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**Re: 20221064 - Land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesend**

**Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Class E uses including floorspace for retail Class E(a)), food/beverage and drinking establishments (Use Class E(b)), local services (Use Class E(c)), indoor sport/recreation/fitness (use Class E(d)), healthcare space (Use Class E(e)), creche/nursery uses (Use Class E(f)), office floorspace (Use Class E(g)(i)), a new multi-use stadium with associated business and leisure facilities (sui generis), hotel (Use Class C1), community uses floorspace (Use Class F2). The phased redevelopment will include other sui generis uses, delivery of open space and significant realignment of the road network including the A226 Galley Hill Road / Stonebridge Road / Lower Road with hard / soft landscaping, car and cycle parking provisions, infrastructure works, ancillary and associated works.**

Thank you for consulting Heritage Conservation on this application. We have also provided the same response internally to KCC.

We have set out below our comments on matters of archaeological interest and have made no detailed comments or recommendations related to designated built heritage and defer to Historic England and your Conservation Officer.

The site lies within the Ebbsfleet Valley at its junction with the Thames at the Swanscombe Peninsula, in an area of multi-period archaeological potential for evidence of human activity from the Palaeolithic to the present day. The area to the south has known remains of national importance dating from the Palaeolithic (Scheduled site NHLE 1003557). 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. Further to the south, nationally important archaeological evidence for

Neolithic activity adjacent to the Ebbsfleet has been designated (Scheduled site NHLE 1004206).

The development site does not contain any presently designated heritage assets but is very likely to contain non-designated archaeological remains related to these nearby designated prehistoric sites as well as for other, more recent periods of human history, as a result of related geological and geomorphological characteristics associated with the course of the Ebbsfleet river as it enters the Thames Valley. Archaeological remains within the development site may include waterlogged organic artefacts, structures and palaeoenvironmental evidence, which could be of equivalent importance to the evidence existing on the above-mentioned designated sites. As well as prehistoric archaeological interest, the site has the potential for archaeological interest related to the crossing and management of the Ebbsfleet river, maritime activity and fishing, the reclamation of marshland, military and defence activities and the post-medieval and modern industrial development of the area, including the cement industry. The eastern boundary of the site is c.150m west of the scheduled Aspdin's kiln and the site has the potential for non-designated built heritage with archaeological interest related to its industrial and military heritage.

The application is supported by an Environmental Statement and three appendices of heritage information:

- Northfleet Harbourside Volume 1: Environmental Statement Main Report – Chapter 13 (Archaeology)
- Annex 1: Legislation and Policy
- Annex 2: Archaeological Desk-Based Assessment
- Annex 3: Geoarchaeological Desk-Based Assessment

These documents provide a useful desk-based assessment of the known and potential archaeological and geoarchaeological interest of the site. However, no purposive field evaluation of the site, to inform the assessment, has been undertaken, due to 'time constraints' (ES Chapter 13 initial summary table). Therefore, whilst the ES states that it '...identifies and assesses potential direct and indirect effects upon the heritage significance of known and potential archaeological receptors.' (ES 13.23), it cannot identify archaeological receptors in sufficient detail to allow an informed assessment of impacts or a subsequent planning decision to be made, especially, because as noted above, the site has the potential to contain sites with archaeological interest of potential national importance. Lack of time is not sufficient justification for not carrying out the necessary field evaluation.

The NPPF (194) is clear that the Local Planning Authority should require the developer to undertake field evaluation where the site is likely to include heritage assets with archaeological interest and especially so where there is a likelihood of below-ground archaeological remains of national importance. The NPPF goes on to state in footnote 68 to paragraph 200 that 'Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.'. Paragraph 200 states that '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(68).'

In as far as they can go the archaeological and geoarchaeological desk-based assessments are a useful first stage (though we highlight some specific concerns below) and, importantly, the need for field evaluation is recognised. But the assessment documents give something of a false sense of certainty about the archaeological interest of the site, which is then carried over into the Environmental Statement and associated documents (e.g. the Planning Statement, Non-technical summary, ES volume and documents on effect interactions (ES 16) and significant effects (ES 17). It is not helpful that these documents conclude that no significant demolition and construction impacts have been identified when the understanding of the archaeological interest is so limited and yet the archaeological assessment recognises that the archaeological potential is high.

The archaeological assessment documents identify the following ‘receptors’ and to help explain the concerns about the present level of understanding of the archaeological resource of the site we have listed these below with the assessment text in italics followed by our KCC comments.

