



Mark Pullin
Ebbsfleet Development Corporation,
The Observatory, Castle Hill Drive,
Castle Hill, Ebbsfleet,
Kent, DA10 1EE

FAO Michael Jessop

**Heritage Conservation
Environment, Planning and
Enforcement**

Invicta House
County Hall
MAIDSTONE
ME14 1XX

Phone: 03000 419388
Ask for: Casper Johnson
Email: casper.johnson@kent.gov.uk

9 December 2022

Dear Mark

EDC/22/0168 | Outline planning application (with all matters reserved) for mixed-use development comprising demolition of the existing car parking, structures and station forecourt and provision of residential dwellings (Use Class C3); flexible commercial, business and service uses (Use Class E) to allow provision of retail, offices, restaurants/cafes, nurseries, and healthcare facilities; flexible learning and non-residential institutions (Use Class F1); flexible local community uses (Use Class F2); hotel use (Use Class C1); residential institutions (Use Class C2); and Sui Generis uses to allow provision of co-living and student accommodation, public houses/drinking establishments, and theatres/cinemas. Associated works include hard and soft landscaping, a River Park, car parking and multi-storey car parks, pedestrian, cycle and internal vehicular network, and other ancillary infrastructure; and associated crossings, highway accesses, and junction improvements.

Ebbsfleet Central East Land Adjacent To Ebbsfleet International Railway Station Thames Way Kent

Thank you for consulting Heritage Conservation on this application. We have also provided a response internally to KCC which covers some aspects of the more detailed response provided here.

We have set out below our comments on matters of archaeological interest and have made no detailed comments or recommendations related to built heritage, which will be provided by Historic England.

The site lies within the Ebbsfleet Valley which is an area of multi-period archaeological potential with evidence for human activity from the Palaeolithic to the

present day. The adjacent area has known remains of national importance dating from the Palaeolithic (Baker's Hole - Scheduled site NHLE 1003557) and the Neolithic (adjacent to the development site - Scheduled site NHLE 1004206) and the development site is very likely to contain presently non-designated archaeological remains related to the nearby designated sites. The Swanscombe Peninsula SSSI includes Pleistocene geological deposits and Palaeolithic archaeology in the area now known as Bakers Hole (including the scheduled area) as a reason for notification. Archaeological remains within the development site may include waterlogged organic artefacts, structures and palaeoenvironmental evidence, which would be of equivalent importance to that existing on the above-mentioned designated sites.

To help deliver the best possible outcomes for the archaeology of the site and so that our recommendations can be most easily addressed by the applicant, we set out our comments below in relation to each of the relevant application documents:

Environmental Statement (Chapter 14 – Cultural Heritage)

- Table 14.5 – it should be noted that non-designated 'receptors' could have high sensitivity, but this remains unknown without field evaluation, which has not been undertaken due to site access constraints. This lack of understanding of the nature and significance of below-ground archaeological remains, seriously restricts the ability to reach an informed decision about the environmental impact of the proposals. In the absence of site-specific evaluation data, it should be assumed, based on the assessment data, that the site will contain below-ground archaeological remains of a significance equivalent to, and most probably also related to, the nearby nationally important designated sites.
- Non-designated organic deposits and remains of likely national importance that owe their significance to waterlogging are not adequately considered in the ES nor in the Cultural Heritage Sensitive Receptors (Appendix N.7). The nearby scheduled sites would be sensitive to changes in hydrology and the potential for such impacts resulting from the development need to be considered in the ES and associated documents. Baseline monitoring for the hydrological environment of the site is required to allow a model to be developed which can then be considered in relation to development proposals and so that appropriate mitigation by design and/or remedial works can be agreed upon.
- In Section 14.6 under Primary Mitigation, it is stated that *'In terms of archaeological deposits, finds and features, it is anticipated that these will be fully investigated and assessed ahead of construction of the scheme. It is intended that themes identified through these investigations will be embedded into the final scheme design of the detailed application in order to ensure that heritage and place making opportunities are met.'* The field evaluation that will be required should be separated from mitigation. The field investigation will be needed to identify and define the extent, character, date and significance of below-ground archaeological remains at the site, to define appropriate mitigation through design and/or through recording of remains that would be impacted. This will be especially important for those areas of

the site which have waterlogged archaeological deposits. Areas of nationally important archaeological remains should be preserved in situ and the development should be designed to enable this to be achieved (see NPPF footnote 68).

