



**Built Heritage Statement in Advance of
the Proposed Development of Land
South West of London Road and West
of Castor Park, Allington, Kent.**

August 2018

Built Heritage Statement in Advance of the Proposed Development of Land South West of London Road and West of Castor Park, Allington, Kent.

National Grid Reference TQ 73570 57309



Report for Clarendon Homes

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SWAT ARCHAEOLOGY

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Built Heritage Statement in Advance of the proposed development of Land South West of London Road and West of Castor Park, Allington, Kent.

Summary

SWAT Archaeology has been commissioned by Clarendon Homes to prepare a Built Heritage statement relating to the proposed development area (PDA) of Land South West of London Road and West of Castor Park, Allington, Kent.

There is a requirement under the National Planning Policy Framework (NPPF) for the client to explain the significance of any particular designated heritage assets that have been identified in the vicinity of the study site and demonstrate any potential impacts that a proposal will have upon their significance.

This report has demonstrated that within the PDA lies a non-designated heritage asset being a World War II Type 24 pillbox.

This statement demonstrates that the significance of the pillbox resides in its historical and aesthetic interest as part of the World War II defence strategy around Maidstone in Kent for the wider North West Kent GHQ stopline rather than as an individual example of a Type 24 pillbox. At present the pillbox is able to understand its position in defending the A20 road and railway with a sightline across the PDA towards the A20, although vegetation obscures the road itself. Therefore, its current setting makes a positive contribution to the heritage significance of the pillbox.

The proposed development will impact the setting of the pillbox by interrupting the view across the length of the railway on the northern border and the A20 from the pillbox. However, the proposals to incorporate the pillbox into the design of the housing proposal by retaining it and including it within an area of open space, having stabilised the condition of the asset and to use it for education purposes with an information board, will have a positive contribution to its significance and architectural interest. This will also prevent potential vandalism if it is more closely overlooked than its current isolated position. The public educational benefit with the provision of new housing outweighs any potential harm done.

Note: The Kent HER Description of record TQ 75 NW 205 should be amended to show the pillbox is of Type fw3/24.

1 INTRODUCTION

1.1 Project Background

- 1.1.1 Swale & Thames Survey Company (SWAT) was commissioned by Clarendon Homes (the 'Client'), to carry out a Built Heritage Statement relating to the proposed development area (PDA) of Land South West of London Road and West of Castor Park, Allington, Kent centred on National Grid Reference (NGR) TQ 73570 57309 (Fig 1).
- 1.1.2 This document will be used in support of planning applications associated with the proposed development.

1.2 The Site

- 1.2.1 The PDA sits on the western outskirts of Maidstone, in an area that borders the parishes of Aylesford and Allington. Maidstone along with Allington and Aylesford sit on the River Medway linking it with Rochester and the Thames Estuary. The road on the eastern side of the PDA is the main A20 road from junction 5 of the M20 into Maidstone called London Road. London is 32 miles north west from the centre of Maidstone. The railway line from Maidstone East to London forms the northern boundary of the PDA. The proposed site sits at an average 38m. The northern western corner is the highest point at 42m AOD with the lowest point in the south east corner at around 36m AOD before it plunges steeply into the quarry pit area to a depth of 31m. The southern area of the PDA and new housing estate sits some 3-5m lower than Beaver Road due to the quarrying.
- 1.2.2 The site consists predominantly of scrub. In the south eastern corner is a large pit presumes to be the remnants of the quarrying. However, the true extent of the quarrying is not clear as some of the soil around appears to be made ground. The western border with the field next door is a low-level fence with a hedgerow. The northern boundary is also a low fence with a hedgerow. At the north western end, the railway is circa 1m higher, but by the north eastern corner, the railway is circa 5m higher in order to be high enough to pass over the A20 road. The southern boundary borders the new housing estate and the communal open area between the estate and the PDA (Fig. 1).

- 1.2.3 It has been identified that within the PDA is a non-designated heritage asset being a World War II Type 22 pillbox.

1.3 Project Constraints

- 1.3.1 No constraints were associated with this project.

1.4 Scope of Document

- 1.4.1 1.4.1 This assessment was requested by the Client in order to determine, as far as is possible, the nature, extent and significance of the development affecting the settings of designated heritage assets. The assessment forms part of the NPPF requirement and is intended to inform and assist with decisions regarding heritage assets and is to be used in the support of planning applications associated with the proposed development for proposed development.

2 PLANNING BACKGROUND

2.1 Introduction

- 2.1.1 National legislation and guidance relating to the protection of, and proposed development on or near, important archaeological sites or historical buildings within planning regulations is defined under the provisions of the Town and Country Planning Act 1990. In addition, local authorities are responsible for the protection of the historic environment within the planning system.
- 2.1.2 The National Planning Policy Framework (NPPF), was updated in July 2018 and is the principal document which sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework in which Local Planning Authorities can produce their own distinctive Local Plans to reflect the needs own their communities.

2.2 Heritage Assets

- 2.2.1 Designated heritage assets are defined in NPPF Annex 2 as:

'World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefields and Conservation Areas designated under the relevant legislation.'

2.2.2 Designation is a formal acknowledgement of a building, monument or site's significance, intended to make sure that the character of the asset in question is protected through the planning system and to enable it to be passed on to future generations.

2.2.3 Statutory protection is provided to certain classes of designated heritage assets under the following legislation:

- Planning (Listed Buildings and Conservation Areas) Act 1990;
- Ancient Monuments and Archaeological Areas Act 1979; and
- Protection of Wrecks Act 1973

2.3 National Planning Policy Framework (NPPF)

2.3.1 The Historic Environment, as defined in the National Planning Policy Framework (NPPF 2018): Annex 2, comprises:

'all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.'

2.3.2 NPPF Annex 2 defines a Heritage Asset 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. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).'

2.3.3 NPPF Section 16: Conserving and enhancing the historic environment sets out the principal national guidance on the importance, management and safeguarding of heritage assets within the planning process. The aim of NPPF Section 16 is to ensure that Local Planning Authorities, developers and owners of heritage assets

adopt a consistent approach to their conservation and to reduce complexity in planning policy relating to proposals that affect them.

2.3.4 Paragraph 185 of the NPPF states that:

‘Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. The planning authorities should take into account:

- a) The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- b) The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- c) The desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) Opportunities to draw on the contribution made by the historic environment to the character of a place.’*

2.3.5 Paragraph 189 of the NPPF states that:

‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.’

2.3.6 Paragraph 190 of the NPPF states that:

'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account to the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.'

2.3.7 The NPPF, Section 16, therefore provides the guidance to which local authorities need to refer when setting out a strategy for the conservation and enjoyment of the historic environment in their Local Plans. It is noted within this, that heritage assets should be conserved in a manner appropriate to their significance.

2.3.8 The NPPF further provides definitions of terms which relate to the historic environment in order to clarify the policy guidance given. For the purposes of this report, the following are important to note:

- **Significance.** 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. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.
- **Setting.** 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.

2.3.9 The NPPF advises local authorities to take into account the following points in paragraph 192 when drawing up strategies for the conservation and enjoyment of the historic environment;

- a) The desirability of sustaining and enhancing the significance of heritage assets and preserving them in a viable use consistent with their conservation;

b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and wider social, cultural, economic and environmental benefits that the conservation of the historic environment can bring;

c) The desirability of new development in making a positive contribution to local character and distinctiveness.

2.3.10 Paragraphs 193 and 198 consider the impact of a proposed development upon the significance of a heritage asset.

2.3.11 Paragraph 193 emphasises that when a new development is proposed, great weight should be given to the asset's conservation (and that the more important the asset, the greater this weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

2.3.12 Paragraph 194 notes that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) Grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

2.3.13 Paragraph 195 states that where a proposed development will lead to substantial harm (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) The nature of the heritage asset prevents all reasonable uses of the site; and

- b) No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c) Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
 - d) The harm or loss is outweighed by the benefit of bringing the site back into use.
- 2.3.14 Conversely, paragraph 196 notes 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 proposal, including securing its optimum viable use.
- 2.3.15 The NPPF comments in paragraph 201, that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.
- 2.3.16 Paragraph 198 states that LPAs should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
- 2.3.17 Paragraph 200 encourages LPAs to look for new development opportunities within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 2.3.18 Any LPA based on paragraph 202, should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

2.4 Planning Policy Guidance

Planning Policy Guidance that help to preserve the built and archaeological heritage are:

Conservation Principles, Policy and Guidance (Historic England, 2008)

- 2.4.1 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of England's historic environment. The Conservation Principles, Policies and Guidance are primarily intended to help us to ensure consistency of approach in carrying out our role as the Government's statutory advisor on the historic environment in England. Specifically, they make a contribution to addressing the challenges of modernising heritage protection by proposing an integrated approach to making decisions, based on a common process.
- 2.4.2 The document explains its relationship to other policy documents in existence at that time, including Planning Policy Statement 1: Delivering Sustainable Development (2005), which includes the explicit objective of 'protecting and enhancing the natural and historic environment' In this document, Heritage England provide detailed guidance on sustaining the historic environment within the framework of established government policy. In particular, the document distils from Planning Policy Guidance note (PPG) 15 Planning and the Historic Environment (1994) and PPG16 Archaeology and Planning (1990) those general principles which are applicable to the historic environment as a whole.
- 2.4.3 The policy document provides details about a range of Heritage Values, which enable the significance of assets to be established systematically, with the four main 'heritage values' being:
- Evidential value. This derives from the potential of a place to yield evidence about past human activity. Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them especially in the absence of written records, the material record, particularly archaeological deposits, provides the only source of evidence about the distant past.

- **Historical Value.** This derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative. Illustration depends on visibility in a way that evidential value (for example, of buried remains) does not. Places with illustrative value will normally also have evidential value, but it may be of a different order of importance. Association with a notable family, person, event, or movement gives historical value a particular resonance.
- **Aesthetic value.** This derives from the ways in which people draw sensory and intellectual stimulation from a place. Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time.
- **Communal value.** This derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values but tend to have additional and specific aspects. These can be commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it or have emotional links to it. Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place.

Historic Environment Good Practice in Planning Notes

- 2.4.4 In March 2015, Heritage England produced three Good Practice Advice in Planning (GPA) notes. The notes provided information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG). GPA1 covered 'The Historic Environment in Local Plans'. GPA2 provided advice on 'Managing Significance in Decision-Taking in the Historic Environment' and GPA3 covered 'The Setting of Heritage Assets'. As at

March 2017, GPA4 entitled 'Enabling Development and Heritage Assets' was still in draft.

GPA2: Managing Significance in Decision-Taking in the Historic Environment.

2.4.5 The guidance focuses on understanding the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest. The document sets out a number of stages to follow:

- 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
- 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.

2.4.6 Since heritage assets may be affected by direct physical change or by change in their setting. It is important to be able properly assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting early in the process to assist with any planning decision-making in line with legal requirements.

GPA3: The Setting of Heritage Assets.

2.4.7 This document emphasises that the information required in support of applications for planning permission and listed building consents should be no more than is necessary to reach an informed decision, and that activities to conserve or invest need to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets.

- 2.4.8 The NPPF makes it clear that the setting of a heritage asset is 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.
- 2.4.9 The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, including a variety of views of, across, or including that asset, and views of the surroundings from or through the asset, and may intersect with, and incorporate the settings of numerous heritage assets.
- 2.4.10 It covers areas such as cumulative change, where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Change over time and understanding any history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset.
- 2.4.11 The implications of development affecting the setting of heritage assets to be considered on a case-by-case basis and since conservation decisions are based on the nature, extent and level of a heritage asset's significance, Historic England recommends the following broad approach to assessment, undertaken as a series of steps:
- Step 1: Identify which heritage assets and their settings are affected.
 - Step 2: Assess whether, how and to what degree these settings contribute to the significance of the heritage asset(s).
 - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance.
 - Step 4: Explore the way to maximise enhancement and avoid or minimise harm.

- Step 5: Make and document the decision and monitor outcomes.

2.4.12 The guidance reiterates the NPPF in stating that where developments affecting the setting results in 'substantial' harm to significance, this harm can only be justified if the developments delivers substantial public benefit and that there is no other alternative (i.e. redesign or relocation).

Historic England has also published three core Advice Notes, which provide detailed and practical advice on how national policy and guidance is implemented. These documents include; 'Historic England Advice Note 1: Understanding Place: Conservation Area Designation, Appraisal and Management' (25th February 2016), 'Historic England Advice Note 2: Making Changes to Heritage Assets' (25th February 2016) and 'Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans' (30th October 2015).

2.5 Local Policies

2.5.1 The vast majority of the site sits within the area of Tonbridge and Malling Borough Council (TMBC). Only a small portion on the east of the site is within Maidstone Borough Council and therefore the policies are focussed on TMBC.

2.5.2 The Tonbridge and Malling Core Strategy was adopted by the Council on 25th September 2007. It sets out the Council's vision, aims and objectives which will determine the future pattern of development in the Borough over the period up until 2021. The Core Strategy policies supersede some of those previously in the Tonbridge and Malling Local Plan (adopted December 1998). The following policies are relevant archaeology:

- CP1/3 - The need for development will be balanced against the need to protect and enhance the natural and built environment. In selecting locations for development and determining planning applications the quality of the natural and historic environment, the countryside, residential amenity and land, air and water quality will be preserved and, wherever possible, enhanced.
- CP24/1 - All development must be well designed and of a high quality in terms of detailing and use of appropriate materials, and must through its

scale, density, layout, siting, character and appearance be designed to respect the site and its surroundings. This applies whether it is a natural or historic resource.