### **Post-medieval Stone Bridge Foundations**

*13.97 The potential foundation remains associated with the bridge would be expected to be of low heritage significance. The Proposed Development impacts within this area would involve the construction of the stadium, car parking and retail structures around the stadium, and residential areas. As such, the effects of the Proposed Development are expected to result in a high magnitude of impact upon a heritage asset of low heritage significance resulting in a direct, long-term, permanent, local, minor adverse (not significant) effect.*

#### **KCC comment**

The location, character and archaeological interest of a bridge, or former bridges, at the same or another site are not known. It is therefore not possible to state that remains would be of low heritage significance. The area needs to be evaluated to understand the historic route of the Ebbsfleet river (which will have moved over time and whose last known course may have been canalised to feed a millpond) as well as the location, character, date and significance of any historic structures that would have been associated with the river such as bridges, causeways, historic routeways, sluices, water mills etc.. Surviving remains of such structures could be of regional or national importance.

### **Possible Mill Pond**

*13.98 Archaeological remains associated with the probable 19th century extension to the mill pond are predicted to be of low heritage significance. The magnitude of the impact from the demolition and construction works is expected to be high, resulting in a direct, long-term, permanent, local, minor adverse (not significant) effect.*

#### **KCC comment**

The location, character, date and archaeological interest of a millpond and any associated structures, within the site is not known with any certainty. It is therefore not possible to state that remains would be of low heritage significance. Domesday Book mentions a mill at Northfleet and potentially the same mill is referred to in documents of the 15<sup>th</sup> century, and the relationship to the surviving remains of a mill pond, comprising a brick-lined tank through which the Ebbsfleet river still flows, remains uncertain. The mill pond is thought to have served a tidal mill of possibly late-18th century date but potentially with medieval origins. Any such remains would be of regional or national importance. The area needs to be evaluated to understand the potential and significance, potential impacts and options for mitigation.

### **Windmill**

*13.99 A windmill is recorded on the 19th century historic mapping within the central northern part of the site. Any remains of the windmill would be expected to be of low heritage significance. This part of the site is proposed as part of the area of public open space in the*

*northern part of the site, which may involve some landscaping activities. The magnitude of the impact of landscaping upon a heritage asset of low significance would be high. This would result in a direct, long-term, permanent, local, minor adverse (not significant) effect.*

**KCC comment**

The location, character and archaeological interest of any remains of the former corn mill and other former buildings recorded on historic mapping in this area are not known. It is therefore not possible to state with any certainty that remains would be of low heritage significance. The relevant areas will need to be evaluated to understand the potential and significance.

**Cement Works**

*13.100 The eastern part of the site has potential for archaeological remains associated with the Cement Works. Remains of the Cement works (structural remains of kilns, associated buildings and tunnel networks) would be considered to be of medium heritage significance. This part of the site is proposed for residential development and landscaping. Activities associated with construction such as excavation/piling for foundations, excavation for utilities and roads as well as excavation and earth movement for landscaping have the potential to result in direct effects to archaeological remains in this area. As such the magnitude of the impact is expected to be a high. The result of a high impact upon a receptor of medium heritage significance would result in a direct, long term, permanent, local, moderate adverse (significant) effect.*

**KCC comment**

We welcome the recognition of the potential significance of archaeological remains associated with the cement industry but recent archaeological work by Wessex Archaeology at the former Bevans cement works to the east of this site, has recorded industrial remains of regional or national importance. In the absence of a more detailed assessment of the industrial potential of the site, it would be safer to assume at this desk-based assessment stage that archaeological remains could be considered to be of medium to high heritage significance and we recommend that areas where potential archaeological remains might be expected to survive should be subject to trial trenching field evaluation at the earliest opportunity followed by a more detailed assessment and interpretation of the site, ideally by an expert on industrial heritage and the cement industry.

*13.101 Infrastructure associated with the cement industry such as wharves, tramlines and quarry pits may also exist within the site as indicated on the historic mapping, these would be expected to be of low heritage significance. The magnitude of the impact from the demolition and construction works is expected to be high, resulting in a direct, long-term, permanent, local, minor adverse (not significant) effect.*

**KCC comment**

As noted above, the recent archaeological work in Northfleet by Wessex Archaeology has demonstrated that industrial remains of regional and national importance can survive. Any such remains of the cement industry at this site should be seen within the wider context of the development of the cement industry in north Kent and it would be safer to assume at this desk-based assessment stage that archaeological remains could be of medium to high heritage significance. One reason for this is that we are learning that archaeological evidence adds significantly to, and can challenge, assumptions about the development of the cement industry (and other pre-cement industry uses of the site) based on documentary evidence.