Archaeological Desk Based Assessment (ADBA Parts 1 – 6)

- The ADBA lacks detail on the archaeological potential and key research questions for the site. For example, there is a lack of detailed consideration of the potential of the site to contain archaeological remains relating to the Mesolithic – Neolithic transition (including for organic remains with the potential for dating). Such remains could be of national importance.
- The ADBA lacks models for the relationship between known and potential archaeological ‘sites’ and the palaeoenvironment. To help inform our understanding of potential archaeological significance from the desk-based assessment approach adopted for this application it is recommended that landscape models for the following key periods are drafted, Lower, Middle and Upper Palaeolithic, Mesolithic-Neolithic, Bronze Age, Romano-British and Medieval. Such plans illustrating known archaeological ‘sites’ and areas of known impacts, would help to show where field evaluation will be needed. When such field evaluation has been undertaken, approaches to mitigation can be put forward to inform design choices and minimise impacts. Scheme parameter plans must define and respond to areas of archaeological potential (as determined by the desk-based assessment stage). At present none of the parameter plans (e.g. the Development Zones Below Ground plan) include any notes on archaeology. Including data on archaeological potential on parameter plans, drainage plans and proposed ground level plans would be helpful to ensure that all stakeholders are aware of how design must be led by an understanding of archaeological interest.
- In our Scoping Opinion we recommended - *The applicant should combine the surveys ... to provide historic environment character areas based on the desk-based and specialist assessments. These should then be used to identify areas of higher and lower potential within the site which in turn should identify areas in which development should be avoided and areas where development could proceed with low impact on the historic environment. This approach should be used to influence the layout of the development and the master planning process at an early stage.* Geoarchaeological Character areas have been defined but character areas are also needed for the Palaeolithic and subsequent archaeological periods as noted above. Relevant research questions should be set out in the ADBA, ES and the HEF and it should be noted that such research questions will be updated following each phase of fieldwork.
- The ADBA should make clear that depending on the results of field evaluation, the impact on nearby designated sites could be significantly greater than ‘slight adverse’, particularly in relation to potential impacts on hydrology within the valley.
- The ADBA notes that new information from archaeological recording within the site could increase the understanding and significance of the nearby

scheduled sites and play an important part in outreach. It should be noted that whilst new knowledge and outreach are very important and the Local planning authority should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

- The ADBA is not sufficiently detailed in relation to Palaeolithic archaeological potential and known remains – see comments on N4 below and our previous comments on the scoping opinion. There is a need for more detailed assessment to be undertaken to inform the layout and impact of the proposed development. As mentioned previously the approach to historic environment characterisation and iterative process of review used for other sites in the Ebbsfleet area e.g. Ebbsfleet Green should be followed for Ebbsfleet Central.
- There are some errors such as in 4.14 – Baker’s Hole rather than Berrow Hill.

Heritage Statement (Parts 1 & 2)

- The Heritage Statement could have the subtitle - Built Historic Environment Statement – for clarity.
- In this case we will defer to Historic England on matters related to Built Heritage and our comments focus on Archaeology. The LPA should consider whether more detailed advice on the historic built environment would be helpful as Historic England’s comments are likely to be at a strategic level.

Industrial Heritage Statement

- The Industrial Heritage Statement is thorough and written by Dr Chris Down with personal experience of the site.
- The report includes a useful consideration (Section 5.3) on the potential significance of any physical remains that might survive at the site. Considering recent experience on other former industrial sites within the EDC area, we caution against concluding that there is low heritage potential as there is a risk that below-ground archaeological remains may survive at the site and any such remains might help to support or challenge ideas based on documentary records. Appropriate field evaluation and/or mitigation (such as an archaeological watching brief) will be required to ensure any surviving archaeological evidence is appropriately preserved and recorded.

N4 Geoarchaeological and Palaeolithic Desk Based Assessment and Deposit Model

- The applicant has provided a specialist geoarchaeological assessment and deposit model for the site as recommended in our Scoping advice which includes useful summary information and sections. However, the assessment does not provide the Palaeolithic characterisation or identification of areas of expected survival of Pleistocene deposits which may contain significant Palaeolithic remains which we had been expecting. This should include significant remains identified during HS1 reporting and examples such as Late

Upper Palaeolithic remains which have not been found within the site boundary previously but it is possible to predict locations where geological deposits and other factors suggest they may be present. There are also some inaccuracies within the assessment such as in figure 4 with the inclusion of work for Northfleet Rise and Jayflex in HS1/STDR4 work. Some previous work in the area also does not seem to have been included. Note also that the site is bounded by a SSSI partly notified for Pleistocene geological deposits.

