfil a reporting role in the event of nuclear conflict. They comprised an underground concrete box with above ground hatch and air intake, covered by a 4ft grass mound. The ROC on the Application Site opened in June 1961 and closed in October 1968.
- 5.10.3 Following approval for the temporary IBF on 1st December 2020, Condition 4 required the photographic recording of this asset:
- Prior to the implementation of relevant works, information confirming vegetation clearance that might affect the Royal Observer Corps underground monitoring post and a photographic record of the above ground remains are to be submitted to and approved in writing by the Secretary of State.*
- 5.10.4 A formal response by Mott MacDonald (2020b) addressed Condition 4. The post was left in situ during the construction of the temporary Sevington IBF.
- 5.10.5 The Royal Observer Corps (ROC) was established in the 1920's when a system of aircraft reporting was developed which formed part of the country's air defence. It was re-instated in 1948 to meet the new threat posed by the Cold War. In 1957 the ROC became a major component of the United Kingdom Warning and Monitoring Organisation (UKWMO); its function to identify evidence of nuclear attack and to monitor radiation in the event of nuclear attack. The ROC were responsible for providing primary data on the position and magnitude of atomic weapons detonated during any such attack. This data would be used by the UKWMO, in conjunction with weather information provided by the Meteorological Office, to produce a forecast of radioactive fallout. Fallout would be monitored as and where it occurred, with its actual location and strength mapped using data obtained from instrumentation at ROC posts. Because of this change in role from overground observation to nuclear monitoring, the Corps' had to undergo a complete transformation. The overground monitoring posts and especially the reinforced Orlit posts constructed between 1951 to 1954 for use in observing enemy aircraft were deemed to offer little protection from the risk of nuclear attack and any resultant risk of fallout. It was therefore decided that protected underground posts would be investigated and which were developed to assist the Corps' to undertake their new monitoring and warning role <http://www.roc-heritage.co.uk/1950s-into-the-cold.html>.
- 5.10.6 Construction of a system of underground monitoring posts, accommodating up to four people, began in the late 1950s and was largely complete by 1965. Where possible, these monitoring posts were located on the sites of old visual reporting posts and they were evenly distributed across the country. Although some new posts were built in the 1970s, by 1968 the number of maintained posts was halved (Cocroft & Thomas, 2005). The ROC monitoring post on the boundary of the Application Site would have comprised an underground structure constructed of reinforced concrete with a compacted earth covering and would have included equipment for detecting nuclear explosions.

- 5.10.7 The post is recorded in the HER as being at NGR 604190 140530, however site investigations by WSP determined the post is located further west than recorded, at NGR 604158 140610. At this location, above ground, is a 2.0m by 1.0m raised mound of approximately 0.5m height with frequent broken concrete blocks and corroded metal objects (Mott MacDonald, 2020a). Further information on the post is detailed in an Archaeological Note, produced by WSP (2019c).
- 5.10.8 The ROC post is located on the boundary of the Application Site at NGR 604190 140530, within the field west of Highfield Lane. Earth bunds have been created to the north and south of the ROC post along the east of Highfield Lane as part of the Development. However, no works have been proposed to the area containing the remains of the ROC post, which is to be left in situ. Therefore, no impact is anticipated on the asset from the construction of Sevington IBF.
- 5.10.9 The permanent operation of Sevington IBF would not physically impact the monitoring post, which remains in situ within the Application Site boundary. The Development would therefore have no archaeological impact on the asset. The asset is an underground facility that is not clearly appreciable from above ground and the permanent operation of the facility would result in negligible harm to the asset. The long-term preservation of this heritage asset will be secured through the provision of heritage interpretation measures. Interpretive heritage information boards are a requirement of the Sevington East Landscape Environmental Management Plan (LEMP).

6 Assessment of Significance

6.1.1 Paragraph 207 of the NPPF states that planning decisions should be based on the significance of the archaeological asset, and that the 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.

6.1.2 It is recognised that not all parts of an archaeological asset will necessarily be of equal significance. In some cases, certain elements could accommodate change without affecting the significance of the asset. Change is only considered harmful if it erodes an asset's significance. Understanding the significance of any heritage assets affected and any contribution made by their setting (paragraph 207, NPPF 2024) is therefore fundamental to understanding the scope for and acceptability of change.

