

LAND AT 70-72 HIGH STREET,
HYTHE, KENT, CT21 5AL
ARCHAEOLOGICAL DESK-BASED
ASSESSMENT

PLANNING ISSUES

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Site

Land at 70-72 High Street, Hythe, Kent, CT21 5AL

Report

Archaeological Desk-based Assessment

Site Centred

TR 16107 134718

Planning Authority

Folkstone & Hythe District Council

Client

Planning Issues

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EXECUTIVE SUMMARY

HAPRO Ltd was commissioned by Planning Issues Ltd in April 2026 to prepare an archaeological desk-based assessment (ADBA) to inform a planning application for the redevelopment of the former Aldi supermarket located at 70-72 High Street, Hythe Kent, in Folkstone & Hythe District Council (hereafter referred to as ‘the Site’); centred on National Grid reference TR 16107 134718. The proposal is for the demolition of the existing vacant supermarket and construction of retirement living apartments over commercial retail space onto the High Street with two semi-detached cottages with associated landscaping and parking located near to Mount Street.

This assessment has been commissioned to focus solely on the proposals with regards to buried archaeological potential. It does not discuss the heritage significance or settings of built heritage assets. This has been provided in a separate heritage statement produced as part of the planning application by HAPRO Ltd (HAPRO Ref. 0033_02).

A review of the available data indicates that the Site lies within an area of notable archaeological and geoarchaeological potential. The Site’s proximity to the former shoreline enhances its significance from both an archaeological and geoarchaeological perspective.

Archaeological interest is closely tied to the medieval and post-medieval development of Hythe and its former harbour, as well as earlier Saxon shifts in settlement from the west. The Site’s location within the historic post-medieval core of the town is of archaeological interest, with historic mapping indicating that the front of the Site has been a focus of development from at least the 17th century.

The geoarchaeological interest relates particularly to the deep alluvial sequences influenced by changes in relative sea level (RSL) within an estuarine environment. These deposits may include sediments from a variety of depositional settings—such as palaeochannels, mudflats, saltmarshes, wetland fens, and possible buried land surfaces.

It is noted in response to a previous planning application for the Site (21/1109/FH), the Kent County Council archaeological advisor to the council recommended a planning condition. It is our professional opinion that this proposed approach and scope of works remain valid for this planning application.

1. INTRODUCTION

1.1 PROJECT BACKGROUND

1.1.1 HAPRO Ltd was commissioned by Planning Issues Ltd in April 2026 to prepare an archaeological desk-based assessment (ADBA) to inform a planning application for the redevelopment of the former Aldi supermarket located at 70-72 High Street, Hythe Kent, in Folkstone & Hythe District Council (hereafter referred to as 'the Site'). The Site is centred on National Grid reference TR 16107 134718 (Figure 1). The proposal is for the demolition of the existing vacant supermarket and construction of retirement living apartments over commercial retail space onto the High Street with two semi-detached cottages with associated landscaping and parking located near to Mount Street.

1.1.2 This assessment has been commissioned to focus solely on the proposals with regards to buried archaeological potential. It does not discuss the heritage significance or settings of built heritage assets. This has been provided in a separate heritage statement produced as part of the planning application by HAPRO Ltd (HAPRO Ref. 0033_02).



Plate 1: General view of the Site looking northwards



Plate 2: View of the Site from the High Street

1.2 THE SITE

- 1.2.1 The Site comprises of a large, vacant supermarket building and part of the Prospect Road car park (Plates 1 and 2). The Site is broadly level, just below 5m AOD and dominated by hard landscaping. The Site is contained by the post-medieval and modern built form of Hythe with the High Street to the north, Bank Street to the west, Mount Street to the east but with a more open aspect to the south over Prospect Road towards the early 19th Century Royal Military Canal.
- 1.2.2 The underlying bedrock geology is Weald Clay Formation mudstone, formed during the Early Cretaceous epoch (126-134 MA), whilst the superficial deposits comprise of Storm Beach Deposits, composed of gravel. The Site is located to the north of the mapped area of these Storm Beach Deposits, with Tidal Flat Deposits (described as clay and silt) mapped c. 300m to the west and 170m to the south of the Site (BGS GeoIndex Onshore, 1:50,000).

1.3 AIMS AND OBJECTIVES

1.3.1 The purpose of this ADBA is to determine, as far as is reasonably possible from existing records and observations, an understanding of the historic environment resource within and surrounding the Site in order to formulate:

- An assessment of the character and potential for archaeological and geoarchaeological remains to survive within the area of study;
- An assessment of significance of the known or predicted heritage assets; and,
- Strategies for further evaluation whether or not intrusive, where the nature, extent or significance of the resource is not sufficiently well defined.

1.3.2 This assessment has been commissioned to focus solely on the potential buried archaeological resource of the Site and therefore does not discuss the proposals with regard to setting or built heritage (including conservation areas). This has been provided in a separate Heritage Statement produced as part of the planning application by HAPRO Ltd (Ref. 027_02).

1.4 REGULATORY AND POLICY CONTEXT

1.4.1 There is national legislation and guidance relating to the protection of, and development on, or near, important archaeological sites or historical buildings within planning regulations as 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. Further detail of the relevant, legislation, policy and guidance is provided in Appendix 1.

2. METHODOLOGY

2.1 STANDARDS

2.1.1 This assessment is undertaken in accordance with:

- Historic England's Historic Environment Good Practice Advice (GPA) in Planning Notes:
 - *The Historic Environment in Local Plans* (2015a);
 - *Managing Significance in Decision-Taking in the Historic Environment* (2015b);
- Historic England's Advice Notes:
 - 12: *Statements of Heritage Significance: Analysing Significance in Heritage* (2019a).
- *Historic Environment Planning Policy Guidance* (revised July 2019), published by the Ministry Housing, Communities and Local Government (MHCLG), providing advice on enhancing and conserving the historic environment;
- The *Chartered* Institute for Archaeologists' *Code of Conduct* (CIfA 2019); and
- The Chartered Institute for Archaeologists' *Standard and Guidance for Historic Environment Desk-Based Assessment* (2020).

2.2 SCOPE OF ASSESSMENT

2.2.1 The initial step of the ADBA process is the identification of archaeological remains likely to be affected by the proposed redevelopment due to their presence within the Site. This is informed through a desk-based study and site visit.

2.2.2 The following sources were consulted to inform the presence of heritage assets within the study area, and to form a baseline for the assessment of their significance:

- Kent Historic Environment Record (HER);

- National heritage datasets including The National Heritage List for England (NHLE) and Historic England Research Records;
- Portable Antiquities Scheme;
- Geotechnical investigations undertaken within the Site;
- Archaeology Data Service (ADS) Grey Literature Library;
- National Monuments Record (NMR);
- National Newspaper Archive;
- Historic mapping available online;
- Aerial photography available online at Britain from Above, Cambridgeshire Aerial Photographic collection online and National Collection of Aerial Photography (NCAP) and Historic England's National Mapping Programme;
- Relevant primary and secondary sources including published and unpublished documents and reports;
- relevant national, regional and thematic research frameworks including the South East England Regional Research Framework (2021);
- British Geological Survey (BGS) for geological mapping and borehole data; and
- A site visit undertaken in April and May 2026. This included an assessment of the general character of the Site, identification of any heritage assets not identified through desk-based review, and assessment of the heritage interest and sensitivity of identified heritage assets. The site visit was undertaken in clear, dry weather conditions with good visibility.

2.2.3 Following consultation with Kent County Council's Heritage Conservation Team, a 350m radius study area was provided by the HER. Those records which related to standing buildings were filtered out of the gazetteer, but are noted to reflect the general historical development of Hythe during the medieval and post-medieval period.

Assumptions and Limitations

- 2.2.4 This report is compiled using secondary information derived from a variety of sources, only some have been directly examined. The assumption is made that this data as well as that derived from other secondary sources, is reasonably accurate. In addition, the records held by the HER represent a record of a wide range of information derived from historical sources and previous archaeological discoveries and does not preclude the subsequent discovery of further elements of the historic environment that are, at present, unknown.
- 2.2.5 This report is compiled using secondary information derived from a variety of sources, only some have been directly examined. The assumption is made that this data as well as that derived from other secondary sources, is reasonably accurate.
- 2.2.6 Archival material relating to the Site and study area was consulted on-line. All non-copyright Ordnance Survey (OS) mapping was reviewed.
- 2.2.7 There may be other material held in private collections, local repositories, and the National Archives, which was not possible to view these as part of the assessment.

2.3 ASSESSMENT OF SIGNIFICANCE

- 2.3.1 The National Planning Policy Framework (NPPF 2025) recommends that, in determining applications, local planning authorities should require applicants to describe the significance of any heritage assets affected, including any contribution made by their setting (NPPF, 207).
- 2.3.2 The significance of heritage assets is defined in terms of their value to this and future generations because of their heritage interest, deriving not only from their physical presence, but also from their setting. This interest may be archaeological, architectural, artistic or historic (NPPF):
- **Archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert

investigation at some point.

- **Architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- **Historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

(MHCLG 2019, Paragraph: 006 Reference ID: 18a-006-20190723)

3. ARCHAEOLOGICAL AND HISTORIC BASELINE

3.1 INTRODUCTION

- 3.1.1 The following section provides an assessment of the historic and archaeological baseline to identify the archaeological potential of the Site, the significance of the potential remains encountered and assesses what could be affected the proposed redevelopment.
- 3.1.2 Within the Study Area, a total of 130 monument records were provided by the HER. A detailed review of these records revealed the majority relate to buildings or listed buildings. Although the historic fabric and built form of these structures provide historic, and potentially archaeological, interest the buildings are not considered in detail as part of this assessment but are rather noted to represent the settlement pattern of Hythe from the medieval period onwards. Those records that are of relevance to understanding the archaeological potential of the Site are considered in detail in the following section and referenced by their HER monument UID number (MKE#) or event number (EKE#). Archaeological assets are illustrated on Figure 1 and tabulated in Appendix 2. A full historic OS map regression is provided in Appendix 3.

3.2 ARCHAEOLOGICAL AND HISTORICAL BASELINE

Designated Heritage Assets

- 3.2.1 The Royal Military Canal is located at its nearest point 55m to the south of the Site, and is designated as a Scheduled Monument (NHLE: 1005116). The canal was excavated from Hythe to New Cliffe during the early 19th Century as a landward line of defence from a Napoleonic invasion, behind a series of Martello Towers located along the coast line. The proposed development would have no effect on the scheduled monument due to changes within its setting.

Previous Archaeological Investigations

- 3.2.2 The HER records an number of events within the Study Area. Those that are of relevance to understanding the archaeological potential and significance of the Site are described below.

- 3.2.3 Approximately 80m east of the Site, five evaluation trenches at The Paddocks, 13 Prospect Road (EKE16379) revealed a 15th century, or later, ditch as well as alluvial deposits which was speculated to represent the original coastline, or mudflats, associated with the Hythe inlet.
- 3.2.4 Further to the east of the Site, at 136-138 High Street, approximately 240m from the Site, an evaluation of former Union Reform Church was undertaken (EKE5362). A possible medieval hard was identified on the edge of a former shoreline. The hard was in use in the thirteenth-early fourteenth century but a later fourteenth century rubbish dump in the area suggests that by this time it's original function had been abandoned.
- 3.2.5 Two small test pits were excavated 20m to the west of the Site at 19 Chapel Street (EKE25877) which did not record any archaeological or artefacts although the test pits were limited in size. A watching brief at 40-44 High Street also did not record any archaeological remains (EKE5185). Various archaeological fieldwork to the north of the High Street on the higher ground compared to the Site has confirmed the presence of medieval and post-medieval settlement remains (EKE15025, 16314, 20629, 20768)

Geoarchaeological Potential

- 3.2.6 The geology of the Site is noted to be Storm Beach Deposits composed of gravel. This has been confirmed by geotechnical borehole investigations across the Site (A2 Site Investigations, 2022 and Crossfield Consulting 2025a &b). Where boreholes were drilled to an adequate depth, storm beach deposits were recorded across the Site. Near to the rear, southern wall of the existing building on the Site the interface between made ground and the underlying beach deposits increased in depth from 2m BGL to over 4.5m BGL. The reason for this is currently unknown but is speculated in the geotechnical report to relate to a tank or similar feature. At the eastern edge of the Site the beach deposits also fall in depth and the borehole log (DSCCL04- Crossfields Consulting 2025b) notes the presence of timber and ashy material.
- 3.2.7 The Storm Beach Deposits mapped at Hythe lie at the north-western end of a series of beach ridges that formed part of the more extensive coastal barrier of Dungeness Foreland. Development of the shingle gravel barrier of the Dungeness Foreland has been dated through OSL dating to approximately 5000BP.

- 3.2.8 The gravel barrier gradually prograded eastward, creating a huge tidal lagoon to landward and leading to the establishment of tidal mudflats and saltmarsh across Romney Marsh; these were subsequently replaced by freshwater peats which had begun to form within the adjacent river valleys from c. 6800 cal. BP.
- 3.2.9 Marine influence gradually increased from 3000 cal. BP with the development of large tidal inlets at Rye, Romney and Hythe, with freshwater peats succeeded by marine dominated tidal flats and saltmarsh across Romney Marsh, punctuated by localised survival of raised mire (e.g. Walland Mire) into the medieval period.

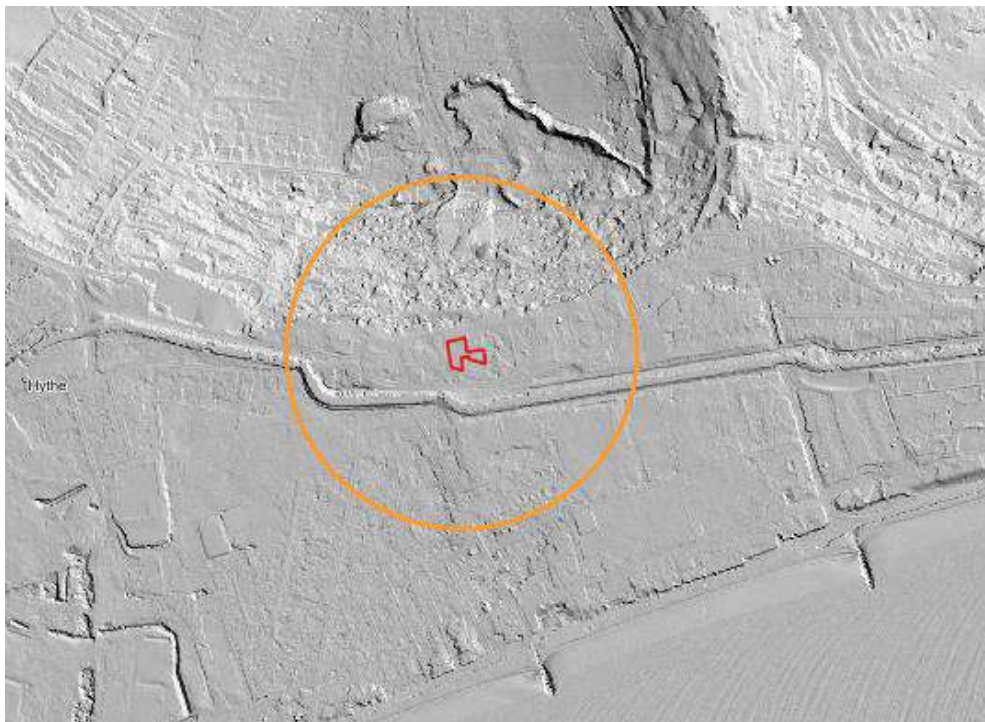


Plate 3: 1m LiDAR Composite DTM showing topographical location of the Site

- 3.2.10 Both archaeological and geomorphic evidence indicate that a tidal inlet through the gravel barrier persisted in the north-eastern part of Romney Marsh during the late Holocene (Long *et al* 2006). Known as the Hythe inlet and thought to have been an earlier conduit for the river Rother (or Limen), it is thought to have existed during the Roman period, although by the late Saxon period this inlet was much reduced in size. The area behind the shingle bank became a tidal lagoon and a 3rd century AD Roman port known as Lemanis located close to the mouth of the tidal inlet, several kilometres to the west of modern Hythe. From the late Roman into the Saxon period the tidal water

retreated and the Hythe inlet infilled.

- 3.2.11 The gravel deposits that underlie the Site are of limited geoarchaeological potential, although any fine-grained deposits will have the potential to contribute to our understanding of subsequent barrier development and the Late Holocene evolution of the Hythe inlet and the earlier course of the river Rother (Limen). The Site may contain tidal flat deposits of alluvium which may relate to the former coastal and estuarian setting of Hythe and the indication of a nearby shoreline as evidenced in nearby archaeological investigations.

