



Historic England

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

Direct Dial: 02079733015

Our ref: P01552264

13 December 2022

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 16 November 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

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

We consider that there is currently insufficient evidence to clearly understand and assess the potential impacts of the development on archaeological remains. Further field evaluation should therefore be undertaken prior to determination.

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).

Our advice focusses on recommendations related to non-designated archaeology, which is potentially of national importance, including amendments and further information which we think are desirable prior to determination of this application. We



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





would be pleased to continue a constructive discussion with you and the applicant about our advice.

Historic England Advice

Significance of the Northfleet Harbourside area

The site lies within the Ebbsfleet Valley at its confluence with the Thames and clips the edge of the higher ground, east of Grove Road. This location has potential for deeply buried waterlogged archaeology and evidence about the changing past environment from all periods, including those which date back to the Lower Palaeolithic period over 400,000 years ago.

Typically, many of these early prehistoric sites are not designated, but the importance of these archaeological, geoarchaeological, and palaeo-environmental deposits cannot be overstated. It is rare for sites of these dates to be retained and recognised in the archaeological record. The evidential value of the artefactual and environmental evidence they provide is instrumental in our understanding of early human occupation in Britain.

The industrial nature in this area of the Thames is a consistent theme across many periods. This is in part reflected through recognition of important modern archaeological assets, such as 'Aspdin's Kiln' scheduled monument (NHLE 1004227) which is situated just east of the site. Built in around 1846, it is thought to be the oldest Portland cement kiln in the world and is one of few remaining structures which testify to the thriving 19th cement industry in the area.

In addition to the above-ground kiln, there could also be well-preserved remains of the Robins Creek Cement Works which was present at this site in the mid to late 19th century. Extensive remains of the former 19th century cement works immediately east of the site have recently been recorded including several kilns, buildings, tramlines and tunnel networks. This that demolition of such works did not necessarily remove the below-ground elements. Extensive remains of early manufacturing sites such as these are important not just for charting the history of the local area, but for understanding the development of critical industries that were the backbone of construction across the UK.

Impact of the proposals

a) Built heritage

In our scoping opinion we stated that a 1km study area for the above ground built heritage assessment was too restrictive for a development of this scale.





We are therefore pleased to see that assets beyond the 1km study area have been considered including:

- Tilbury Fort, a scheduled monument and the grade II* listed Riverside Terminal
- designated heritage within the town of Gravesend, including conservation areas like Windmill Hill and listed buildings like the grade II* listed Church of St George

Views from Tilbury Fort and from the River by Gravesend are those said to be relating to heritage (ES Vol 2 TVIA para 1.13). Two verified view from Tilbury Fort are presented and one non-verified massing from the River by Gravesend. We note that view 16 (Tilbury Fort) is omitted on the Summary Table (ES Vol 2 TVIA Table 6.1) and the table as a whole makes no mention of built heritage receptors.

Overall Historic England agree with the assessment presented in the ES Vol 2 TVIA Appendix 1: Heritage Statement that, in EIA terms, significant effects caused by development within the setting of heritage assets are not likely.

However, due to the substantial change in the nature of the historic environment being proposed, we consider that the heritage character of the area should form an inherent basis for detailed design. We therefore welcome that the industrial history of the site has been noted as a driver for material design and as one of the 'six key Vision Pillars' for placemaking presented in the DAS and Design Code.

To that end, we consider that, at a minimum, measures such as incorporating heritage references within the public art and the provision of a heritage trail should be secured through condition. This condition should also seek to ensure that further opportunities for enhancing the historic environment are sought as the project progresses.

Historic England also think that the potential for impact on non-designated built heritage has not been fully considered. It seems plausible that some structures associated with the industrial history of the area may be preserved on site which would be worthy of continued retention within the proposed development. Heritage assets such as this may only be revealed through undertaking a walkover survey and may therefore be currently unidentified. On this point however we defer to the heritage advisors for Kent County Council (KCC).

b) Designated archaeological remains

The applicant has assessed the potential for impacts to the significance of nearby scheduled monuments from by development within their setting.





Historic England are pleased that scheduled monument comprised of buried remains (i.e. Paleolithic Sites Near Baker's Hole and Neolithic Sites Near Ebbsfleet) have been included in this assessment despite the lack of 'above ground' built heritage.

Historic England agree with the assessment that the development is not likely to harm the significance of these monuments.

Aspdin's Kiln is outside of the development site and currently situated within an industrial area planned for redevelopment. Therefore, we understand that the current proposals have limited capacity to either fully assess the potential for harm to this monument or to design in enhancements at this time.

We also advised in our Scoping opinion that the separation of archaeology and built heritage was flawed. The kiln continues to derive significance from archaeological remains associated with the cement industry in this location as they contribute to our understanding and appreciation of this monument. It is within this context that we can understand the kiln not as an isolated structure but as part of an industrial complex. Damage or destruction of any archaeological remains associated with the cement industry in this area would therefore have an impact on the scheduled monument.

