

Old Rectory Luddesdown Road Luddesdown DA13 0XE

ARCHAEOLOGY STATEMENT

Demolition of the existing outbuilding at the front of the dwellinghouse and erection of a single-storey front extension in its place.

Partial resubmission of works previously approved under planning permission ref: 20160966.

Householder development

1. The application site is not located within an 'Area of Archaeological Potential' as defined under the Gravesham Local Plan Core Strategy (2014) and associated Proposals Map.
2. No concerns regarding archaeology were raised, and no pre-commencement planning conditions were imposed on planning permission ref: 20160966, which covered building operations of the same footprint, nature, and scale as the current proposals. While each application must be considered on its own merits, it is noted that the previous application was determined under the same local development plan that remains in force today (see point 1 above).
3. Furthermore, the National Planning Policy Framework (2024) states that planning conditions should only be imposed when they are "necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects" - a requirement known as the "six tests". These same national requirements applied when the previous application was determined (then under paragraph 206 of the 2012 iteration of the NPPF). Given this, it would be unreasonable to suggest that a pre-commencement planning condition relating to archaeology must be imposed on the current application when an identical proposal, assessed under the same local development plan and subject to the same "six tests", was previously approved without such a condition, demonstrating that it was not considered necessary, 'necessity' being one of the 'six tests'.

4. While officers have noted, based on 19th-century tithe maps, that the outbuilding to be demolished may have previously been attached to the host building, a closer examination of historical maps from 1888 to 1964, included in Figure 4 of the submitted Planning, Design and Heritage Statement (and reproduced below), reveals substantial discrepancies between different map editions. This is common, as the scale of these maps is not suitable for determining the exact position of structures. Furthermore, it appears the outbuilding has undergone significant reconstruction at least once, particularly after 1915, likely to accommodate its use (or part of it) as a domestic garage for housing combustion-engine vehicles. Evidence of previous reconstruction is evident from both internal and external photographs submitted with the application.

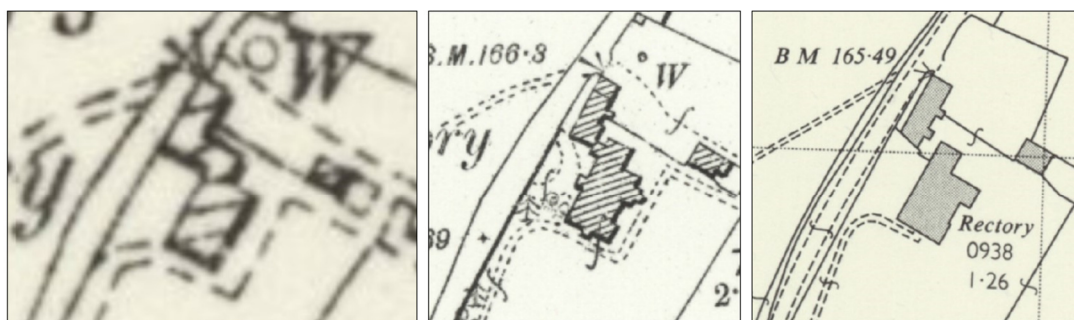


Image 4: Historic maps from 1888-1915 (left), 1892-1914 (middle) and 1947-64 (right) OS series.

5. In any case, no building operations are proposed beyond the footprint of the existing outbuilding (or outside of the rough building outlines shown on any of the numerous historic OS maps), except for the area between the outbuilding and the host building, where a “link” structure is proposed. However, the area affected by this construction already consists of hardstanding, and the link structure can be built without requiring additional consents under extant planning permission ref: 20240869, which is not subject to any planning conditions relating to archaeological protection measures.
6. Given the minor nature of the proposed household development (the replacement of a dilapidated single-storey outbuilding of simple construction within the curtilage of a residential dwellinghouse), excavation requirements will be minimal and confined to the existing outbuilding footprint (plus the link structure), thereby limiting the potential for any harmful impact on archaeological remains. It is noted that some excavation could already take place within the confines of the existing buildings without the need for planning permission, provided such works do not materially affect the external appearance of any buildings. In the absence of such alterations, these works would not constitute "development" under Section 55 of the Town and Country Planning Act.
7. For further information, please refer to parts 3 and 5 of the submitted Planning, Design and Heritage Statement.