Regulation 18 Stage 2 Consultation
Part 2: Draft Development Management Policies Document
October 2020

Page	Chapter	Policy / paragraph	Respondent	Commentary
15-16	3. Green Belt 3.3. New dwellings for agricultural, forestry or other rural workers in the Green Belt	Proposed Policy GB1: Agricultural and Forestry Development Proposed Policy GB2: New Dwellings for Agricultural, Forestry and Other Rural Workers in the Green Belt	Heritage Conservation	The County Council welcomes the commitment to ensure that new development in the countryside is in keeping with the character of existing settlements. It should be noted that development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England (together with KCC and the Kent Downs AONB team) has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside. The Kent Farmsteads Guidance[1] has been endorsed by the County Council and it is recommended that Gravesham Borough Council considers adopting the guidance as Supplementary Planning Document, as part of the Local Plan process. The County Council would welcome further engagement on this matter.
15-16	3. Green Belt 3.3. New dwellings for agricultural, forestry or other rural workers in the Green Belt	Proposed Policy GB1: Agricultural and Forestry Development Proposed Policy GB2: New Dwellings for Agricultural, Forestry and Other Rural Workers in the Green Belt	Rural Economy	The County Council considers that the diversification of farms is of vital importance and can be the difference to them being profitable (and surviving) or not. Therefore, this policy to assist with farm diversification projects is to be welcomed. The policy mentions farm shops, processing, leisure activities etc but there is no specific mention of the visitor economy. Many farmers convert redundant buildings into holiday lets, or glamping/camping sites. KCC recommends reference to this as an important diversification avenue for farmers. The County Council notes the reference to increased traffic on country lanes, further reference should be made to the increase in size of farm machinery. Farm machinery that needs to be taken from field to field (often by contract farmers farming someone else's land) and the increasing size of this machinery makes it difficult to access some lanes. Farmers will need to alter the access and egress to farm sites and create new entrances to some fields. The Local Plan should take account of this. The County Council welcomes the policy reference to housing for farm workers (and other rural workers), especially where it is near their place of work
17	3. Green Belt 3.4 New Buildings and other Facilities for Outdoor Sport, Recreation and Cemeteries in the Green Belt	Paragraph 3.4.5	Public Rights of Way and Access Service	While the general text of this policy is supported, the County Council recommends that additional wording should be inserted in paragraph 3.4.5 to ensure there is a good provision of sustainable transport connections with the sites. There should be walking, cycling and public transport connections available to encourage active travel and provide realistic alternatives to private car journeys. This approach would help to reduce traffic congestion on the highway network by minimising vehicle journeys.
27	3. Green Belt 3.8 Re-use of Buildings in the Green Belt	Proposed Policy GB 7 Re-use of Buildings in the Green Belt	Rural Economy	The County Council welcomes the proposal for the re-use of redundant buildings in the Green Belt for diversification purposes.
31	4. Agricultural Land 4.1. Protection of Good Quality Agricultural Land	Proposed Policy AG 1 Agricultural Land	Rural Economy	The County Council welcomes the protection of good quality agricultural land in terms of future food production and food security and would recommend reference to how land may adapt and change due to climate change and the wider implications of this.

