

APPEAL BY KENT INTERNATIONAL GATEWAY LTD ARISING FROM MAIDSTONE BOROUGH COUNCIL'S FAILURE TO DETERMINE AN APPLICATION FOR PLANNING PERMISSION FOR A PROPOSED RAIL/ROAD FREIGHT INTERCHANGE, WAREHOUSING AND OTHER WORKS ON LAND BETWEEN THE M20 AND THE A20, TO THE WEST OF JUNCTON 8 AND EAST OF THURNHAM LANE, MAIDSTONE.

Revised Proof of Evidence on behalf of the Joint Parishes Group (JPG)

Archaeology

5 October 2009

Lesley Feakes

JPG

c/o Clerk to the Joint Parishes Group
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1. PERSONAL DETAILS

- 1.1 My name is Lesley Feakes and I appear at this public inquiry in my role as Chair of Lenham Archaeology Society and on behalf of the Joint Parishes Group (JPG). I have been helped in the preparation of this proof of evidence by colleagues within the JPG.
- 1.2 I am not an expert in planning law or any other technical matter relevant to this public inquiry. I appear as a local resident and member of the JPG.

2. ARCHAEOLOGY

- 2.1 Having read the appellant's "Supplementary Environmental Statement: Archaeology" there are various issues mentioned that stand out as inaccurate in regard to the archaeology, history and geology of the area as I know it.
- 2.2 These statements concern the extent of "plough damage" and the amount of "hill wash" and calcium content of soils that might falsely suggest that there is little intact archaeology present. Magnetometer surveys we have had done on fields in Lenham prove that the hill wash and alluvial deposits almost completely mask the archaeology that we know is there.
- 2.3 Chalk molecules interfere with the build up of detectable magnetism. From aerials that I have studied, particularly ones lodged at H.E.R. Swindon, evidence indicates that there is a possible barrow (could be two) in Area 2 (Areas as defined in the Appellant's SES). The huge number of features immediately south of the A20, visible on aerials makes it an illogical to assume there is nothing in Area 2, in prehistory it was a confluent site. Using Geostore.com it is possible to get a height print-out that shows archaeological features almost as good as does Lidar. Appendix 1 shows a picture of White Heath, the raised round area that I think is a barrow or henge is outlined by yellow dots.
- 2.4 Note the second smaller bump just below the SE edge of the yellow square could be another barrow. Wessex Archaeology did not dig a trench across this exact area as far as I can ascertain. They were chasing Magnetometer anomalies not on this bump. A desk top survey should be done for the whole of the KIG SITE using Geostore.com data. It would show the entire ditches /banks/ field boundaries even when hidden beneath trees.
- 2.5 So why do no barrows show on the magnetometer? It is the calcium /chalk added to the soil by farmers and sometimes hill -washed chalk present. The SES report ignores the fact that modern farmers (from 1930 onwards) have regularly spread chalk on the fields (particularly in Areas 1,2 & 3). In previous centuries this spreading of marl was also common. Area 2 is Folkestone sand (acid), the chalk marling makes it less acid and more fertile but it masks any result of Magnetometers.
- 2.6 When we did resistivity on fields at Snagbrook Farm, Hollingbourne (1.5 Km N.E.) we found 3 Roman buildings. See Appendix 2. What was noticeable was that the Roman top soil was completely missing. The walls that showed were the foundations only of a type of villa (common in 300AD.) It was only 30cm beneath the present top soil. All tile, bricks, small finds seemed stripped

away. History gave the answer, reports re Eythorne Street (lower Hollingbourne) record that river flooding is common in this area.

