



Growth, Environment & Transport

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BY EMAIL ONLY

31 October 2023

Dear Sir / Madam

Re: Medway Council Local Plan 2022-2040 – Setting the direction for Medway 2040 – Regulation 18 consultation

Thank you for inviting Kent County Council (herby referred to as the 'County Council') to comment on the Medway Council Local Plan – Setting the direction for Medway 2040.

The County Council welcomes the commitment to prepare a new Local Plan. The County Council seeks to work in partnership with Medway Council to ensure the delivery of well designed, sustainable growth – supported by the necessary infrastructure that is planned for and delivered in a timely manner.

The County Council is supportive of the Strategic Objectives identified which focuses on the delivery of sustainable, resilient and healthy communities and economy in Medway.

It is recognised that this is an early-stage consultation and Medway Council is currently progressing an evidence base to inform the Local Plan. The County Council would welcome continued discussions on any cross boundary and strategic matters as the evidence base is developed.

The County Council recognises the significant housing requirement for Medway, and the ongoing consideration of whether there is capacity to provide an additional 2,000 homes to help to meet Gravesham's housing need.

The County Council notes that four broad categories of locations where development could take place have been identified within this consultation document. The County Council would urge that for categories that are likely to have cross boundary impacts, engagement takes place at this early stage to address these impacts and ensure adequate mitigation and infrastructure can be secured to ensure that growth in these locations is sustainable.

Identified growth forecast in Medway will have an impact on key services provided in Kent, especially in areas close to neighbouring boundaries. The County Council will continue to work with Medway Council to ensure that, as growth options are developed, a clear strategy to deliver the necessary infrastructure is in place to ensure that development is sustainable.

The County Council recognises the need for Medway Council to consider the potential impacts of the proposed Lower Thames Crossing. The County Council would encourage Medway Council to engage in the ongoing Examination of this Nationally Significant Infrastructure Project.

The County Council has reviewed the consultation document and sets out its comments below.

Highways and Transportation

The County Council, as Local Highway Authority for Kent, notes that this consultation document provides a useful summary of the issues and challenges facing Medway in developing a Local Plan.

In respect of transport, the Local Highway Authority for Kent, supports the aim to reduce car dependency to create safe, connected and sustainable places. It also understands the need to encourage economic development to enable people to live and work in Medway, as well as the need to secure investment in transport and green infrastructure.

The Vision for 2040, as set out in Section 3, is clearly defined and the ongoing work whereby all potential development sites are being assessed for their ability to deliver sustainable development, will contribute to the necessary evidence-based plan making process. Given the constraints in the transport network surrounding Medway, and the opportunities offered to create sustainable developments building on the existing network of footways, cycleways and public transport services - the County Council, as Local Highway Authority for Kent, considers an urban regeneration focused development strategy could offer the best opportunity to meet the vision. The County Council appreciates the Local Plan will also likely need to contain a mix of other sites in suburban and rural areas. The County Council looks forward to further close working with Medway Council as the plan is progressed, including scenario testing and identification of potential impacts and mitigations utilising the Kent Transport Model. Particularly in areas along the A2 corridor, along which further growth is proposed.

In this respect, the County Council as Local Highway Authority for Kent, wishes to highlight the importance of the existing strategic transport corridors connecting into Medway within the Kent boundary that experience congestion and air quality issues. There is particular interest where the proposed development areas are likely to materially impact on the transport corridors and the operation of the associated local highway network.

Public Rights of Way

The County Council, in respect of Public Rights of Way (PRoW), has a statutory duty to protect and improve PRoW in the County and is therefore committed to working in partnership with Medway Council to achieve the aims contained within the County Council Rights of Way Improvement Plan and the Medway Rights of Way Improvement Plan. The partnership aims to provide a high-quality PRoW network, which will support the Kent and Medway economy, provide sustainable travel choices, encourage active lifestyles and contribute to making Kent and Medway a great place to live, work and visit.

In respect of the Vision for Medway in 2040, the reference to *“improved travel choices”* is welcomed and the County Council would take the opportunity to suggest links to the Kent networks should be included. There is an increasing need for Active Travel cross-border routes due to development both in Medway and neighbouring Kent districts/boroughs.

