



O'Halloran & O'Brien

LAND AT DALEFIELD WAY (EAST), GRAVESEND

Archaeological Desk-Based Assessment

Local Planning Authority: Gravesham Borough Council

Internal Project Reference: 02163

Version 2: Final For Submission

Date: 13th October 2025

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1 EXECUTIVE SUMMARY

INTRODUCTION

- 1.1.1. HEA has been commissioned by O'Halloran & O'Brien to produce an Archaeological Desk-Based Assessment (ADBA) in support of a current planning application (Ref: 20250763) for development at Land at Dalefield Way (East), Gravesend. This report draws together the available archaeological, historical, topographical, and land use information in order to clarify the archaeological potential of the Site. It is the intention that this report will address the information requirements as set out in the NPPF and the Gravesham Borough Council local planning framework.

DEVELOPMENT PROPOSALS

- 1.1.2. The planning application proposed the Site for an industrial external storage area (use class B8), with associated access, temporary buildings, hard landscaping, and areas of soft landscaping. Below ground excavations are likely to be generally limited in depth as no permanent structures are proposed. The only identified area of potential greater depth of excavation is the petrol interceptor proposed in the northern part of the Site.

RELEVANT ARCHAEOLOGICAL ASSETS

- 1.1.3. There are no designated archaeological assets that require consideration as part of this report. The Site is located within three locally defined Archaeological Notification Areas.
- 1.1.4. Previous archaeological work in the immediate area to the south and west has identified very limited archaeological activity, including a large Roman ditch and residual finds of later Prehistoric, Medieval, and Modern date. Therefore, this assessment has identified a limited archaeological potential at the Site for archaeological artefacts and features to be present, with any potential instead more pertinently related to palaeoenvironmental remains associated with the underlying alluvial sequence. Any archaeological evidence would most likely be of at most low significance.

SUMMARY & RECOMMENDATIONS

- 1.1.5. Development impacts are anticipated to be generally shallow but widespread, comprising installation of hardstanding and landscaping. This is likely to impact only the topmost levels of the underlying sequence, potentially contained within topsoil / subsoil / made ground deposits with limited impact on the underlying alluvial sequence.
- 1.1.6. Overall, it is considered unlikely that there would be any archaeological constraint to development and this assessment is therefore considered sufficient to support the planning application. The Council will confirm their position when consulted and as advised by the County Archaeologist.



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2 INTRODUCTION

2.1 PROJECT BACKGROUND

INTRODUCTION

- 2.1.1. HEA has been commissioned by O'Halloran & O'Brien to produce an Archaeological Desk-Based Assessment (ADBA) in support of a current planning application (Ref: 20250763) at Land at Dalefield Way (East), Gravesend centred at National Grid Reference (NGR) TQ 67203 73546, hereafter referred to as the Site (Figure 1). The Site is located within the administrative planning boundary of Gravesham Borough Council.