- The assessment also does not provide a sufficiently detailed characterisation of the nature and potential of Holocene sequences within the development site. More detailed Holocene character areas have been provided previously for Northfleet Rise (now part of Ebbsfleet Central) and with the publication of Prehistoric Ebbsfleet it should be possible to provide a detailed characterisation for the site as a whole. Period based characterisation for the Mesolithic to Early Medieval periods should be undertaken and areas where there is high potential for nationally important Mesolithic, Neolithic and later remains should be identified.
- The more detailed characterisation of the Palaeolithic and Holocene resource should have been provided at this stage of consideration of the application and should be undertaken as soon as possible. As with the Industrial assessment, the input of academic specialists who have worked extensively in this area should be sought. Recent higher level characterisation and deposit modelling of the area which has been undertaken for the EDC Urban Archaeological Database and Characterisation should be included and referred to where relevant. This characterisation has prepared helpful preliminary models of the earlier courses of Ebbsfleet which should be included and added to as part of this work as appropriate.
- It would be helpful if the plans of past impacts could be shown as shaded polygons rather than defined only by boundary lines. Plans of the GCZs should be shown at a larger scale so that they are easier to relate to the underlying modern map. As noted above plans of Palaeolithic character areas (see KCC standard specification provided previously) and areas of known and likely survival of Pleistocene deposits should be provided. Plans for the Holocene and later period characterisations should be included.
- Extensive previous archaeological investigation has been undertaken within the development area and a more detailed desk based assessment and characterisation phase as outlined above will help target any further archaeological evaluation and mitigation and save time in the development phase.

Heritage Assessment Management Plan

- We recognise that this document is presently in a draft format but it would be helpful if there was greater clarity and distinction of aims and content between this document and the Historic Environment Framework. Should the document be called Heritage Management Plan?
- We recommend that there is a commitment to ensuring that interpretation and information for outreach is developed within the context of other approaches across the EDC area to ensure information is coordinated and complementary. As noted for the HEF the bullet point list (HEF 5.2.3) of

proposed outreach is comprehensive but there must be a commitment to starting this work immediately following the granting of any planning consent and not left until the post-excavation assessment stage. This document and/or the HEF should include a commitment to appropriate storage with a funding contribution for storage and box charges.

- The S106 agreement for the site should include provision for heritage interpretation and long term storage of and access to the physical archaeological archive. We would be pleased to provide further advice on this aspect.
- Opportunities should also be sought for the enhancement of nationally important Palaeolithic and Neolithic sites present in the area adjacent to the application site.

Historic Environment Framework

- We recognise that this document is presently in a draft format but it would be helpful if there was greater clarity and distinction of aims and content between this document and the Heritage 'Assessment' Management Plan. The document should be iterative and updated throughout the life of the project. On previous schemes the inclusion of archaeological character areas within the framework has been helpful.
- In Section 4 there is a misunderstanding that field evaluation can be considered a part of mitigation in this context. It must be made clear that the primary aim of field evaluation is to inform the understanding of archaeological potential and significance and for that information to then be available to make informed decisions about appropriate mitigation which could include design choices (including for example types of foundations, location of structures etc.) and/or archaeological recording in advance of destruction of archaeological remains.
- We recommend that the document includes draft research questions for each chronological period.
- This document should include a discussion and/or model of the likely state of preservation of archaeological remains (particularly those areas likely to be waterlogged) and be clear that following field evaluation, mitigation by design will include the preservation, in situ, of areas of high archaeological potential and this may reduce the amount of developed land available and this flexibility will need to be reflected in parameter plans.
- We recommend (see 5.2.3) that this document sets out a clearer strategy for outreach activities to start during the processes of archaeological assessment, evaluation and mitigation, particular by working with local schools and colleges. We would like to see more detail on options for including heritage interpretation in public realm features and public art. As note above with respect to the Heritage Management Plan, the HEF should include a commitment to appropriate storage with a funding contribution for storage and box charges.

Cultural Heritage Sensitive Receptors (Appendix N.7)

- Waterlogged, non-designated archaeology should be seen as a sensitive receptor. We recommend that prehistoric and historic non-designated

archaeological remains and organic deposits, especially those that are waterlogged, are included in the list of cultural heritage sensitive receptors in this appendix. Such archaeological remains may be similar to those surviving on the nearby scheduled site and could exist throughout the valley within the site (particularly in ED1, ED2 and ED6). Field evaluation is required to understand these sensitive receptors to ensure that the development can be designed to avoid any negative impacts which would reduce the significance of any such remains, such as a change to their hydrological context.