---

[1] http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance

36	5. Retail 5.5. Retention of Public Houses	Proposed Policy RE 5: Retention of Public Houses	Rural Economy	The County Council welcomes the recognition of the importance of rural public houses – they are an important rural community hub and a driver for rural tourism. They are also an important link in the rural food supply chain as outlets for local food and drink provide by local farms and businesses.
52	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development		Highways and Transportation	The County Council notes that the 2014 Core Strategy sought to improve public transport provision and facilities, including segregated bus lanes. The County Council, as Local Highway Authority, recognises that public transport has not been mentioned within this consultation document and there is no mention at all of Fastrack and its importance in encouraging model shift. KCC requests that more emphasis is placed on public transport and the benefits it can achieve. In addition, in support of cycling infrastructure, reference could be made to recently published government guidance, such as "Gear Change: A bold vision for cycling and walking" (2020)[2].
52	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Paragraph 6.2.5	Highways and Transportation	KCC supports Proposed Policy INF 1: Route Safeguarding, as this will secure the routes required for future sustainable infrastructure. The County Council proposes the following changes to give more emphasis on sustainable transport modes and recognise that whilst a shift from petrol/diesel vehicles to electric vehicles will be good for the environment it will not solve any congestions issues on the local highway network *6.2.5. Core Strategy policy CS11 on Transport sets out the Council's strategic approach in this area, with the objective of facilitating the movement of people, goods and services in a sustainable way. This means ~~trying to reduce~~ reducing reliance on the private car and road based transport of goods, with a move toward walking, cycling, the use of public transport, and more use of the River Thames for the carriage of both passengers and goods. The ~~gradual~~ introduction of electric vehicles will assist in making road trips more sustainable in terms of air quality, although their presence will still have an impact on congestion and their needs will also have to be accommodated.*
52	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Paragraph 6.2.7	Highways and Transportation	The County Council recommends the following amendment to this paragraph: *6.2.7. Where new highways and accesses are being constructed to serve existing or new development, it is important that this is done in a safe manner which is compliant with both local and national highway standards, taking into account the circumstances of a particular location and the characteristics of the road concerned.*
53	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Paragraph 6.2.14	Highways and Transportation	The County Council recommends the following amendment: *6.2.14. … It also means that appropriate visibility splays ~~sight lines~~ will need to be provided so that drivers using the access point can see oncoming traffic.*
53	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Paragraph 6.2.19	Highways and Transportation	The County Council recommends the following amendment: *6.2.19. As noted above, transport is not simply about accommodating additional traffic on the highway network, it is also about providing sustainable alternatives to the private car. ~~when there may be more sustainable alternatives that can be considered.~~*
53	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Footnote 15	Highways and Transportation	Reference is made to the KCC guidance document 'KCC guidance Transport Assessments and Travel Plans', Oct 2008. This should be removed, however reference to the KCC pre-application service should remain.

[2] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf

54	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Paragraph 6.2.20	Public Rights of Way and Access Service	The reference to the KCC Rights of Way Improvement Plan (ROWIP) is acknowledged and supported. However, it is requested that additional text is inserted into this paragraph, advising developers to engage with KCC at an early stage of the planning process. The County Council could then discuss their proposals in advance with the applicant and provide advice on PRoW matters, before the submission of a planning application. This approach would help prevent delays later in the planning process.
55	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Proposed Policy INF 2: Transport Design Principles	Highways and Transportation	KCC generally supports Proposed Policy INF 2: Transport Design Principles. However, a Travel Plan will also be required for major developments, regardless of whether this is needed for mitigation purposes or not. KCC also questions the use of '*unless otherwise justified as an exception*' in terms of EV charging, as this provision should be provided as standard. KCC recommends paragraph 6.2.27 should include reference to high quality walking and cycling links.
55	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Proposed Policy INF 2: Transport Design Principles	Public Rights of Way and Access Service	Given the value and importance of the PRoW network to the local community, there should be a requirement for development applications to show PRoW on their plans. The following wording should be added to paragraph 6.2.25: "*Where PRoW would be directly affected by development, proposals should illustrate how the existing PRoW network will be positively accommodated within the site.*"
56	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Proposed Policy INF3: Understanding and Mitigating Transport Impacts	Highways and Transportation	KCC generally supports proposed Policy INF3: Understanding and Mitigating Transport Impacts. However, it should be noted that Travel Plans are not just about mitigating impacts – Travel Plans will be required for larger sites regardless of whether there is a severe traffic impact. Paragraph 6.2.32 states "*Sufficient parking in new development will be provided in accordance with the Council's adopted parking standards which will reflect the availability of alternative means of transport, accessibility to services and facilities, and the objective to secure a modal shift to more sustainable modes*". The Borough Council currently defers to KCC's parking standards – KCC requests clarification on whether this is to continue. If this is not the case, KCC would welcome discussion on any parking standards that are to be developed. KCC's parking standards are contained in Interim Guidance Note 3: Residential Parking for Residential[3] and Supplementary Planning Guidance (SPG 4) Kent Vehicle Parking Standards[4] for non-residential. It is understood that the Borough Council has not adopted IGN3. KCC is currently drafting revised parking standards which will combine standards for both residential and non-residential uses.
56	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Proposed Policy INF3: Understanding and Mitigating Transport Impacts	Public Rights of Way and Access Service	The inclusion of PRoW within this text is welcomed and supported.
56	6. Infrastructure 6.2. Traffic Management and Addressing the Impact of Development	Proposed Policy INF 4: New Accesses and Junctions	Highways and Transportation	KCC is generally supportive of proposed Policy INF 4: New Accesses and Junctions. Paragraph 6.2.35 states "*All such accesses and new on-site highways associated with them should unless otherwise justified as an exception: Ensure vehicles can easily reach the necessary loading, servicing, and parking areas on-site without the need for multiple manoeuvres*". The County Council recommends that reference is made to the need for appropriate drag distances for refuse vehicles to designed in line with local and national guidance.