6.2 Designated Heritage Assets

6.2.1 The study site does not contain any designated heritage assets.

6.3 Archaeological Remains

6.3.1 The 2020 archaeological excavations recorded evidence of prehistoric to post-medieval activity on the Application Site. The prehistoric to Late Saxon results were identified to be of regional/medium significance, while the medieval to post-medieval remains are of local/low significance.

6.3.2 Based on the significance of the results of the excavations, publication of the results has been proposed (AOC, 2022). The results will be disseminated either as a journal article or special paper amounting to c. 30,000 words or as an AOC monograph. The dissemination of the results would have a beneficial effect.

6.3.3 The Royal Observer Corps Post was considered to be of local significance and has been preserved in situ. Information relating to the Royal Observer Corps Post is proposed to be included on interpretation boards intended for trails through the site, this would increase understanding of the asset and result in beneficial effect (Mott MacDonald, 2020a).

7 Impact Assessment

7.1 Proposed Development

7.1.1 The Development comprises the current operational IBF including:

- Goods vehicle parking for up to 855 vehicles, including 42 entry lanes with a capacity of up to 260 goods vehicles, 24 refrigerated semi-trailers and 357 staff car parking spaces;
- Border checking facilities;
- Security fencing;
- Noise attenuation bunds and fences;
- CCTV and lighting columns;
- Drainage; and
- All associated engineering and landscaping works.

7.1.2 The estate roads, sustainable drainage system and landscaping already operate under planning permission, pursuant to extant planning permission (reference 19/00579/AS).

7.1.3 Because the Sevington IBF is built and currently operational, any archaeological impacts from the construction phase on archaeological assets would have already occurred and would no longer apply to this new application. The Royal Observer Corps post is preserved in situ and a programme of archaeological publication and archiving is underway. As such, the current application proposes to make this a permanent facility. There are no archaeological impacts anticipated to result from the continued operation of the Development at the Application Site.

7.2 Previous Impacts

7.2.1 The archaeological excavations undertaken 2020 will have removed archaeological deposits within the excavation areas and are mitigated through 'preservation by record'. Any unrecorded archaeological deposits outside the excavation areas will be preserved in situ.

7.3 Designated Heritage Assets

7.3.1 The Development will have no impact on any designated heritage assets.

7.4 Archaeological Remains

7.4.1 The Royal Observer Corps Post (MM110) was avoided during the construction phase of the temporary IBF Development, and therefore was not impacted. A programme of archaeological mitigation has been implemented to mitigate development impacts on archaeological assets on the Application Site.

8 Conclusions

- 8.1.1 Lanpro Services Limited was commissioned by Waterman Infrastructure & Environment Ltd to produce an archaeological statement to support an application for full planning permission for the Sevington Inland Border Facility (IBF) in Sevington, Ashford (NGR 603926 140758). The existing IBF currently operates under a temporary planning permission which will expire on 31st December 2025 and the Development will seek full planning permission for the continued use and operation of the Sevington IBF. It is located within the administrative boundaries of Ashford Borough Council and Kent County Council.
- 8.1.2 This archaeological statement draws together the available archaeological, historical, topographic and land-use information in order to clarify the significance of archaeological assets on the Application Site and the wider search area, and details the programme of archaeological mitigation and past investigations. This assessment addresses the information requirements set out in the NPPF and provides the proportionate response sought by the NPPF. This archaeological statement does not consider built heritage assets.
- 8.1.3 The Development would result in permanent operation phase impacts, including:
- Goods vehicle parking for up to 855 vehicles, resulting in permanent visual and noise impacts as a result of increased vehicle traffic,
 - Permanent hardstanding, buildings and lighting, and
 - Permanent timber barrier walls and security fencing.
- 8.1.4 The Development does not physically impact any designated or non-designated archaeological asset. There is one non-designated heritage asset located within the Application Site, the Royal Observer Corps underground monitoring post, Sevington (MKE18070, TR04SW126). However, this remains in situ as part of the Development and the scheme results in no harm to the asset.
- 8.1.5 Within the wider 500m search area there is one scheduled monument, which would not be impacted by the Development.
- 8.1.6 This assessment has established that a programme of archaeological mitigation fieldwork was undertaken in advance of the construction of the temporary IBF, and subsequent post-excavation reporting, publication and archiving is currently being undertaken. The Royal Observer Corps post has been preserved in situ.
- 8.1.7 Due to the implementation of the programme of archaeological mitigation, the operation of the Development will have no impact to archaeological assets on the Application and will have no impact the setting and significance of any archaeological within the surroundings.