The County Council would welcome partnership working and investment in cross border routes. This applies to routes which have the potential to bring economic and tourism benefits to the area such as the new National Trail, the King Charles III Coast Path, promoted routes and green spaces.

Education

The County Council, as Local Education Authority for Kent, has considered the location of the proposed new development areas in relation to their proximity and potential impact on existing state-maintained schools that might be affected. Four districts/boroughs share an administrative boundary with Medway: Gravesham, Tonbridge and Malling, Maidstone and Swale.

The County Council recognises that Medway Council intends to provide new schools for any new development. The County Council supports this and would request that each development provides the necessary funding and infrastructure to mitigate the impact of growth. For all four Kent districts/boroughs which border Medway, there are County Council schools that are close to the border and it is understood that there will be students that cross the border to attend these schools. Similarly, there will be Kent children who travel into Medway to attend a school. However, it is important to note that the Kent schools near the borders are virtually full and will not have capacity to accommodate any new children generated from new Medway development. Therefore, if any of these schools need to pick up the additional growth

proposed, the County Council would ask that discussions take place to ensure that the growth can be properly accommodated, with the appropriate level of funding.

It should be recognised that the four mentioned districts/boroughs which border Medway are currently progressing new Local Plans. The County Council will be analysing the housing that is proposed through these local plans and will likely need to consider additional new provision. The County Council would therefore welcome continued engagement with Medway Council to ensure adequate level of provision of this infrastructure to support communities in Kent and Medway.

Minerals and Waste

The County Council, as Minerals and Waste Planning Authority for Kent, notes that Medway has a significant waste management capacity, mineral importation and transportation infrastructure. These should be subject to safeguarding to maintain their viability and effectiveness. It appears that the waste management capacity at the industrial Chatham Docks site is possibly at risk of being lost if this area is allocated for non-waste development. This should be given due consideration and the County Council would ask that the net waste management self-sufficiency could be included within the vision for Medway. If capacity is lost, this should be proximately replaced to ensure growth is sustainable in Medway.

Sustainable Urban Drainage Systems

The County Council, as Lead Local Flood Authority for Kent, supports Medway Council's aspiration to reduce the risk of flooding through preparations of a sustainable and green future by securing a robust green and blue infrastructure network. The County Council would recommend that the Local Plan should be robust in its requirements with regards to defining acceptable operational characteristics of surface water systems and would draw reference to paragraphs 159-169 of the National Planning Policy Framework regarding planning and flood risk.

Heritage Conservation

Medway's historic environment has played a significant role in forming the character of the unitary authority today, as well as having potential as a contributor to the success of the area in the future. Medway has a wide range of heritage assets, many of which are of international importance. These include 76 scheduled monuments, almost 650 Listed Buildings and 3 Registered Parks and Gardens. There are many more heritage assets that contribute to character at a local level. These include more than 30 historic parks and gardens as well as historic landscape features, historic buildings and archaeological sites. Indeed, the Kent Historic Environment Record lists more than 4,600 non-designated heritage sites in Medway. These assets are to be found across the unitary authority. Highlights include Rochester with its important Roman, Saxon and Medieval remains, Chatham, with its internationally important Royal Dockyard and associated fortifications, Gillingham which has Saxon origins and the Thames Estuary fortifications located on the Hoo peninsula and Isle of Grain. Within the rural areas of Medway, the historic environment is similarly important:

important Palaeolithic remains are present at Cuxton and elsewhere along the former courses of the river Medway, and the marshes and intertidal zone are important for later prehistoric remains. The rural areas are particularly important for military and industrial survivals as well as the pattern of historic villages and lanes. Many of these sites are of national significance but currently not designated. For new growth and development to successfully integrate with the historic environment of the area, it will need to work with the grain of this existing character and, if possible, enhance it.

The County Council considers that the need to regenerate and develop Medway in a way that is sympathetic to its past should be a consideration through the Local Plan process. At present, Rochester is a visibly historic city with many high-quality buildings and an attractive streetscape. Chatham has the areas, primarily associated with the river frontage, - the Dockyard and historic fortifications which are similarly attractive. . In Gillingham, by contrast, historic features are less common and less visible, yet Gillingham is a historic settlement dating to perhaps Anglo-Saxon times. The river frontage contains numerous heritage assets and has great potential for heritage-led leisure and tourism. The County Council recommends that the Local Plan should seek to ensure that the heritage assets of all of Medway are used to their maximum advantage so that regeneration can be successful and durable.