Prehistoric to Romano-British

- 3.2.12 There is no evidence for prehistoric activity within the Study Area. This may partly reflect the lack of systematic archaeological investigation, but it is also likely influenced by local topography and the gradual fall in sea level since the medieval period. As the northern edge of Romney Marsh slowly silted up, settlement appears to have shifted north-eastwards along the coast—first to West Hythe and subsequently to Hythe.
- 3.2.13 By the first century AD, the landscape west of modern Hythe comprised of a lagoon-like body of water adjoining the marshland creek of the Limen. This waterway provided access to the Weald and created a sheltered natural harbour. During the early second century, an area of dry ground on the lagoon's edge, close to present-day West Hythe, was selected as the site of a naval base and harbour for the *Classis Britannica*—the Roman fleet operating in British waters—known as *Portus Lemanis* (Lympne).
- 3.2.14 The fort was integrated into the wider Romano-British road network. The Roman road linking Maidstone and Dover via Lympne passes approximately 230 metres north of the Site, following the alignment of the modern North Road (MKE75998). Lympne became a Saxon Shore fort during the later Roman period. Coin evidence suggests that this fort was in use from about c.250AD until c.370AD when it was abandoned, possibly due to coastal erosion and the silting up of the harbour which would have reduced the immediate threat from the sea.
- 3.2.15 The only evidence for Romano-British activity within the Studay Area of Hythe is the retrieval of a few sherds of possible Roman date pottery identified during an excavation

in the basement of the Grade II listed 'Centuries', located approximately 60m north of the Site (MKE100536).

Saxon and Medieval

- 3.2.16 There is no recorded evidence for Saxon activity within the Study Area, although a Saxon fibula and beads recovered from quarrying in 1870, located approximately 380 m northwest of the Site.
- 3.2.17 Place-name evidence indicates that the name Hythe derives from the Old English hȳð, meaning a landing place on a river or an inland port. Although Hythe is now a coastal settlement, the name is understood to refer not to a maritime harbour but to a landing point on the former River Limen.
- 3.2.18 As the estuary continued to silt up, a new settlement developed at Sandtun, located on the sand and shingle bank immediately southeast of the Roman fort and west of West Hythe. This community may have originated as a trading centre—possibly the settlement known as Limen—but was subsequently forced to migrate eastwards towards present-day West Hythe and then Hythe as silting intensified during the late Saxon and medieval periods.
- 3.2.19 A charter of 1036 confirms that Hythe was established on its current site by that time, and by around 1050 Hythe, Dover, Romney, Sandwich and Hastings were supplying ships to King Edward the Confessor as part of a reorganised coastal defence system. These towns would later form the Cinque Ports. Hythe (recorded as Hede) appears in the Domesday Book of 1086 as one of Kent's principal sea ports (MKE4318).
- 3.2.20 The expansion of settlement at Hythe during the medieval period is reflected in the substantial number of surviving buildings and monuments dating from this era, situated to the north, northeast and northwest of the Site along High Street, Bartholomew Street and Dental Street (MKE43019, 4313, 8854, 115801). The medieval town appears to have developed along these principal east-west routes, largely confined to the steep hillside overlooking the mouth of the River Limen.
- 3.2.21 By the late eleventh and early twelfth centuries, Hythe had become one of the principal Cinque Ports, alongside Sandwich, Dover, Romney and Hastings. This status derived from an arrangement established under Edward the Confessor, whereby the towns

supplied ships and men to the Crown for coastal defence. In return, the Cinque Ports received privileges including exemptions from certain taxes and the right to hold their own courts.

- 3.2.22 A medieval slipway located approximately 240 m east of the Site is believed to mark the medieval shoreline. It remained in use from the early thirteenth to the fourteenth century (MKE17138). However, by the early thirteenth century Hythe's harbour had begun to silt up, and by the sixteenth century it had become largely unusable. Despite this decline, some waterborne trade continued into the early sixteenth century (Kent County Council & English Heritage 2004).

Post-Medieval and Modern



Plate 4: 1797 OS Surveyors drawing of Hythe (© British Library)

- 3.2.23 By the end of the 16th century, drifting shingle had built up considerably and resulted in the destruction of the harbour. Historical mapping from the 17th century shows a similar coastline to that seen today, with the old port town set back from the shoreline. Thomas Hills Hospital Map of Hythe of 1684 (not reproduced) shows the distinct grid-like pattern of streets with buildings extending southwards from the High Street, which may include part of the Site. This similar settlement pattern is recorded as part of the

Ordnance Surveyors 1797 drawing of Hythe (Plate 4).

3.2.24 The arrival of the Hythe and Sandgate Railway during the late 19th century, and the increasingly known benefits of sea-bathing and sea air resulted in Hythe becoming a popular seaside resort during the 18th and 19th centuries (Kent County Council & English Heritage 2004). Much of this custom was derived from military officers and their families stationed in Hythe during and after the Napoleonic Wars. Folkestone, Hythe and Sandgate Tramways operated from 1891 until 1921 to transport people down to the coast (MKE91037) and began as an attempt to assist the development of the Seabrook Estate. It was a horse drawn tramway although the horses were commandeered during the First World War. It re-opened after the war but only ran during the summer. It closed fully in 1921.

3.2.25 The 1842 Tithe Map (Plate 5) shows the extent of mid-19th century development coming off the High Street within the Site. The northwest corner of the Site is defined as the stables and yard for the Swan Hotel (#238), which is located on the opposite side of the High Street. In the eastern part of the Site, beyond a north-south aligned roadway (#234) are two undeveloped areas, described as pasture and named 'Platt' (#233 and 235). On the eastern edge of the Site, onto Mount Street is a building which is named Wood Lodge (#236). The whole area beyond the Swan Yard and Stables was in the ownership of Edward Sedgwick, who lived on the High Street (#232). The southwestern corner of the Site is listed as a garden, under Sedgwick's ownership (#237) which appears to have a stream running through it.

3.2.26 By the 1872 OS map (Appendix 3), Sedgwick's house fronting onto the High Street had been demolished and a new house was constructed set back into the rear of the plot. Wood Lodge on the eastern edge of the Site had been demolished and the southern part of the Site is set out as formal gardens.



Plate 5: Extract of 1842 Parish of St Leonard's Hythe Tithe Map with approx. Site outline

Plot #	Landowner	Occupier	Name	State
229	William Tiffin	Henry Stokes	House & Yard	
230	Edward Andrews	James Brittenden	House & Yard	
231	William Marshall	William Pullen	House Yard & Garden	
232	Edward Sedgwick	Edward Sedgwick	House & Yard	
233	Edward Sedgwick	Edward Sedgwick	Platt	Pasture
234	Edward Sedgwick	Edward Sedgwick	Roadway	
235	Edward Sedgwick	Edward Sedgwick	Platt	Pasture
236	Edward Sedgwick	John Cocks	Wood Lodge & Yard	
237	Edward Sedgwick	Edward Sedgwick	Garden	
238	Henry Mackeson	Robert Clarke	Swan Yards Stables etc	
239	Henry Mackeson	John James Bond	Office	
240	Henry Mackeson	Thomas Kemp	House & Yard	
241	Thomas Gilbert	Thomas Gilbert	House & Yard	
242	Edward Hutton	George Reynolds	House & yard	
243	Edward Hutton	Thomas Garrett	House & yard	

Table 1: Tithe Apportionment detail for Plate 5, highlighting plots within the Site



Plate 6: 1923 aerial photograph of Hythe with approx. Site outline © Historic England. Aerofilms Collection EPW009221

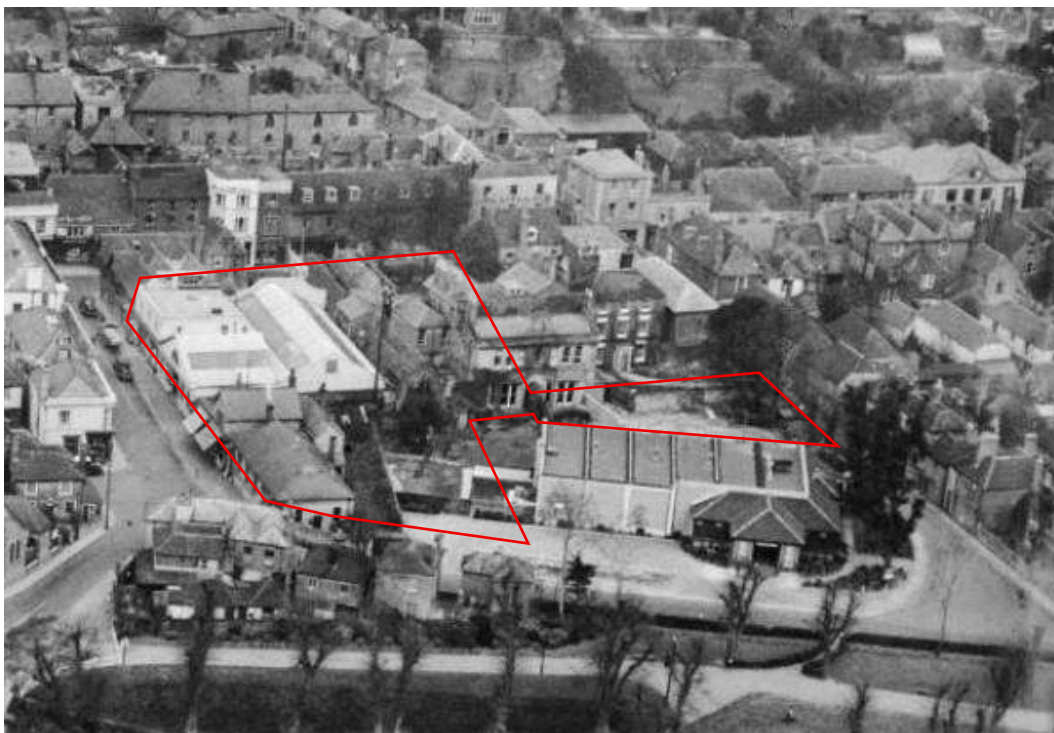


Plate 7: 1929 aerial photograph of Hythe with approx. Site outline © Historic England. Aerofilms Collection EPW026120

3.2.27 On the 1897 and 1898 OS maps (Appendix 3) the main house appears to have been subdivided into two and a sessions hall constructed in the southwest corner of the Site. There is very little change recorded until the 1930s OS maps when the former stables within the Site are demolished and replaced by a large single structure. To the immediate south east of the Site a 'picture theatre' had been constructed (and later named Grove Cinema). This change is recorded on historic aerial photographs dating from 1923 and 1929 (Plates 6 and 7). By the 1933 the westernmost part of the two residential properties on the edge of the Site appears to have been demolished with a small building built in the eastern part of the Site.

3.2.28 The Royal Military Canal was requisitioned by the British Army during the Second World War and lined with pillboxes in preparation for the expected German invasion. The Defence of Britain Database lists 24 pillboxes along the RMC's extent at Hythe (www.britarch.ac.uk/projects/dob/index.html), four of which lie within the Study Area (MKE39598, 39599, 39600, 39601).

3.2.29 The 1957 OS map (Appendix 3) shows the Sessions Hall had been demolished, and the large building in the Site labelled as a 'garage', with the small building in the eastern part of the Site labelled as a 'club'. Between the 1967-1975 OS maps this building, was named Emgren and footprint doubled in size. It is not until the 1970s that the Grove cinema is demolished and in the early 1980s the supermarket is constructed. Emgren was demolished in the early 2000s.

3.3 SUMMARY OF ARCHAEOLOGICAL POTENTIAL AND SIGNIFICANCE

3.3.1 The archaeological interest of potential buried remains within the Site derives from their evidential value and the potential information they may provide about past human activity. A review of the available data indicates that the Site lies within an area of notable archaeological and geoarchaeological potential. The Site's proximity to the former shoreline enhances its significance from both an archaeological and geoarchaeological perspective.

3.3.2 Archaeological interest is closely tied to the medieval and post-medieval development of Hythe and its former harbour, as well as earlier Saxon shifts in settlement from the

west. The Site's location within the historic post-medieval core of the town is of archaeological interest, with historic mapping indicating that the front of the Site has been a focus of development from at least the 17th century.

3.3.3 The geoarchaeological interest relates particularly to the deep alluvial sequences influenced by changes in relative sea level (RSL) within an estuarine environment. These deposits may include sediments from a variety of depositional settings—such as palaeochannels, mudflats, saltmarshes, wetland fens, and possible buried land surfaces.

3.3.4 It is considered the potential for prehistoric and Romano-British remains are negligible. The Site was located off the higher ground that defines the medieval settlement pattern but may be located near to the former shoreline edge of the Hythe inlet estuary. The likelihood for Saxon remains is very low and medieval remains low to moderate. The potential to encounter post-medieval archaeological remains is high. Any archaeological remains if present are anticipated to be of local significance.

4. STATEMENT OF IMPACT

4.1 PROPOSED DEVELOPMENT

4.1.1 The current character of the Site is a supermarket and car parking. The footprint of the proposed development is largely within the existing footprint of the supermarket. The main apartment building will be constructed on rafted foundations set onto piles. A pair of small cottages are proposed to be constructed in the northeast corner of the Site near to Mount Street.

Redevelopment Proposals

4.1.2 The proposed redevelopment of the Site comprises:

- Demolition of the vacant supermarket building;
- Construction of a retirement development a single building with broad L-shape on the area of existing building;
- Construction of a pair of small cottages near Mount Street; and
- Landscaping surrounding the building.

4.2 ASSESSMENT OF PROPOSALS

Potential Archaeological Impacts

4.2.1 Any direct physical impact to archaeological remains, if present, within the Site would primarily result from groundworks associated with construction. On-site activities which are likely to affect the archaeological resource could comprise the following:

- Pre-construction impacts associated with demolition and ground investigation works;
- Construction ground works, including stripping and excavation associated with the foundations;
- Ground reduction/landscaping; and
- Excavation of new service trenches and drainage (including soakaways), as

required.

- 4.2.2 The abovementioned ground works and excavations in relation to the proposed redevelopment could result in the disturbance to, or loss of, any buried archaeological features that may be present within their footprint, resulting in the total or partial loss of significance of these assets. However the majority of the proposed development is located within the footprint of the existing buildings which will have already impacted upon any earlier archaeological remains, if they were present. In addition, the proposed piling foundations for the main apartment building will limit the harm to deeply stratified geoarchaeological remains.

5. CONCLUSION

5.1 DISCUSSION

5.1.1 This assessment has utilised a range of sources, with a review of available data, desk-based research, historic mapping and site visit, in line with industry guidance, to identify known and potential heritage assets of archaeological interest within the Site which could be affected by the proposed redevelopment. Any effects of this redevelopment upon the significance of the buried archaeological resource will be a material consideration in the determination of the planning application.

5.1.2 It is noted in response to a previous planning application for the Site (21/1109/FH) the Kent County Council archaeological advisor to the council recommended a planning condition stating;

No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with appropriate written schemes of investigation (including timetables) which have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that features of archaeological interest are properly examined and recorded.

The programme of archaeological work should include the following:

- 1. An archaeological watching brief on any ground investigation works at the site*
- 2. Purposive geoarchaeological borehole survey of a minimum of three boreholes to create a transect across the site to understand the geoarchaeological potential of the site and the context for archaeological remains*
- 3. Trial trenching and test pits (the array of which will be determined by the impact assessment of past development, the results of 1 and/or 2 above, and an assessment of services across the site.*

Following the reporting of the results of these three stages an impact assessment would be undertaken for the proposed development to allow decisions to be made about appropriate mitigation which could include a combination of preservation in situ

and/or archaeological recording in advance of any loss of archaeological remains.

- 5.1.3 It is our professional opinion that this proposed approach remains valid for this planning application.

6. REFERENCES

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CARTOGRAPHIC SOURCES

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1596 Symonson's Map of Kent

1684 Thomas Hills Hythe Hospital Map

1719 Parker's Map of Hythe

1769 Andrews, Dury and Hubert's Map of Kent

1778 Hasted's Map of Kent

1797 Ordnance Surveyors Drawing 105 Hythe

1821 Greenwood's Map of Kent

1842 Parish of St Leonard's Hythe Tithe Map

Full OS map regression (see Appendix 3)

APPENDIX 1: REGULATORY AND POLICY CONTEXT

Introduction

There is national legislation and guidance relating to the protection of, and development on, or near, important archaeological sites or historical buildings within planning regulations as 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. The following policies are considered to be of relevance to the Site and the proposed scheme.

Ancient Monuments and Archaeological Areas Act 1979

Scheduled Monuments and Areas of Archaeological Interest are afforded statutory protection under the Ancient Monuments and Archaeological Areas Act 1979 (as Amended) and the consent of the Secretary of State (Department for Digital, Culture, Media and Sport), as advised by Historic England, is required for any works.