CURRENT SITE CONDITIONS

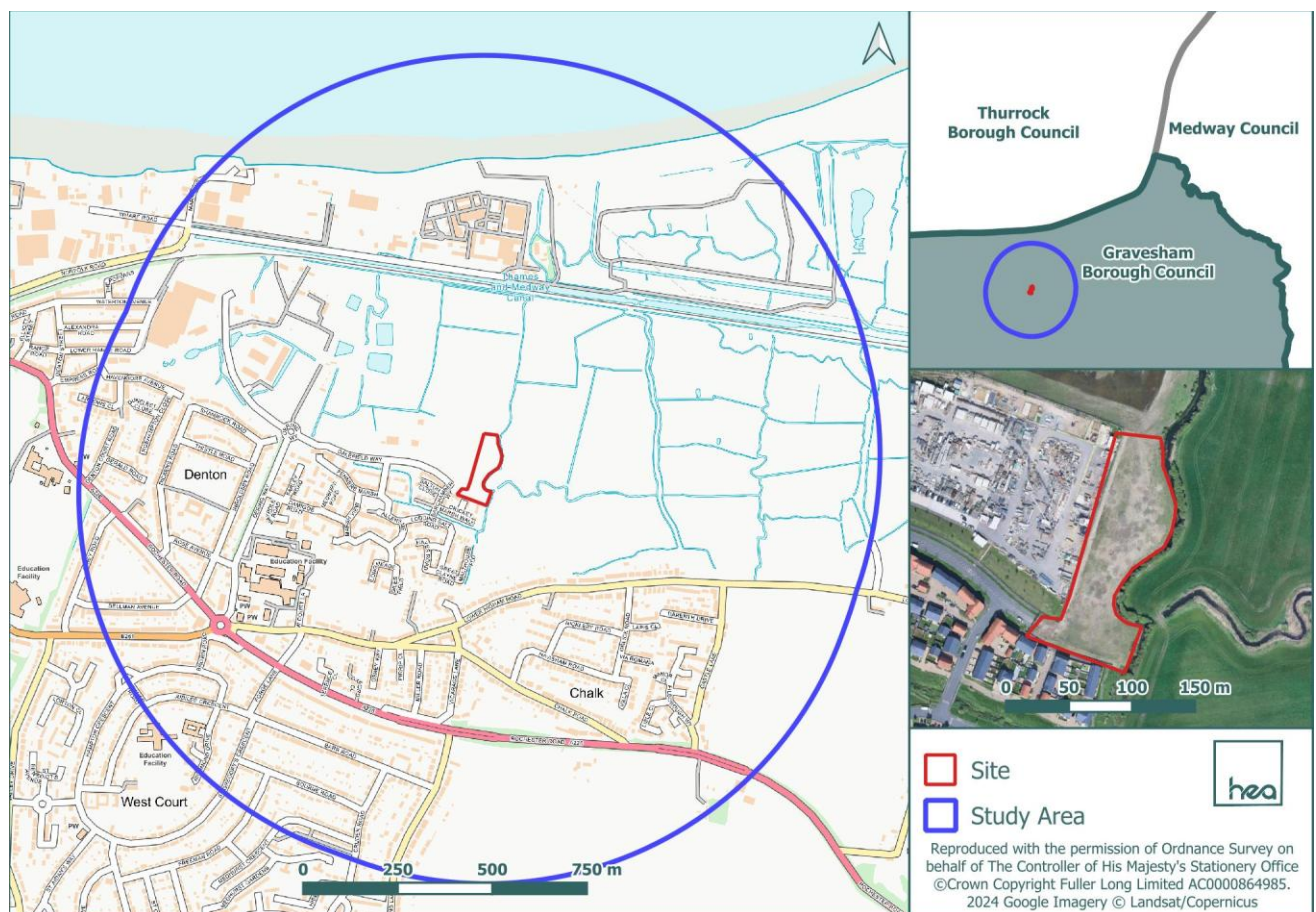


Figure 1 Site Location

CURRENT DEVELOPMENT PROPOSAL

- 2.1.2. The planning application proposes the Site for an industrial external storage area (use class B8), with associated access, temporary buildings, hard landscaping, and areas of soft landscaping.
- 2.1.3. As part of that application, the Kent County Archaeologist, in their role as advisors to the Council, have provided consultation advice. This has highlighted the Site's location within "an area of multi-period archaeological potential, especially for later prehistoric archaeology associated with the formation of the Westcourt Marsh wetlands." It was suggested that an archaeological desk based assessment was required to determine the application, and that this DBA



should include a review of any relevant ground investigation data for the site as well as review the results of previous archaeological work to the immediate west.

- 2.1.4. This report has therefore been produced to inform the current planning application and complies with relevant national, regional, and local planning legislation, policy, as well as industry standards and guidance, as summarised in Appendix 1. The local development planning framework is provided by Gravesham Borough Council documentation.
- 2.1.5. For full details of the proposed scheme, reference should be made to the plans and documents submitted with the application. These should be fully viewed in tandem with this ADBA.