Overall, we consider that cumulative change to the character of the Northfleet Harbourside area away from its industrial heritage and the potential for damage to associated archaeological remains would impact on the significance of this scheduled monument.

c) Non-designated archaeological remains

The KCC Heritage Team are your lead advisor on impacts to non-designated archaeology. However, because of the high potential for non-designated archaeology of national importance within the site there is the potential for any such remains to be damaged or destroyed by the proposed development.

The ES Chapter 13 Archaeology makes it clear that the lack of data within the site has made it impossible to map the distribution of deposits of geoarchaeological and archaeological interest across the site. This means that an assessment of the likely harm from the proposed development also cannot be made with any real certainty at this time.

In particular our concern relates to:

- the high potential for industrial remains associated with the former cement works to be retained on site; and





- waterlogged palaeoenvironmental and archaeological deposits from both prehistoric and historic periods which, if present, could be highly significant.

We therefore include here some comments and advice on the Archaeological Desk Based Assessment (DBA, ES Vol 3 Appendix: Archaeology Annex 2) and the Geoarchaeological Desk Based Assessment and deposit model (GDBA, ES Vol 3 Appendix: Archaeology Annex 3) in order to ensure that any potential impacts can be fully understood moving forward.

Archaeological Desk Based Assessment

The DBA is clear that there has been very little previous work on the site itself (so no firm assessment of potential or significance can be made without fieldwork). However, it has been assumed it was all marshland for most of the prehistoric and historic periods. Therefore, the low to moderate potential allocated for prehistoric archaeology (5.4.2) and low for the historic period (5.4.1) seems reasonable. However, if any archaeology is found it is likely to be highly significant and waterlogged, such as the the Saxon tide mill recorded to the south.

It has also indicated that the site is likely to preserve remains of the former cement works. These remains have the potential to be of greater than the low to moderate importance attributed (5.3.2). This is due to the concentration of and evolution of the cement industry in this part of Kent, the lack of previous study, as well as any association it might have with better understanding the context of the scheduled Aspdin's Kiln.

Historic England understand that there is a large 19th century quarry pit in the centre of the site. We do not dispute that a large area of archaeological remains would likely have been removed during these works, but we cannot assume (as stated in 5.2.1) that it was all quarried out. Many Palaeolithic artefacts are thought to have come from this pit (see GDBA) and assessing how much of the Palaeolithic and later deposits survive should be an objective of fieldwork.

Geoarchaeological Desk Based Assessment

The GDBA is well-constructed and makes some very sensible and reasonable inferences from the limited information available from the site itself. However, this lack of data from the site itself is not made clear enough in the text. It should be emphasised more strongly that Section 5 (assessment of potential and significance) and Section 6 (recommendations) are largely based on extrapolated information from outside the site boundaries.





More explicit investigation into the changing extent of the Thames foreshore at this location is also warranted. This would provide highly relevant information for understanding the probable location and nature of archaeological remains.

i) Assessment of potential and significance (Section 5)

It is perfectly reasonable to base the geoarchaeological assessment on extrapolated data, where there is no (or very little) data from the site itself and this has been done very well here. However, the very preliminary and provisional status of the deposit model constructed means that assessments of potential and significance should be more tentatively presented.

Currently the deposit sequence, distribution, potential and significance of each GCZ (even the GCZ extents) is essentially unknown and needs testing and refining by evaluation fieldwork.

Until evaluation fieldwork is done, not enough is known about what actually exists on the site for anything more than a very indicative version of Table 10.

ii) Recommendations (Section 6)

Given the lack of existing information from the site, deep penetrating geophysics (such as Electrical Resistivity Tomography (ERT) or Electromagnetic (EM)) would be worth doing in addition to boreholes and test pits.

Rather than the more specific recommendations set out in Table 11, it might be better proposing a comprehensive spread of boreholes. This would have test pits where the sequence is likely to be shallower, towards the valley sides and deep penetrating geophysics to extend the sequence logged in the intrusive interventions more widely across the site.

Also, it would be useful to assess the extent and depth of impact of the Botany Pit and whether any deposits of interest survive within / below it.

It would also be worth assessing the state of preservation / degree of humification of the various peat deposits, to assess the likely state of preservation of any contained organic remains (environmental and artefactual).

Environmental Statement, Chapter 13 Archaeology

In contrast to the GDBA, this chapter makes it clear (13.44 and elsewhere) that lack of data has made it impossible to map the distribution of deposits of geoarchaeological and archaeological interest across the site.





i) Receptors and receptor sensitivity

In Table 13.5: add 'and palaeoenvironmental remains' to line 2: i.e. "In situ waterlogged archaeology **and palaeoenvironmental remains** within peat or alluvial deposits"

ii) Potential effects

Based on the receptors in Table 13.5, the section on '*Waterlogged deposits within peat and alluvial layers*' (13.96) should include the potential for impact on timber structures and organic artefacts as well as the palaeoenvironmental remains that this paragraph focuses-on.

Similarly, 13.104 '*Waterlogged deposits outside of the site*' appears to focus on palaeoenvironmental remains, because it says: "*As these deposits are thought to be **relatively widespread within the local area** the magnitude of the impact of the changes to hydrology is considered to be of low magnitude to this resource overall. This would result in a minor adverse (not significant) effect on these deposits*".