National Planning Policy Framework

Section 16 of the National Planning Policy Framework (NPPF) sets out the Government's current planning policy in relation to conserving and enhancing the historic environment. The key requirements are summarised below.

207. 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.

208. 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 of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

209. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

210. In determining applications, local planning authorities should take account of:

(a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

(b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

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

212. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the 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.

213. 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 ⁷⁵.

214. Where a proposed development will lead to substantial harm to (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 total 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 not for profit, 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.

215. 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, where appropriate, securing its optimum viable use.

216. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

217. Local planning authorities 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.

219. Local planning authorities should look for opportunities for new development 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.

220. 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 214](#) or less than substantial harm under [paragraph 215](#), 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.

Local Plan

The adopted development plan for Folkestone & Hythe District comprises the Core Strategy Review (2022) and the Places and Policies Local Plan (2020). Of relevance to this assessment are the following policies:

Places and Policies Local Plan Adopted September 2020

Policy HE2 Archaeology

Important archaeological sites, together with their settings, will be protected and, where possible, enhanced. Development which would adversely affect them will not be permitted.

Proposals for new development must include an appropriate description of the significance of any heritage assets that may be affected, including the contribution of their setting. The impact of the development proposals on the significance of the heritage assets should be sufficiently assessed using appropriate expertise where necessary. Desk-based assessment, archaeological field evaluation and/or historic building assessment may be required as appropriate to the case.

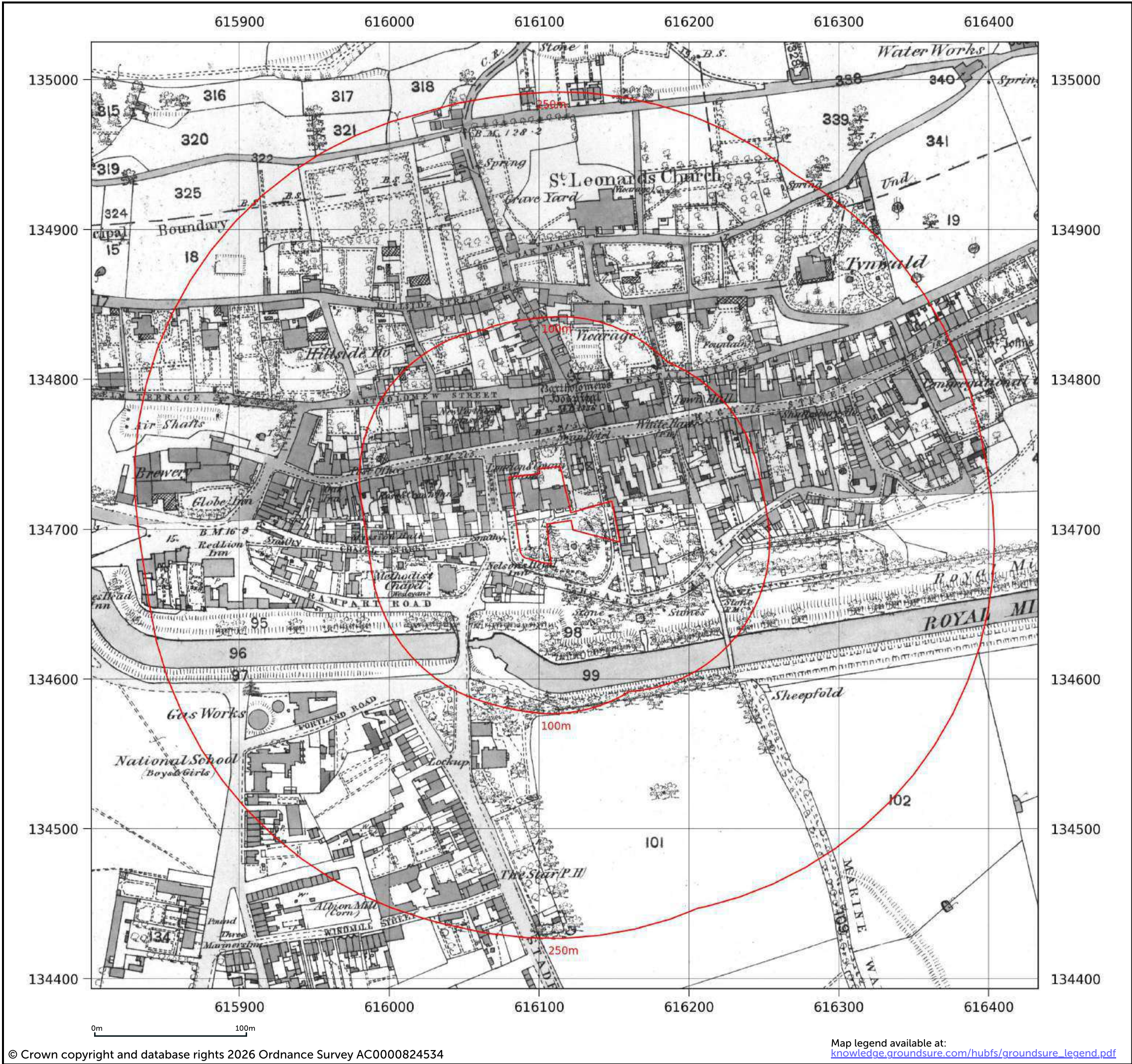
Where the case for development affecting a heritage asset of archaeological interest is accepted, the archaeological remains should be preserved in situ as the preferred approach. Where this is not possible or justified, appropriate provision for preservation by record may be an acceptable alternative. Any archaeological investigation and recording should be undertaken in accordance with a specification and programme of work (including details of a suitable archaeological body to carry out the work) to be submitted to and approved by the Council in advance of development commencing.

APPENDIX 2: GAZETTEERS

Monument UID	Preferred Reference	Name	Monument Type	Period
MKE75998	TR 04 SE120	Roman road running from Maidstone to Dover via Lympe	ROAD	Roman
MKE100536	TR 13 SE 256	Roman, medieval and post medieval finds made beneath the basement floor of 'Centuries', in Hythe, Kent.	FINDSPOT	Roman to Post Medieval
MKE4318	TR 13 SE 24	Hythe	TOWN	Early Medieval or Anglo-Saxon to Post Medieval
MKE17138	TR 13 SE 60	Medieval hard at Hythe	SLIPWAY	Medieval
MKE43019	TR 13 SE 100	Medieval timber structure and medieval/post medieval finds, 100-102 High Street Hythe, Shepway	CROSS WING HOUSE	Medieval
MKE4313	TR 13 SE 18	Medieval building, Hillside st	HOUSE	Medieval
MKE98148	TR 23 SE 240	Iron slag pit, Canon Newman Hall, Dental Street, Hythe	METAL WORKING SITE	Medieval
MKE8854	TR 13 SE 62	Kipps' Bookshop	BUILDING	Medieval to Post Medieval
MKE115801	TR 13 SE 257	Three late medieval / post medieval refuse pits and a ditch, Hythe Street	RUBBISH PIT; DITCH	Medieval to Post Medieval
MKE15275	TR 13 SE 52	Albion mill	CORN MILL	Post Medieval
MKE15276	TR 13 SE 53	Hythe gasworks	GAS WORKS	Post Medieval
MKE15277	TR 13 SE 54	Mackeson's brewery, Hythe	BREWERY	Post Medieval
MKE15618	TR 13 SE 57	Dukes Head Bridge, Hythe	WHARF; BRIDGE	Post Medieval
MKE16041	TR 13 SE 236	The maltings, malthouse hill	MALTINGS	Post Medieval
MKE32394	TR 13 SE 120	Former site of Hill House	SITE; HOUSE; HOUSE; STEPS	Post Medieval
MKE113608	MKE113608	Post Medieval copper alloy token	FINDSPOT	Post Medieval
MKE112086	TR 13 SE 209	Site of former National school, St. Leonards Road, Hythe	NATIONAL SCHOOL	Post Medieval
MKE99698	TR 13 SE 243	Congregational Chapel - High Street/Sun Lane, Hythe	CONGREGATIONAL CHAPEL	Post Medieval to Unknown

Monument UID	Preferred Reference	Name	Monument Type	Period
MKE99709	TR 13 SE 245	Mission Hall - Chapel Street, Hythe	MISSION HALL	Post Medieval to Unknown
MKE42955	TR 13 SE 201	Modern ragstone wall, floor remnant and chimney/fireplace foundations and Late C19th deposits, Hythe Forge, Chapel Street, Hythe	WALL; FLOOR; CHIMNEY	Post Medieval to Modern
MKE91037	TR 13 SE 233	Folkestone, Hythe and Sandgate Tramways	TRAMWAY	Post Medieval to Modern
MKE39598	TR 13 SE 174	PILLBOX	PILLBOX; PILLBOX	Modern
MKE39599	TR 13 SE 175	PILLBOX	PILLBOX	Modern
MKE39600	TR 13 SE 176	PILLBOX	PILLBOX	Modern
MKE39601	TR 13 SE 180	PILLBOX	PILLBOX	Modern
MKE39708	TR 13 SE 187	FORTIFIED HOUSE	FORTIFIED HOUSE	Modern
MWX51396	MWX51396	Second World War pillbox, north of the Royal Military Canal, Hythe	PILLBOX (TYPE FW3/22)	Modern
MWX51417	MWX51417	Second World War roadblock on the southern end of the A259 road bridge crossing over the Royal Military Canal	ROADBLOCK	Modern
MKE96758	MKE96758	Lead Alloy unidentified object	FINDSPOT	Unknown
MKE98054	TR 13 SE 239	Dog burial, Canon Newman Hall, Dental Street, Hythe	ANIMAL BURIAL	Unknown

APPENDIX 3: HISTORIC OS MAPS



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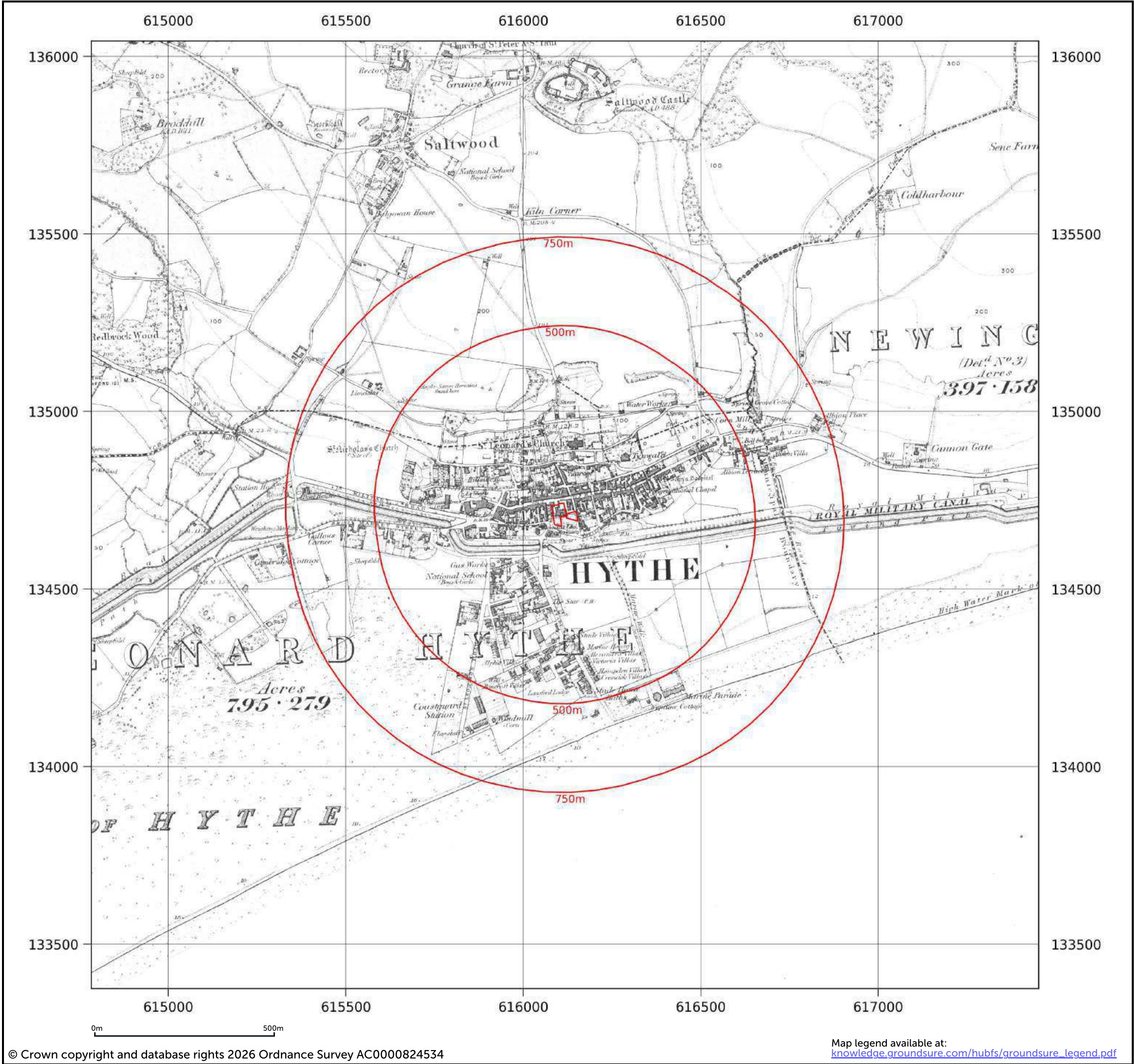
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Revised: 1872



