

Ian D Bull BTP DMS MRTPI
1 Mountbatten Way
Brabourne Lees, Ashford
Kent TN25 6PZ

By e-mail only

22 August 2025



Dear Ian

PA/2025/0824 – Land between Copper Lodge and The Cloth Hall, Water Lane, Smarden

I write in my capacity as the Heritage Consultant for the above planning application which is currently being considered by Ashford Borough Council. As you know, we provided the Heritage Statement that accompanies the application and, having considered the heritage related representations submitted as part of the public consultation, I remain of the opinion that the findings of that assessment are correct, which are based upon an appropriate identification of significance of the relevant heritage assets.

The principal purpose of writing to you is in respect to the consultation response that has been submitted by the Senior Archaeological Officer at Kent County Council. I cannot recall ever having to respond to comments from a county archaeologist before, as they tend to concern procedural matters, such as a request for potential investigative works or to recommend conditions. However, in this instance I cannot let the response be left unchallenged.

There is evidence of early human activity in the Lower Palaeolithic period, with finds discovered in the Thames Valley and, at Swanscombe, in northern limits of Kent. It wasn't until the end of the last Ice Age, the Mesolithic period (c. 10,000–4,000 BC) began and widespread evidence exists of people living in the country as hunter-gatherers. There is, however, insufficient evidence to form any objectively assessed conclusion that the site contains any significant likelihood of archaeological interest of early man, or from later periods, including the Neolithic, Medieval, or post-Medieval periods.

The Officer refers to a single archaeological event, which is not even on the site. That event is a single findspot containing a Mesolithic flint scatter to the south of the site within the burial ground extension. The summary provided in the Historic Environment Records reads:

In May 2001 during the opening of a new grave, three pieces of flint debitage were recovered. The recently enclosed extension to the burial ground was walked to ascertain whether anymore material was present. In all 380 pieces were recovered amounting to 2285grams of material from an area of approximately 600 sq m. The assemblage has been assessed by a specialist and found to consist of cores, blades, flakes, and angular fractures. Formal tool types were lacking but there were three Mesolithic microblades and a fragment of knife blade possibly of Neolithic date. One hundred and eight pot-boilers were also found. The scatter appears to be reasonably discrete and is bounded on the southeast by the River Beult 30 m away on the application site.

To help put this single find into perspective, no actual historic tools were found. Flint debitage is a general term for the waste flakes, chips and spalls produced during the manufacture and maintenance of flint tools. Also, a pot-boiler is not a cooking pan, but a small stone that is heated in a fire and then dropped into a vessel containing a liquid in order to heat it. The low level of interest that this find contains is not sufficient to indicate any likelihood of similar or more interesting finds on the site.

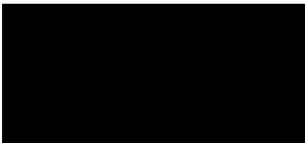
The Officer also refers to the site being located between active water channels “which feed into the Beult and being located on gravels it **may** have been a good location for processing cloth”. Please note the use of the word in bold. It is much more likely to be an area that was subject to regular flooding.

The consultation responsive is alarmist in its tone and suppositions. An objective assessment of the evidence is that the site is unlikely to contain any significant archaeology. However, in order to fully address this matter, the Applicant will commission a geophysical survey of the site, a copy of which will be forwarded to the County. Any anomalies in the survey data can then be further investigated, if required.

I ask that my concerns be raised with the Case Officers and that they put to one side the last substantive sentence, which has no evidential basis and is simply beyond the remit of the Officer.

I have discussed the County’s response with Paul Wilkinson of SWAT Archaeology, who is one of the most experienced and knowledgeable experts on the archaeology of Kent. I have shared the above contents of this letter and supports its submission to you.

Yours sincerely,



Jason Clemons
BA(Hons) Dip.UD MA MSc MRTPI IHBC FRSA
Executive Director