2.2 AIMS AND OBJECTIVES

- 2.2.1. The Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015c) states that desk-based assessments should ‘determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment’. The Chartered Institute for Archaeologists (CIfA) states that a desk-based assessment should ‘enable reasoned ... decisions to be made as to whether to mitigate, offset or accept [archaeological impact] without further intervention’ (Chartered Institute for Archaeologists, 2020).
- 2.2.2. This ADBA will assess the archaeological potential within the Site, the potential impacts of the proposed development works upon either the known or anticipated archaeological resource, and provide recommendations for a suitable mitigation strategy, if required, as part of a planning application. This is achieved through five overarching objectives:
 - identify the presence of any known or potential archaeological assets that may be affected by the proposals;
 - describe the significance of such assets, in accordance with relevant national, regional, and local planning legislation and policy, as well as industry standards and guidance;
 - identify any factors which may have compromised an asset’s survival and / or significance;
 - assess the likely impacts upon the significance of the asset(s) arising from the proposals;
 - provide recommendations for further investigation and/or mitigation where considered appropriate, aimed at enhancing and/ or preserving the asset(s) in the first instance, reducing or removing any adverse effects in the second instance, or finally, as outlined in relevant policy and guidance as the least preferred option, recording the asset(s) prior to its loss during development works.
- 2.2.3. The approach taken by this report, as well as the relevant legislation, policy, guidance, and source material, will be summarised further below.
- 2.2.4. This report was originally issued in October 2025 and has undergone a quality assurance process to ensure that the issued version meets the required guidelines and standards.
- 2.2.5. The relevant project contact is James Archer, BA (Hons), MCIfA.
- 2.2.6. The archive of data resulting from the completion of this report is anticipated to be entirely digital and will therefore be held centrally by HEA.



3 METHODOLOGY SUMMARY & BASELINE DATA COLLATION

3.1 INTRODUCTION

- 3.1.1. This ADBA will make an assessment of the likely potential for the site to contain archaeology, and the likely significance of this archaeology if present. It will summarise the archaeological and historic background of the Site, including an overview of previous land use and development, provide an assessment of the likely impacts of development upon archaeological remains if present, and conclude an overall effect of the development upon the archaeological resource.
- 3.1.2. This report has been produced to comply with relevant legislation, policy, standards and guidance, including:
- Ancient Monuments and Archaeological Areas Act (AMAAA) 1979, as amended;
 - The National Planning Policy Framework (NPPF), first published in March 2012 and has since been periodically updated;
 - The Regional and Local Planning Policy Framework provided by the relevant regional and local administrative authorities;
 - The National Planning Practice Guidance (PPG) was published in support of the NPPF and is available on the Government Gateway website. The PPG is separated into categories of which the relevant category for this report is the Historic Environment category, first published in April 2014 and has since been periodically updated;
 - The Chartered Institute for Archaeologists Standard and Guidance for historic environment desk-based assessment (Chartered Institute for Archaeologists, 2020);
 - Historic England Guidance, including:
 - Good Practice Advice Note 1: The Historic Environment in Local Plans (Historic England, 2015);
 - Good Practice Advice Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015);
 - Good Practice Advice Note 3: The Setting of Heritage Assets (Historic England, 2017);
 - Conservation principles, policies and guidance for the sustainable management of the historic environment (Historic England, 2008); and
 - Historic England Advice Note 12: Statements of Heritage Significance (Historic England, 2019).

- 3.1.3. This section summarises the methodology that underpins this assessment, with further detail included at Appendix 2.

3.2 CONSULTATION

- 3.2.1. With due regard to commercial and sensitivity considerations as agreed with the client, the local curatorial archaeologist will be contacted to discuss the Site where possible. The curatorial archaeologist advises the relevant LPA on archaeological matters relating to planning and development applications and therefore will be consulted by the LPA throughout the archaeological process.
- 3.2.2. As noted above, the County Archaeologist has provided comment on the current planning application. This has highlighted the Site's location within "an area of multi-period archaeological potential, especially for later prehistoric archaeology associated with the formation of the Westcourt Marsh wetlands." It was suggested that an archaeological desk based assessment was required to determine the application, and that this DBA should include a review of any relevant ground investigation data for the site as well as review the results of previous archaeological work to the immediate west.