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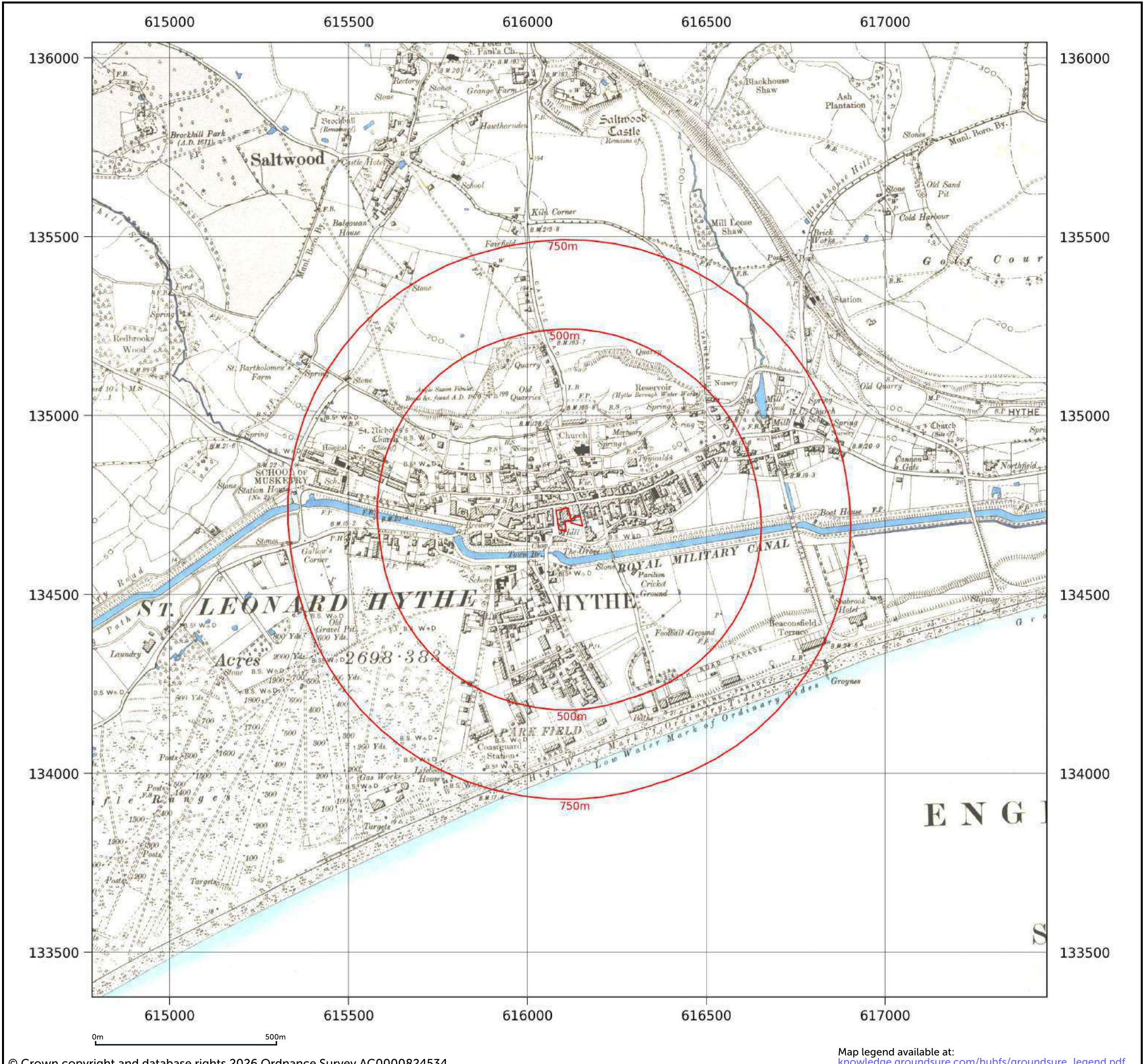
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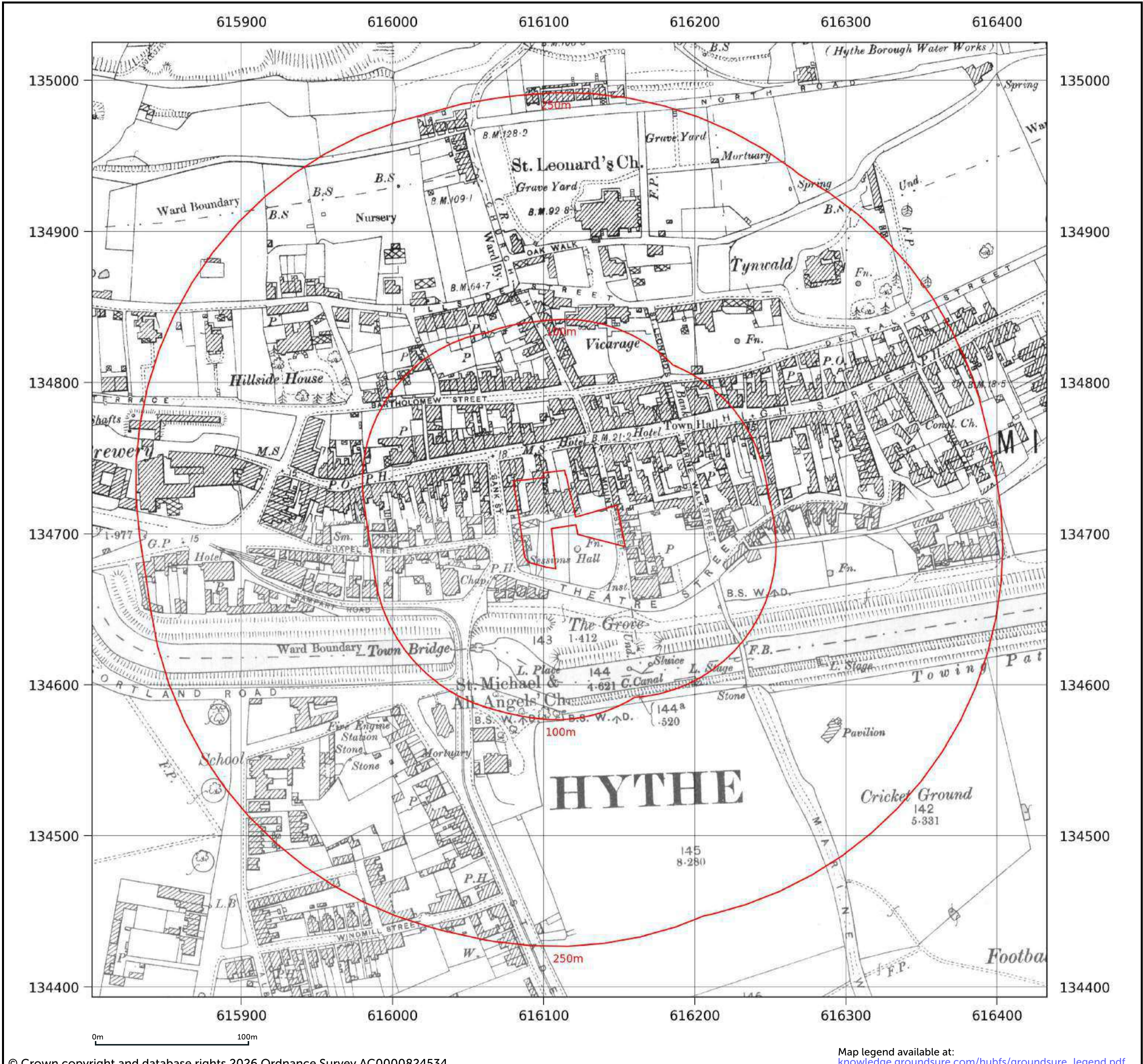
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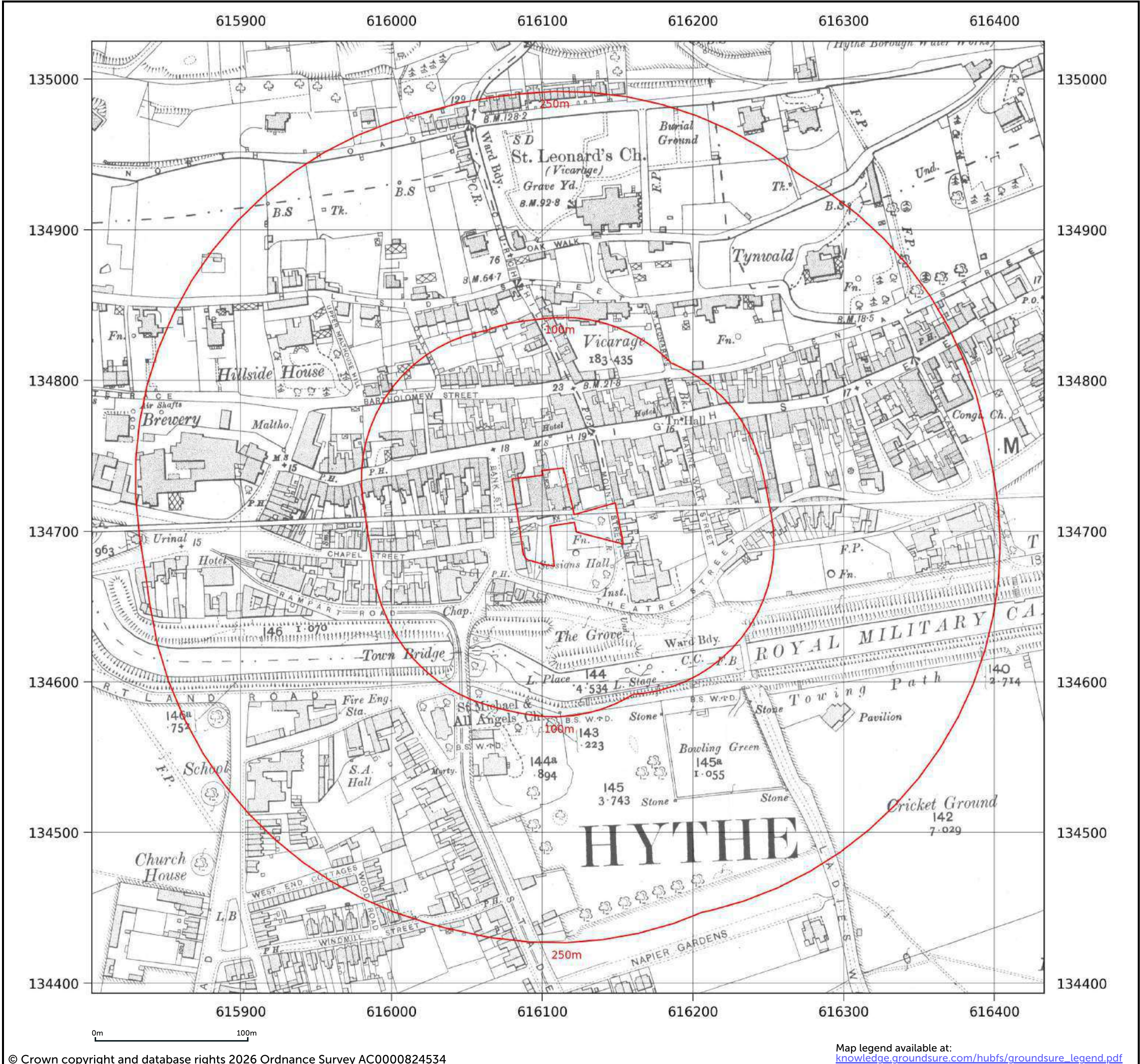
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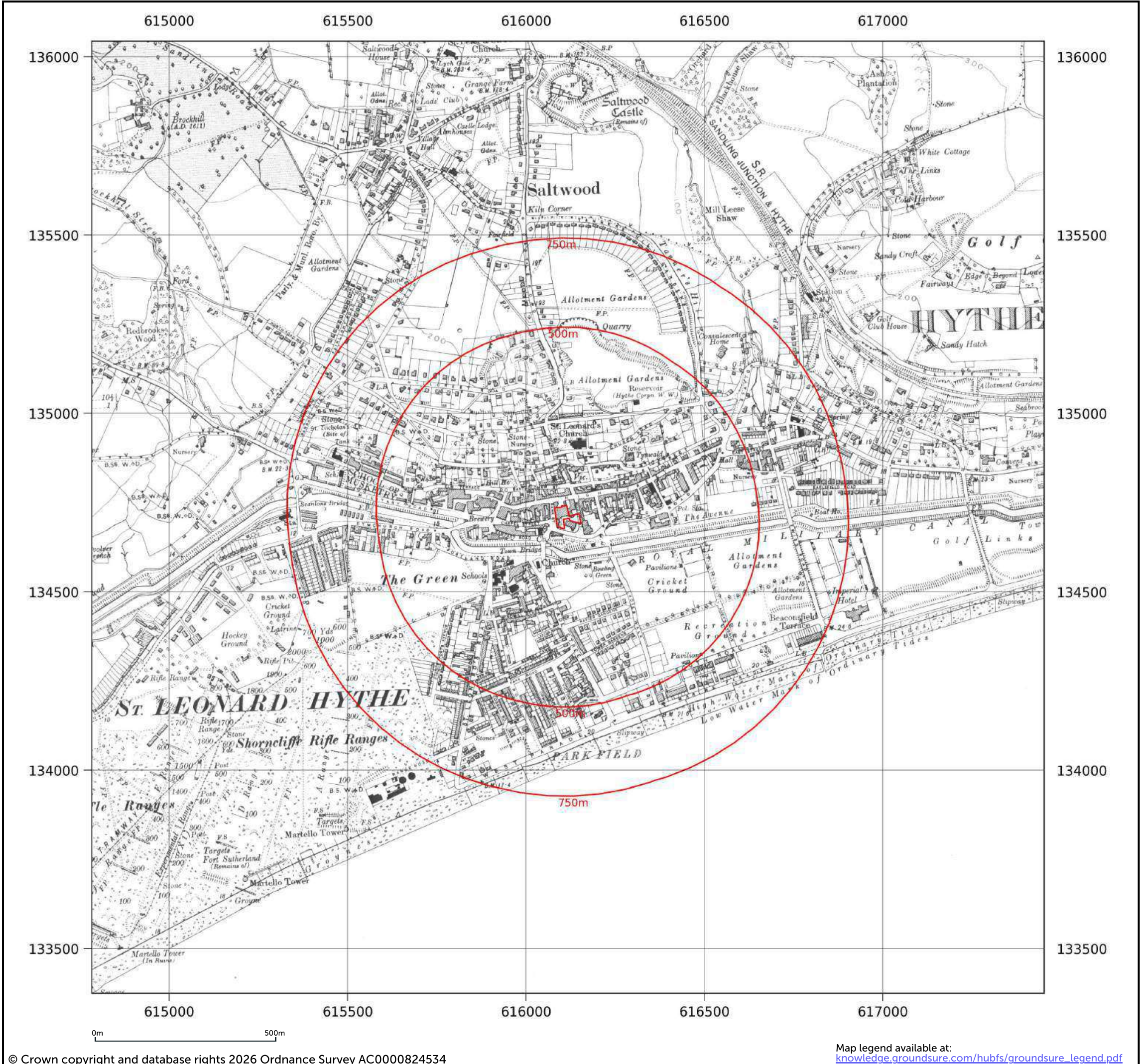
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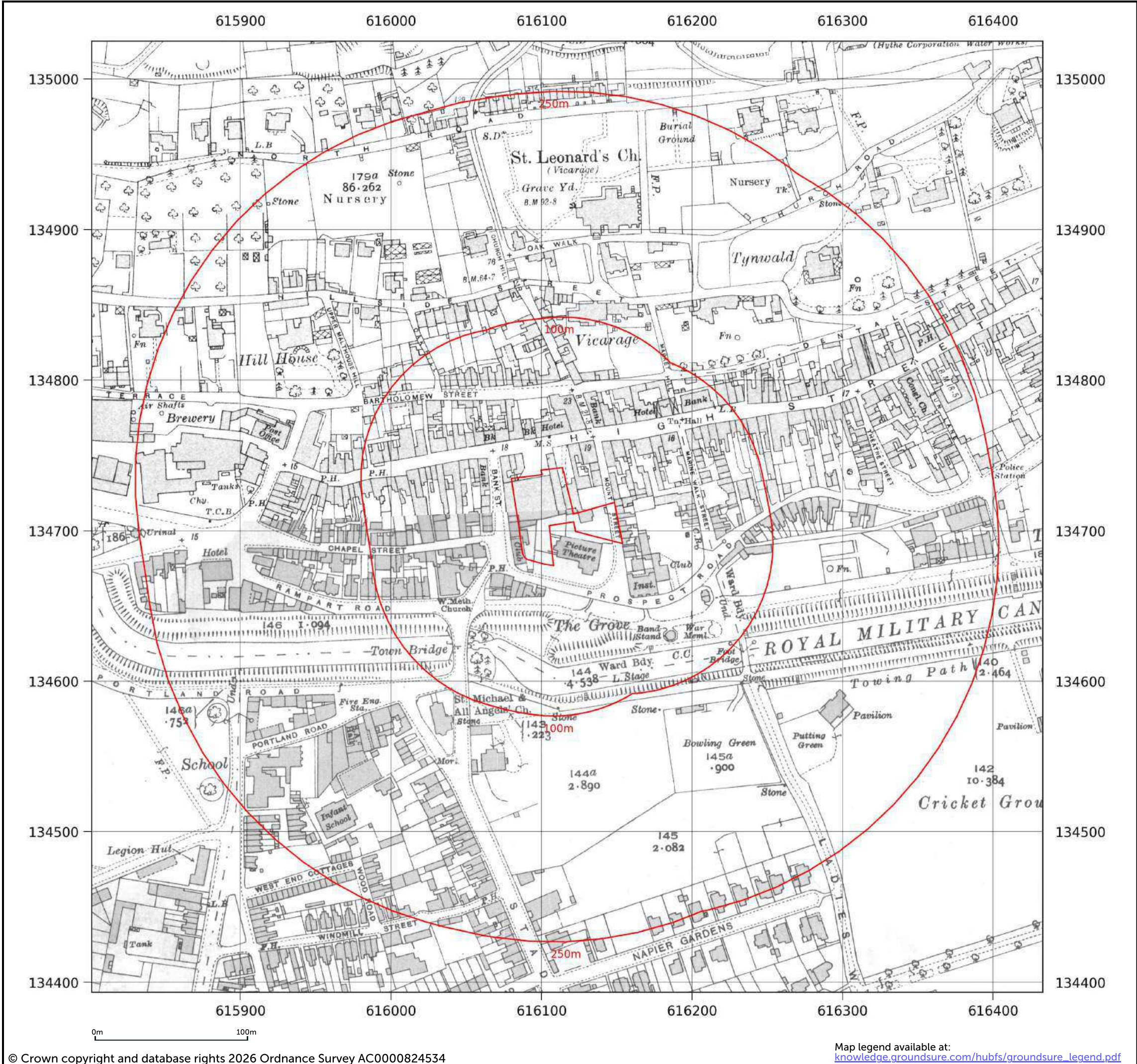
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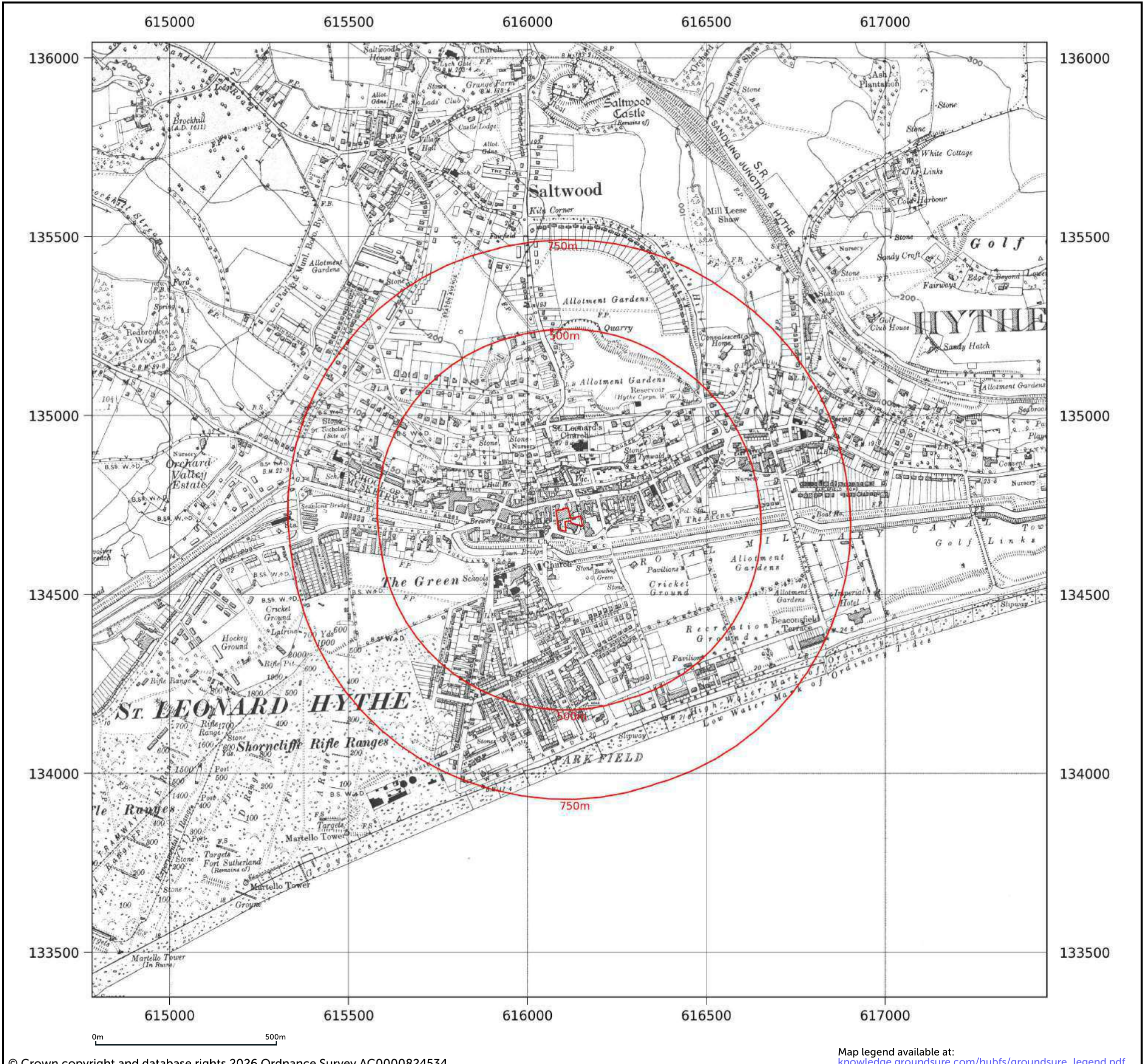
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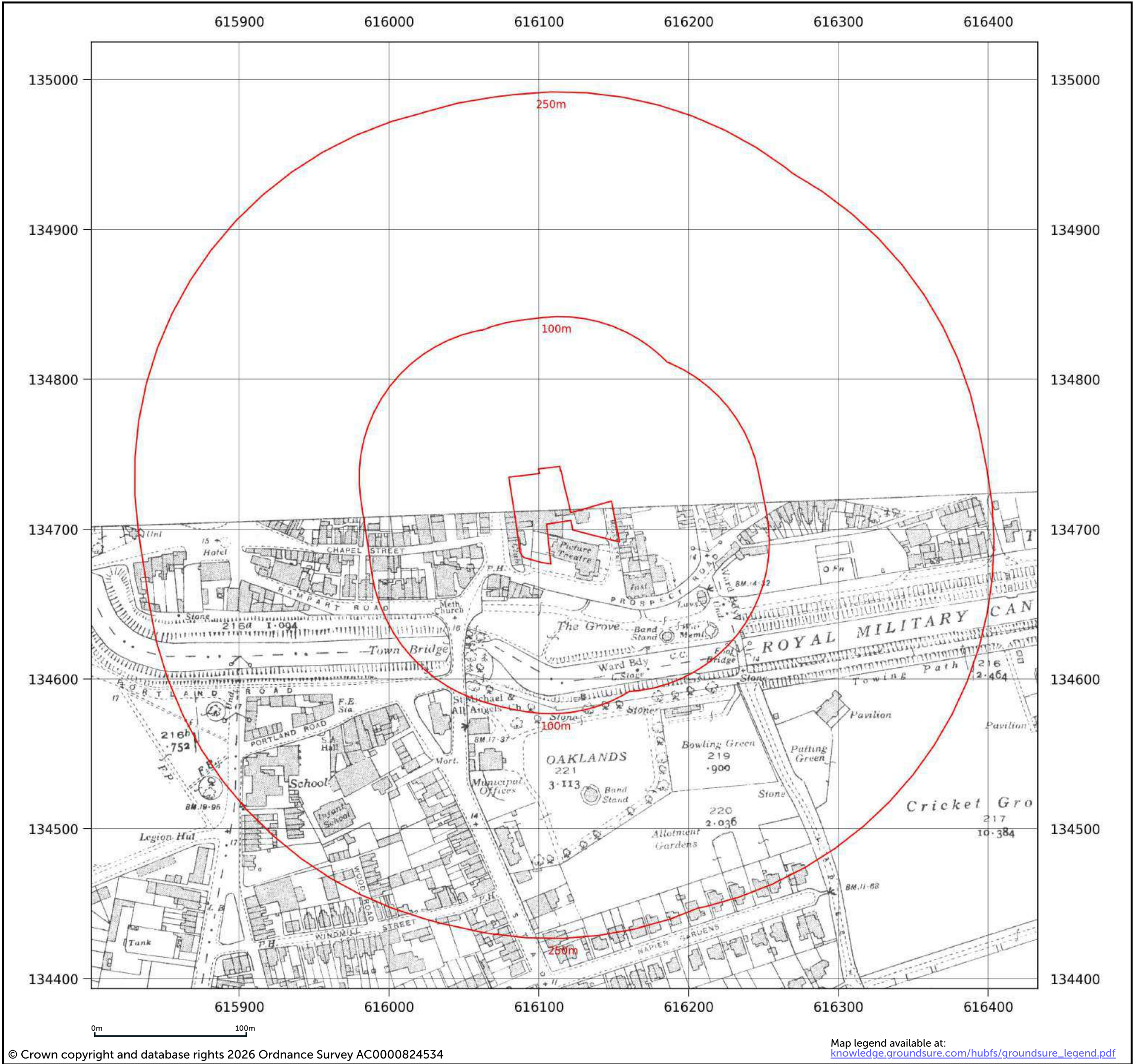