The County Council would also recommend that it would be helpful if the Local Plan could identify ways in which the heritage of the area could actively contribute to life in Medway. On the Hoo Peninsula alone, Cockham Wood Fort, Grain and Slough Forts, the Second World War Stop Line and the coastal and maritime heritage all have the potential to become foci of community activity in the form of heritage walks and community projects.

The County Council would draw attention to a number of key studies and resources that could inform consideration and use of Medway's historic environment:

- [Kent Historic Environment Record](#), a database of archaeological sites, historic buildings and landscape features in Kent and Medway.
- The outputs of the [Hoo Peninsula Historic Landscape Project](#) – a major project carried out by Historic England from 2009 – 2012 that examined all aspects of the peninsula's heritage.
- [Historic town survey reports for Chatham, Rochester and Gillingham \(2004\)](#). These reviewed the known archaeological and built heritage of the three towns and identified Urban Archaeological Zones of sensitivity.
- [Kent Farmsteads Guidance \(2012\)](#) for developers and planners considering development in the countryside.
- [Kent Historic Landscape Characterisation \(2001\)](#).
- [Kent Gardens Trust survey reports](#) for gardens and green spaces in Medway.

It is important that appropriate policies for the protection and enhancement of Medway's heritage are included in the Local Plan. The County Council would encourage consideration of the full range of heritage types including:

- Archaeology, including non-designated heritage assets
- Built heritage, including non-listed buildings, listed Buildings and Conservation Areas
- Historic landscapes, including historic parks and open spaces
- Local Heritage Assets, perhaps including a commitment to the development of a Local List.

The County Council, in respect of heritage conservation matters, has provided detailed comments on the consultation document in Appendix 1.

Biodiversity

The County Council draws attention to the need to consider Biodiversity Net Gain and the emerging Local Nature Recovery Strategy. There is a need to ensure that allocated sites will not result in the loss / impact on habitat connectivity. The County Council would also recommend that the Local Plan should be looking to protect areas which are important for species/habitat connectivity.

The County Council would also draw attention to the need to ensure that sufficient ecological information is available to ensure the impact of development can be fully understood and considered accordingly.

Whilst the consultation does not have a specific section which relates to the Environment, the County Council does note the objective within the Plan to prepare for a sustainable and green future. The County Council would recommend that as well as consideration of climate change, sustainable transport, robust green and blue infrastructure and the effective management of natural resources, there should be a stronger consideration of environmental goals. The Local Plan should include a detailed consideration of the environment, encompassing the natural and built environment, including heritage.

Wharves

The County Council also notes that development is proposed along the Chatham Docks and Rochester Riverside in Medway. The County Council is concerned that the closure of some of the deep-water wharfs could lead to increase pressure on the current working docks in Kent, for example Riddock Dock and Sheerness. The County Council would ask that protection for these facilities is considered to limit the pressure on other ports in the area.

The County Council recognises the importance of the Local Plan in developing a growth strategy that responds to the strategic objectives and the vision for Medway. Joint working between the County Council and Medway Council, working in collaboration to understand and address cross boundary matters, should continue throughout the Local Plan process and delivery of good growth.

The County Council would therefore welcome continued engagement as the Local Plan progresses and will continue to work closely with Medway Council to support the delivery of new sustainable housing, employment and required infrastructure in response to local needs.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours faithfully



Simon Jones

Corporate Director – Growth, Environment and Transport

Encs:

[Appendix 1](#): Kent County Council Heritage Conservation detailed commentary.

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3.1 Vision for Medway

The references to Medway's historic environment are rather inconsistent in the current text. When the Vision is eventually defined, it would be better to include a firm overall commitment to protecting and enhancing Medway's heritage to which additional mention can be made as needed in other sections. This will help ensure that preserving a high-quality historic environment is regarded as a key goal for the Vision for Medway in its own right, rather than just being an adjunct to other goals.

By 2040, Medway is responding and adapting to climate change, providing for more sustainable and resilient development.