In conclusion, we recommend that for an informed planning decision to be made, further work is undertaken to address the comments above, including to model the extent of Holocene, as well as Palaeolithic archaeological potential and to develop research questions for each period and character area. We would be happy to discuss how this could be achieved in detail with the applicant and their consultants.

We stress that the site has the potential to contain non-designated archaeological remains that may be of national importance and would therefore be subject to the relevant paragraphs in the National Planning Policy Framework (NPPF, paras 194, 195 and 202) for designated heritage. More work is needed to define the potential for these areas, which will then have to be tested by field evaluation in order that the character, date, extent and state of preservation can be understood and development impacts avoided or minimised. If it is impossible to undertake any pre-determination field evaluation then we would wish to make recommendations for planning conditions to secure the field evaluation and subsequent design-refinements that would be required to ensure avoidance and minimisation of impacts to archaeological remains. In the event that you are minded to grant outline planning permission we would be grateful if you could discuss appropriate conditions with us before issuing the decision notice. Our preference is for further assessment and field evaluation to be undertaken prior to determination but if that is not possible, we recommend that the following planning conditions be applied to any forthcoming consent:

AR1: No demolition/development shall commence until the applicant, or their agents or successor in title, has secured the implementation of a programme of archaeological work (including further archaeological characterisation and field evaluation as a first stage). The programme of archaeological works will comprise:

A) Prior to any development works the applicant (or their agents or successors in title) shall secure and have reported a programme of archaeological characterisation and field evaluation works, in accordance with a specification and written timetable which has been submitted to and approved by the local planning authority.

B) Following completion of archaeological evaluation works, no development shall take place until the applicant or their agents or successors in title, has secured the implementation of any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further

archaeological investigation and recording in accordance with a specification and timetable which has been submitted to and approved by the local planning authority.

C) The archaeological safeguarding measures, investigation and recording shall be carried out in accordance with the agreed specification and timetable.

D) Within 6 months of the completion of archaeological works a Post-Excavation Assessment Report shall be submitted to and approved in writing by the local planning authority. The Post-Excavation Assessment Report shall be in accordance with Kent County Council's requirements and include:
a. a description and assessment of the results of all archaeological investigations that have been undertaken in that part (or parts) of the development; b. an Updated Project Design outlining measures to analyse and publish the findings of the archaeological investigations, together with an implementation strategy and timetable for the same; c. a scheme detailing the arrangements for providing and maintaining an archaeological site archive and its deposition following completion.

E) The measures outlined in the Post-Excavation Assessment Report shall be implemented in full and in accordance with the agreed timings.

Reason: To ensure appropriate assessment of the archaeological implications of any development proposals and the subsequent mitigation of adverse impacts through preservation in situ or by record.

AR2: Prior to any Reserved Matters Application the applicant, or their agents or successors in title will submit for approval in writing by the Local Planning Authority a Written Specification and timetable for the preservation in situ of important archaeological remains and/or for further archaeological investigation.

Reason: To ensure that adverse impacts to features of archaeological interest are appropriately mitigated according to their significance and so that the archaeological heritage of the site can fully inform design.

AR3: No phase of the development hereby permitted shall be brought into use until the archaeological site investigation and post-investigation assessment (including provision for analysis, publication and dissemination of results and archive deposition) for that phase has been completed and approved in writing by the Local Planning Authority. The archaeological site investigation, post-investigation assessment, final publication and archive deposition will be undertaken in accordance with the programme set out in the written scheme of investigation approved under condition AR2.

Reason: To ensure appropriate assessment, analysis, reporting and dissemination of the results of the programme of archaeological work and the deposition of the project archive.

Future Reserved Matters Applications will be in accordance with the parameter plans, save for where any changes are required to address or incorporate findings of the archaeological investigations, including those undertaken under AR1 or AR2.

Reason: In order that the detailed design has full regard to archaeology that might be found post-outline approval.

No demolition/development shall commence until the applicant, or their agents or successors in title has submitted and had approved in writing by the Local Planning Authority an updated Heritage Management Plan which will include a commitment to the principle that future archaeological site investigations will inform the detailed design and layout of the scheme and measures to ensure preservation of important archaeological remains.

Future Reserved Matters Applications will be accompanied by an updated Heritage Management Plan to explain how site archaeological conditions and further field evaluation has informed the final scheme design, including preservation, mitigation and interpretation.

We would be pleased to discuss any of the above further and would suggest that we meet with the applicants' specialists to discuss the further work required in more detail.

Yours sincerely

Casper Johnson
Senior Archaeological Officer
Heritage Conservation