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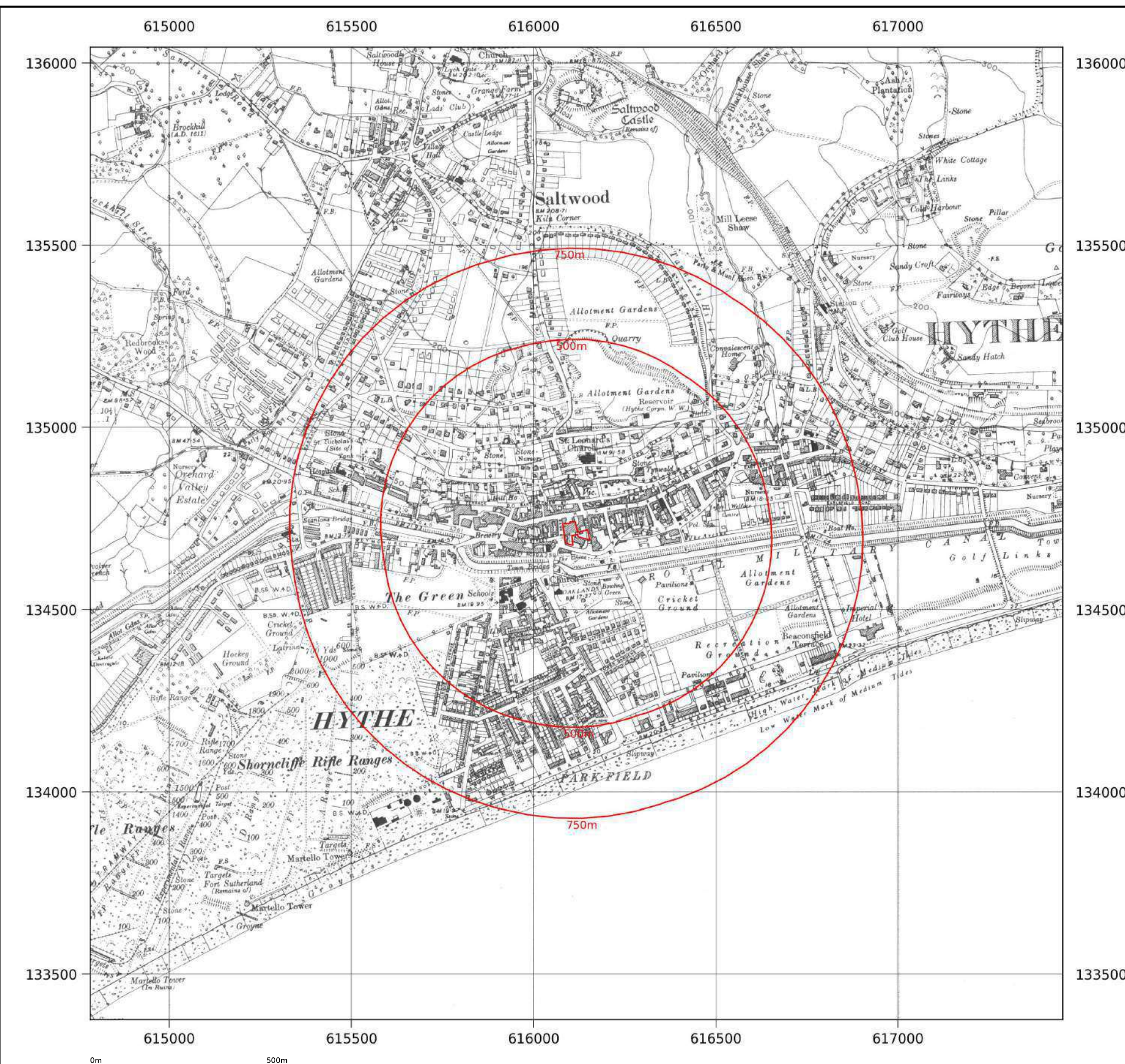
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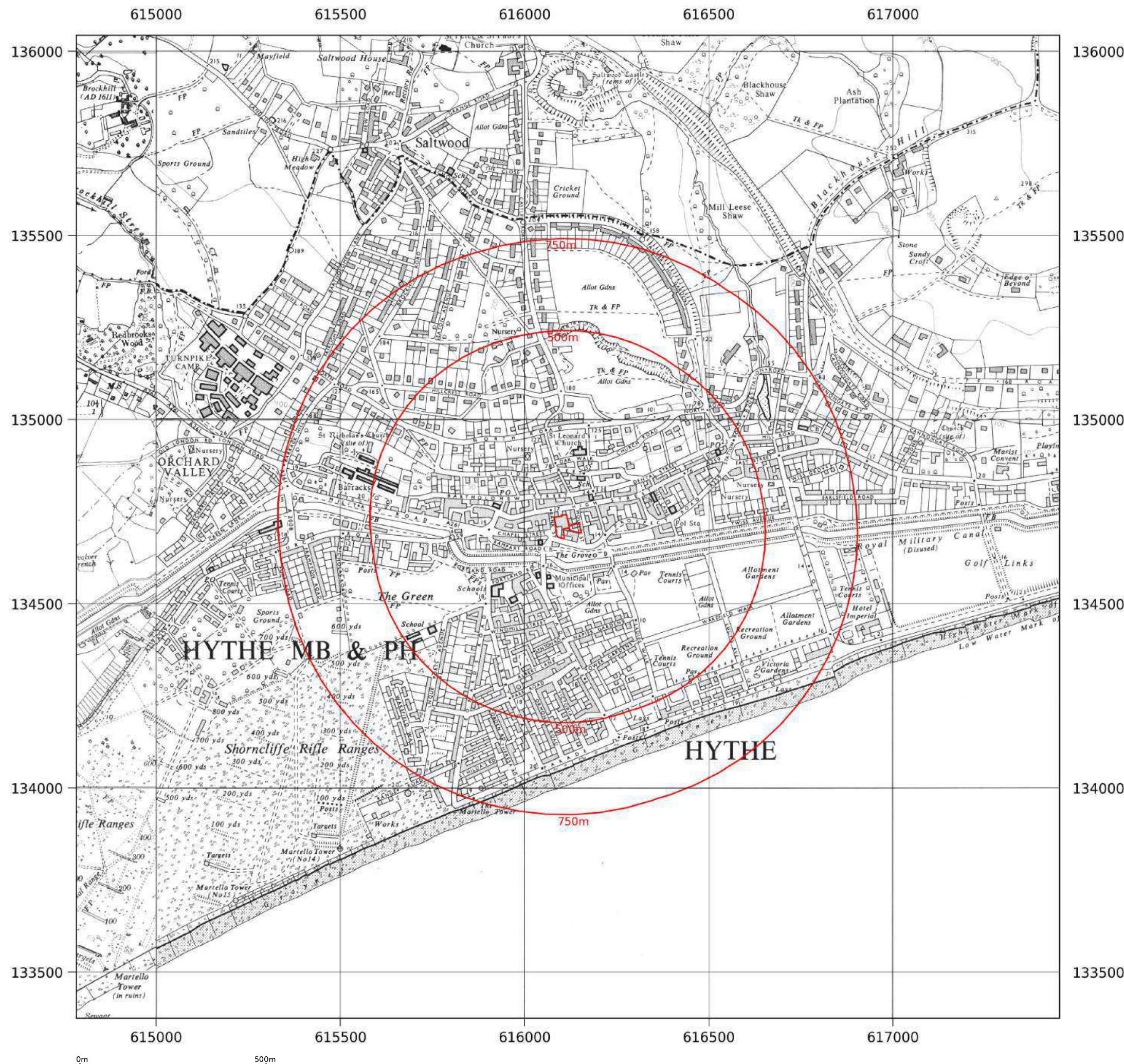
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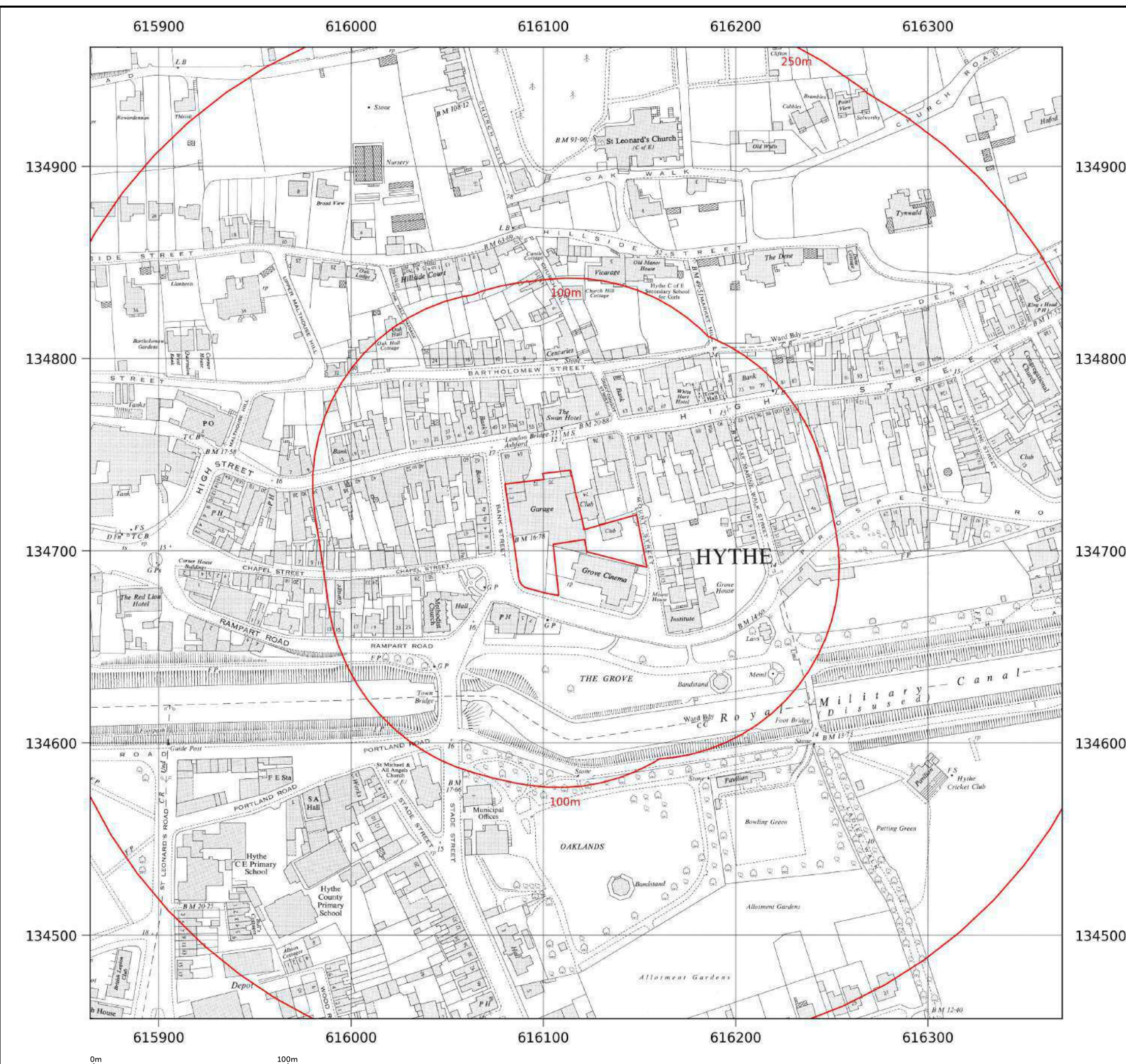
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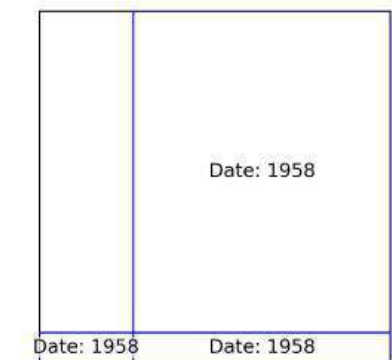
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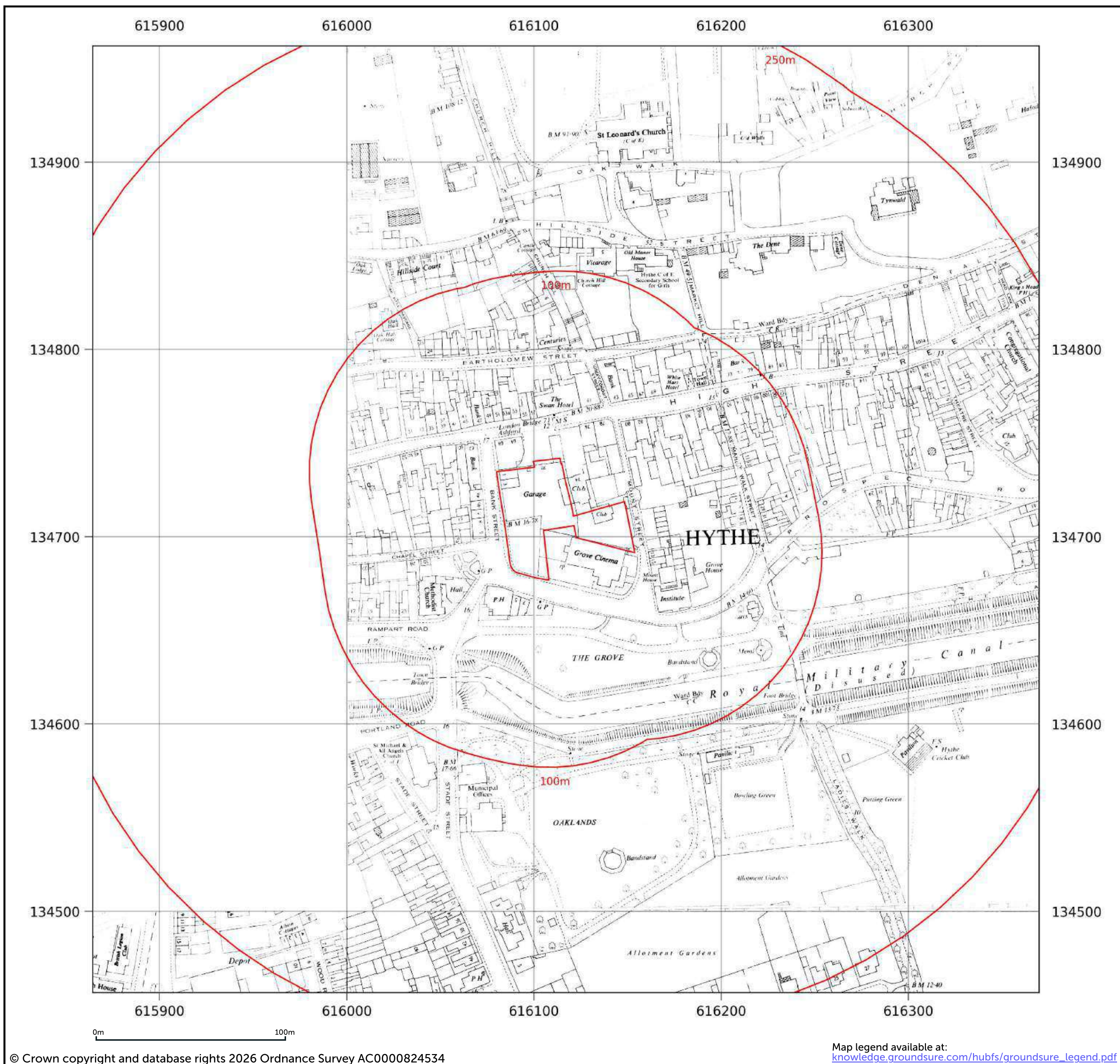
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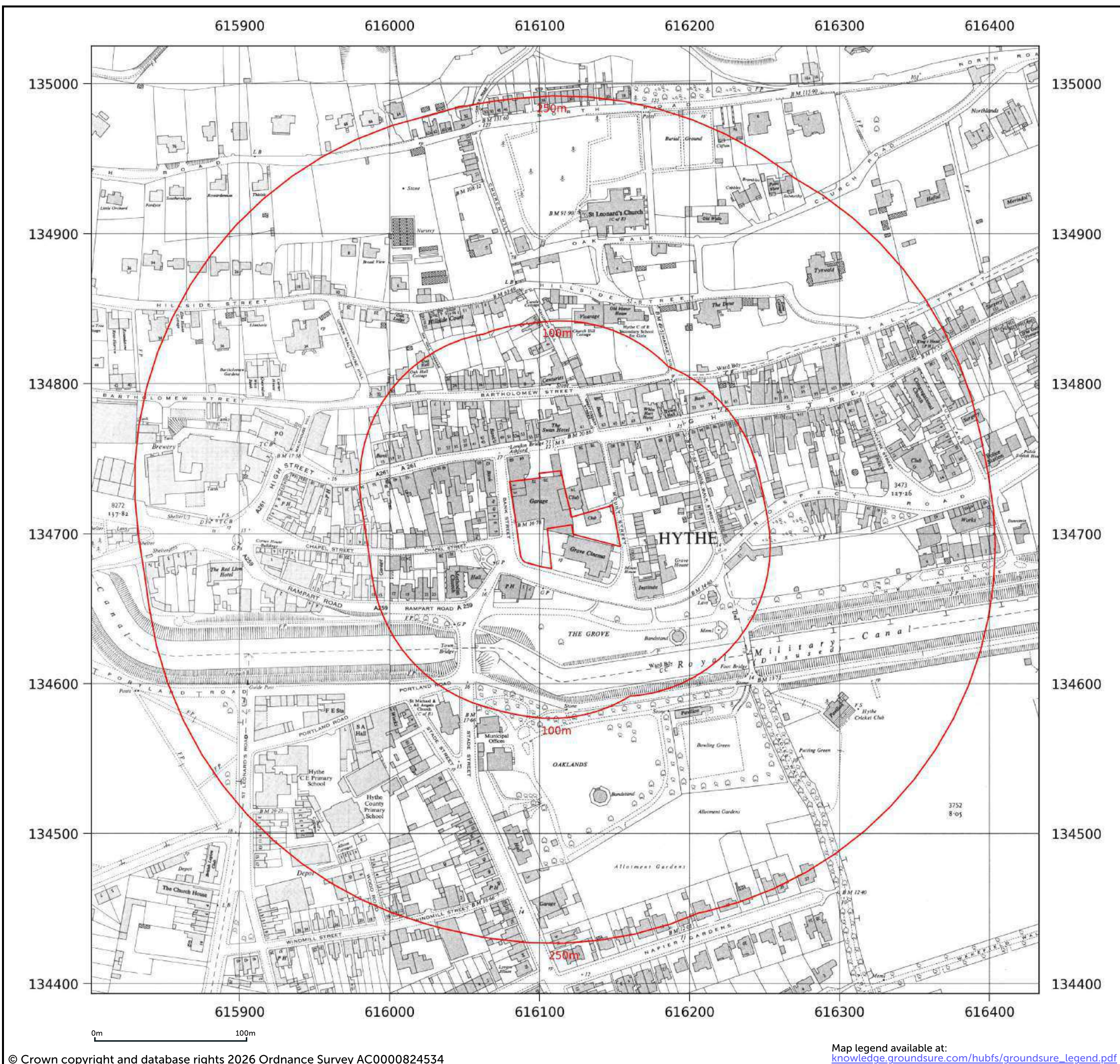
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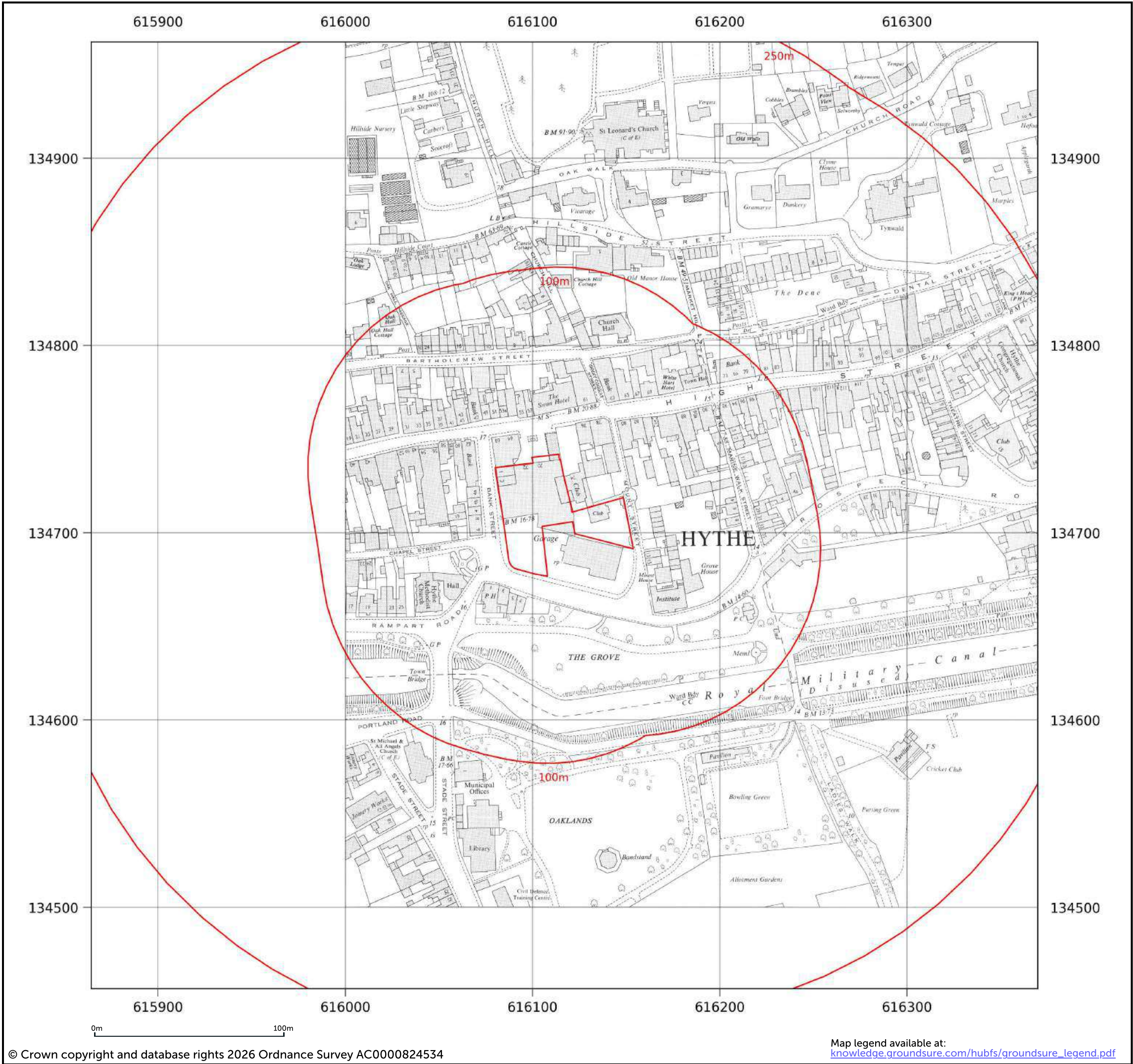