- CP25/2 - Where development that causes material harm to a natural or historic resource is exceptionally justified, appropriate mitigation measures will be required to minimise or counteract any adverse impacts. Where the implementation of appropriate mitigation is still likely to result in a residual adverse impact then compensatory measures will be required. Acceptable mitigation measures could be enhancement of the character of a Conservation Area or restoration of a Listed Building or its setting.

2.5.3 In addition, Tonbridge and Malling Borough Council has under the Local Development Framework, the Managing Development and the Environment Development Plan Document (adopted in April 2010). It applies existing and emerging national and regional policies at the local level. This plan has the following policies appropriate to archaeology:

- SQ1- 1. Proposals for development will be required to reflect the local distinctiveness, condition and sensitivity to change of the local character areas as defined in the Character Area Appraisals.

-All new development should protect, conserve and, where possible, enhance:

(a) the character and local distinctiveness of the area including its historical and architectural interest and the prevailing level of tranquillity; (b) the distinctive setting of, and relationship between, the pattern of settlement, roads and the landscape, urban form and important views; and (c) the biodiversity value of the area, including patterns of vegetation, property boundaries and water bodies.

- SQ2 - Buildings included within the Local List of Buildings of Architectural or Historic Interest adopted by the Council will be retained wherever possible and protected from development that would harm their setting or local historic or architectural interest.

- SQ3 - Development will not be permitted where it would harm the overall character, integrity or setting of the Historic Parks and Gardens identified on the Proposals Map and listed in Annex SQ3, or which might prejudice their future restoration.

3 AIMS AND OBJECTIVES

3.1 Introduction

- 3.1.1 This Built Heritage Statement was commissioned by Clarendon Homes to support a planning application. This assessment has been prepared in accordance with guidelines set out by the Chartered Institute for Archaeologists (see below).

3.2 Heritage Asset Assessment – Chartered Institute for Archaeologists (2017)

- 3.2.1 This heritage asset study has been produced in line with archaeological standards, as defined by the Chartered Institute for Archaeologists (2014, revised 2017). A desktop, or desk-based assessment, is defined as being:

‘Desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices which satisfy the stated aims of the project, and which comply with the Code of conduct and other relevant regulations of ClfA. In a development context desk-based assessment will establish the impact of the proposed development on the significance of the historic environment (or will identify the need for further evaluation to do so) and will enable reasoned proposals and decisions to be made whether to mitigate, offset or accept without further intervention that impact.’

(2017:4)

- 3.2.2 The purpose of the Heritage Asset report is, therefore, an assessment that provides a contextual archaeological record, in order to provide:

- *an assessment of the potential for heritage assets to survive within the area of study*

- *an assessment of the significance of the known or predicted heritage assets considering, in England, their archaeological, historic, architectural and artistic interests*
- *strategies for further evaluation whether or not intrusive, where the nature, extent or significance of the resource is not sufficiently well defined*
- *an assessment of the impact of proposed development or other land use changes on the significance of the heritage assets and their settings*
- *strategies to conserve the significance of heritage assets, and their settings*
- *design strategies to ensure new development makes a positive contribution to the character and local distinctiveness of the historic environment and local place-shaping*
- *proposals for further archaeological investigation within a programme of research, whether undertaken in response to a threat or not.*

IFA (2017:4)

4 METHODOLOGY

4.1 Introduction

- 4.1.1 The methodology employed during this assessment has been based upon relevant professional guidance including the Chartered Institute for Archaeologists' *Standard and guidance for historic environment desk-based assessment* (CIfA, 2017).

4.2 Designated Heritage Assets

- 4.2.1 There are a number of criteria to address and they include the impact of the proposed development on the significance of the Heritage Assets.

Heritage Assets

- 4.2.2 Any Heritage Asset which includes a World Heritage Site, Scheduled Monument, Listed Building, Wreck, Registered Park or Garden, Conservation Area or Landscape can be identified as having a degree of significance meriting consideration in planning decisions. Heritage Assets are the valued components of the historic environment and will include designated Heritage Assets as well as assets identified by the Local Planning Authority during the process of decision making or through the plan making process.

Setting

- 4.2.3 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 or may affect the ability to appreciate that significance or may be neutral.

Significance

- 4.2.4 The value of a Heritage Asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance may be informed by a number of factors which may include; assessment of the significance of the site, setting and building, where relevant, under a number of headings:
- Historic significance – the age and history of the asset, its development over time, the strength of its tie to a particular architectural period, the layout of a site, the plan form of a building, internal features of special character including chimneystacks and fireplaces,
 - Cultural significance – the role a site plays in an historic setting, village, town or landscape context, the use of a building perhaps tied to a local industry or agriculture, social connections of an original architect or owner,
 - Aesthetic/architectural significance – the visual qualities and characteristics of the asset (settlement site or building), long views, legibility of building form, character of elevations, roofscape, materials and fabric special features of interest,

- Archaeological significance – evolution of the asset, phases of development over different periods, important features, evidence in building fabric, potential for below ground remains.

4.3 Sources

- 4.3.1 A number of publicly accessible sources were consulted prior to the preparation of this document.

Archaeological databases

- 4.3.2 Although it is recognised that national databases are an appropriate resource for this particular type of assessment, the local Historic Environmental Record held at Kent County Council (KCCHER) contains sufficient data to provide an accurate insight into catalogued sites and finds within both the proposed development area and the surrounding landscape.
- 4.3.3 The National Heritage List for England (NHLE), which is the only official and up to date database of all nationally designated heritage assets and is the preferred archive for a comprehensive HER search.

Cartographic and Pictorial Documents

- 4.3.4 A full map regression exercise has been incorporated within this assessment. Research was carried out using resources offered by the Kent County Council, the internet, Ordnance Survey and the Kent Archaeological Society. A full listing of bibliographic and cartographic documents used in this study is provided in Section 9.

Aerial photographs

- 4.3.5 The study of the collection of aerial photographs held by Google Earth was undertaken (Plates 1-9).

Secondary and Statutory Resources

- 4.3.6 Secondary and statutory sources, such as regional and periodic archaeological studies, archaeological reports associated with development control, landscape

studies, dissertations and research frameworks are considered appropriate to this type of study and have been included within this assessment.

Walkover Survey

4.3.7 The Site is visited for a walkover survey. This is for the purpose of:

- Identifying any historic landscape features not shown on maps.
- Conducting a rapid survey for archaeological features.
- Making a note of any surface scatters of archaeological material.
- Identifying constraints or areas of disturbance that may affect archaeological investigation.

5 ARCHAEOLOGICAL AND HISTORICAL DEVELOPMENT

5.1 Introduction

5.1.1 As the PDA is situated on the border between Aylesford and Allington, the history of both areas will be reviewed.

5.1.2 Aylesford takes its name from an Old English personal name, and literally denotes 'Ægel's ford' identified from 455 AD, becoming 'Ailesford' in 1086 AD and 'Aylsesforde' by 1610 AD. There would have been a ford across the river Medway at this spot. Ægel's settlement was at Aylesham and he was chief of a tribe living at Ellinge.

5.1.3 Aylesford is a village, 4 miles north west of Maidstone. The parish of Aylesford is large, stretching from the outskirts of Maidstone by Barming, and northwards towards Rochester Airport.

5.1.4 In the Palaeolithic period the Medway was initially the dominant river rather than the Thames and Lower Palaeolithic finds have been found along the Medway river usually in relation to quarrying. There has been Neolithic activity in the area given the Neolithic chamber tombs located to the north of the village in an area known as Kit's Coty. There are remains of a burial chamber at one end of one of the long

barrows. Slightly closer towards the village is a similar structure known as the Countless Stones. Near the church Bronze Age swords have been discovered as well as Iron Age finds from a cemetery discovered in 1886, although the Iron Age period is less well represented in the area of the river Medway.

- 5.1.5 The village of Aylesford has been put forward as the site of the battle of Medway following the Roman invasion but there is currently no evidence to corroborate this. For the Roman's, the Medway was an important navigable river that was used to supply ragstone from quarries to places like London, Richborough and Canterbury. The furthest downstream was Allington, the tidal reach of the river. Associated with the various quarries, are a number of Roman villas along its lengths overlooking the river Medway.
- 5.1.6 Anglo-Saxon chronicles record a battle taking place in 455 AD in the Aylesford area when Germanic Hengest fought the Welsh Vortigern. Horsa (Hengist's brother) is said to have fallen in this battle.
- 5.1.7 Following the Norman conquest of 1066, the manor of Aylesford was owned by William the Conqueror. Some of the land was given to the Bishop of Rochester as compensation for land seized for the building of Rochester Castle. The Domesday Book records Aylesford as being in the Hundred of Larkfield with 53 households comprising of 40 villagers, 5 smallholders and 8 slaves. There were 43 acres of meadow, woodland for 70 pigs and one mill. Quarrying continued in the area during the Norman period with the stone used in the construction of the White Tower in London and Westminster Abbey.
- 5.1.8 In 1240, on Ralph Frisburn's return from the Holy Land, founded a Carmelite convent under the patronage of Richard, Lord Grey of Codnor: the first of the Order to be founded in Europe. He was followed later by Simon Stock, who in 1254 was elected Prior General of the now mendicant Carmelites. The relics of St Simon Stock are retained at the friary, having been preserved in Bordeaux for centuries before being returned to Aylesford in July 1951. The remains of the manor house present at the foundation of the priory are believed to lie under the Great Courtyard; this could date from as early as 1085.
- 5.1.9 Following the Dissolution of the Monasteries by Henry VIII in 1536, ownership of the site was transferred in 1538 to Sir Thomas Wyatt of nearby Allington Castle.

Following the rebellion against Queen Mary by Sir Thomas's son, Thomas Wyatt the younger, the property was forfeited back to the crown. Possession was later granted to Sir John Sedley by Mary's half-sister Queen Elizabeth. Although the Sedley family made some changes to the priory, it was the next owner, Sir John Banks, in the 1670s, who remodelled the buildings.

- 5.1.10 Preston Hall is a former manorial home and associated estate in Aylesford. The estate dates to at least 1102. Between around 1300 and 1734 the estate was owned by the Culpeper baronets. Jeffrey Culpeper was High Sheriff of Kent twice, once between 1364–66 and again in 1374 and the family remained influential in Kent throughout their time at the hall. The Baronetcy of Culpeper of Preston Hall was created on 17 May 1627 for William Culpeper. He served as High Sheriff of Kent in 1637 and his grandson, Sir Thomas Culpeper, 3rd Baronet served as High Sheriff in 1704 and was Member of Parliament for Maidstone between 1705 and 1713 and again between 1715 and 1723. The estates passed to Alicia Culpeper, Thomas' sister, and, through her, to her husband's family, the Milners.
- 5.1.11 The Milner family lived at Preston Hall until the mid-19th century when the property was purchased by Edward Ladd Betts in 1848. Betts demolished the old house and commissioned John Thomas to build a replacement in the Jacobean style slightly to the south of the original house location.
- 5.1.12 Maidstone was not initially included in the railways in the 1840s when they were first built as the local inhabitants at the time were opposed to it. The mainline from London towards Dover put the line through Tonbridge and Ashford, some 6 miles south of Maidstone. In 1846, a branch line connected Maidstone with Strood called the Medway Valley line that runs out of Maidstone West. A new line was opened in 1874 as a terminus of the line from Otford called Maidstone East, which was subsequently extended in 1884 eastwards towards Ashford.
- 5.1.13 The main part of the priory house was destroyed by fire in the 1930s, revealing many original features, which had been hidden by Banks's alterations. The Carmelites purchased it in 1949 from the Hewitt family and restored some of the original buildings.
- 5.1.14 Allington Nursery obtained the name Bunyards Farm as the 1936 Tithe Apportionments confirm that the site was owned by George Bunyard & Co Ltd

- 5.1.15 During World War I, Preston Hall was used as a hospital and convalescent home for servicemen. In 1925, the Royal British Legion took over the running of the hall and the area became known as the British Legion Village as it contained many housing units for the soldiers. The hall was again used as a hospital during World War II and was brought into the National Health Service when it was established in 1948. It was used first as a specialist chest hospital before becoming a general hospital. When the Maidstone General Hospital opened in the early 1980s the hall was used as the headquarters of the Maidstone Health Authority until 2012.
- 5.1.16 During World War II in 1940, defence lines were set up across south east England to create barriers against potential invasions. These barriers were called stoplines and consisted of a number of different features including pillboxes, anti-tank obstacles, minefield, trench systems and gun emplacements. The River Medway was one of these stoplines and the A20 being a main Road between Maidstone and London, along with the railway line, the area of the PDA was considered strategic. As a consequence, two pillboxes were placed on the western and eastern side of the A20 by the railway line. The western one being located in the north west corner of the PDA.
- 5.1.17 The name Allington, which is shared by a hamlet near Lenham, is derived from the Old English tun farmstead; it comes via eleventh-century Elentun and was connected with a man called Ælla.
- 5.1.18 Allington Castle was originally built in the 11th century and it thought to have had a motte with wooden fortifications. In 1281 the present stone castle was built, which was converted to a mansion in the 15th century. In 1492 the castle came into the possession of the Wyatt family. Although the castle was never attacked or besieged, a major fire in around 1600 left only enough of the castle to make a farmhouse. By the mid-19th century it was derelict. In the early part of the 20th century the castle was restored. In 1951 it was taken over by the Carmelite order. Today it is a private residence.
- 5.1.19 Allington is a reasonable modern village. The few dwellings around the castle had a population of 49 in 1841.