**Unknown Archaeology**

*13.102 As the site has not been previously investigated the assessment has found there to be potential for archaeological remains that are as yet unknown to be discovered within the site. As the nature, survival and extent of these features is unknown, the heritage*

*significance of these assets remains unknown. The magnitude of the demolition and construction impacts would be high but as the heritage significance of the heritage assets is unknown, the significance of the effect cannot be determined.*

**KCC comment**

We welcome this recognition of the potential for presently unknown archaeological remains to exist at the site but the ES should, based on the evidence presented in the assessments, recognise that archaeological remains (particularly those that are waterlogged – see for example ES Table 13.5) could be of regional or national importance. It is the potential for waterlogged deposits to contain archaeological artefacts and structures which is of critical archaeological importance and we disagree with the conclusion in the ES (13.104) that if the deposits area widespread then changes to hydrology would lead to an effect that would not be significant. If a change to hydrology were to alter the conditions of a buried and waterlogged timber platform, boat or mill, for example, then the effect would be very significant. The site should therefore be subject to field evaluation to allow the EIA process to be appropriately followed.

The geoarchaeological assessment presents an initial model of character zones based largely on data from outside the site. We consider that even at this desk-based assessment stage, these character areas could be refined further to define areas of archaeological potential related to the late Pleistocene and Holocene development of the Ebbsfleet valley. More refined character areas with appropriate research questions, should then be subject to field evaluation. Period based characterisation for the Mesolithic to Medieval periods should be undertaken and areas where there is high potential for nationally important Mesolithic, Neolithic and later remains should be identified. A fundamental geoarchaeological research question, with significant archaeological implications, is the understanding of former courses of the Ebbsfleet river channel over time and the location and extent of former dryland/wetland interfaces. 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.

The site comprises an area of historic clay pits, in which area evidence for Palaeolithic material has been identified and where there will have been potentially widespread impacts to any below-ground archaeological remains. Field evaluation is required to understand the exact depth and extent of the historic quarrying and to determine what archaeological potential survives below as well as at, and beyond the margins of the former quarry.

**Recommendations**

Our recommendations are that pre-determination, further characterisation is required with field evaluation to provide a more robust approach to understanding the archaeological interest of the site, the significance of any archaeological remains and to allow informed decisions about impacts and appropriate mitigation to be made. At present we consider that there is not enough evidence to clearly understand and assess the potential impacts of the development on archaeological remains and particularly those that are waterlogged. 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.

We recommend the following field evaluation methods are employed to develop the deposit and archaeological models for the site:

1. Geophysical survey such as Electromagnetic survey, to understand in more detail the underlying geo-archaeological deposits including for deposits with Palaeolithic

potential and those associated with the evolution of the Ebbsfleet and its location within the valley and confluence with the Thames and how these have changed over time.

2. Geo-archaeological boreholes and test pits combined where appropriate, with trial trenching across the site to ground-truth and enhance a deposit model based on the geophysical survey and existing extrapolated borehole data. Samples from the boreholes would be used to understand the palaeoenvironmental potential, hydrology, state of preservation of organic waterlogged remains, the likely location for human activity, and to provide dates to develop a chronology for the sequences at the site. The combined assessment and evaluation data should then be used to create landscape environmental models for each chronological period with research questions as part of the process of a consideration of impact mitigation options.

If there is a programme of Ground/Site Investigation works undertaken before a planning decision is made, then these works should be subject to a geo-archaeological watching brief, integrated with the above-recommended field evaluation works.

We would like to see a draft Heritage Management Plan (HMP) for the site included in the submission documents. An HMP should include a commitment to ensuring that interpretation and information for outreach is developed within the context of other approaches across the Dartford, Gravesham and EDC areas to ensure information is coordinated and complementary. The HMP must include a commitment to a wide range of outreach and interpretation which should commence immediately following any planning consent. We would like to see detail on options for including heritage interpretation in public realm features and public art. We would like to see detail on a commitment to appropriate storage of archaeological archives resulting from the project with a funding contribution for storage and box charges. A S106 agreement for the site should include provision for heritage interpretation and long-term storage of and access to the physical archaeological archive.

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 in more detail using purposive field evaluation (geophysical survey, boreholes, test pits and trial trenching) 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. The tendency of the assessment and ES to consider field evaluation as mitigation should be avoided.

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