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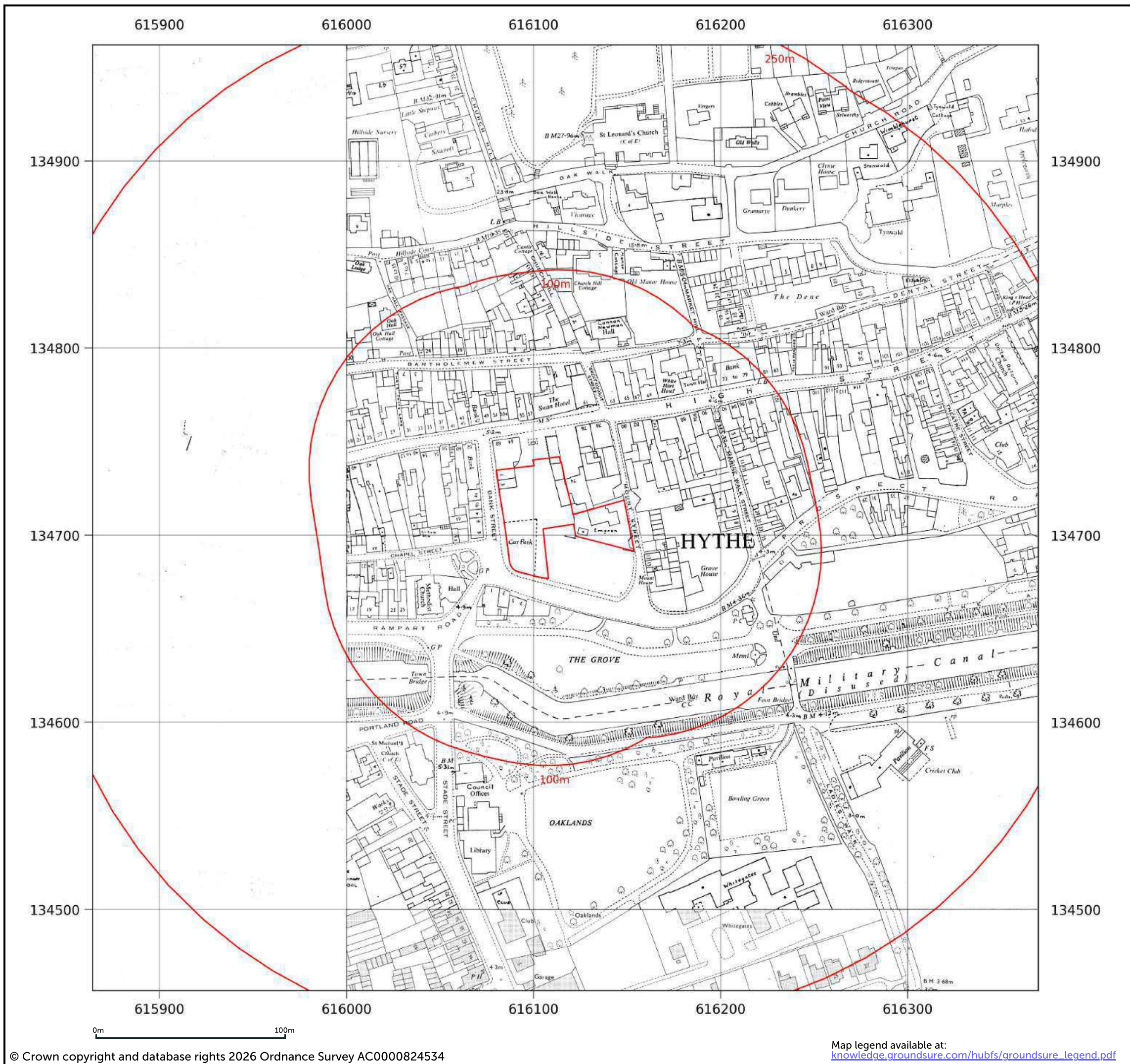
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Grid ref:	616109.39, 134710.75
Production date:	7 May 2026
Map name:	National Grid
Map date:	1967
Scale:	1:1,250
Printed at:	1:2,000
Date: 1967 Surveyed: 1957 Revised: 1966 Copyright: 1967 Levelled: 1951	