5.2 Historical Map Progression

Symonson's Map of 1596

- 5.2.1 This shows the PDA on the edge of a larger wooded area that stretches all the way south west towards Teston. The river is the main focus on the map rather than roads. Although a road is showing traversing north of the PDA on an east west axis from Larkfield, across the bridge at Aylesford heading towards Boxley. Allington Church and castle can be located, as can Preston Hall (Fig. 3).

Andrews, Dury and Herbert map of 1769

- 5.2.2 Andrews, Dury and Herbert published their atlas some thirty years before the Ordnance Survey, immediately becoming the best large-scale maps of the county. As a result of the Administrative boundary line between Tonbridge and Maidstone the PDA can be located on the western side of the London Road travelling into Maidstone. A large woodland is located to the west and the PDA is a field located between the wood and the road. Hermitage Lane is the Road through the woodland leading towards the Armitage (aka The Hermitage). To the north are located the areas of Upper Preston and Little Preston. The area is sparsely populated. To the east is the River Medway and Allington Castle (Fig. 4).

Hasted, 1798

- 5.2.3 The area is still sparsely populated and the locations of buildings and the edge of the wood is not dissimilar to the map above. The PDA is still a field located between the wood and London Road (Fig. 5).

Ordnance Surveyors Drawings 1797

- 5.2.4 Unfortunately, the survey obtained in this area was not complete and leaves an 'L' shaped gap. The PDA is on the edge or just within the wooded area which here is named as East Malling Woods. To the north and east of the PDA on the other sides of the London Road, the area is agricultural (Fig. 6).

Tithe Map from 1840

Ascertaining location from the title map was difficult given the location of the PDA on the Administrative boundary line making the location of the PDA on the extreme edges of the tithe map. The Earl of Romney is the owner and occupier at this time and the PDA appears to be located in field designated 352. In the

records the field was named 'Quarry' being a wood of 57 acres. Within the wooded area is a smaller area designated 368 which is referred to as a Stone. To the north of the PDA is area 367, labelled as 'quarry' whose use is recorded as arable (Fig. 7).

Historic OS mapping 1879

5.2.5 This map shows that in the south eastern area immediately below the PDA is a small quarry and the PDA area north of the quarry is wooded, being an eastern extension of a larger unnamed wood. To the far west of the map, it shows Roman remains were found at that location. Given the Tithe map named the area quarry Wood, itself that quarrying may have occurred in the area over a long period of time (Fig. 8).

Historic OS Map 1897 1:2500

5.2.6 This is the first properly scaled OS map. The PDA is part of a field designated 205 (29.168 acres). The railway has been built and borders the northern boundary of the PDA. London Road borders the eastern side. The area is labelled Allington Nursery with the area criss-crossed by tracks. The western boundary of the PDA follows the line of one of these tracks. There is now no quarry label nor does the map show any features relating to a quarry. Immediately to the south of the PDA are several greenhouses and other buildings. Just outside of the PDA on the south east side is a building labelled as Lodge. The path of the Administrative Boundary is clearly shown (Fig. 9).

Historic OS map 1908 1:2,500

5.2.7 No changes are noted other than to the east of the PDA on the eastern side of London Road, one of the fields is now an orchard (Fig. 10).

Historic OS map 1931-1933 1:2,500

5.2.8 The PDA has not changed. However, on the eastern side of London Road there appears to be a new layout of roads/tracks along with a glasshouse. In addition, there appears an internal boundary line at the eastern end of the PDA, which is probably an area separated off due to the location of the old quarry (Fig. 11).

Historic OS map 1936-1938 1:2,500

5.2.9 There appears to be no changes to the PDA. The area east of the London Road is now also labelled Allington Nursery (Fig. 12).

Historic OS map 1955 1: 1250

5.2.10 There appears to be changes to the PDA in that the south eastern and eastern area appears to be a small wood and orchard in what was the old quarry area. The area is no longer labelled Allington Nurseries. The western side of the map is incomplete. South of the PDA is also now orchards. The glasshouses to the south of the PDA appear to have been replaced with buildings. A pillbox is now showing on the field to the east of London Road. To the south east there are now properties showing along the western side of London Road. One being Sir Thomas Wyatt and public house. South of the public house is residential housing. The Lodge appears to now have a couple of smaller outbuildings (Fig .13).

Historic OS map 1960 1:2500

5.2.11 There does not appear to be any difference to the map above other than the pillbox can now be located within the PDA (Fig. 14).

Historic OS map 1970 1:1250

5.2.12 There appears little change (Fig. 15).

Historic OS map 1967-1971 1:2500

5.2.13 There do not appear to be any changes (Fig. 16).

Historic OS map 1989 1:1250

5.2.14 The area to the south of the PDA is labelled as Bunyards Farm and there is a Garden centre next door. South of the Lodge, there is a new road off London Road to the west towards the garden centre. In the area of the garden centre there are many other large buildings but these are all unlabelled (Fig. 17).

Historic OS map 1993 1:1250

5.2.15 There have been significant changes to the area south of the PDA with a number of new roads and alterations to the buildings that were previously part of Bunyards Farm. To the west of the Lodge is a large building called Wyatt House (Fig. 18).

5.3 Site Assessment

5.3.1 A walkover survey was undertaken on the 20th August 2018. The PDA is mainly scrub with the exception of the south eastern corner where there is a large pit

and it recently looks like there is made ground in the eastern part of the site. There is hedgerow along the northern and western boundaries with a view across to the south of the PDA towards the new houses. The eastern boundary is to the A20. The land is highest in the north west corner and gently falls away to the south and eastern until about two-thirds of the way across towards the eastern side of the site where it begins to fall away more sharply towards the quarry area. Given the recent housing estate in the south eastern area beyond the PDA and also the potential for there being made ground in the eastern part of the site, it is not clear as to the exact extent of the old quarry. Located in the north western corner of the PDA is a World War II pillbox. There is another pillbox located on the opposite side of the A20, London Road, circa 290m north east. The pillbox located west of the London Road is circa 190m from the road, whilst the pillbox east of the London Road is circa 85m from the road. The western pillbox is situated circa 5m above the road level whilst the eastern pillbox is situated at the same level as the road.

Table 2: Heritage Assets

TQ 75 NW 205	Modern	Pillbox. A Second World War Type 22 pillbox exists south of the railway to the west of London Road, Maidstone
TQ 75 NW 204	Modern	Pillbox. An overgrown and possibly fire-damaged Second World War Type 24 hexagonal pillbox is located north east of London Road, Maidstone. The pillbox faced south-west and defends London Road and the railway.

5.4 Assessment of Heritage Assets

Type 22 Pillbox

Architectural Interest:

- 5.4.1 The pillbox is classed as a fw3/22 type of pillbox. The shape of Type 22 is usually a regular hexagon with walls around 12-24 inches thick and an internal ‘Y’ shaped blast wall with the ‘Y’ nearest the entrance (fig. 21). Internal measurements size is circa 10ft between walls with rifle loops in five of the six walls and an entrance in the sixth.

- 5.4.2 The basic designs were adapted to local circumstances and available building materials such that, outwardly, two pillboxes of the same basic design could look different. The height of a pillbox could vary significantly according to local needs. Appearance also varied due to the building materials used, although all the FW3 designs are formed from reinforced concrete. Where brick was used as a shuttering, the bricks essentially formed a mould into which concrete was poured, the bricks being left in place. The reinforced concrete used in construction was generally conventional making use of thin steel rebars with floor, walls and roof all mutually bonded.
- 5.4.3 The type 22 is the second most common pillbox type with 1,347 recorded as being extant with 38 Type 22 pillboxes in Kent. It can be confused with the common type 24, which is an irregular hexagon. The type 24 pillbox is an irregular hexagon in plan (fig. 21). The rear wall is the longest at about 14 feet (4.3 m); this has the entrance with an embrasure on either side. The other walls vary from 7–8 feet (2.2–2.5 m), each having a single embrasure. Internally there is a Y-shaped anti-ricochet wall. The type 24 is the most common type, with more than 1724 recorded as being extant.
- 5.4.4 The pillbox in the PDA is of an irregular hexagon shape with 2 embrasures either side of the door and one embrasure on each of the remaining 5 walls (Plate 11). Construction is with concrete with re-enforced rebars and a brick shuttering was used and left in place (Plate 17). In parts the brick shuttering is now falling away. The walls are circa 18 inches thick. There is an internal brick built 'Y' shaped blast wall. The entrance wall is the longest at just over 13ft in length. All but two of the embrasures are blocked up (Plate 18). The doorway has been bricked up but the top half has been pushed in allowing access to the inside (Plate 11).
- 5.4.5 Following a review of the buildings design, I am of the opinion that it is of a fw3/24 type given its irregular hexagon shape.

Historical Interest:

- 5.4.6 Across the southern UK a number of GHQ stop lines were set up. They were set up in World War II to halt any possible German Invasion, which was considered a possibility after the retreat at Dunkirk in 1940. The pillbox is grouped by the Defence of Britain Project into the GHQ Line (North west Kent), which ran from

Leigh to the river Thames via the Medway valley. Figure 19 shows the location of the pillboxes in Kent and it can be seen that many follow the paths of rivers. There were seven different pillbox designs although variations existing depending on individual locations and materials available.

- 5.4.7 Within the North Kent line, the pillbox is part of the defence strategy around Maidstone. The defences in the wider area around the pillbox in the PDA is shown in figure 20. A report on the defence area around the river Medway has been produced and confirms that the area consisted from a point north of Maidstone town centre to Little Preston, that includes Allington Lock, which was considered vital for water management. The GHQ Line, it was defended here by infantry pillboxes interspersed with anti-tank gun emplacements at important crossing points. Bridges were prepared for demolition, and roads and railways set with blocks to be activated in the event of an invasion.
- 5.4.8 As part of the fortification of the Maidstone section of the GHQ Line, infantry type 24 pillboxes were built at regular intervals on the west bank of the river, also being sited against the cuttings and embankments of the railway line behind. A number of pillboxes were constructed around Allington Castle strengthening the defences of Allington Lock a few hundred yards downstream. A type 28A anti-tank gun emplacement to take a 6pdr. gun, with a side chamber for light machine gun fire, defended the Lock itself. In the event of an invasion the pillboxes would be manned by infantry as an initial line of defence under the responsibility of the Home Guard until additional troops could arrive to support.
- 5.4.9 The Defence Area 67 report comments that almost all the examples of surviving type 24 infantry pillboxes are in an overgrown and neglected condition, some so hidden away under thick vegetation that they are extremely difficult to locate. However, there are some that have been carefully preserved within Whatman Park in Maidstone. At the new estate to the east of the PDA on the eastern side of the A20, the pillbox has been incorporated into the design of the housing estate to be left in situ within an area of open space. Although this pillbox is in poor condition and overgrown and not accessible inside (Plate 19).

- 5.4.10 Reviewing the other defence features around the Maidstone stop line, confirms that currently this pillbox is recorded as the only Type 22. All the other pillboxes are recorded as Type 24.

Setting:

- 5.4.11 The pillbox within the PDA is located on higher ground within the PDA in a field current of scrubland. The entrance is located on the south western side and the railway is circa 15m to the north west and the A20 road faces the front to the north east/east/south east. The view towards the railway bridge and the A20 would have been a composition of the placing and design of the heritage asset. At the eastern end of the PDA there are a number of trees and bushes which shield the road from the pillbox and conversely the pillbox cannot be seen from the road. At the north eastern corner of the PDA is where the A20 road passes under the railway bridge. Obviously, whilst the defence line is no longer active it does provide a reminder to the wider community regarding World War II.
- 5.4.12 The pillbox's wider setting and contextual relationship needs to be considered that is relevant to its significance. There is another pillbox located on the opposite side of the A20 by the railway. Both of these pillboxes, either side of the A20, by the railway bridge would have effectively formed a pair defencing the main road and the railway in and out of Maidstone. The pillbox on the eastern side of the A20 is of a Type 24 and is a 'mirror' image of the pillbox located in the PDA, with the entrance doors located in the wall facing away from the road. The other pillbox is larger in size compared to our pillbox, being 15ft rather than just over 13ft on its longest wall but this may be due to the fact that it is located on the eastern side of the A20 and as such closer to Maidstone it was made stronger as a result.
- 5.4.13 There have been many changes in the landscape of the defence area since the Second World War, although some sections of the Maidstone defence line on the Medway remain unaltered, there have been many other changes. The M20 motorway cuts across the wider area, and industrial developments have spread along its line, isolating some defence works in pockets of wasteland. New housing estates have been built and one was recently built in the vicinity of the Bunyard Way where the pillbox has been incorporated into the design of the new housing as an open space area. Other defensive features in the Maidstone area have has

their setting eroded with the development of housing and industrialisation since the 1940s.