3.3 ASSESSING ARCHAEOLOGICAL POTENTIAL

- 3.3.1. “Archaeological potential” refers to the possibility of currently unknown archaeological heritage assets being present at the Site. The nature of below-ground archaeological assets means that they remain unknown until discovered during either non-intrusive survey or intrusive excavation works.
- 3.3.2. There are a number of factors which affect an assessment of archaeological potential. These include:
- The distribution and character of known archaeological heritage assets from the nearby area;
 - The results of nearby archaeological fieldwork;
 - Environmental factors such as geology, topography, and soil quality, will have affected the way in which a site may have been utilised by past human populations, and may also affect the potential for the survival or visibility of archaeological features or finds.
 - Previous land-use and development history, such as agricultural plough activity and modern development, which may have reduced the potential for a site to contain surviving archaeological remains.
- 3.3.3. This assessment will make a judgement on the likely archaeological potential of the Site on the basis of each relevant archaeological time period. This potential will be defined as one of: Nil, Negligible, Low, Medium, High, or Certain.

3.4 ASSESSING HERITAGE SIGNIFICANCE

- 3.4.1. Significance is a concept that forms the foundation of conservation philosophy. The NPPF states that heritage ‘assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.’
- 3.4.2. A heritage asset is defined in the NPPF (Annex 2) as ‘a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including through local listing).’
- 3.4.3. The Framework (NPPF Annex 2) goes on to define significance as ‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.’
- 3.4.4. The PPG (Paragraph: 006 Reference ID: 18a-006-20190723) expands upon the component interests that can contribute to significance:
- ‘archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.’
 - ‘architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.’
 - ‘historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity’.

- 3.4.5. In addition, the non-statutory criteria for Scheduled Monuments established by the Secretary of State (DCMS 2013) outline several principles that aid in assessing the significance of a heritage asset. Whilst produced prior to the adoption of the NPPF and the PPG, Historic England's Conservation Principles document (HE 2008) comprises an active guidance document, and includes guidance on understanding the physical structure of a "place" and its evolution over time, in order to understand its significance. The guidance outlines various heritage values that facilitate a systematic determination of asset significance, with four primary "heritage values" being Evidential, Historical, Aesthetic, and Communal. It should be noted that below ground archaeological remains will most often have evidential value only. In addition, the "setting" of a heritage asset will contribute towards its significance.
- 3.4.6. The setting of a heritage asset is defined in the NPPF as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.' Crucially, setting is not an asset in itself but rather, 'its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance' (Historic England, Planning Note 3: The Setting of Heritage Assets (December 2017) p.4). Setting is distinguished from curtilage, character, and context. While primarily visual, setting, and consequently the way in which the asset is appreciated, understood, and experienced, can also be influenced by factors such as noise, vibration, odours, and more.
- 3.4.7. This assessment will make a judgement on the likely significance of archaeological remains which are either known or could be anticipated at the Site on the basis of each relevant archaeological time period. This significance will be defined as one of: Nil, Negligible, Low, Medium, High, or Very High.