Waterlogged timber structures and organic artefacts are not likely to be 'widespread' within the local area. Such remains are rare but might be expected to exist. Therefore, we disagree with the minor adverse (not significant) effect. It is important that the development does not impact on the hydrology of the surrounding area.

iii) Mitigation and monitoring

Rather than separate geoarchaeological work from the standard archaeological trenching, in a river valley location such as here, the trenching should form part of the overall geoarchaeological approach (as set out quite nicely in the "Geoarchaeological Test Pit Evaluation / Purposive Boreholes" section. The site is virtually blank in terms of known deposits / remains.

Therefore, the staged approach should be:

Stage 1

- Monitoring of geotechnical works (supplemented by purposive geoarchaeological boreholes if not comprehensive enough coverage)
- Deep penetrating ERT and EM geophysical survey
- Update of deposit model, to target and inform Stage 2

Stage 2

- Test pits, trenches, purposive boreholes
- Update of deposit model (to inform mitigation and/or post-ex assessment)





iv) Residual effects

Table 13.6 - as for Table 13.5, line 2 should clearly include both palaeo-environmental remains and waterlogged archaeology. Therefore, instead of “*Palaeoenvironmental / waterlogged remains*”, it would be preferable if line two referred to “*palaeoenvironmental remains and waterlogged archaeology*”. We think this may have been intended, but it needs to be clearly stated.

Policy considerations for this proposal

The legislative context for decision taking, where this applies to listed buildings, is set out in the 1990 Planning (Listed Buildings and Conservation Areas) Act, section 66(1). This places a statutory duty on a Local Authority to give special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Also, of relevance to decision taking are policies governing change to the Historic Environment described in Section 16 of the National Planning Policy Framework (NPPF). The framework indicates that applicants should be required to describe the significance of any heritage assets affected, including any contribution made by their setting (paragraph 194). Where a site has the potential to include heritage assets with archaeological interest, local planning authorities should require developer to submit an appropriate desk-based assessment and, where necessary, a field evaluation (paragraph 194).

The framework highlights the need to avoid or minimise any conflict between a heritage asset's conservation and any aspect of the proposal (paragraph 195) and the need to give great weight to the conservation of designated heritage assets, noting that the more important the asset, the greater the weight (paragraph 199).

It also clear and convincing justification for any harm to, or loss of, the significance of a designated heritage asset, and specifies that substantial harm to designated heritage of the highest significance, must be wholly exceptional (paragraph 200).

Where a proposal causes less than substantial harm, the NPPF requires that it is weighed against the public benefits of a proposal in the manner described in paragraph 202. Heritage benefits are a public benefit to consider in the weighing exercise.

Historic England's position on the proposals

Historic England has concerns regarding the application on heritage grounds. This is because of the potential for harm to non-designated archaeological remains which may be of national significance.





In particular, we consider that there is currently insufficient information to fully understand the potential for impacts of the proposal on the historic environment. Despite the provision of both archaeological and geoarchaeological desk-based assessments, without field evaluation we consider that the requirements of NPPF paragraph 194 have not been met.

Based on the information available, we consider that there is a high potential for harm to non-designated archaeological remains which may be of national significance. While the applicant has indicated preservation in situ would be undertaken 'where practicable' (ES chapter 13 para 13.108), we cannot be certain how, where and when this could be achieved. Therefore we cannot be clear on the degree to which harm can be avoided or minimised moving forward as required by paragraph 195.

The capacity for the parameter plans to be amended in response to the findings of historic environment evaluations needs to be communicated more clearly.

Further mitigation of 'unavoidable impacts' (ES chapter 13 para 13.109) would be through preservation by record. However, this does not 'reduce the severity of the impacts' (ES Chapter 13 para 13.109) and the NPPF is clear that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (paragraph 205).

In order for our concerns to be addressed, a programme of field evaluation should be undertaken prior to determination to inform the extent, condition, and significance of archaeological, geoarchaeological, and palaeoenvironmental deposits which may be present at this site. This should be developed in conjunction with KCC's Heritage Team.

An overarching framework detailing the archaeological evaluation and mitigation strategy should also be developed in conjunction with KCC's Heritage Team. This document should identify a set of preliminary research questions (that can be updated as the project progresses) and should outline opportunities for public engagement throughout all stages of the proposed scheme. This will help ensure that engagement and outreach are delivered through the lifetime of the project to maximise public benefit.

Recommendation

Historic England recommends that further work is done pre-determination to address our concerns about the content of the supporting information for non-designated archaeology and waterlogged remains. We would be pleased to discuss this advice with you and your archaeological advisors if helpful.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
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The proposed measures for ensuring that the historic environment forms part of placemaking, such as incorporating heritage references within the public art and the provision of a heritage trail, should be secured through condition. This condition should also ensure that further opportunities for enhancing the understanding and appreciation of the historic environment of the Northfleet Harbourside area are sought as the project progresses.

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).

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Christina Reade

Inspector of Ancient Monuments

E-mail: Christina.Reade@historicengland.org.uk

cc: Casper Johnson - Senior Archaeological Officer Kent County Council



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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