Summary of Significance:

- 5.4.14 The pillbox's wider setting needs to consider that there is another pillbox located on the opposite side of the A20 by the railway. The pillbox was one of a number of surviving defence features based around Maidstone and the river Medway as part of a wider defence strategy and stopline in World War II.
- 5.4.15 Whilst it is to be appreciated that there are still a large number of individual pillboxes in existence across the UK, each individual pillbox tells the wider story. For this pillbox its contextual significance is related to the GHQ Medway stopline around Maidstone and in Kent it is of local interest.
- 5.4.16 It is important to retain these features in the landscape where possible and improve the surviving condition of the pillboxes by clearing rubbish and overgrowth from them and making them more publicly accessible. In Whatman Park on the river banks in Maidstone recent work has been done to preserve the Second World War heritage of the area. In addition, the pillbox on the eastern side of the A20, was retained and incorporated into an open space in the housing area design.
- 5.4.17 The survival of the pillbox will enable this section of the defence of the North west Kent GHQ Line, and its inter-relation with the northernmost defences of the Maidstone fortress, to continue to be interpreted, and provide evidence of the defence features of the stopline and the interrelationship of the pillbox with the various different components that made up the stopline around Maidstone.

5.5 Aerial Photographs

1940s

- 5.5.1 Unfortunately, the photographs do not line up perfectly. However, it can clearly be seen that the eastern section is very different to the rest of the PDA in that it was a sinuous boundary and the area is scrub with trees. The rest of the PDA is

arable fields. However, there is an unusual feature in the north west corner of the PDA being a semi-circle shape which appears to contain a row of small trees or bushes. Due to this feature and the quality of the photograph prevents locating the pillbox. To the south east of the PDA can be seen the farm buildings and greenhouses and an area of orchards. The western boundary adjoins arable fields. The Lodge is located just beyond the south east corner of the PDA. The main road east of the PDA passes north under the railway (Plate 1).

1960s

- 5.5.2 The PDA appears unchanged except that the semi-circular feature adjoining the northern boundary is no longer there and that there is now a pillbox in the northern western area of the PDA. A similar pillbox can also be seen to the east, in the field on the eastern side of the main road. Access to the Lodge and farm buildings is via a track off the main road that runs past the north of the Lodge. The area south east of the PDA shows as orchards. To the far south east area of the map the pub and housing estate can be seen (Plate 2).

1990

- 5.5.3 There have been some changes. The PDA and the field to the west are now pasture. The scrub areas in the eastern part of the PDA is cleared except for a number of mature trees. It is not clear as to the activity that is occurring in this area. Perhaps earth is being added to the area for made ground. The remainder of farm buildings can be seen aside the southern corner of the PDA. And to the south east boundary Wyatt House has been built with an access road diagonally off a new road that is Beaver Road and it looks like the previous access road that ran past the north of the Lodge is no longer in use. Further south east is now a garden centre with car park next to the pub. To the north of the PDA on the main road north of the railway there is now a roundabout and a new road of to the east from that roundabout hugging the northern side of the railway (Plate 3).

2003

- 5.5.4 The eastern area of the PDA has grown again into scrub with bushes and trees. The building to the south east of the PDA have changed. There is now a new larger building on the location of the garden centre with a large car park showing at the

rear relating to the park and ride. The pub has had an extension added to the north of the building and is now a motel. The area residential housing has also increased to the south. The southern corner of the PDA next to Wyatt House is showing a yard area with lorries surrounded by a number of buildings. (Plate 4).

2007

5.5.5 There is little change. (Plate 5).

2011

5.5.6 There is little change (Plate 6).

2013

5.5.7 There is little change other than to the south east of the PDA. Wyatt House has been demolished. There does not appear to be any activity in the area of the Lodge. (Plate 7).

2015

5.5.8 The yard area south of the PDA no longer appears used. There is a fenced area adjoining the southern corner of the PDA. The Lodge is in a state of disrepair. In the triangle of land to the south east of the roundabout located north of the PDA a pub and car park has been built (Plate 8).

2018

5.5.9 There have been significant changes to the area to the south and of the PDA with new residential housing. The area of the farmyard, what was Wyatt House and the Lodge is now residential housing as is the field to the east of the PDA on the eastern side of the main road. In the far northern area of this around the pillbox in that field have not been built on (Plate 9).

6 PROPOSALS AND ASSESSMENT OF IMPACT

6.1 Proposals

6.1.1 The proposed development is for an area of mixed residential housing of 106 units. The area of the old quarry at the eastern end is to be open space. The area around the pillbox is also to be an open space with the structure retained and the

masonry made stable. It is intended by the developers to use the feature for its educational value (Fig. 2).

6.2 Assessment of Impact

From our findings it appears that the pillbox has been incorrectly classed in the HER Records as Type 22 and that it is in fact a Type 24. Given its irregular hexagon shape and that all other pillboxes in the wider Maidstone nodal area were of Type 24, including the one on the eastern side of the A20, that 'mirrors' this pillbox. Whether it is of Type 22 or 24, the primary heritage significance of the pillbox is its aesthetic and historical interest as a World War II pillbox as part of the Maidstone area GHQ stopline. It has been determined that the wider PDA forms part of the heritage asset's historical setting with the sightline across towards the A20 and the railway. The impact of the development will have a negative effect on the setting of the heritage asset by affecting the current sightlines towards the eastern boundary and the A20. However, vegetation currently obscures a view of the road itself. By incorporating the heritage asset into the design of the new housing with its own open space and to stabilise the building, it will have a positive impact on its architectural significance. The benefit for the improvements in consolidating the structure of the pillbox and it having a less isolated setting, will potentially reduce vandalism to the structure and outweighs the harm done. Therefore, overall any impact caused to the significance of the heritage asset would be considered as 'less than substantial' in accordance with NPPF Paragraph 196.

7 CONCLUSION

7.1 Introduction

7.1.1 The purpose of this Built Heritage Statement was to assist the Local Authority to fully understand the impact of the proposed development as required by the NPPF on the significance of any Heritage Assets affected, including any contribution made by their setting. This Built Heritage Statement has been prepared by SWAT Archaeology for Clarendon Homes in support of the

application for proposed developments of Land South West of London Road and West of Castor Park, Allington, Kent.

- 7.1.2 This report has demonstrated that within the PDA lies a non-designated heritage asset of a World War II pillbox.
- 7.1.3 This statement demonstrates that the significance of this pillbox resides in its historical and aesthetic interest as part of the World War II defence strategy around Maidstone in Kent for the wider North West Kent GHQ stopline rather than as an individual example of a Type 24 pillbox. At present the pillbox is able to understand its position in defending the A20 road and railway with a sightline across the PDA towards the A20, although vegetation obscures the road itself. Therefore, its current setting makes a positive contribution to the heritage significance of the pillbox.
- 7.1.4 The proposed development will impact the setting of the pillbox by interrupting the view across the length of the railway on the northern border and the A20 from the pillbox. However, the proposals to incorporate the pillbox into the design of the housing proposal by including it within an area of open space, having stabilised the condition of the asset and to use it for education purposes with an information board will have a positive contribution to its significance and architectural interest. This will also prevent potential vandalism if it is more closely overlooked than its current isolated position. The public educational benefit with the provision of new housing outweighs any potential harm done.

8 OTHER CONSIDERATIONS

8.1 Archive

- 8.1.1 Subject to any contractual requirements on confidentiality, two copies of this Heritage Asset Assessment will be submitted to the LPA and Kent County Council (Heritage) within 6 months of completion.

8.2 Reliability/Limitations of Sources

- 8.2.1 The sources that were used in this assessment were, in general, of high quality. The majority of the information provided herewith has been gained from either

published texts or archaeological 'grey' literature held at Kent County Council, and therefore considered as being reliable.

8.3 Copyright

- 8.3.1 Swale & Thames Survey Company and the author shall retain full copyright on the commissioned report under the Copyright, Designs and Patents Act 1988. All rights are reserved, excepting that it hereby provides exclusive licence to Clarendon Homes (and representatives) for the use of this document in all matters directly relating to the project.

Paul Wilkinson PhD MCIFA.

SWAT Archaeology

August 2018

9 REFERENCES

9.1 Bibliographic

- Tonbridge and Malling Borough Council Core Strategy (2007)
- CIFA (2014, revised 2017) Standard and guidance for historic environment desk-based assessment
- National Planning Policy Framework 2018
- English Heritage Guidance (2014) The setting of the Heritage Assets
- Data provided by Kent HER
- Hasted. 1789. The History and Topographical Survey of the County of Kent, Volume 4.
- Glover, J. 1982. The Place Names of Kent.
- Wills, H. 1985. Pillboxes. A Study of UK Defences 1940. Leo Cooper Ltd.
- Pillbox Study Group

9.2 Websites

- Ancient Monuments and Archaeological Areas Act 1979. Available at: <http://www.legislation.gov.uk/ukpga/1979/46>.
- Chartered Institute for Archaeologists, 2014. *Standards and guidance for historic environment desk-based assessment*. Available at: <http://www.archaeologists.net/codes/ifa>
- Ministry of Housing, Communities and Local Government, 2018. *National Planning Policy Framework*. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- Historic England, 2008: *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*. Available at: <https://www.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/>
- Planning (Listed Buildings and Conservation Areas) Act 1990. Available at: <http://www.legislation.gov.uk/ukpga/1990/9/contents>
- Historic England, 2008: *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*. Available at: <https://www.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/>
- Historic England, 2015. *Historic Environment Good Practice Advice in Planning: 2: Managing Significance in Decision-Taking in the Historic Environment*. Available at:

<https://www.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>

Historic England, 2015. Historic Environment Good Practice Advice in Planning: 3: The Setting of Heritage Assets. Available at:

<http://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

Historic England (2015) Advice Note 1: Understanding Place: Conservation Area Designation, Appraisal and Management. Available at:

<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>

Historic England (2016) Advice Note 2: Making Changes to Heritage Assets. Available at:

<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>

Historic England (2015) Advice Note 3: The Historic Environment and Site Allocations in Local Plans. Available at:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Tonbridge and Malling Borough Council Core Strategy (2007). Available at:

<https://www.tbmc.gov.uk/services/planning-and-development/planning/local-development-framework/ldf/2856>

Local Development Framework Managing Development and the Environment Development Plan Document. Available at:

<https://www.tbmc.gov.uk/services/planning-and-development/planning/local-development-framework/ldf/3690>

Defence Area 67: River Medway: Maidstone. Available at:

http://archaeologydataservice.ac.uk/catalogue//adsdata/arch-455-1/dissemination/pdf/Text_Reports/DA67_TEXT_-_RIVER_MEDWAY_MAIDSTONE.pdf

10 KENT HER RECORD DESCRIPTION

10.1 Pillbox (Type FW3/22)

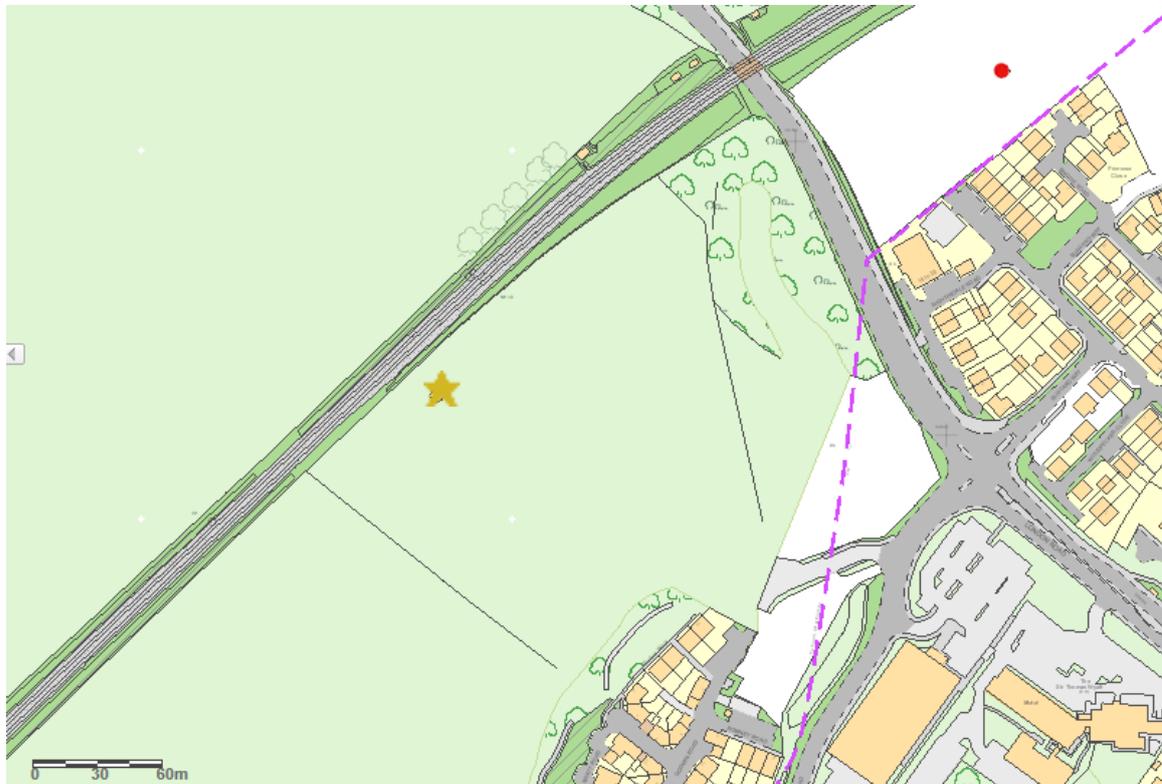
HER Number: TQ 75 NW 205

Type of Record: Building

Period: Modern

Summary: A Second World War Type 22 pillbox exists south of the railway to the west of London Road, Maidstone

Location: Gold star on the map below.