Climate change will also provide a major challenge for the management of Medway's heritage. Many of Medway's heritage assets are coastal and are directly threatened by rising sea levels. Examples include the prehistoric, Roman and medieval salterns of the marshes of the Hoo Peninsula, Roman pottery-making sites visible in the foreshore and the fortifications of Grain, Cockham Wood Fort, Slough Fort, Hoo and Darnet Forts and the Historic Dockyard. Changing moisture levels in the soil will impact on archaeological remains which are susceptible to drying, wetting and erosion and historic buildings will be challenged by increased wind and storms. It would be helpful if Medway Council could include a survey of Medway's heritage in its action plans and the likely impact of climate change so that management can be identify both risk and any necessary actions.

The County Council agrees with the goal "*Medway has secured the best of its intrinsic heritage and landscapes alongside high quality development to strengthen the area's distinctive character... Important wildlife and heritage assets are protected and enhanced.*" Key to this will be ensuring that the Medway Heritage Strategy is fully integrated into relevant decision-making, design and master planning for development proposals as well as blue and green infrastructure projects.

4. Strategic Objectives

The County Council considers that it is unusual that there is no strategic objective that relates to Medway's environment. The environment is central to whether Medway is a good place to live in and visit, with clear consequences for health and wellbeing, economic dynamism and quality of design. The County Council recommend that a specific objective be included that includes securing Medway's high-quality environment for future generations, in all its forms including the historic environment.

Proposed objective: *Prepared for a sustainable and green future*

The historic environment has a significant role to play in the conservation of resources required for development, and in energy efficiency. Old buildings can often be more energy efficient than newer ones and of course have already been built.

Thus, it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. Historic England has produced a range of guidance on the role that heritage can play in mitigating climate change and historic building adaptation ([Climate Change Adaptation Report](#) (Historic England, 2016)). The guidance demonstrates that historic structures, settlements and landscapes can in fact be more resilient in the face of climate change, and more energy efficient than more modern structures and settlements. This has also been updated in the Historic England report [There's no Place Like Old Homes: re-use and Recycle to Reduce Carbon](#) (Historic England 2019). This could be highlighted in the text which, at present rather suggests that the brunt of making housing energy efficient must only be borne by new buildings.

Using historic routeways also allows Green infrastructure (GI) designers to incorporate heritage assets to provide features of interest. In turn this will help people accessing the GI to become more aware of and value Medway's heritage which will in turn assist their conservation and re-use. For example, the Hoo area has links to internationally important fortifications at Grain. If the GI were to feature these it would help raise their profile to assist with conservation whilst diminishing the attractiveness of the sites for anti-social activity. GI can also be used to support tourism in Medway by linking historic sites and landscapes such as the Chatham Lines, Rochester Castle and Cathedral and the historic explosives works of the Hoo Peninsula.

To fully appreciate the Medway's landscape character and incorporate it into GI effectively, it is first important to understand it. The main method for investigation historic landscape character is by historic landscape characterisation. This is a method of assessing the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape. This has been completed for the [Hoo Peninsula](#) and the County Council would urge Medway Council to draw on the research to identify connectivity between the heritage assets of the area.

GI also makes an important contribution to health. Historic England has released research that demonstrates how heritage actively supports health and well-being through contributing to a generally more attractive environment, allowing activities that encourage participation and inclusion and by encouraging outdoors activities. [Wellbeing and the Historic Environment | Historic England](#)

5. Developing a Spatial Strategy

The County Council has submitted detailed appraisals of the strategic sites mentioned in Chapter 5 previously. All will need to be subject to fully detailed appraisal to inform development proposals and master planning. The potential for the main sites is, however, summarised below.

Urban Regeneration

Although brownfield sites may be attractive for development for various reasons, they can nonetheless contain significant heritage assets. Medway has an important industrial past with early examples of chalk pits, factories and infrastructure related to the cement and other industries. These contribute significantly to the area's historic character and can be used in master planning new developments to help new build be better integrated into the existing landscape. Similarly, many such sites, especially quarries, will contain deposits of archaeological significance. Medway is important for Palaeolithic archaeology (c. 800,000 BC to 10,000 BC) and sensitive deposits may well survive beneath the floors, and in the edges of quarries. Riverside brownfield sites may well contain archaeological remains associated with the former river frontage. To establish the archaeological potential of brownfield sites it will be necessary to carry out detailed assessments in the form of desk-based assessment and, if appropriate, fieldwork.