3.5 ASSESSING POTENTIAL DEVELOPMENT IMPACT AND HARM / BENEFIT

- 3.5.1. Conservation is the process of managing change and the current guidance by Historic England is that 'change' does not equate to 'harm'. This is consistent with the 1992 'South Lakeland' House of Lord's judgement, which states that in the context of heritage planning to 'preserve' means to 'do no harm'.
- 3.5.2. In the case of designated heritage assets, the NPPF and the PPG distinguish between two degrees of harm – substantial and less than substantial. NPPF paragraphs 212-215 state that 'any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.' Where "substantial harm" is identified to a designated heritage, NPPF paragraph 214 states that consent should be refused, unless it 'can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.' Where "less than substantial harm" is identified to a designated heritage assets, NPPF paragraph 215 states that 'this harm should be weighed against the public benefits of the proposals.'
- 3.5.3. Where designated heritage assets may be considered within this report, the potential harm to such assets will be considered in line with the NPPF using the two degrees of harm. In addition, where less than substantial harm might be identified, a scale of such harm will be considered at negligible, low, medium or high.
- 3.5.4. The NPPF does not provide guidance on the classification of harm to non-designated heritage assets. NPPF paragraph 216 states that '*in weighing applications that...affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of harm or loss and the significance of the heritage asset.*' Given that the vast majority of archaeological heritage assets are non-designated, it is therefore important to understand both the likely significance of the archaeology and also the scale of harm of the proposed development in order to enable the balanced judgement required by paragraph 216.
- 3.5.5. For the purposes of this test, the scale of any harm to non-designated heritage assets is identified as Nil, Negligible, Low, Medium or High in this report.



- 3.5.6. With regard to an evaluation of (any) harm to significance through changes to setting, the assessment will follow the methodology provided in 'The Setting of Heritage Assets'.
- 3.5.7. Accordingly, any impacts are described in terms of how they affect the significance of the heritage asset, whether this be through physical impacts or setting impacts.
- 3.5.8. It should be noted that potential impacts can be beneficial as well as harmful. Beneficial impacts can be assessed in the same manner.
- 3.5.9. Therefore, in accordance with relevant guidelines, this assessment undertakes a staged approach to understanding the significance / heritage value of relevant heritage assets, the impact of the development proposals, and the resultant potential for harm / benefits arising from the proposed development.

3.6 COLLATION OF BASELINE DATA

- 3.6.1. In line with industry standards, a number of key data sources used to inform the production of this report and these have been detailed at Appendix 2. These include, but are not limited to, local historic environment databases, national heritage databases, and historic documentary and cartographic sources.
- 3.6.2. Designated heritage assets are available online at the National Heritage List for England (NHLE), as maintained by Historic England. This List includes a record of the various heritage assets designated under national legislation, including Scheduled Monuments, Registered Parks and Gardens, Protected Wreck Sites, Registered Battlefields, and Listed Buildings. Conservation Areas are available from the relevant local administrative authority.
- 3.6.3. Information on the local archaeological and heritage resource is available via the Kent Historic Environment Record (KHER) database. A search request was issued to the relevant KHER officer, comprising a 1km buffer from the site boundary. This is considered to be a proportionate search radius to inform this assessment. This finalised search area will be referred to as the "study area". Upon receipt of this data, a full analysis of the records was undertaken, but only those records considered relevant to the archaeological baseline of the Site have been discussed in this report.

3.7 SITE DEVELOPMENT APPLICATIONS

RELEVANT PREVIOUS DEVELOPMENT APPLICATION HISTORY

- 3.7.1. There have been no previous planning applications at the Site. There is a current application for which this assessment has been prepared:
 - Application Reference No: 20250763 – 'Change of use of the land for open storage (B8 use) primarily for equipment and operations related to Dalefield Way Industrial Park (B8 use) with associated installation of hardstanding/surface treatment, security fencing/gates, access, a soft landscaping mound, and erection of temporary office cabins'.

3.8 ASSUMPTIONS AND LIMITATIONS

- 3.8.1. It is assumed that the data relied upon in this report is accurate. However, as the data used is derived from secondary sources, such as the Kent Historic Environment Record database, the accuracy of the data cannot be confirmed. The available archaeological data is a record of currently known archaeological assets and therefore is not a definitive list of all possible archaeological or historical assets from the nearby area. This data can be used to model the Site's archaeological potential; however, it does not preclude the discovery of further currently unknown heritage assets.
- 3.8.2. Whilst this assessment has utilised available sources to surmise the Site's potential for archaeological remains, there may be an element of uncertainty over the nature, extent and condition of the buried archaeological resource. Archaeological remains can be obscured by modern infrastructure, and / or give no visible indication of their presence at surface level.
- 3.8.3. The assessment of potential impacts is based on site plans provided by the client and assumes the accuracy of those plans.