---

[3] https://democracy.kent.gov.uk/documents/s12688/Item%20B5%20Appendix.pdf

[4] https://maidstone.gov.uk/__data/assets/pdf_file/0010/88984/Kent-and-Medway-Structure-Plan-2006-SPG4-Vehicle-Parking-Standards.pdf

| 59 | 6. Infrastructure 6.3. Electric Vehicle Charging Points | Proposed Policy INF 5: Electric Vehicle Charging Points18 | Highways and Transportation | KCC is generally supportive of proposed Policy INF 5 Electric Vehicle Charging Points. With regard to paragraph 6.3.7, the encouragement of the implementation of electric vehicle charging infrastructure is welcomed and will help to encourage a shift away from petrol and diesel vehicles, improving the air quality in the Borough and beyond.

It is also recognised that Policy INF5 will be updated as appropriate to reflect emerging government guidance. However, in line with KCC's emerging parking standards, KCC would like to see a bolder commitment to EV infrastructure for shared parking areas, requiring a minimum of 10% active spaces and 90% passive spaces for residential car parks, and 10% Active Charging Spaces and 10% Passive Charging Spaces for non-residential car parks. KCC will also require developers to provide chargers that are a minimum of 7kw and would encourage the Borough Council to adopt the same approach.

Reference should be made to the Kent and Medway Energy and Low Emissions Strategy. |
| 59 | 6. Infrastructure 6.3. Electric Vehicle Charging Points | Proposed Policy INF 5: Electric Vehicle Charging Points | Rural Economy | The County Council would also recommend consideration of charging points at rural locations, such as farm shops and countryside attractions. |
| 60 | 6. Infrastructure 6.4. Telecommunications Infrastructure | | Provision and Delivery of County Council Community Services | The County Council recommends that this element of the Local Plan must balance the concern regarding the visual impact, with the recognition of the critical importance of digital infrastructure – this balance will ensure opportunities for connectivity investments from network operators. Given the current circumstances resulting from the COVID-19 pandemic, it is of vital importance that adequate digital infrastructure is developed to ensure connectivity to allow people to work from home as required.

The County Council does welcome the inclusion of a dedicated telecoms infrastructure policy and provides the following comments:

Paragraph 6.4.5 – current government policy (set out in the Future Telecoms Infrastructure Review) is for all premises to have access to gigabit capable broadband connections (e.g. full fibre). As such, the reference to the Government's previous superfast targets should be removed.

It is important to recognise that citing constraints (e.g. what is required to achieve coverage) and the technical specifications/requirements of telecoms infrastructure limit the design options for broadband and mobile infrastructure. Not accommodating these constraints risks reducing future mobile and fixed broadband network coverage and connectivity.

Paragraph 6.4.9 – the County Council recommends inclusion of the requirement that new homes should be provisioned with gigabit capable broadband. Government has announced and consulted on plans to introduce legislation requiring developers to provide broadband connectivity for new homes.

Paragraph 6.4.10 – KCC recommends that the Local Plan will need to be mindful of the load bearing capacities of existing infrastructure – as well as the importance for high quality digital infrastructure for social and economic well-being of local communities and businesses. |
| 68 | 7. Green Infrastructure

7.1 Green Space, Playing Pitch and Sports Facility Standards | Proposed Policy GI 2: Open Space, Playing Pitches and Sports Facilities Provision | Public Rights of Way and Access Service | The proposed green infrastructure policies are welcomed by the County Council, though additional wording should be added to the first bullet point of Policy GI 2 covering improvements to the accessibility of open spaces and recreational resources.