To ensure that new development on brownfield sites is fully integrated into the existing character of Medway's historic towns, it will also be important to ensure that Conservation Area appraisals are completed for all Conservation Areas. This should also be a recommendation in any action plan.

The Local Plan will also need to ensure that Medway's historic river frontages are conserved and enhanced during urban regeneration schemes. It is easy for historic features to be sacrificed during revetment refurbishments and the construction of new promenades etc, but it is these that give the frontages their character. Full, detailed assessment of river frontages will be needed to inform scheme designs.

Suburban Expansion

Grange

The development area lies in a region of considerable archaeological potential, primarily from the Roman period onwards. At Grange Manor prehistoric features and over 20 Roman structures were excavated including a temple or mausoleum, workshops and roads. Early medieval evidence was also found and Grange/Grench Manor includes the remains of a 13th century medieval manor house complex. Close to (or possibly within) the development area the remains of two 19th century infantry redoubts also survive. These experimental sites marked important stages in the development of defensive sites.

Lower Rainham

The development area has archaeological potential associated with its position close to the river Medway, where a number of past archaeological discoveries have been recorded. These include Romano-British pottery vessels found close to Lower Rainham Road, and probably originally deposited in association with a burial. Other finds from the area include a 5th century AD gold Merovingian coin and large numbers of flint tools including Palaeolithic hand-axes.

Rainham

The Rainham development area has been relatively little studied, and few heritage assets are known from within the area itself. Nevertheless, the general potential of this part of Medway is significant and includes important Roman remains to the north and at Hartlip. Roman Watling Street also passes through the development area. There are also a number of historic farmsteads and listed buildings.

Capstone

There has been little formal investigation of the development area. A number of Palaeolithic implements have been discovered in the Darland area. A Bronze Age barrow may have existed at Sharstead Farm. Romano-British burials have been reported from Hale Farm and Gransden's Brickfield, although there is little further information about these. Their locations suggest that a Roman routeway may have existed in this area. A possible pre-18th century chapel has been identified near Capstone. Fort Darland, built as part of the Chatham ring-fortress in 1899, is located to the north of the area. Although now demolished, earthworks associated with the fort remain and these and their setting could be affected by development in the area.

Wigmore

This small development area lies in an area of more limited archaeological potential. The remains of a medieval chapel are located immediately south of Hempstead Valley Shopping Centre. A Second World War decoy site for the Shorts aircraft factory was located west of Capstone Road and a heavy anti-aircraft battery was installed at Gibraltar Farm. Some camp structures remain.

Rural Development

Chattenden

Although the Chattenden village centre as indicated on the map in the document is some distance from the main Chattenden military site, there are nonetheless several heritage assets that could be affected by the proposals. On the Kitchener Road roundabout, part of one of the former 1961 guardhouses survives alongside the main access road into the barracks. At Copse Farm, three concrete Second World War (probably) barrack huts also survive. At the junction of Kitchener Road and Chattenden Lane the former Garrison Church still survives, albeit as a civilian church. All three of these sites are located in the area identified as the 'indicative neighbourhood centre'. In the event of major development in this area it will be important to ensure that those structures which are retained keep some of their context in terms of setting and interpretation, so the military origins of the area remain in the local memory and contribute to the character of the neighbourhood.

In the angle between Broad Street and the Ratcliffe Highway, aerial photographs have suggested former field systems of unknown date. Also running through this

area from the main Chattenden village site was a small-gauge railway from Chattenden to Hoo.

In the area south and west of the proposed village centre, there are numerous remains of the area's military past. These include a former 19th and 20th century Naval military railway that connected munitions and military depots around Hoo, a 1950's wireless transmitter Station at Beacon Hill, the remains of a Second World War Naval Signal Station, the scheduled Second World War blockhouse and beacon, a Cold War air-raid shelter, a Second World War pillbox and a First World War anti-aircraft battery. There are also areas of First or Second World War practice trenches on Beacon Hill. This complex of sites would suit being brought together in a trail or another form of interpretation to help maintain the green space between settlement areas and to retain memory of the military origins of the Chattenden area.

Finally, recent archaeological investigations at Chattenden, in response to housing development, have revealed important, but previously unknown, archaeological sites including evidence for Mesolithic activity and Anglo-Saxon settlement. These discoveries highlight the potential for further important, but unknown, archaeological sites to exist within the proposed growth area. Any future masterplan for the area would need to have sufficient flexibility to take account of important archaeological discoveries. This will likely require a comprehensive programme of desk-based, non-intrusive and intrusive assessment and evaluation prior to any detailed master planning.