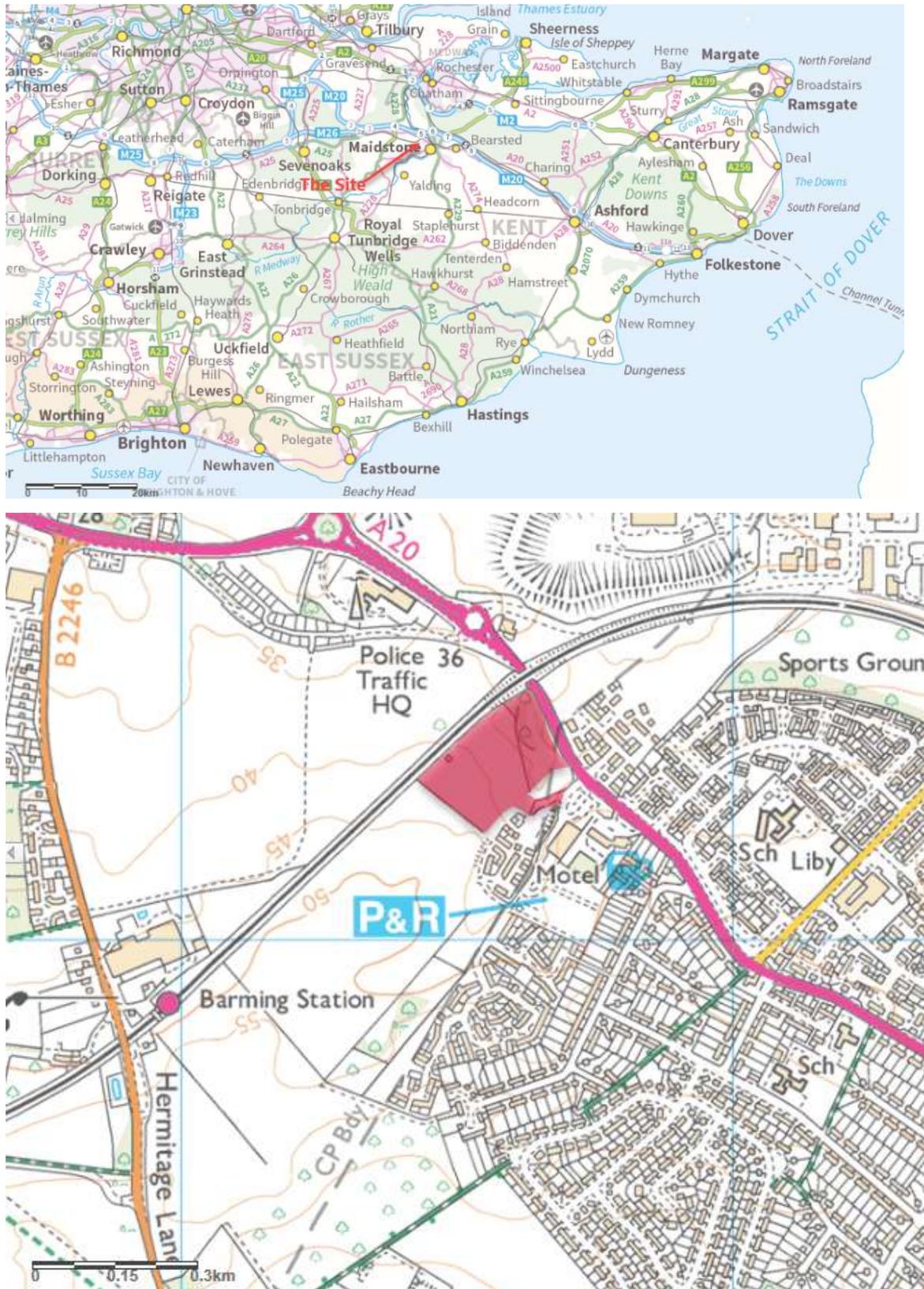


Figure 1: Site location map, scale 1:10000.