In addition to being publicly accessible, there must be a good provision of walking and cycling routes to the sites, to provide opportunities for active travel. The public should not be dependent on private vehicle use to access these sites. Improved connectivity should encourage recreational and leisure activity, including access to country parks, honey pot sites and other facilities of high leisure. |
| 70 | 7. Green | Proposed Policy GI 3: | Heritage | To identify which local green spaces are significant and contribute to the character of the Borough, it may be helpful for the Borough |

	Infrastructure 7.2. Local Green Spaces	Local Green Spaces	Conservation	Council to carry out a Parks and Gardens / Green Spaces Assessment. KCC has been working with the Kent Gardens Trust for the last few years, on a district by district assessment of parks and gardens and green spaces. Volunteers research the history and development of different green spaces and write Statements of Significance, that are helpful to planning authorities in assessing the impact of proposed change on the spaces concerned. It would be helpful if the Borough Council carried out a similar survey which would also prepare the spaces for inclusion on a Local List of Heritage Assets. KCC would welcome further discussions on this matter.
72	7. Green Infrastructure 7.3. Trees, Hedgerows and Woodland	Proposed Policy GI 4: Trees, Hedgerows and Woodland	Heritage Conservation	The text states the importance of trees, hedgerows and woodland and the contribution that they make to local character. At present, however, it does not mention that the pattern of tracks, lanes and field boundaries have a similar and complementary role. The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. A Green Infrastructure Strategy would have the potential to use some of these historic linkages to give shape to the open spaces that are to be developed or retained. The Kent Historic Landscape Characterisation Survey (2001) (HLC) is an important resource for understanding the landscape of Kent and its development through time. KCC acknowledges, however, that the HLC is a strategic, not local, assessment. It allows a look at the landscape of Kent and draw conclusions about the development of the landscape in different parts of the county and the county as a whole. It is not detailed enough to use at a large scale. It was also entirely map-based and involved no survey or site visits at all. It is not appropriate, therefore, to use the HLC data alone to inform specific development proposals or to identify potential development sites. To be fully effective in local planning and development control, the Historic Landscape Characterisation should be backed up by more detailed district-wide or case-by-case analysis, to add greater detail through secondary sources. KCC would be happy to discuss this further.
75	7. Green Infrastructure 7.4. Landscape Character	Policy GI 5: Landscape Character	Heritage Conservation	The County Council welcomes the policy on Landscape Character as this is often neglected in local plans. KCC is also pleased to see the Farmstead Guidance produced by the Kent Downs AONB, Historic England and KCC referenced here. The comments made with regard to Policy GI 4 above also apply here. The Historic Landscape Characterisation Survey (2001) should also be referenced here and, if possible, enhanced by local study.
80	7. Green Infrastructure 7.5. Biodiversity	Policy GI 6: Biodiversity	Biodiversity	Paragraph 7.5.28 - The reference to the connection and improvement of ecological networks is vital. Fragmentation is a serious threat to biodiversity and KCC recommends the following amendment: *"…. Opportunities will be taken to connect and improve ecological networks and linkages both within Gravesham and to similar networks in adjoining areas."* Paragraph 7.5.29 - The County Council is supportive of this section, as demonstrable *measurable* net-gain is fundamental to limiting/negating biodiversity loss and, importantly, will be mandatory in the near-future. This policy accommodates this impending legislation. The County Council also welcomes justification being required for when the mitigation hierarchy has not been adhered to. Paragraph 7.5.30 - The County Council is supportive of demonstrable long-term management delivery as this information is often neglected or too vague within planning applications. Paragraph 7.5.31 - The County Council is supportive of this paragraph and highlights the benefit of referencing specific sites of conservation importance, such as 'Local Wildlife Sites'. Paragraph 7.5.32 - The County Council is supportive of this policy as over-wintering birds along the north Kent coast are subject to