Deangate Ridge

Deangate is located in a highly significant military landscape originally dating back to the late 19th century with the use of the area being a major magazine establishment. Although much of the site has been demolished, numerous magazines, protecting earthworks as well as later defences still survive. During the Second World War, the entire site was defended by an arm of the General Headquarters Stop Line that ran from Hoo St Werburgh to Higham Marshes. A 2014 survey by Historic England has mapped the route of the Stop Line and its accompanying pillboxes, earthworks and defences which essentially follow the route of Dux Court Road as far as Wyborne's Wood before turning west. Four of the pillboxes in this area of the GHQ Line have been designated as listed buildings and several features relating to the Lodge Hill Magazine. Between Hoo St Werburgh and the magazine also formerly stood the Deangate Second World War radar station, which included gun emplacements and ancillary structures.

West/East of Hoo St Werburgh

Previous archaeological investigations in the area have discovered extensive prehistoric and Romano-British remains in the vicinity of Hoo. The alignment of a Roman road linking the Hoo Peninsula to Roman Watling Street is projected to run to the south of the former Chattenden Barracks close to the development area. To the north-west of the area, within the Lodge Hill enclosure, a Romano-British cemetery has previously been identified and a further occupation site has been found south of

Hoo between the village and the shoreline. The village itself contains built heritage assets such as the church and it is important to protect the long views towards them. There are also Saxon and Medieval remains, although the site of the 7th century nunnery has yet to be identified. The landscape also contains numerous survivals of the Second World War associated with the GHQ Stop Line that runs from the foreshore south-east of Hoo to the north of Lodge Hill where it turns west.

West of Hoo St Werburgh. Finally, both east and west of Hoo there is a strong maritime character with many coastal features that also contribute to the historic character of the area.

The Cockham Farm area has an extensive heritage. From north to south:

Both north and south of Stoke Road, cropmark complexes and field boundaries have been observed in aerial photographs, although the dates of the complexes are unknown.

Along the route of the Saxon Shore Way a number of well-dated archaeological discoveries have been made. Palaeolithic artefacts have been recovered from a brickearth pit to the south-west of St Werburgh's Church in Hoo in the 1930s. A late bronze age occupation site was discovered during a watching brief in 1999. An iron age coin and torc were found close to Hoo village. A Romano-British cemetery and occupation site was found in 1894 near Cockham Cottages. The lost 7th century nunnery may exist either within the village or perhaps within the Cockham Farm area and other middle Saxon features are known from the area south of the village.

Along the coast can be seen numerous examples of more recent heritage assets. Although Roman remains have been found at Hoo Marina Park, most of the remains relate to the maritime use of the coastline. The most significant site is the scheduled 17th century Cockham Wood Fort built by Sir Bernard de Gomme as a response to the Dutch Raid. Despite its scheduled status, the fort is included in the national Heritage risk register where it is described as at risk of immediate further rapid deterioration or loss of fabric if no solution for its conservation and management is agreed. There are also numerous wharves, jetties and quays, as well as several examples of wrecked barges dating from the 18th to 20th centuries.

In addition to the maritime activity, there are several important 20th century military assets along the coast. The GHQ Stop Line meets the coast at this point and the junction was defended by at least 8 pillboxes and anti-landing sites.

East of Hoo St Werburgh

Prehistoric cropmarks, enclosures and features have been seen in aerial photography between Sharnal Street and Tunbridge Hill and also around Tile Barn Farm. A number of discoveries dating between prehistoric to Saxon times were made during the Isle of Grain gas pipeline works, including most notably, a Late Bronze Age settlement or probable possible funerary site and a possible Late Bronze Age

small scale industrial site. A Romano-British industrial site with a probable pottery kiln was also found.