- 2.7 A context was found there (see SMR) containing mixed Roman and medieval sherds sealed by clay deposit, washed down from higher land. How can a river flood only 0.5 Km from its source? Answer is the 'Boscastle' effect , 10 – 12cm of rain falling on the Downs would rush down the gorge of Hollingbourne Hill tearing all buildings and top soil in its path. This dramatic hill wash has obviously occurred many times in near and distant past. The deep cuts of Broad Street and particularly Water Lane suggest this also and the head deposits in the trial pits would surely prove it.
- 2.8 This area beneath the Downs had the densest population farming and iron production of the Iron Age and it continued through the Roman occupation but has enough been done in discovering it all? Much archaeology will be underneath extensive hill wash from the Downs.
- 2.9 In the Blue Bell Hill CTRL excavation, that I watched with interest, the NA Longhouse was covered by metres of hill wash. It is very likely that there is amazing and intact archaeology beneath much of the KIG area.
- 2.10 The 19th C land drains on Area 15 indicate former drainage problems in those fields, caused by the silt /clay deposits over the years. Even with the hillwash deposits blanking magnetism build-up the magnetometer has shown features in Areas 15 and 14, and with the curious aerial features also, I would deduce that there is an enormous amount of archaeology present and hillwash protects it, too deep for plough damage to have occurred.
- 2.11 The number of features showing in Area 6, Area 5 and Areas 8, 9 and 10 would surely indicate that archaeology (particularly Iron Age) is there in abundance. This would fit with my own observations at the CTRL trench opened at Junct 8 M20 in 1999 where there were Iron Age pots sticking up out of the sand. Although apparently 'sufficient' archaeology was done there before work started there were several features not fully dug and the unique pots I retrieved were upside down in a charcoal cooking trench. They contained remnants of food and pot boilers. Evidence they were abandoned in a hurry in the path of Roman invasion? This corridor of Kent was one of the most densely populated and important areas in prehistory and Roman times . Look at the amount discovered near Burham recently (see KAS Newsletters)
- 2.12 From my calculations of the position of known Roman Villas and from those showing on aerials, from known Roman roads (one was recently found by Lenham Archaeology Society) and ones showing on aerials, from Roman Water mills I have deduced that there are at least two Roman buildings under KIG. Area 5 and Area 9 and possibly 15 seem the most likely.
- 2.13 More generally the images CgMs Consulting are using in the appellant's SES report, for example, fig. 4 topography, appears to be a much bigger section at a much lower magnification than the (publicly available) images I have used. If so then CgMS have certainly not used all the material available to give an accurate report. I question why they would not use the best information

available even after the JPG publicly wrote to the Inspector in July to highlight our concerns – are they concerned by what they might find?

- 2.14 If they had just zoomed down on the fields of that topographical map they should have seen all the ditches/banks/bumps & features that I can see. Lidar "sees" beneath the trees also and the report therefore should have included what is "visible" in the adjacent woodland areas surely? Ancient archaeology is not confined to modern field boundaries and woods were quite often NOT woods 2000 years ago.
- 2.15 The JPG has already written to the Planning Inspector to raise the issue of lack of detail within the appellant's Environmental and Supplementary Environmental Evidence¹. Despite this written warning, no further evidence has been forthcoming in many cases. This failure to use such readily available information to assess the archaeology on is yet another case in point. In its letter the JPG pointed out that failure to provide sufficient detail in the SES was a breach of European and UK law including the Aarhus Convention, and Article 3 of Directive 2003/35/EC² (which amended the EIA Directive 85/337/EEC (as amended by 97/11/EC).
- 2.16 Having highlighted several archaeological features and written to the Inspector to highlight our concerns over the ES and SES the JPG naturally looked forward to a comprehensive analysis of the site in the Appellant's Proof of Evidence. Sure enough, the Appellant has highlighted archaeological features in Fields 1, 3, 8/9, 14 and 15³ (two of which were immediately dismissed as 'only passing archaeological interest'). However, the features I identified in area 2 still do not appear to have been assessed and certainly no new imagery has been supplied.
- 2.17 The many of the features in Area 6, Area 5 and Areas 8, 9 and 10 also seem to be ignored, even in the Appellant's final proof of evidence.
- 2.18 The S.E.S does not mention the Mortuary building still standing at White Heath Workhouse site. Apparently it is the only building of its type left in Kent.

