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2 October 2023

**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 the submission of additional information in respect of this application. We have also provided the same response internally to KCC.

Our comments focus on non-designated archaeology and we have made no comments or recommendations related to designated built heritage and defer to Historic England and your Conservation Officer.

The additional information includes a document (see - Montagu Evans: NORTHFLEET HARBOURSIDE, APPLICATION REF. 20221064 APPLICANT REPOSE TO AY / GBC COMMENTS 29 August 2023 – v1) which summarises work that the applicant is undertaking (see below) but the additional information does not include any new technical data with which to address in any detail, the issues raised in our letter of 14<sup>th</sup> December 2022.

To help progress the application I have included the additional text from the applicant below (in italics) and provided a response and comments:

*Comments received from KCC recommend pre-determination fieldwork, including geophysical survey and geoarchaeological boreholes / test pits combined with trial trenching as well as the production of a Heritage Management Plan.*

This refers to our letter of 14 December 2022, where we recommended the need for pre-determination field evaluation and a more detailed consideration of the archaeological potential of the site, the significance of heritage assets and the potential impact of the scheme. As noted above, no new technical information has been provided and therefore there has been no detailed consideration of the issues we raised in our letter of 14 December 2022. For example, in our response to the Outline Application in 2022, we asked for a more detailed and considered assessment of the potential national significance and the likely impact to the selected heritage assets (receptors) listed in the Environmental Statement, but no further work appears to have been carried out and no changes have been made to the ES.

*The Applicant has liaised with KCC regarding these comments, and it has been agreed that access to the Site for pre-determination (in respect of the outline application) evaluation is not possible.*

We have liaised with the applicant's archaeological contractor during 2023 and the applicant has stated that access to the site for pre-determination field evaluation is not possible. Whilst we understand that this is the applicant's position it would be wrong to conclude that by implication, we agree that pre-determination field evaluation is not needed or possible, in some form. Evidence to demonstrate that field evaluation is not possible in areas that we have highlighted, with specific reasons, would be useful to help understand the difficulties and how, and when they could be overcome. In addition it would be helpful to have more information and consideration of non-intrusive methods that could be considered and whether, and when, any geotechnical investigations (which could be subject to a geoarchaeological watching brief) would be undertaken.

*In reviewing the archaeological work undertaken in association with the Ebbsfleet United Football Club permission (ref. 20150517), it has been determined that geoarchaeological fieldwork was undertaken for 1A and 1B but not completed at assessment stage for 1A nor initial monitoring report or subsequent assessment / analysis for 1B. Nothing was undertaken for Phases 1C or 1D. Consequently, Quest have been commissioned to combine the assessment, analysis and reporting of the geoarchaeological work from both Phase 1A and 1B and provide a single report for the site, updating the deposit model. This will provide better baseline data to Wessex Archaeology to support the Northfleet Harbourside application.*

We very much welcome the work that the applicant and their archaeological contractor are undertaking to address previously incomplete geoarchaeological work within the scheme area and we agree that when completed this will provide better baseline data. However, this work has not been completed, nor the implications for a revised assessment of significance and impacts made, and we are therefore not able to make more informed recommendations than in December 2022.

*This assessment can be provided to discharge an appropriately worded condition.*

In our opinion this work should be part of the assessment to understand archaeological potential, significance, impacts and mitigation options (as set out in our letter of December

2022) and to allow for an appropriately informed planning decision on the Outline Application.

*Separate to this, a Draft Heritage Management Plan is to be provided to set out the programme of archaeological work going forwards through the Reserved Matters phases – this will be a live document that can be updated as surveys are completed to inform later stages of mitigation.*

We agree that the Heritage Management Plan should be a live document but we would expect to see a first draft document at this stage to allow for an appropriately informed planning decision to be made.

*KCC have included some recommendations for draft conditions within their response, which the Applicant agrees are appropriate to apply to any forthcoming outline planning consent, given that require the submission and approval of further assessment work prior to development works or the submission of any reserved matters.*

We included suggestions for conditions in our letter of 14 December 2022 to ensure that the necessary archaeological assessment, field evaluation, detailed impact assessment and agreements on mitigation, would be secured in the event that planning permission were to be granted. It should be stressed that our key recommendation in December 2022 was for more detailed assessment of potential, significance, impacts and mitigation options, and for field evaluation, where possible. As noted above, no new information on these matters has been submitted.

*We note that the Committee Report associated with the Albion Waterside application references conditions related to Archaeology and Building Recording, including “Archaeological field evaluation of undesignated archaeological remains and measures to ensure preservation – pre-commencement requirement”. A similar condition is considered appropriate in respect of Northfleet Harbourside.*

Non-designated archaeological potential, significance, impacts and mitigation options will be unique for each site and decisions about what is appropriate for Northfleet Harbourside archaeology should be based on evidence for this site.

In conclusion, we recommend that the applicant is asked to provide a revised assessment of the archaeological potential and significance of below-ground, non-designated archaeology at the site, responding in detail to the issues we raised in December 2022 and setting out clearly how archaeological remains would be impacted, what specific field evaluation will be undertaken, where and when, and what mitigation options are confirmed for the scheme and each identified heritage asset (receptor) or area of potential.

We continue to be available to consider any detailed, new technical information (e.g. revised deposit model, asset (receptor) revised significance statements and impact assessments etc.) which address these fundamental archaeological matters and to help secure a positive way forward for the project and the heritage of the site.

Yours sincerely,

**Casper Johnson FRSA MCIfA FSA**  
Senior Archaeological Officer  
Heritage Conservation