				high degrees of recreational disturbance. The North Kent Strategic Access Management and Monitoring Strategy (SAMMS) helps to mitigate against the adverse effects upon the designated sites and their bird populations.
84	8. Flood Risk and Water 8.2 Managing Water Quality	Policy FW 1: Managing Water Quality	Sustainable Urban Drainage Systems	There is currently a review of the Non-Statutory Technical Standards (NSTS) for Surface Water Drainage which the County Council, as Lead Local Flood Authority (LLFA), uses to assess drainage submissions. It has been proposed the surface water standards will include a standard to assess water quality. It is beneficial that this policy is clear in the need for assessment but flexible enough in wording that it may also include any future changes that may occur in the NSTS.
86	8. Flood Risk and Water 8.3. Managing water supply and efficiency in new development	Policy FW 2: Managing water supply and efficiency in new development	Rural Economy	The County Council would also recommend consideration of housing growth and the resulting impact on water resources and crops which are heavily water dependant.
89	8. Flood Risk and Water 8.4. Managing Flood Risk	Policy FW3: Managing Flood Risk	Sustainable Urban Drainage Systems	The County Council notes that there is a focus upon tidal flood risk and climate change. Paragraph 8.4.7 notes that other types of flood risk, such as surface water flood risk may require due consideration. The County Council recommends reference the Environment Agency's mapping of surface water flood risk, which does highlight specific potential overland flow paths which will need consideration and assessment for any new development.
93	8. Flood Risk and Water 8.6 Managing Surface Water Drainage	Managing Surface Water Drainage	Sustainable Urban Drainage Systems	KCC policy is outlined in KCC's Drainage and Planning Policy which was adopted November 2019. The policy will be reviewed in 2021 given other changes proposed in planning. As mentioned above, it may be worth noting that the NSTS are currently under review and possible revisions may be proposed in the near future (anticipated February 2021). The County Council welcomes the inclusion to multi-functional benefits within the policy.
93	8. Flood Risk and Water 8.6. Managing Surface Water Drainage	Policy FW5: Managing Surface Water Drainage	Heritage Conservation	Sustainable Drainage Schemes (SuDS) may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations. When SuDS are planned, it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. KCC has recently produced guidance for SUDS and the historic environment. It provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets.
139	11. Design 11.4 Designing for a High Quality and Accessible Riverside	Proposed Policy DES 4: Designing for a High Quality and Accessible Riverside (Page 139)	Public Rights of Way and Access Service	The County Council notes that there no reference to the England Coast Path (ECP) within this policy, despite the supporting text highlighting this National Trail (Paragraph 11.4.4). To address this matter, it is requested that additional text is inserted into Paragraph 11.4.15, stipulating that future development should accommodate and enhance the ECP, as per the National Planning Policy Framework (Paragraph 98).

142	12. Heritage Assets 12.1 Heritage Assets	Proposed Policy HER1: Development Involving Heritage Assets	Heritage Conservation	Paragraph 12.1.16 – The County Council welcomes the commitment to the protection, conservation and enhancement of heritage assets reflected in this paragraph, and in particular the encouragement given to the re-use of heritage assets. This commitment to re-using heritage assets will be helped by advance information about where they are. Therefore, KCC would encourage the Borough Council to develop a local List of Heritage Assets (not just historic buildings) so that the assets can be identified, and their significance be given added weight in the decision-making process. Paragraph 12.1.17 – 12.1.19 - The text describes the conditions under which development affecting designated heritage assets will be permitted. Whilst KCC has no objection to the criteria presented it should be noted that recent reviews of how designated assets have been treated during the development control process have noted how often heritage has been sacrificed by the application of such criteria[5]. The review concluded that "The balance between heritage and other public benefits was found to be a judgement easily made in favour of other benefits". KCC would encourage the Borough Council to ensure that applicants proposing to develop in/near heritage assets in a way that impacts on their significance be obliged to show that alternative development options, including design alternatives, have been fully considered. This consideration of alternatives should be standard practice, comparable to Environmental Impact Assessment. Paragraph 12.1.20 - The text states that a Heritage Statement will be required where development affects the significance of either designated or non-designated heritage assets. KCC recommends that the text is modified to indicate that the scope and detail to be presented in the Heritage Statement needs to be appropriate to the proposed impact. For a more significant asset, the Heritage Statement will need to be more detailed than for a less significant asset - with some Heritage Statements needing to be accompanied by professional assessments, potentially involving fieldwork. The County Council also suggests that the Borough Council prepares detailed guidance for applicants to help them write effective Heritage Statements. There are a number of issues with how Heritage Statements are currently formulated. Mostly these revolve around the fact that they are generally regarded as Validation requirements. They are often accepted in a tick-box exercise, irrespective of quality, and it is doubtful that in such cases they play a meaningful role in decision-making. For this paragraph to be effective, it is important that the current approach is changed so that Heritage Statements are well designed, challenged where appropriate, and are genuinely useful to planning officers and applicants alike. This may mean taking the Heritage Statement work flow away from the Validation process. KCC's Heritage Conservation team is currently engaged in a project to review how Validation and Heritage Statements operate in Kent and would be pleased to discuss this further.
144	12. Heritage Assets 12.1 Heritage Assets	Proposed Policy HER 3: Conservation Areas	Heritage Conservation	As the text notes, the process of Conservation Area Appraisal (CAA) is essential for assessing the impact of development proposals on character and significance. The Borough Council has CAAs for most of its rural Conservation Areas and KCC would encourage the Borough Council to continue the CAA process for its urban Conservation Areas too.
145	12. Heritage Assets 12.1 Heritage Assets	Proposed Policy HER 4: Archaeology Conservation Areas	Heritage Conservation	The County Council is supportive of this policy as currently drafted.
Gravesham Heritage and Character Background Paper				
			Heritage Conservation	General The text states in paragraph 1.1.7 that it intends to focus on those areas of Gravesham that have been subject to most change. If the aim of the document is to assess the heritage and character of the Borough, however, then this is not appropriate. Although the