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Site details:	unspecified
Client ref:	EMS_1100939_1384098
Report ref:	EMS-1100939_1381628
Grid ref:	616109.39, 134710.75
Production date:	7 May 2026

Map name:	National Grid
Map date:	1975-1979
Scale:	1:1,250
Printed at:	1:2,000



Date: 1975	Date: 1979 Surveyed: 1979 Revised: 1979 Copyright: 1979
Date: 1975	Date: 1976 Surveyed: 1957 Revised: 1975 Copyright: 1976 Levelled: 1974

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Site details:	unspecified
Client ref:	EMS_1100939_1384098
Report ref:	EMS-1100939_1381628
Grid ref:	616109.39, 134710.75
Production date:	7 May 2026

Map name:	National Grid
Map date:	1973-1978
Scale:	1:10,000
Printed at:	1:10,000

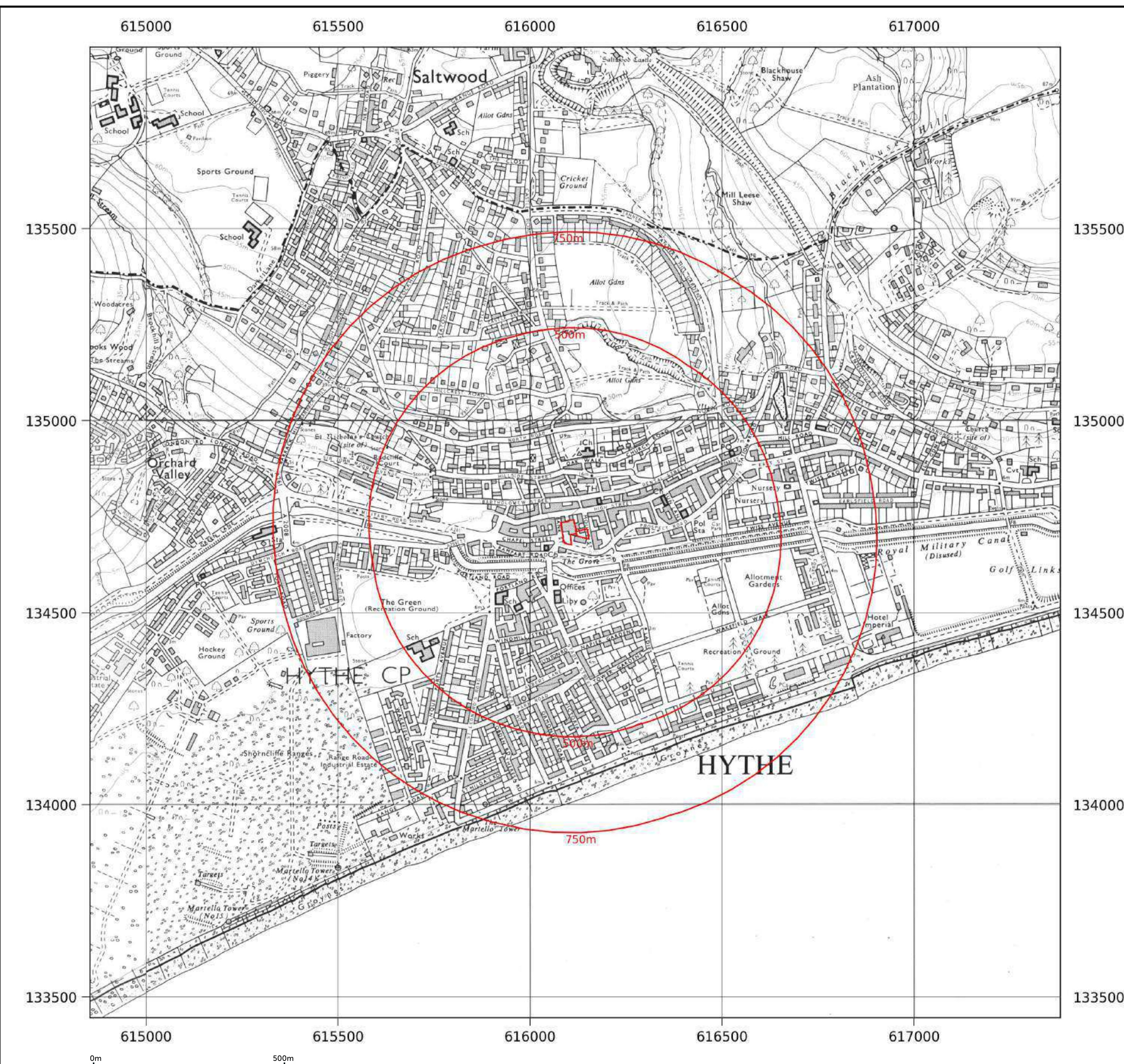


Date: 1973	Date: 1973
Surveyed: 1970	Surveyed: 1971
Revised: 1973	Revised: 1973
Copyright: 1973	Copyright: 1973

Date: 1978	Date: 1976
Surveyed: 1974	Surveyed: 1974
Revised: 1977	Revised: 1976
Copyright: 1978	Copyright: 1976

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Client ref:	EMS_1100939_1384098
Report ref:	EMS-1100939_1381628
Grid ref:	616109.39, 134710.75
Production date:	7 May 2026

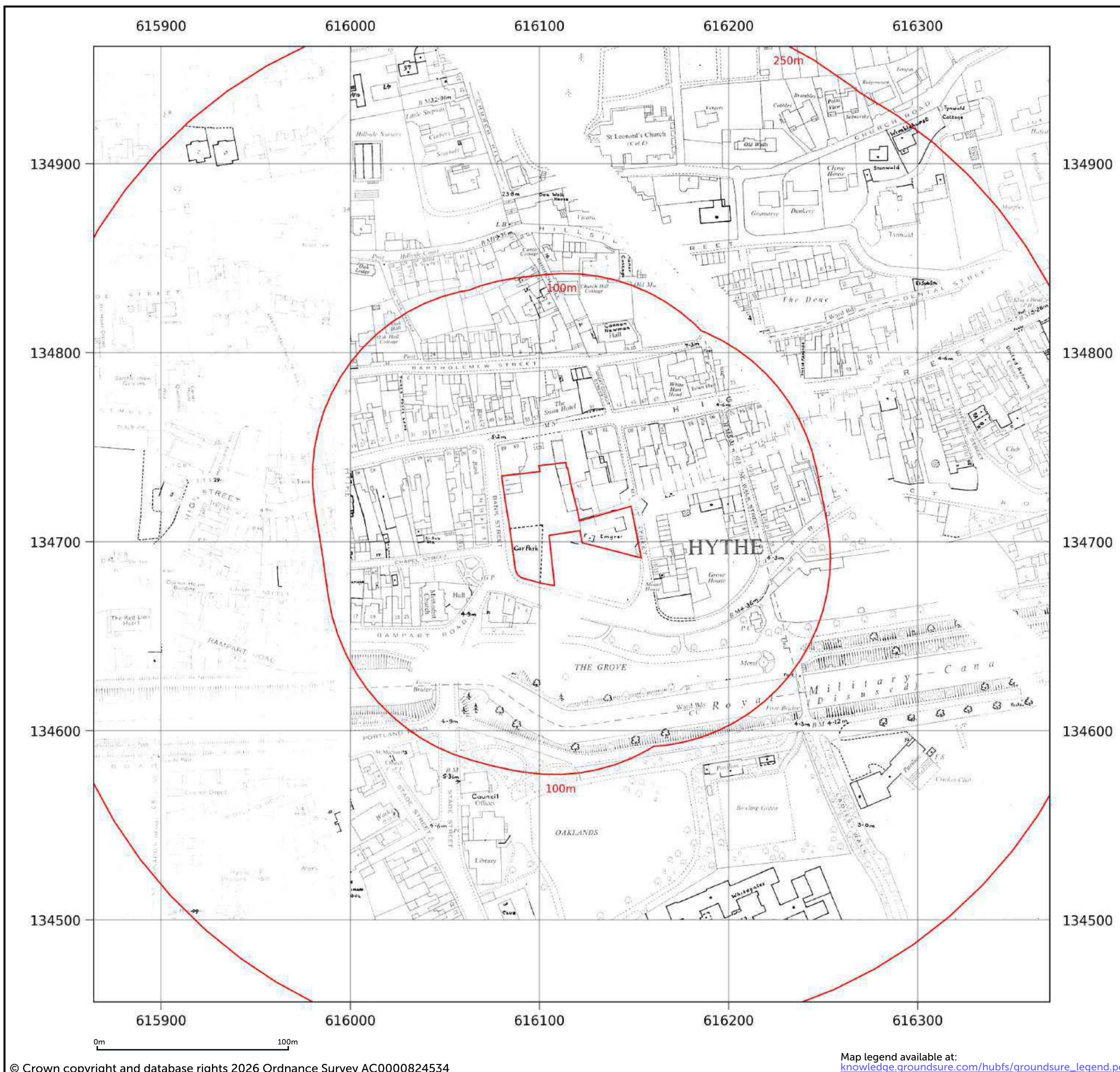
Map name:	National Grid
Map date:	1978-1979
Scale:	1:1,250
Printed at:	1:2,000



Date: 1978	Date: 1979
Copyright: 1978	Surveyed: 1979
	Revised: 1979
	Copyright: 1979

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Site details:	unspecified
Client ref:	EMS_1100939_1384098
Report ref:	EMS-1100939_1381628
Grid ref:	616109.39, 134710.75
Production date:	7 May 2026

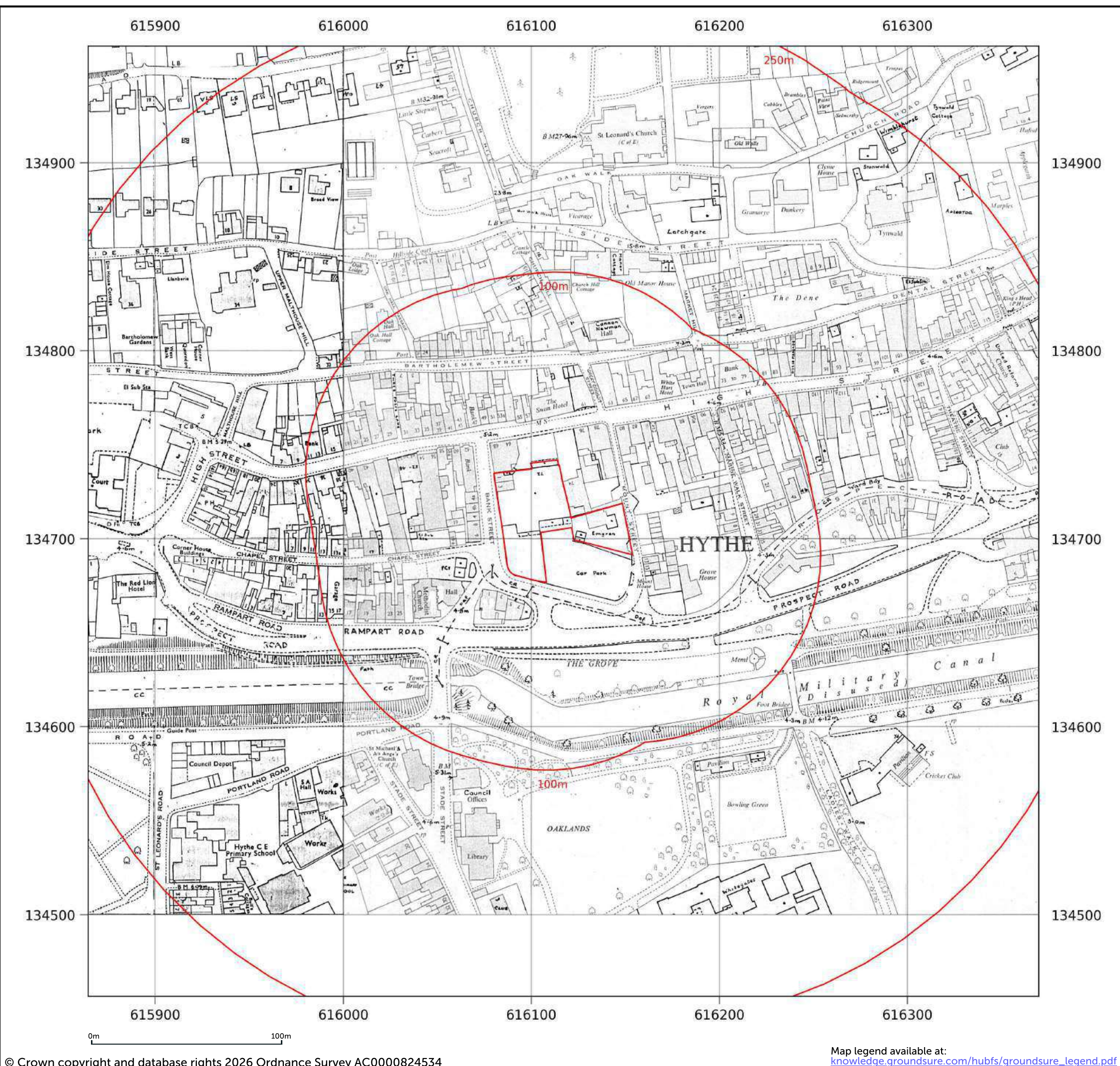
Map name:	National Grid
Map date:	1981-1984
Scale:	1:1,250
Printed at:	1:2,000



Date: 1984	Date: 1981
Surveyed: 1974	Copyright: 1981
Revised: 1984	Levelled: 1974
Copyright: 1984	
Levelled: 1974	

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Site details:	unspecified
Client ref:	EMS_1100939_1384098
Report ref:	EMS-1100939_1381628
Grid ref:	616109.39, 134710.75
Production date:	7 May 2026

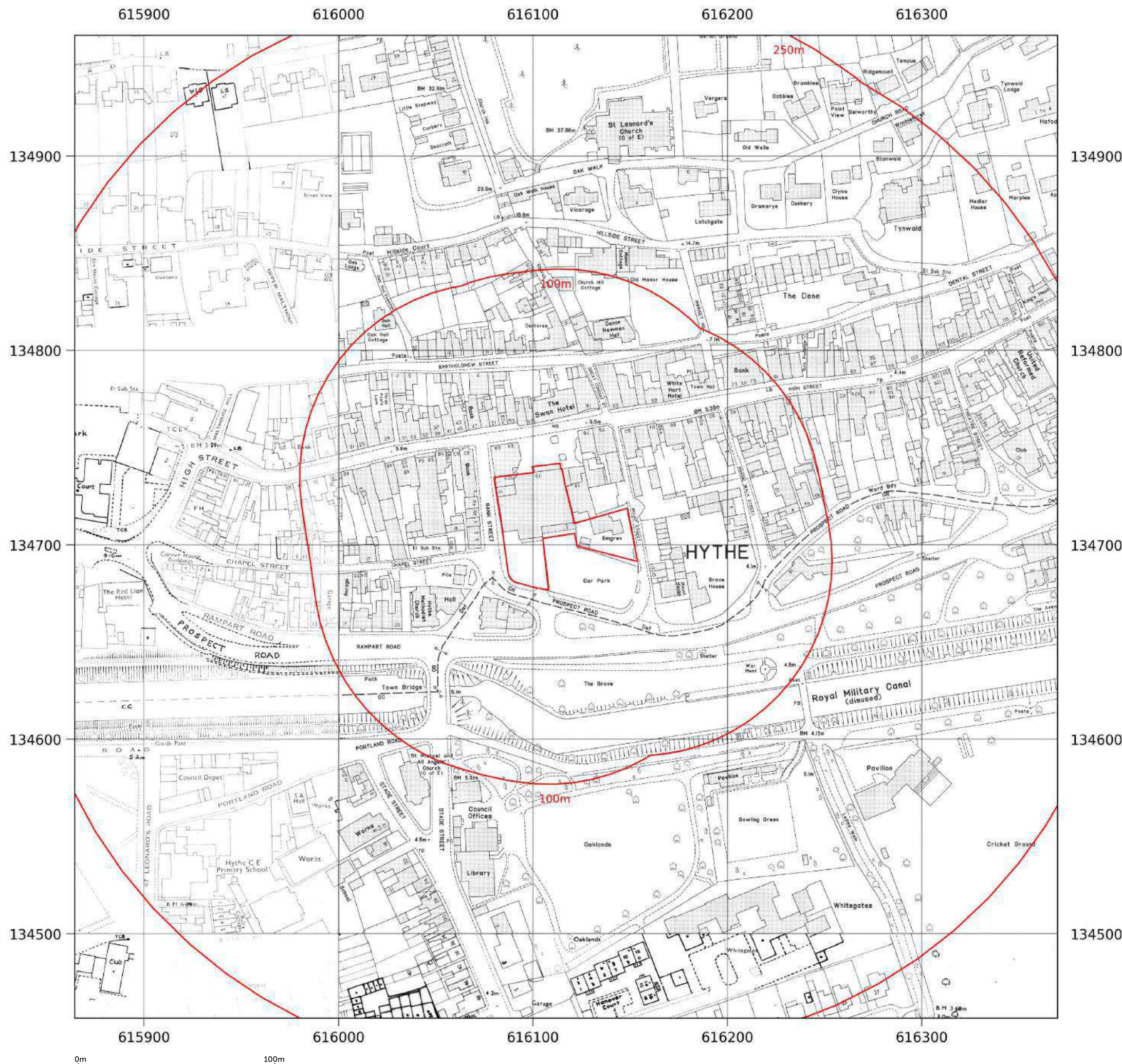
Map name:	National Grid
Map date:	1984-1988
Scale:	1:1,250
Printed at:	1:2,000