Figure 2: Proposed Development Area,



Figure 3: Symonson's Map of Kent 1596

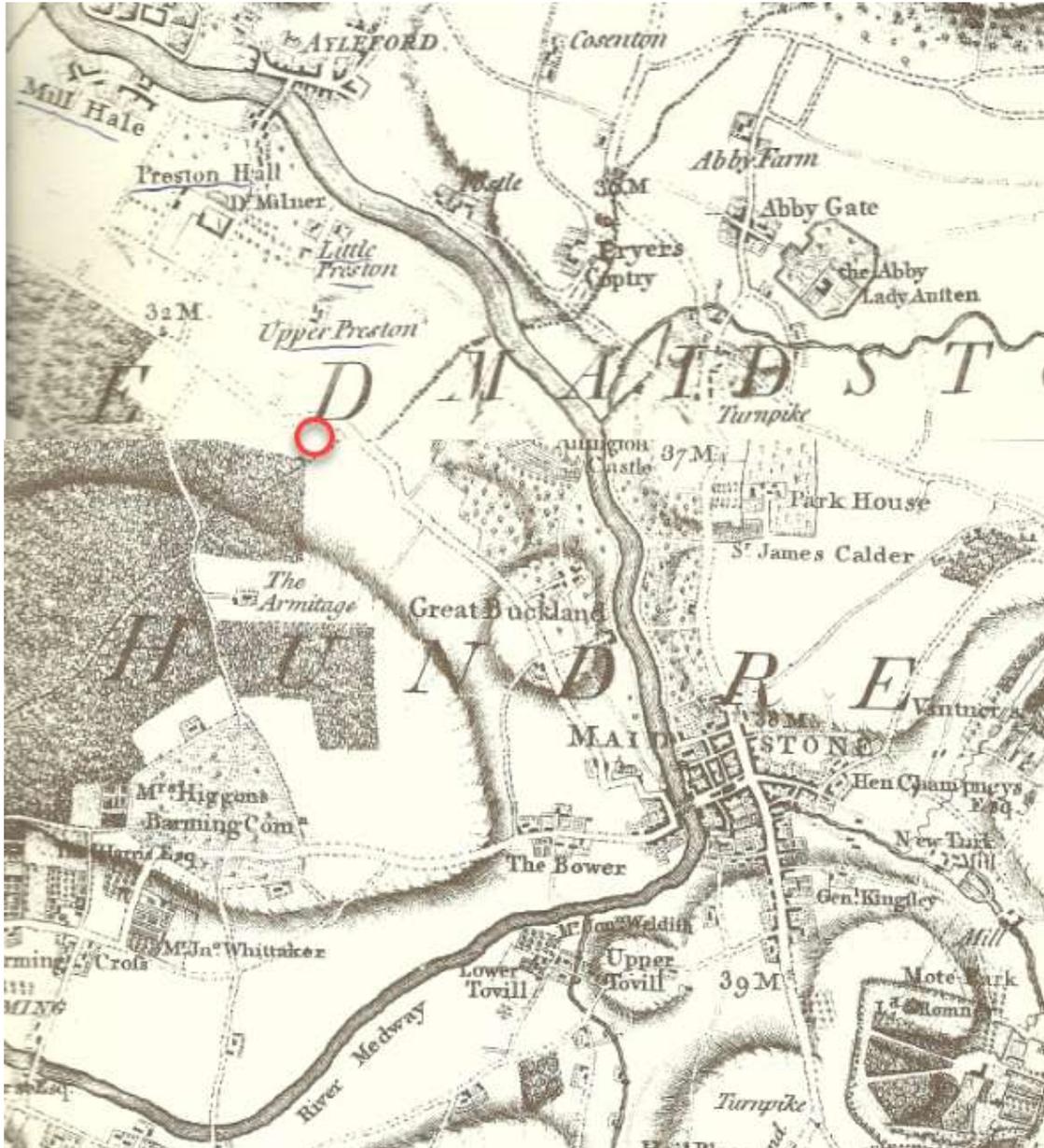


Figure 4: Andrew, Dury and Herbert Map from 1769

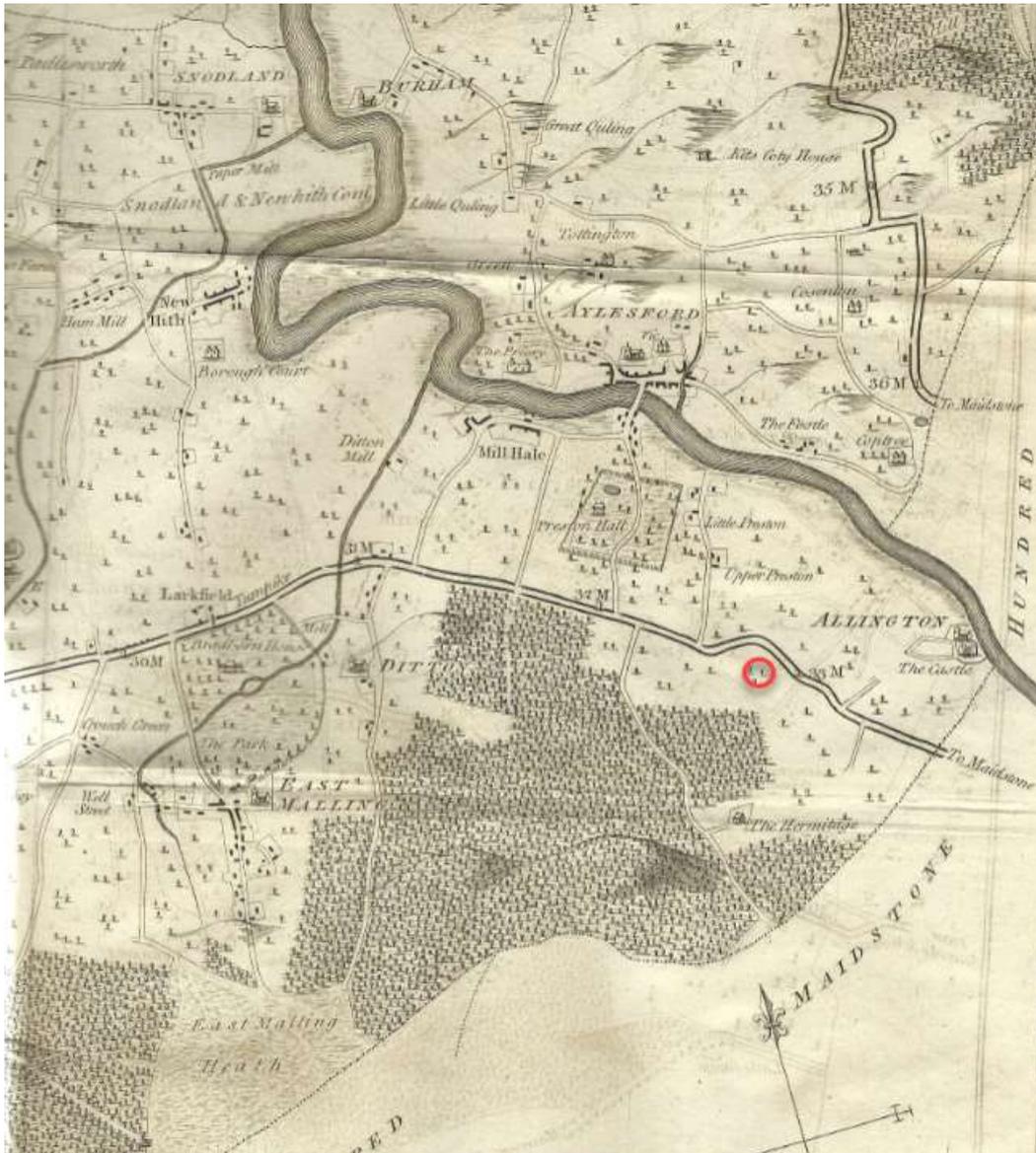


Figure 5: Hasted, 1798



Figure 6: Ordnance Surveyors Drawing, 1797

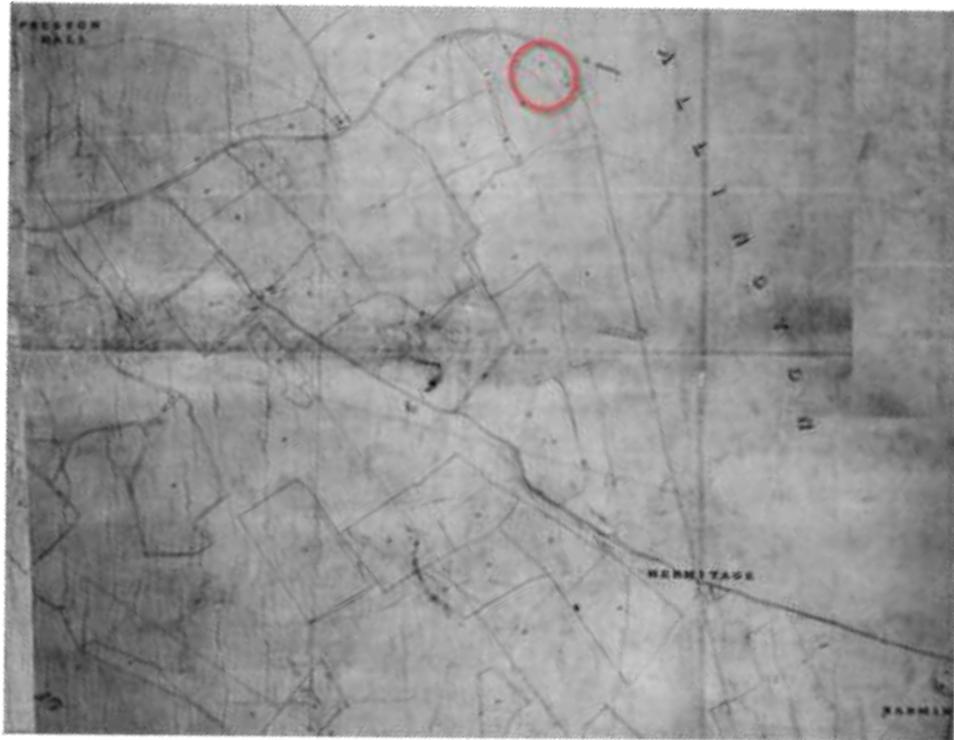


Figure 7: 1840 Tithe Map

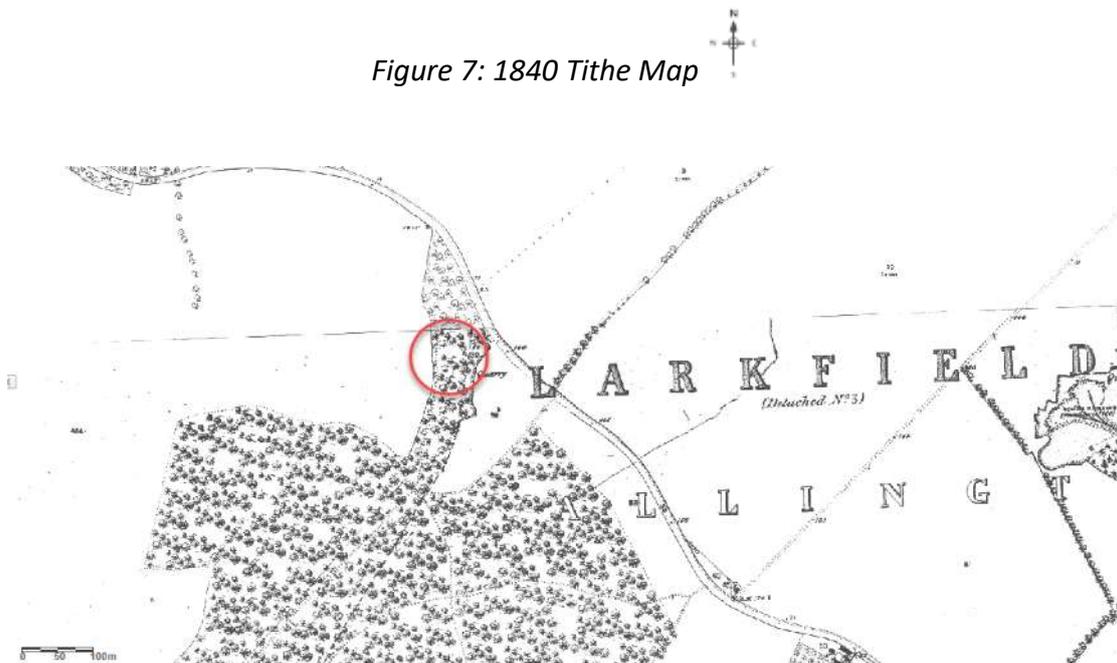


Figure 8: OS Map 1879

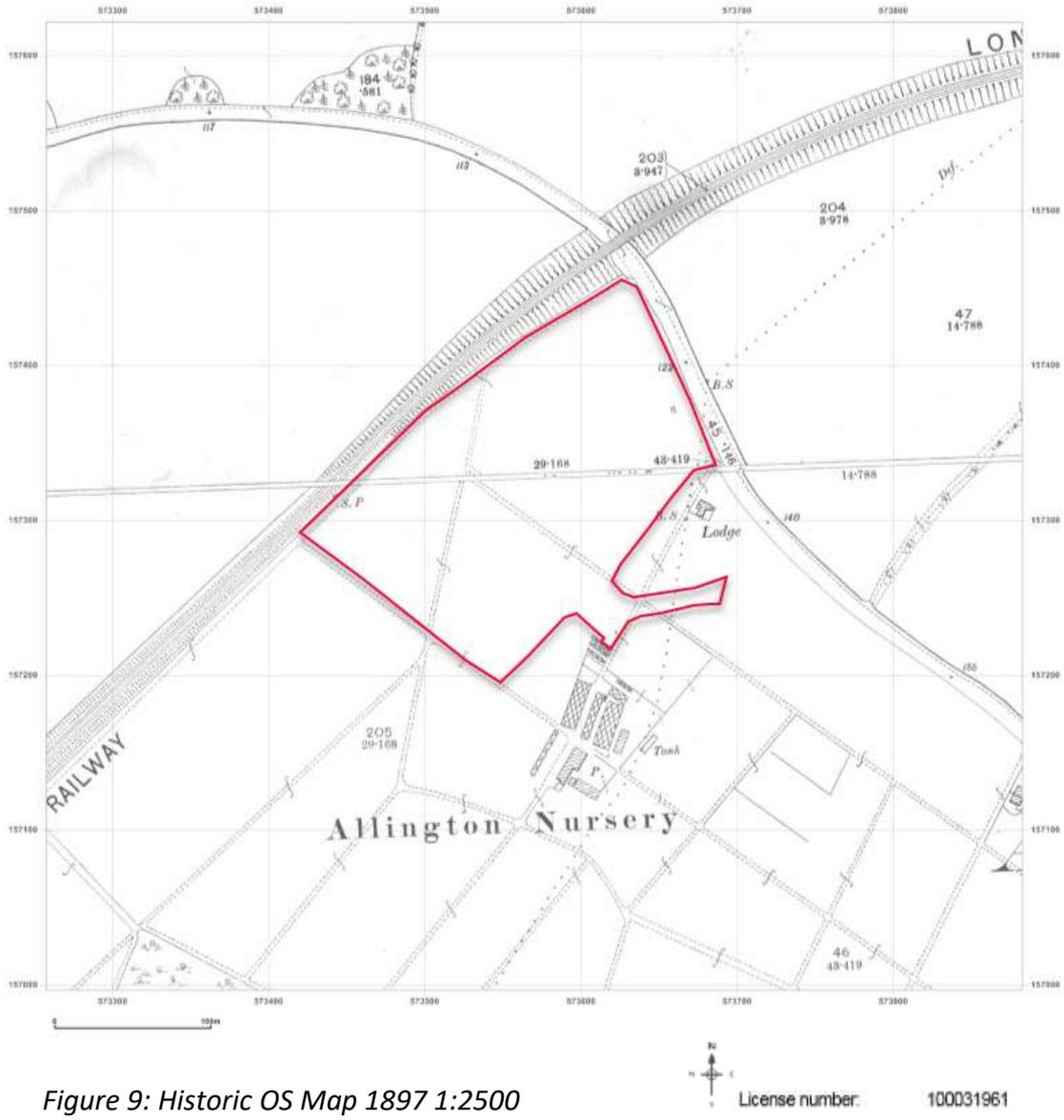


Figure 9: Historic OS Map 1897 1:2500

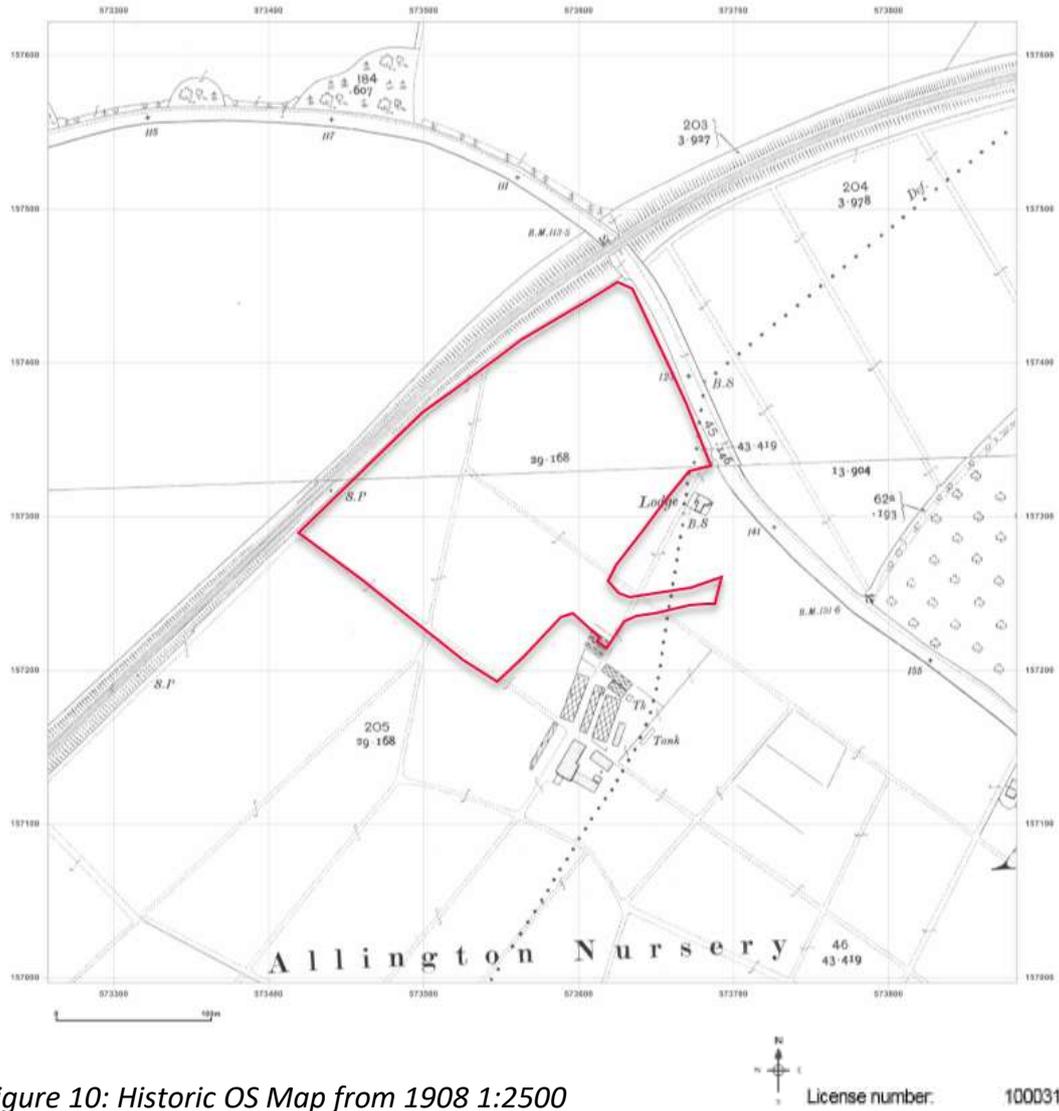