9 References

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10 Figure

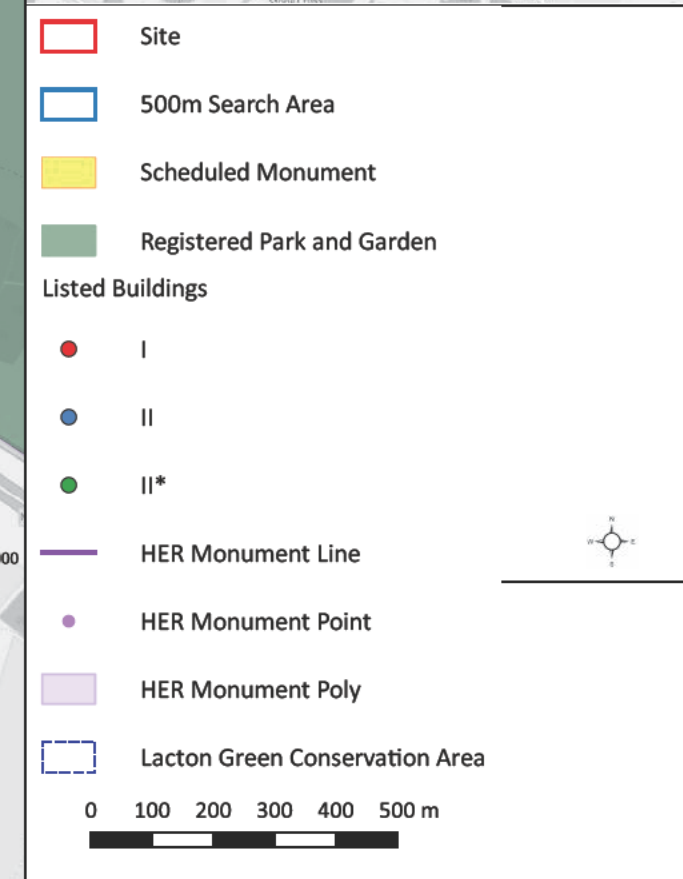
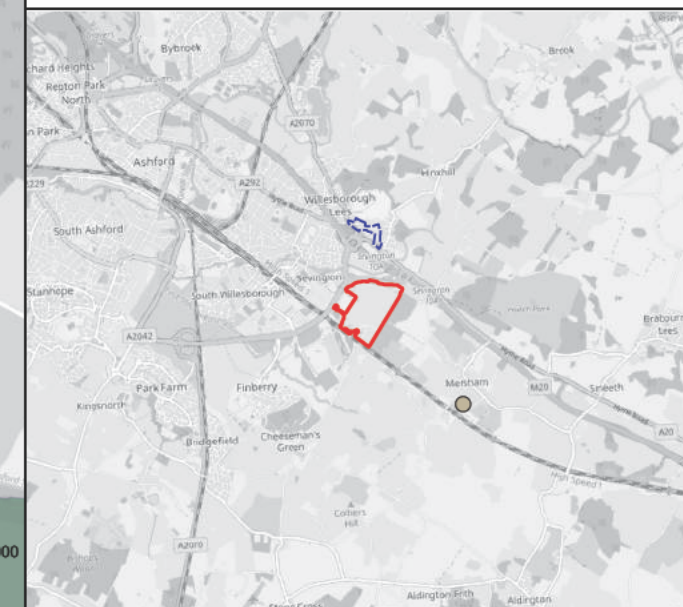


Figure 1. The Site and Search Area with the location of HER and NHLE records

Appendix 1 Plan showing Archaeological Excavation Areas (AOC, 2022)



Figure 2: Detailed Site Location

03/34280/PXA/02/01

Appendix 2 Plan showing Excavation Area 6 containing Anglo-Saxon cemetery (AOC, 2022)

