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24 August 2022

Re: 20220852 - Land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesend

Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application with all matters reserved, except for means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works, and the development of up to 3,500 residential units (Use Class C3), up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages and up to 18,000 sqm (GEA) office floorspace, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F), delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road. Redevelopment of the site will also include some sui generis uses, with hard/soft landscaping, car and cycle parking, highways works, infrastructure provisions with ancillary works.

Thank you for your letter consulting us on the Scoping Opinion request.

The site lies within an area of very high, multi-period, archaeological, geoarchaeological and palaeoenvironmental interest, where the Ebbsfleet valley meets the Thames. This is recognised in the Scoping Report so that cultural heritage and archaeology will be scoped in to the EIA process. The importance of geoarchaeology as well as early and later prehistoric archaeology is recognised in the Scoping Report, but this archaeological and palaeoenvironmental interest and potential could be very complex and include archaeological remains of national or international importance. I recommend that the ES includes a detailed impact assessment based on both desk-based assessment and field evaluation. The archaeological desk-based assessment would include a review of all existing borehole data for the site and the immediate surroundings (within a 500m study area from the redline boundary of the site). The field evaluation would comprise purposive boreholes to

ground truth and develop a deposit model for the site and this geoarchaeological and palaeoenvironmental evaluation would need to be undertaken by specialists approved by the Local Planning Authority.

The Scoping Report recognises the importance of the post-medieval and modern industrial heritage of the site and I recommend that as well as considering Aspdin's kiln under 'Built Environment', it and the cement industry, also need to be considered as 'archaeology'. The industrial archaeology of the site and area will comprise both above and below-ground heritage assets with archaeological interest. The results of recent and ongoing work to the south and east of Grove Road will be important sources of information, some of which may not yet be on the HER but are available through the EDC planning portal.

The ES should include consideration of potential positive benefits of the scheme to learn more about the heritage of the site and the opportunities to promote and communicate this heritage to residents and visitors.

I would be happy to discuss any of the above with the applicant and agree a Written Scheme of Investigation for the field evaluation, as well information about relevant specialists and recent research not yet on the Kent HER.

Yours sincerely,

Casper Johnson
Senior Archaeological Officer
Heritage Conservation