---

[5] https://content.historicengland.org.uk/content/docs/planning/7559-heritage-in-planning-decisions-green-balance.pdf

consideration of the aspects in which the text has reviewed is highly detailed, some of the most significant themes of Gravesham's heritage are left largely unaddressed. This brings the inevitable risk that these themes will be assumed to be less important, and less worthy of conservation and protection, than those the text has covered.

The importance of Gravesham's prehistoric resource is underestimated in the text. The Dartford/Gravesham area is of international significance for the Palaeolithic period. Within Gravesham there have been numerous finds of Palaeolithic handaxes and flakes but also important faunal remains such as the remains of mammoth, elephant and rhinoceros. Numerous Mesolithic flints have been found across the Borough. A Neolithic mortuary enclosure or barrow has been found at Tollgate and Early Neolithic pottery and flints were discovered together with a possible timber trackway in 1938 at Ebbsfleet (now a scheduled monument). More recent excavations at Ebbsfleet have revealed many more Neolithic features including hearths, pits and evidence of flint working. There is extensive Bronze Age evidence. A Bronze Age barrow (scheduled monument) exists within Ashenbank Wood and numerous examples of ring-ditches have been seen in aerial photography. Probable settlements have been identified from aerial photography and several have been excavated. There are also numerous finds of Bronze Age metalwork from across Gravesham including axes, rapiers, awls and other tools. Similarly, widespread Iron Age settlement evidence has been found, such as at Tollgate, Coldharbour Road, Northumberland Bottom and Singlewell.

An area of particular significance, which is mentioned in the text but not given enough prominence, is the Ebbsfleet Valley. Excavations carried out over many years now have revealed that the valley is of great significance for the archaeology of many periods. Although the western half of the valley is in Dartford, it needs to be considered in its entirety if its significance is to be understood. It is one reason why it might be appropriate for Dartford Borough Council, Gravesham Borough Council and the Ebbsfleet Development Corporation to consider developing a joint Heritage Strategy. The recent completion of an Urban Archaeological Database for the EDC area, with an extension for Springhead, would enable and enhance such a Strategy.

The NPPF requires local planning authorities to "set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment". There is considerable scope about how to do this, but the most effective way may be to bring together all policies and actions related to the historic environment into a Heritage Strategy. This allows the Local Planning Authority to review the heritage resource, consider the main historic environment themes of relevance to the area and identify the heritage assets they comprise. The Strategy can also assess the main threats to the historic environment of the Borough and suggest ways in which it can be enhanced and exploited. Finally, the Strategy provides an Action Plan and can be used to refine policies to be adopted by the Local Plan. The advantage of this approach is that it fully integrates all aspects of historic environment policy. It prevents it from being developed piecemeal and in a fragmented manner which can lead to the historic environment failing to play a full role in the life of the Borough.

Several Local Planning Authorities in Kent either have a Heritage Strategy already or are in the process of developing one. Although Gravesham has written a 'Heritage and Character' background paper, this does not really constitute a Heritage Strategy. In light of this, and the potential offered by KCC/EDC's recent completion of an Urban Archaeological Database for Ebbsfleet (a more detailed and comprehensive version of the Historic Environment Record) KCC Heritage would be happy to discuss this further. It is possible, for example, that Gravesham, Dartford and EDC could prepare a joint Heritage strategy. KCC, who wrote the Dover Heritage Strategy, and is preparing the Folkestone and Hythe Heritage Strategy, would be happy to assist with this.

