The following comment is in response to Jacobs (July 2014) Inner Thames Estuary Feasibility Study 1: Environmental Impacts, Chapter 8 Cultural Heritage, sections 8.3 Baseline and 8.7 Summary

The information provided is factually accurate. However, insufficient detail is provided regarding specific aspects of the non-designated archaeological assets within the study area. As a result the feasibility study gives an impression that principal effects are restricted to post-medieval and modern heritage assets, failing to give adequate consideration to the heritage significance of earlier remains, which are likely to be of equivalent importance, more vulnerable to airport development impact and present important questions regarding the promoters ability to offer viable mitigation measures.

There is considerable evidence for pre-Roman Iron Age and Roman communities specialising in local craft and manufacturing industries based on estuarine resources in North Kent. It includes a number of pottery production sites, with a principal industry located alongside the Thames and Medway (Pollard R J. 1988. The Roman Potters of Kent. http://www.kentarchaeology.org.uk/Research/Pub/RPofK/Ch6/196.htm). The Jacobs study recognises a potential for significant unknown archaeological remains within the inter-tidal zone, and presumably this observation was made with the Roman pottery evidence in mind, as to date it has mostly come from the intertidal area. However, it is important that this potential is extended to the land beyond the relatively narrow zone where coastal processes happen to be eroding and thus exposing Holocene alluvial deposits in which these buried archaeological remains occur.

The homes and workspaces of the communities responsible for pottery production, who are also likely to have been engaged in salt-making and the supply of shellfish to surrounding urban markets, have yet to be properly defined. The significance of the industry is most clearly gauged, on current evidence, by the distribution of North Kent pottery vessels throughout southern Britain. Evidence for the actual production sites is relatively limited, but modes of production are known to range from household production to nucleated groups of workshops. It is reasonable to assume, therefore, that significant remains are likely occur in landscape settings fringing the estuary across a broad geographic area, including the Hoo Peninsula and the Isle of Grain, preserved under Holocene alluvial sediments that also provide a record of environmental changes over a considerable timeframe.

In focusing on heritage designations located within the study area, the importance of a unique society and economy, originating in the pre-Roman Iron Age and flourishing into the Roman period, is overlooked. The description of the study area as 'primarily characterised by cultural heritage assets which date from the post-medieval and modern periods' does not provide a truly accurate description of a multi-focal archaeological legacy. It is important this impression is adjusted in order that the feasibility of mitigation measures can be better assessed. Whilst evaluation techniques could draw on deposit modelling methods, as Jacobs refers to; the prospect that this might lead to a requirement for landscape scale excavations within deep alluvial deposits subject to high groundwater levels has major logistical challenges. It certainly raises questions as to whether an estuary airport can achieve a viable

mitigation strategy, given the unprecedented scale of impact the various options entail.