Figure 10: Historic OS Map from 1908 1:2500

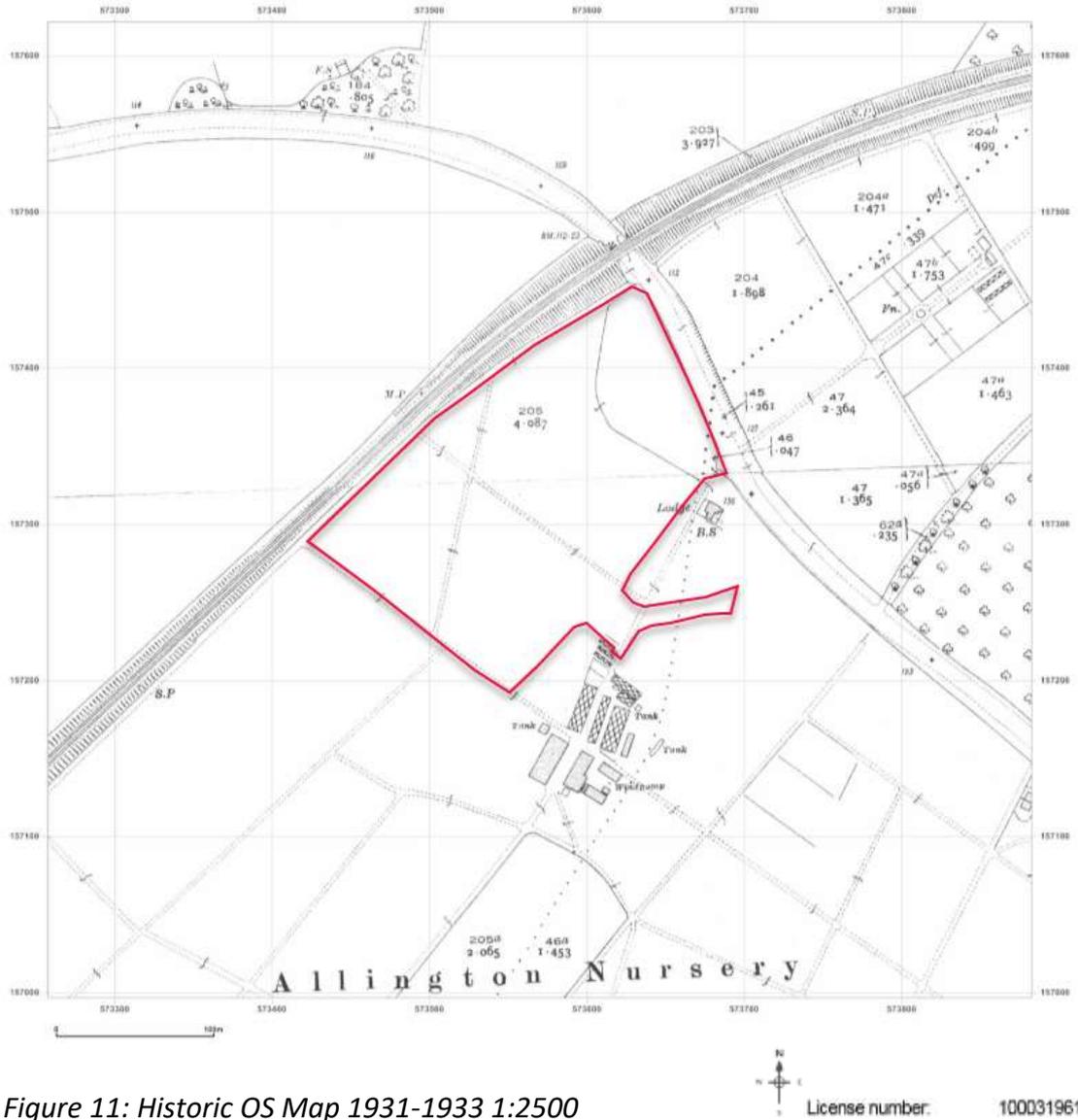


Figure 11: Historic OS Map 1931-1933 1:2500

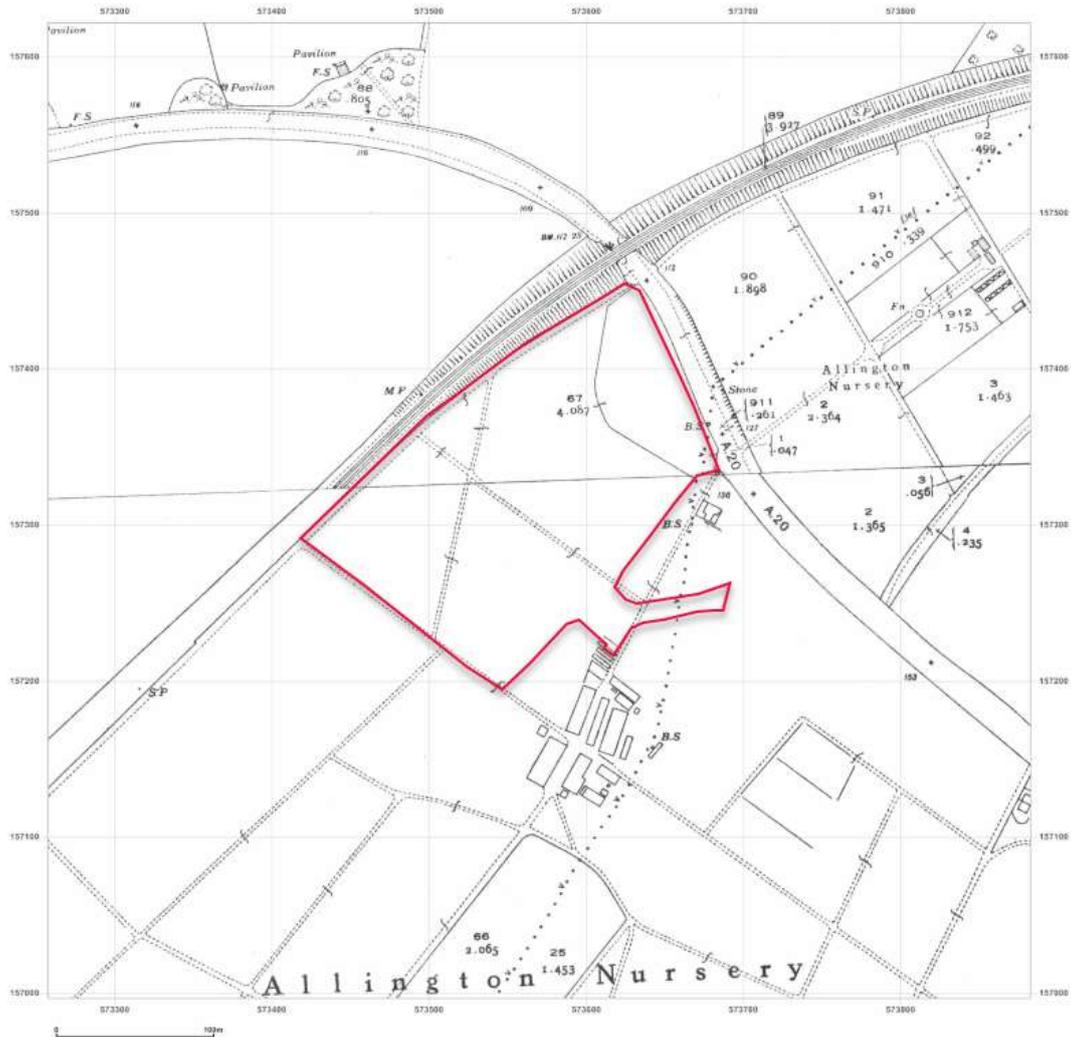


Figure 12: Historic OS Map 1936-1938 1:2500



License number:

100031961

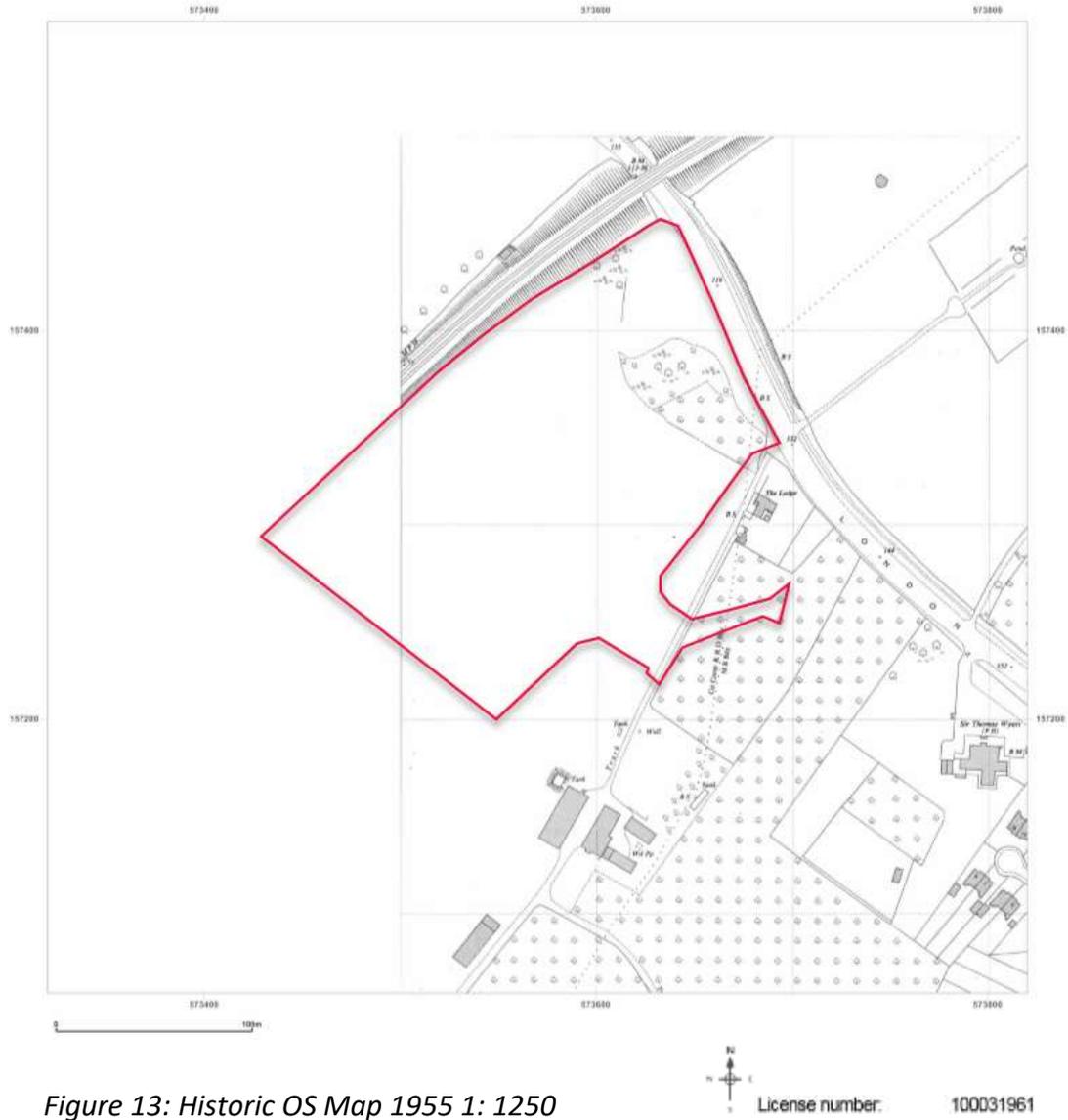


Figure 13: Historic OS Map 1955 1: 1250



Figure 14: Historic OS Map 1960 1:2500

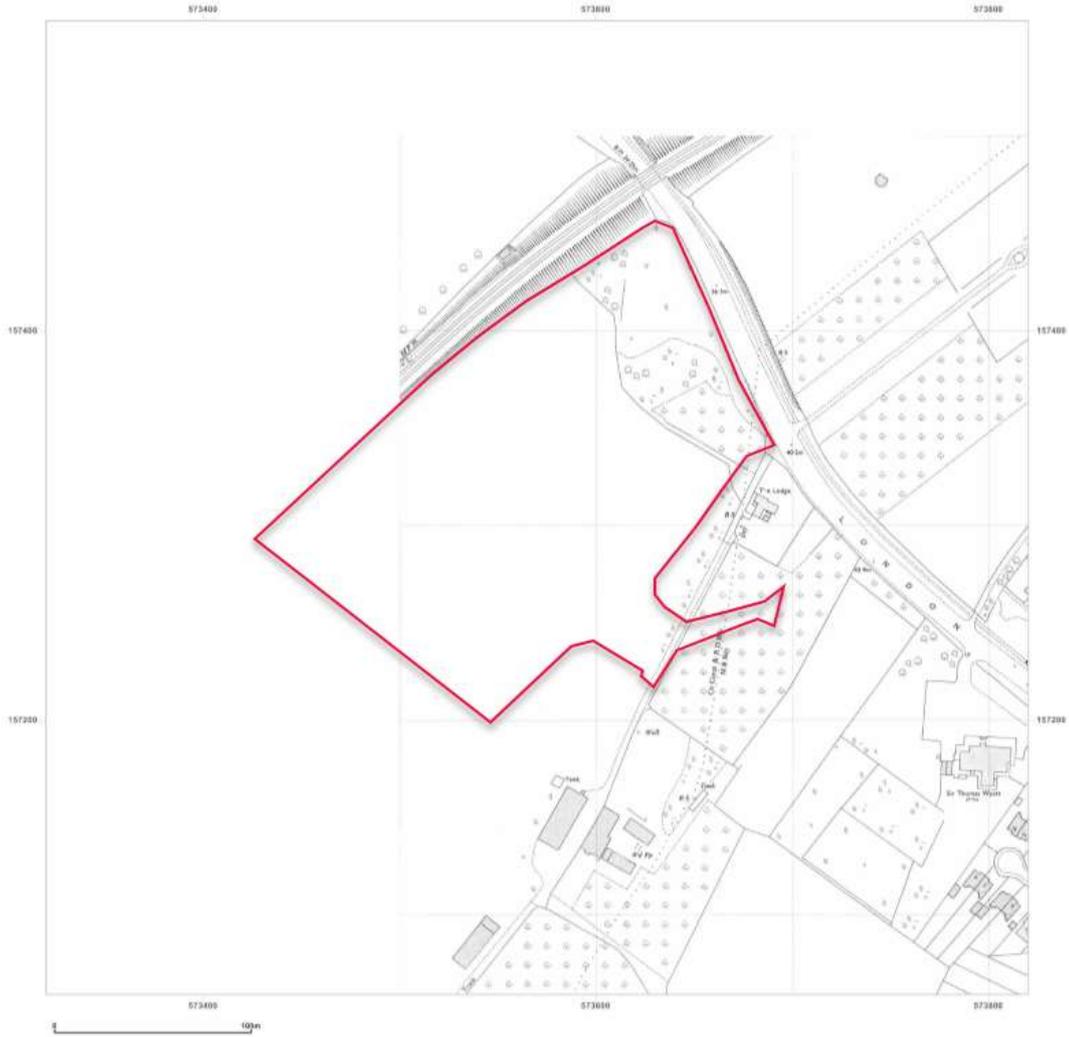


Figure 15: Historic OS Map 1970 1:1250



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Figure 16: Historic OS Map 1967-1971 1:2500