3. Conclusion

- 3.1 This proof has shown that the Appellant's SES is incomplete and much of it is based on inappropriate techniques for this area, given the high chalk content. Why should we let developers suppose, irrationally, that there is little archaeology under KIG site, when they haven't even done the basic research needed? A Geostore data desk top study would provide evidence of far more important archaeology. The danger is the Appellants now take the lowest tender from Archaeological Units and have the same scenario as on Union Rail where they ran out of money and only did the minimal rescue.
- 3.2 Why should Kent be so overlooked by our National Heritage? What is the point of the Government saying they are "Heritage Aware" when they allow our huge amount of archaeology to be run rough shod by developers?

¹ Letter from Richard Jacques Chair of the JPG to the Planning Inspector dated 13 July 2009.

² Environmental Impact Assessments Directive, Article 3

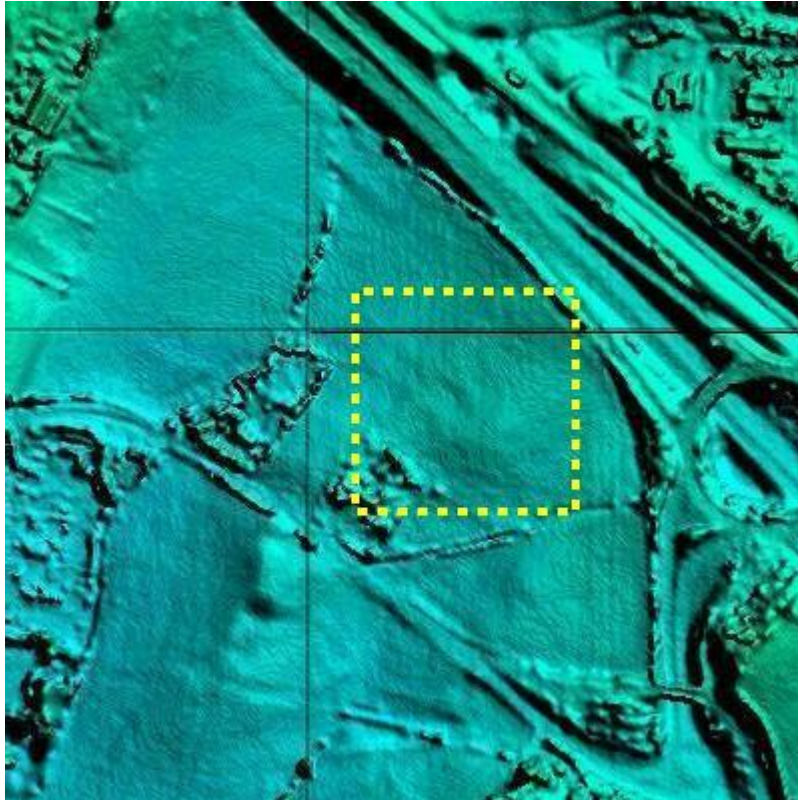
³ KIG 7.1 – Proof of Evidence on Archaeological p13, para 4.7.2

- 3.3 The Maidstone to Ashford corridor was the centre for Iron Age iron production, was the main area of Iron Age grain production and the main reason Caesar invaded in the first place!

Please give us our Heritage back rather than destroying it forever.

Appendix 1

Evidence of Whiteheath Barrow



Source: Geostore.com

This shows a picture of White Heath, (Area 2) the raised round area that or henge is outlined by yellow dots. The failure of the applicant to conduct such a desk top survey means their research has failed to pick up on these features. The techniques they used meant chalk molecules interfered with the build up of detectable magnetism and they missed this, as well as other archaeological features.

We respect the Inspector's decision not to allow electronic evidence to be shown at this Inquiry but would point out that this picture is much clearer when viewed in its original electronic format relative to its printed reproduction.

Appendix 2

Roman building 1. Striations NW→SE appear to be bands of underlying hillwash.