The goal of the strategy could be:

- To identify and describe the key themes of relevance of the heritage of the district and the heritage assets that represent them
- To assess the role that these can play in in regeneration and tourism, including interpretation of key themes like Palaeolithic Gravesham, the archaeology of the Ebbsfleet Valley and Gravesham's maritime and industrial past
- To identify both their vulnerabilities and the opportunities they provide
- To inform site allocations within the district

- To support policy development

The Ebbsfleet Valley contains two areas of Scheduled Neolithic remains, which have become a type-site for Neolithic pottery. Also found were arrowheads and animal bones, and a possible timber trackway structure. Middle to late Bronze Age settlement evidence has also been found in the form of pits, ditches and field systems, and burial evidence in the form of ring-ditches. During the late Iron Age, the valley seems to have taken on a particularly ritual function. At the spring at the head of the valley a late Iron Age ritual landscape developed with a processional way running along the river. It was during the Roman period, however, that the valley was most intensively used for ritual purposes. A small road-side settlement ('Vagniacis') developed alongside the springs, focused on several temples and a walled cemetery to form a religious centre almost unique in Britain. A short distance downriver was a rich Roman villa accompanied by a bath house and waterfront structures. In the Anglo-Saxon, period perhaps three settlements were established in the valley accompanied by large and rich cemeteries, and an extremely well-preserved tidal watermill dating to AD 692 and the earliest of its kind in the country. The richness and diversity of the Ebbsfleet archaeological resource is unique in Kent and needs to be included in any review of Gravesham's heritage and character.

Paragraph 1.1.4
To this list should be added:
- the Kent Historic Town Surveys for Gravesend and Northfleet (2004)[6]
- The Kent Historic Landscape Characterisation (2001)

Paragraph 2.1.12
Please note that the appropriate acronym for the Kent Historic Environment Record is HER, not HERS

Paragraph 2.1.13
The general comments on the desirability of a Heritage Strategy made in relation to the Local Plan Core Strategy and here should be noted. This background paper would be a very good start point for such a strategy, but the key issues related to Gravesham's heritage and its potential and vulnerabilities need drawing out more.

Paragraph 2.1.15
Please see comments in relation to 2.1.12 above.

3.2 Historic Development
Paragraph 3.2.1
While it is true that there is little evidence that human activity earlier than the iron age has affected patterns of settlement today, a case can be made that iron age use of the landscape is sometimes reflected in modern field boundaries and routeways. In addition, the landscape of modern Gravesham is certainly reflective of the landscape of earlier periods. For example, the geological and landscape factors that make Gravesham important for palaeolithic archaeology are also those that made it attractive industrial exploitation in later periods.

Paragraph 3.2.15
The text describes Gravesend's role as a Garrison town but does not actually mention the very important heritage assets that demonstrate this. Even though this section is a rapid summary of the Borough's heritage, KCC would suggest that Gravesend and Milton Blockhouses and New Tavern Fort should be mentioned here.

7 The Rural Area
The text reviews the Gravesham Landscape Character Appraisal at length but does not mention Historic Landscape Character. The rural settlements mentioned in the draft text do not exist in isolation, rather they are all linked by the landscape in which they sit.

---

[6] https://archaeologydataservice.ac.uk/archives/view/kent_eus_2006/downloads.cfm

| | | | | The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. The text notes, for example, in 7.1.19 that many of the sea defences in the marshes are historic in nature and that many features in the countryside have historic significance but it does not recognise that the landscape pattern itself is derived from centuries of human interaction with nature and has a historic character. The Kent Historic Landscape Characterisation Survey (2001) is an important resource for understanding the landscape of Kent and its development through time. KCC must emphasize, however, that the HLC is a strategic, not local, assessment. It allows us to look at the landscape of Kent and draw conclusions about the development of the landscape in different parts of the county and the county as a whole. It is not detailed enough to use at a large scale. It was also entirely map-based and involved no survey or site visits at all. It is not appropriate, therefore, to use the HLC data alone to inform specific development proposals or to identify potential development sites.

To be fully effective, the Historic Landscape Characterisation should be backed up by more detailed district-wide or case-by-case analysis, to add greater detail through secondary sources. KCC be happy to discuss this further. |
|---|---|---|---|---|