



Historic England

Ms Genna Henry
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Direct Dial: 02079733015

Our ref: P01552264

25 September 2023

Dear Ms Henry

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND SURROUNDING EBBSFLEET UNITED FOOTBALL CLUB, BOUNDED BY
LOWER ROAD, RAILWAY LINE, GROVE ROAD AND THE RIVER THAMES,
NORTHFLEET, GRAVESEND
Application No. 20221064**

Thank you for your letter of 6 September 2023 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Historic England do not object in principle to the proposed redevelopment of the Northfleet Harbourside site, but we continue to have concerns regarding the potential for impact on the historic environment. This is primarily because of the potential for harm to non-designated archaeology which may be of national importance.

The application documents have not been amended in response to our previous advice (dated 13 December 2022). The applicant has instead provided a written response to the comments of KCC Heritage and Historic England in their additional information document 'Applicant Responses to Comments on Proposal' (Montagu Evans, 29 August 2023 - v1). We understand from this that discussions with KCC heritage advisors have been ongoing, and that intrusive pre-determination evaluations have been agreed as not being possible pre-determination due to access constraints. We also understand that updates to the reporting and deposit modelling are proposed and that a Draft Heritage Management Plan is to be provided. These measures would be secured through conditions placed on any outline planning consent (if granted), which would aim to provide reassurance that the archaeological programme would be conducted appropriately moving forward.



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However, no further supporting documentation has yet been produced, and we are still limited in our ability to fully understand the potential for an effective programme of evaluation and subsequent mitigation should significant archaeological remains be discovered post-determination. For example, the applicant contends that the viability of the site depends on the quantum of development proposed, which therefore raises concerns regarding the ability to preserve any highly significant remains in situ should this be warranted.

Historic England's previous position on this application therefore remains the same. In particular, we still consider that there is currently insufficient evidence to clearly understand and assess the potential impacts of the development on archaeological remains. We consider that the issues and safeguards outlined in our previous advice (dated 13 December 2022) still need to be addressed in order for the application to meet the requirements of paragraphs 194 and 195 of the NPPF.

Recommendation

Historic England continues to have concerns regarding the application on heritage grounds. However, we recognise that the KCC heritage team have been in more direct discussion with the applicant and are best placed to advise on matters pertaining to non-designated archaeology. Therefore, we consider that any recommendations provided by your specialist conservation and archaeological advisors on this case are likely to address Historic England's concerns appropriately.

In reaching a decision on this proposal, you will need to decide if the harm to potential non-designated archaeology that you judge to be of national importance, and thus subject to the relevant paragraphs in the National Planning Policy Framework for designated heritage, is properly described and the impacts understood, avoided or minimised, and outweighed by public benefits (NPPF, paras 194, 195 and 202).

Yours sincerely

Christina Reade

Inspector of Ancient Monuments

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cc: Casper Johnson, Senior Archaeological Officer, Kent County Council



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