Date: 1984 Copyright: 1984 Levelled: 1974	Date: 1985 Surveyed: 1957 Revised: 1984 Copyright: 1985 Levelled: 1974
Date: 1987	Date: 1988 Surveyed: 1974 Revised: 1988 Copyright: 1988 Levelled: 1974

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Site details:	unspecified
Client ref:	EMS_1100939_1384098
Report ref:	EMS-1100939_1381628
Grid ref:	616109.39, 134710.75
Production date:	7 May 2026

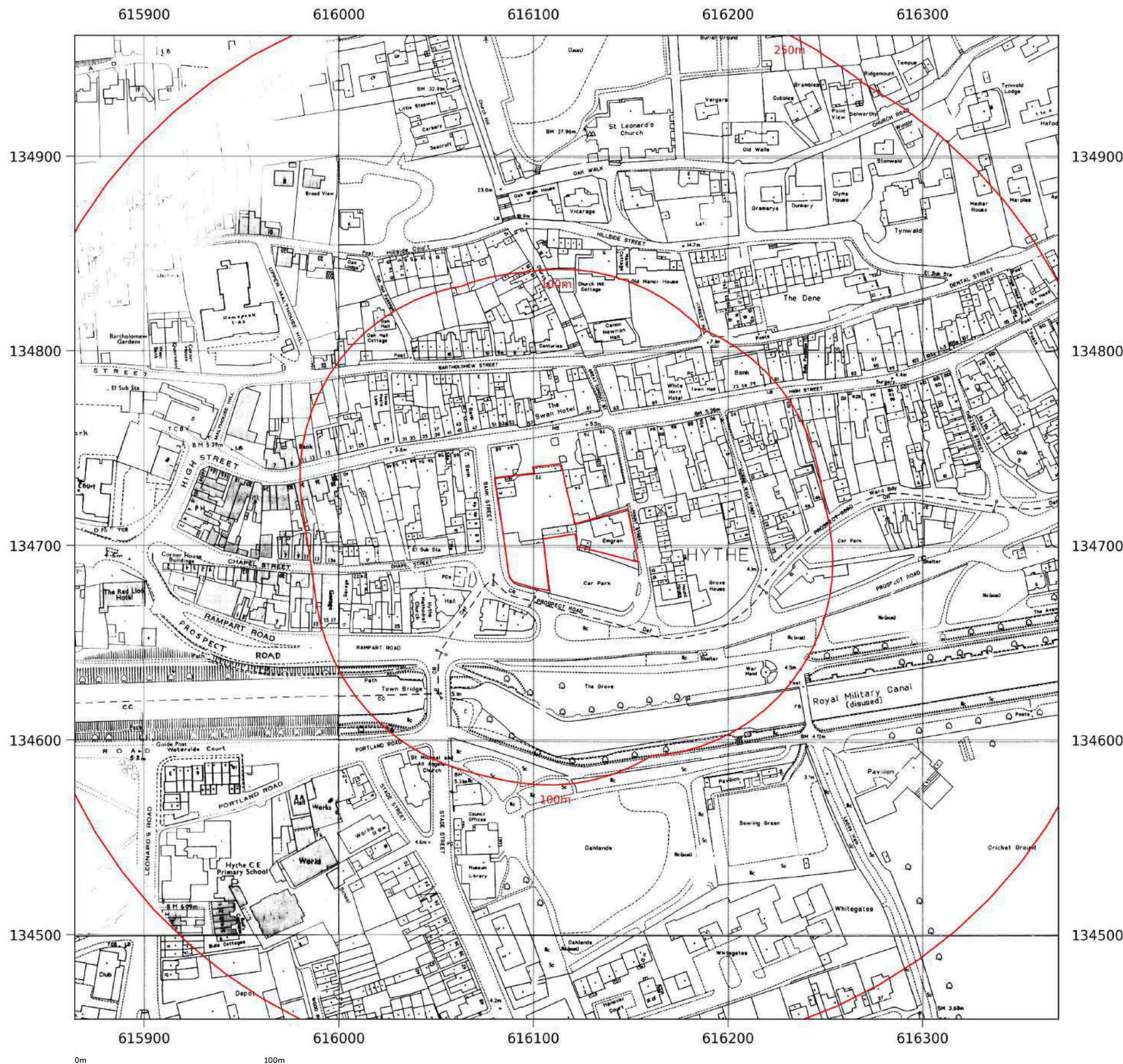
Map name:	National Grid
Map date:	1988-1992
Scale:	1:1,250
Printed at:	1:2,000



Date: 1988	Date: 1992
Surveyed: 1974	Copyright: 1992
Revised: 1988	
Copyright: 1988	
Levelled: 1974	
Date: 1992	Date: 1992
Copyright: 1992	Copyright: 1992

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Site details:	unspecified
Client ref:	EMS_1100939_1384098
Report ref:	EMS-1100939_1381628
Grid ref:	616109.39, 134710.75
Production date:	7 May 2026

Map name:	National Grid
Map date:	1987-1989
Scale:	1:10,000
Printed at:	1:10,000



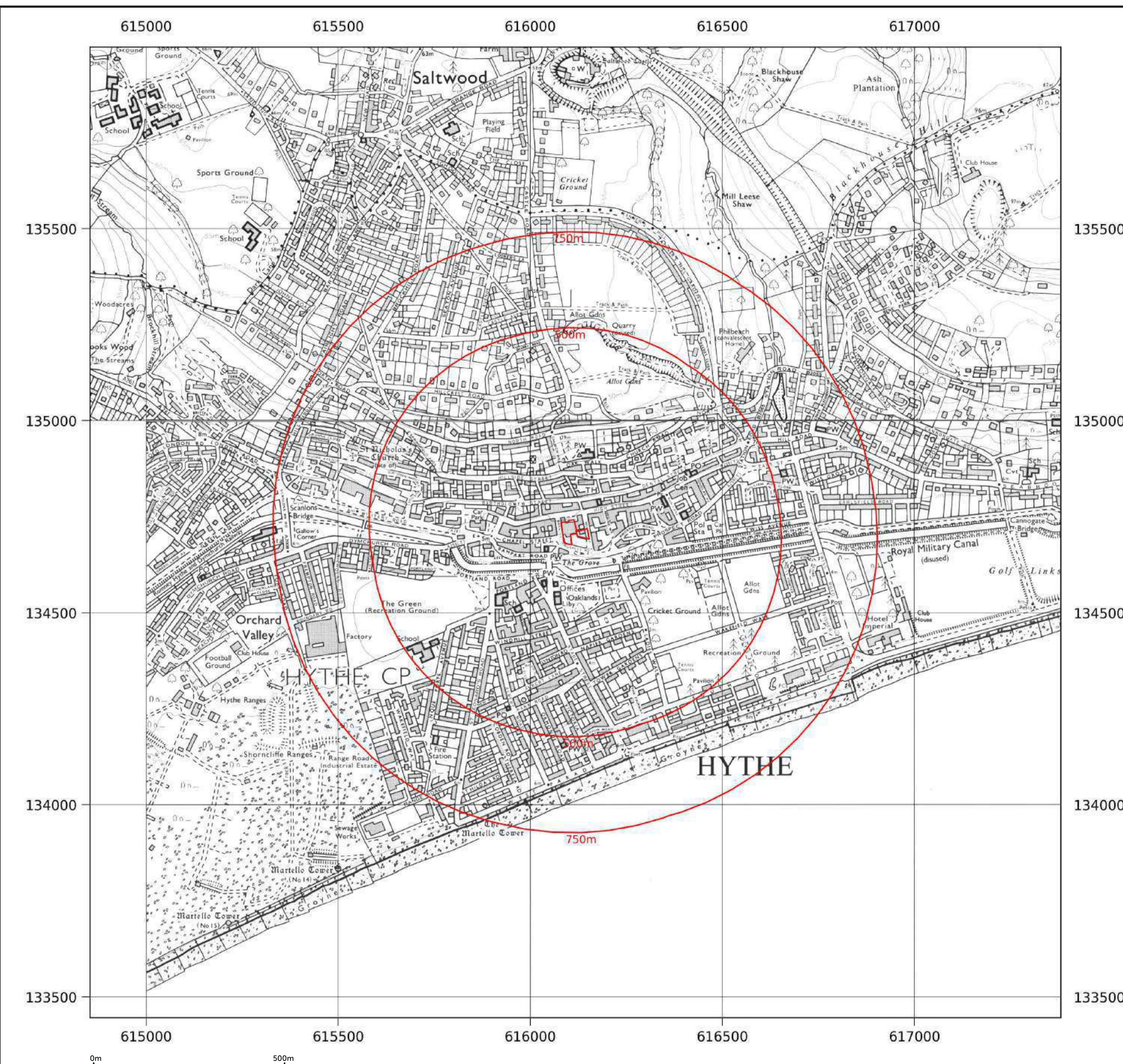
Date: 1989
Surveyed: 1985
Revised: 1989

Date: 1987
Surveyed: 1984
Revised: 1987

Date: 1989
Surveyed: 1987
Revised: 1989

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Site details: unspecified
Client ref: EMS_1100939_1384098
Report ref: EMS-1100939_1381628
Grid ref: 616109.39, 134710.75
Production date: 7 May 2026

Map name: National Grid
Map date: 2001
Scale: 1:10,000
Printed at: 1:10,000



Date: 2001	Date: 2001
Date: 2001	Date: 2001

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Site details:	unspecified
Client ref:	EMS_1100939_1384098
Report ref:	EMS-1100939_1381628
Grid ref:	616109.39, 134710.75
Production date:	7 May 2026

Map name:	LandLine
Map date:	2003
Scale:	1:1,250
Printed at:	1:1,250



Date: 2003

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Site details:	unspecified
Client ref:	EMS_1100939_1384098
Report ref:	EMS-1100939_1381628
Grid ref:	616109.39, 134710.75
Production date:	7 May 2026

Map name:	National Grid
Map date:	2010
Scale:	1:10,000
Printed at:	1:10,000



Date: 2010	Date: 2010
Date: 2010	Date: 2010

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Site details:	unspecified
Client ref:	EMS_1100939_1384098
Report ref:	EMS-1100939_1381628
Grid ref:	616109.39, 134710.75
Production date:	7 May 2026
Map name:	National Grid
Map date:	2015
Scale:	1:10,000
Printed at:	1:10,000
Date: 2015 Date: 2015 Date: 2015 Date: 2015	

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Site details:	unspecified
Client ref:	EMS_1100939_1384098
Report ref:	EMS-1100939_1381628
Grid ref:	616109.39, 134710.75
Production date:	7 May 2026

Map name:	National Grid
Map date:	2025
Scale:	1:10,000
Printed at:	1:10,000

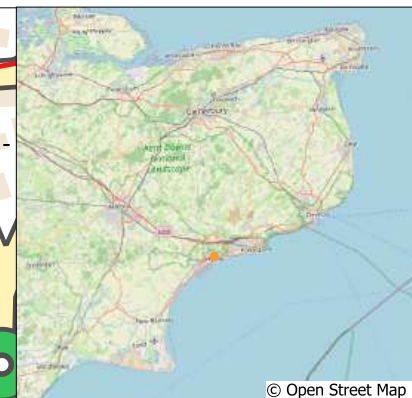
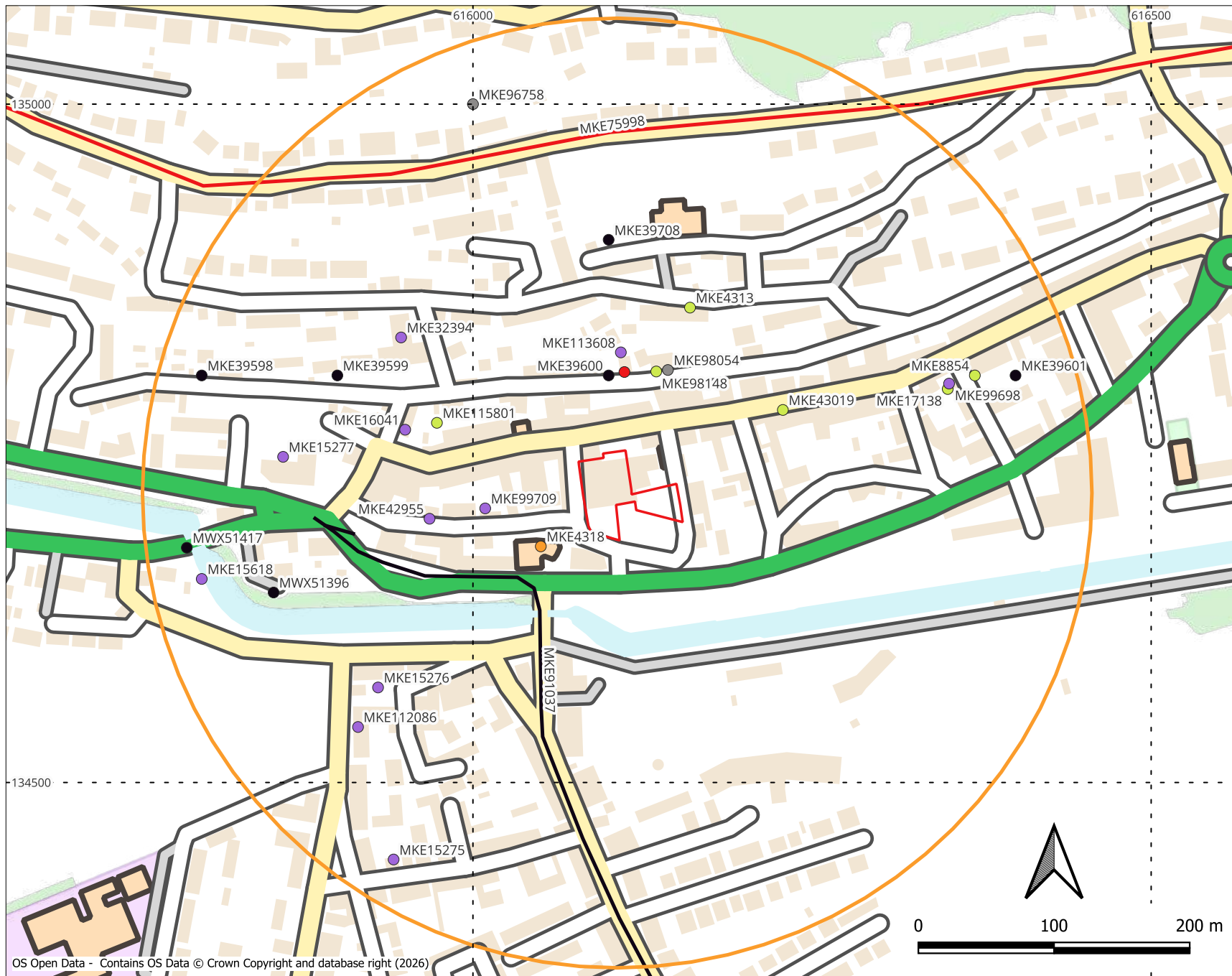


Date: 2025	Date: 2025
Date: 2025	Date: 2025

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Legend

- SITE
- Study Area

HER Data

- Roman
- Early Medieval
- Medieval
- Post Medieval
- Modern
- Unknown

Created by: Paul White
Date: 11/05/2026

Centred: TR 16107 134718

Figure 1: Site Location and Archaeology





HAPRO

Purposeful Planning Solutions for the Historic Environment