License number: 100031961

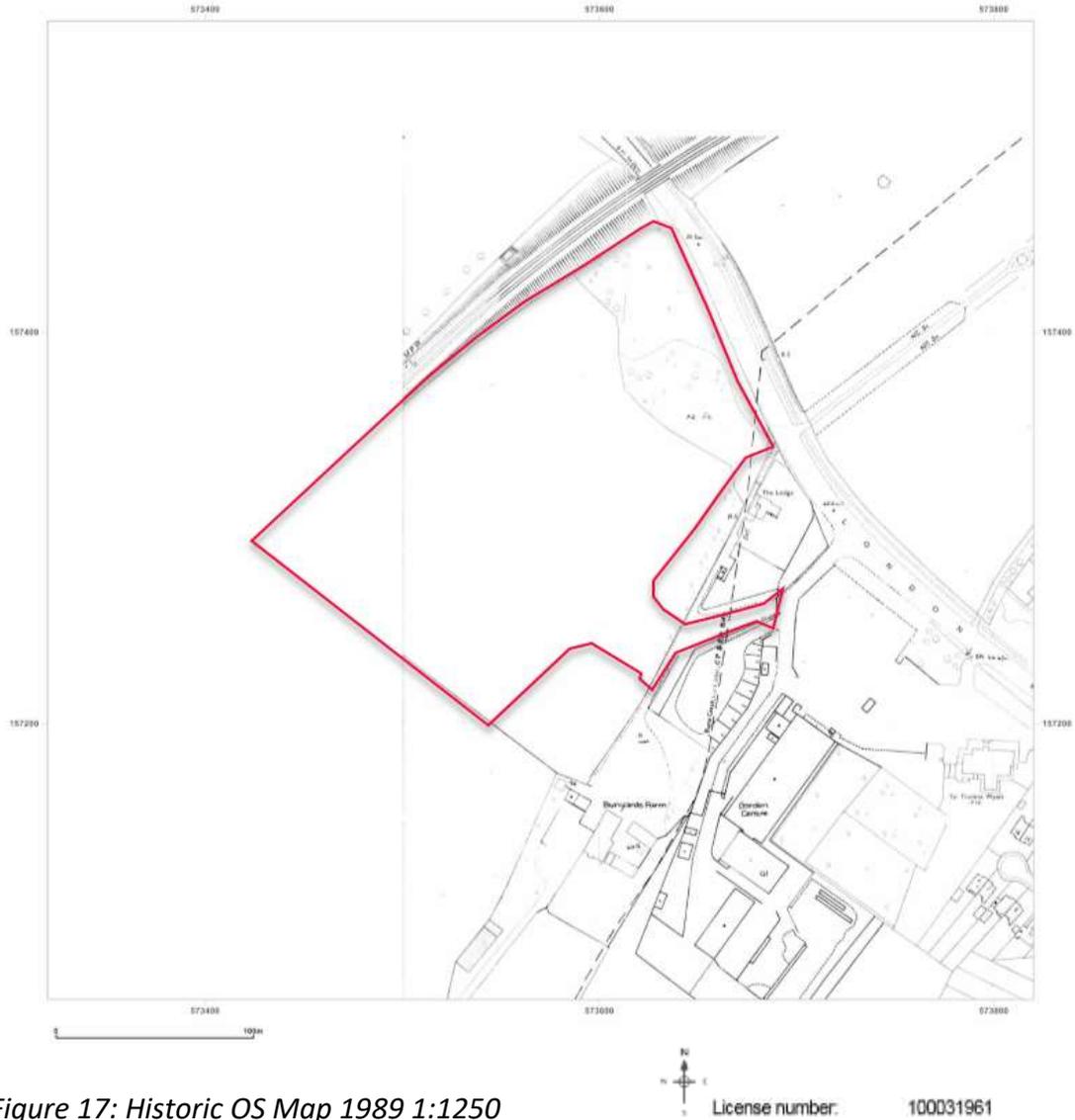


Figure 17: Historic OS Map 1989 1:1250



Figure 18: Historic OS Map 1993 1:1250



License number:

100031961

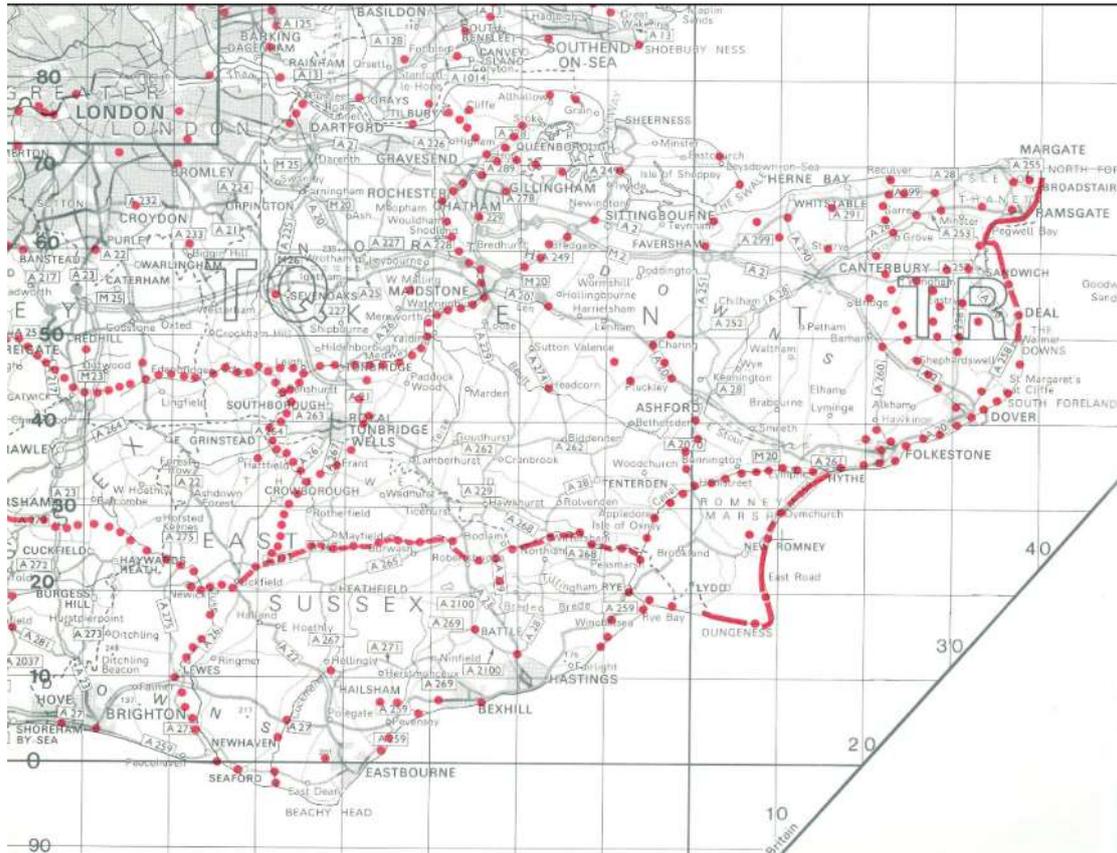


Figure 19: Kent Pillbox Map (Wills, 1985)

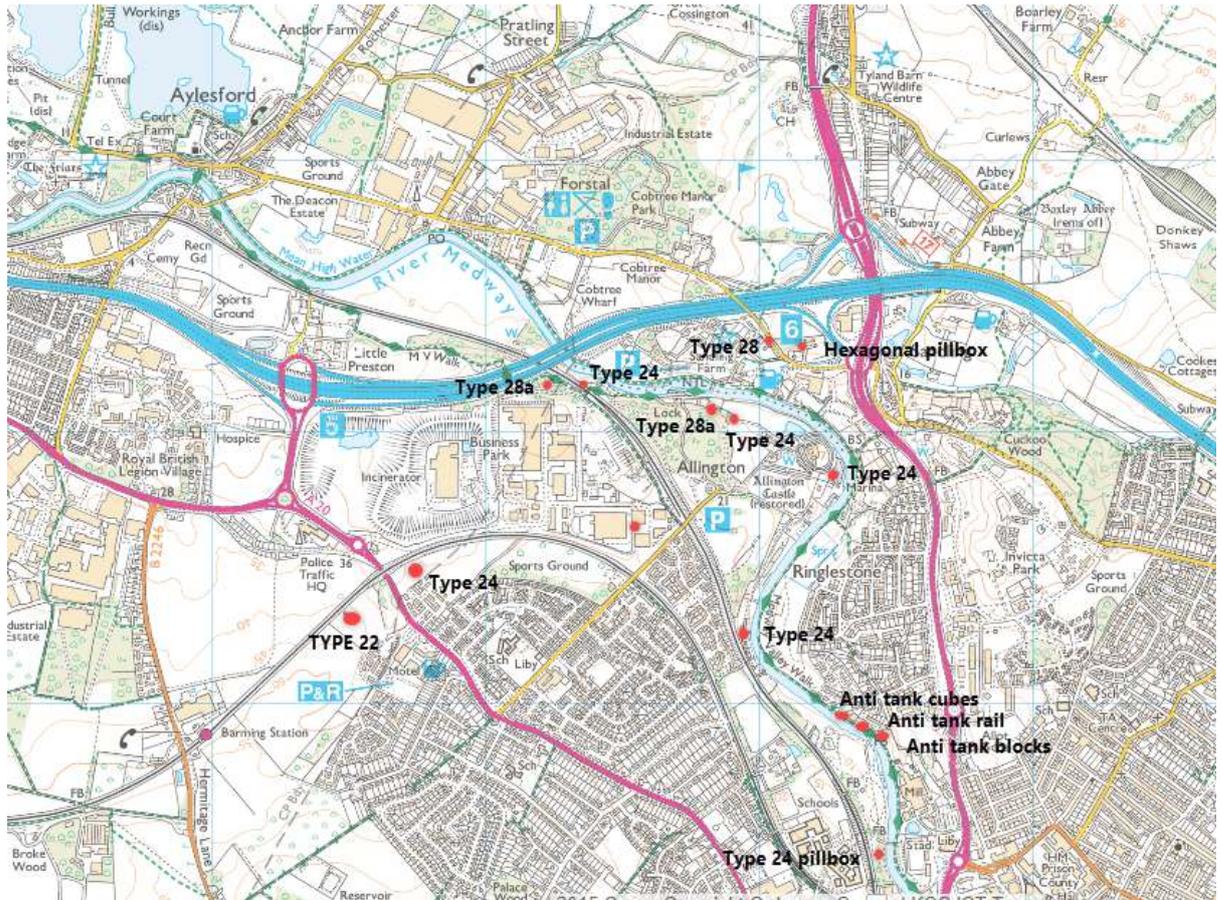


Figure 20: GHQ Defences in vicinity of the PDA

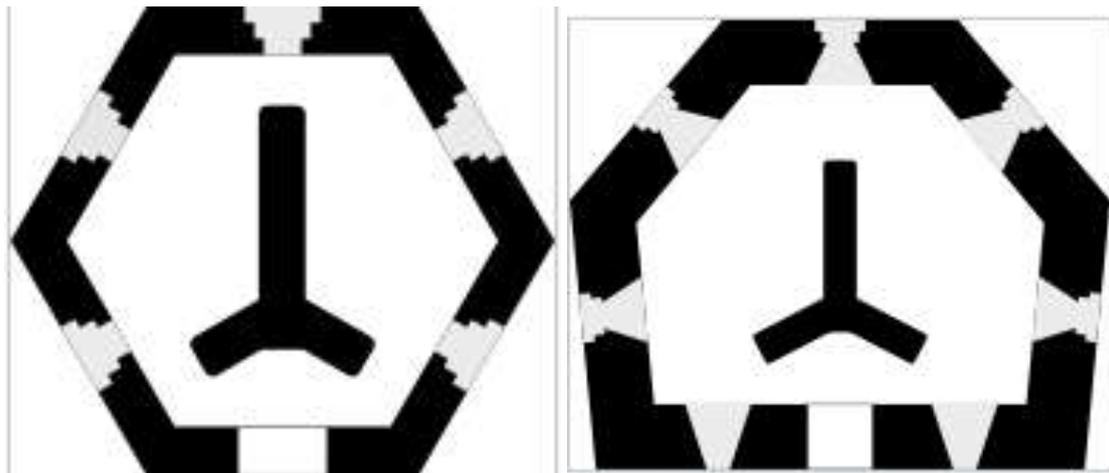


Figure 21: Pillbox design: Type 22 on the left and Type 24 on the right.



Plate 1: 1940s. All at an altitude of 1.09km (Google Earth).



Plate 2: 1960 (Google Earth)



Plate 3: 1990 (Google Earth)



Plate 4: 2003 (Google Earth)



Plate 5: 2007 (Google Earth)



Plate 6: 2011 (Google Earth)



Plate 7: 2013 (Google Earth)



Plate 8: 2015 (Google Earth)



Plate 9: 2018 (Google Earth)



Plate 10: View across PDA from north west corner (facing E)



Plate 11: View of the entrance to the Pillbox (facing NE). Scale 1m



Plate 12: View of the north western side (facing SE). Scale 1m



Plate 13: View of the northern side (facing S). Scale 1m



Plate 14: View of the north eastern side (Facing SW). Scale 1m



Plate 15: View of the south eastern side (facing NW). Scale 1m



Plate 16: View of the southern side (facing N). Scale 1m



Plate 17: Close up of the shuttering and concrete on north eastern side (Facing W).



Plate 18: Close up of the gun embrasure on the southern side (Facing NW).



Plate 19: Pillbox on the eastern side of the A20.