The Second World War GHQ Line runs south-east to north-west through the western end of the area and as described above (see Deangate) contains many surviving heritage assets of importance. The indicative illustration appears to show extensive new development, including a proposed neighbourhood centre between Ropers Lane and Bells Lane. The area is crossed by part of the General Headquarters (GHQ) stop-line between Hoo St Werburgh and Higham Marshes; a notable surviving example of anti-invasion defence. It is an important remnant of the Second World War defense landscape of the peninsula and is a well-preserved example of this type of defence, which is part of a major chapter in the national story. A group of pillboxes are located along the edge of the existing development along Bells Lane, two of which are listed (Grade II). The stop-line comprised an anti-tank ditch, pillboxes (both anti-tank and infantry), barbed wire entanglements, road-blocks and other features. The surviving remains form a coherent pattern of defence linked to the local topography. Extensive development here would result in the loss of part of the stop-line and would be harmful to the setting of the listed pillboxes. Development should not take place along the route of the GHQ stop line and its setting should instead be enhanced.

High Halstow

The area is centred on High Halstow village which retains its medieval core and includes a medieval church and tithe barn and several medieval buildings. Within the village, however, older remains have been discovered including Bronze Age and prehistoric features. Outside the village, several enclosures and cropmarks have been seen in aerial photographs. Metal detectorists working around the village have discovered numerous examples of artefacts, particularly from the iron age to the medieval period.

Immediately to the east of the area is the Fenn Street Second World War air defence post with associated radar station. The area also forms the northern extremity of the GHQ line in Kent/Medway and there are several surviving pillboxes and other features.

The area is also crossed by several industrial and military tramways such as the Port Victoria Railway, the Chattenden Naval Tramway and the Kingsnorth Light Railway.

The indicative illustration shows development between the existing village and Sharnal Street on a ridge of higher ground that forms part of the 'spine' of the Hoo Peninsula, with views towards the Thames to the north and the Medway to the south. The site may have been a favourable location for past occupation, having access to a range of natural resources. A number of Late Iron Age gold coins have been found to the north of High Halstow, whilst remains of Bronze Age date have previously been recorded south of the village. Within the illustrated development area itself various crop- and soil- marks have been observed indicating the presence of buried archaeological remains and landscapes. These crop-and soil- marks include a ring

ditch (possibly representing the ploughed out remains of a prehistoric burial mound), along with enclosures and other features. The area also has some potential to contain remains of Pleistocene/Palaeolithic interest.

Green Belt Release

Halling

It is not possible from the consultation document to tell exactly where this site is but it seems to be in or close by the Rochester Cement Works. It is possible that the development area thus lies in a site already subject to quarrying, in which case the below-ground archaeological potential may be limited although important industrial archaeology assets may still survive. If the site has not yet been disturbed then the site has archaeological potential related to its location on the historic route up the Medway valley. A prehistoric burial, possibly of Neolithic date, has been found to the north of the site and a second, probably Romano-British, burial found in the Bores Hole quarry to the north-west.

Outer Strood/Frindsbury

The development area lies in an area of general potential, particularly related to the prehistoric and Roman periods. Excavations for new housing on Hoo Road found Middle to Late Bronze Age features. Cropmarks of probable Bronze Age ring-ditches have been observed c. 1 km north of the development area. Excavations near Four Elms roundabout found evidence for prehistoric, Roman and medieval settlement. North-west of the area, a watching brief in 1977-9 found evidence for Roman occupation and a Roman bowl and associated finds were found at Brompton Farm. Roman Watling Street also runs to the south of the development area. Large numbers of finds have also been recorded by metal-detectorists including Roman and Medieval finds but also prehistoric flintwork.

Employment sites

West of Kingsnorth

The development area lies in an area of potential associated with its rural and low-lying character, close to the marshes east of Hoo. This includes deposits of Pleistocene and palaeo-environmental potential, probable prehistoric remains and land surfaces, several historic farmsteads and an extant historic landscape character.

Grain Power Station

The suggested development area lies east and west of Grain Power Station. As such there is considerable potential for undisturbed archaeological remains. These may relate to sands and gravels of Pleistocene date which could contain Palaeolithic finds and/or faunal (or other) palaeo-environmental remains, possible Late Neolithic – Early Bronze age funerary monuments and features associated with the Prehistoric exploitation of the Medway Marshes, evidence for Iron Age and Romano-British

occupation and activity, including potentially industrial activity associated with pottery or other manufacturing, other presently unknown non-designated archaeological remains and an aircraft crash site of Heinkel He 111H-2, which crash-landed on the Isle of Grain 7th September 1940.