- 3.8.4. Overall, it is anticipated that the methodology employed for this assessment is both suitable and as effective as possible, albeit based on currently available information, to address the professional requirements of this report. On the basis that previous trenching to the immediate west and south provides a firm foundation, the confidence rating given to the conclusions of this assessment is therefore moderate to high.

4 SITE LOCATION, DESCRIPTION, & CONTEXT

4.1 LOCATION, EXTENT, & LAND USE

- 4.1.1. The Site measures 9721m² and comprises open grassland. It is located adjacent to marshland to the east and north, industrial external storage land to the west, and residential development to the immediate south. The eastern Site boundary is formed by a former marshland channel.

4.2 GEOLOGY, TOPOGRAPHY, & CONTEXT

- 4.2.1. The geology and topographical situation associated with a site can underpin the potential archaeological resource and give an indication of the character of archaeological remains that could be anticipated.
- 4.2.2. The underlying bedrock geology of the Site is recorded by the BGS as Lewes Nodular Chalk Formation, Seaford Chalk Formation and Newhaven Chalk Formation (Chalk), a sedimentary bedrock formed between 93.9 and 72.1 million years ago during the Cretaceous Period (British Geological Survey, 2025b). The bedrock geology is overlain by superficial alluvium deposits (Clay, Silk, Sand and Peat), which formed between 11.8 thousand years ago and the present during the Quaternary Period (British Geological Survey, 2025b). A desktop geo-environmental study (Manhire, 2025) has suggested that, on the basis of nearby geotechnical boreholes, the anticipated sequence at the Site could comprise between 0.3 – 2.3m of made ground / topsoil and subsoil overlying alluvial deposits.
- 4.2.3. Previous archaeological trenching to the immediate west of the Site (TVAS, 2016) identified topsoil / subsoil of circa 0.3 – 0.5m depth, overlying alluvial deposits. Similar conclusions were drawn from the 2016 evaluation to the immediate south of the Site, which revealed made ground / topsoil deposits, along with colluvial and alluvial layers present from approximately 0.4-0.5m below the existing ground level. An exception was noted in the northwest corner, to the west of the Site where the ground had been artificially raised through the deposition of compacted chalk and hardcore, resulting in an increase in ground level of approximately 1.5–2m (Wessex, 2016). Those trenches closest to the south to the immediate south comprised trenches 13 and 14. Trench 13 contained dark greyish-brown silty clay topsoil (c.0.46m thick) directly overlying dark grey, greasy and compact alluvial clay with brown mottling and rare chalk inclusions. In Trench 14, up to 0.42m of topsoil sealed a compact light grey layer of made ground containing flint and chalk fragments, which in turn overlay dark grey to brown mottled alluvial clay. These deposits are consistent with low-lying floodplain sediments associated with the Thames Basin, indicating limited modern disturbance and some potential consolidation deposits, as well as confirming the presence of naturally accumulated alluvial material across the immediate area of the Site.
- 4.2.4. The Site is located on the southern side of the valley and floodplain formed by the River Thames, and therefore would naturally slope down northwards towards the river. The natural level of the Site is recorded as c. 3m above Ordnance Datum (aOD). The present course of the Thames is c.750m to the north.
- 4.2.5. The area around the Site is largely industrial to the west, residential to the south, and open marshland to the north and east.

5 ARCHAEOLOGICAL & HISTORICAL CONTEXT

5.1 INTRODUCTION

5.1.1. This section provides an overview of the Site's archaeological and historical background relevant to assessing its potential to contain archaeological features, finds, or deposits. This is based on accessible records and currently known and available evidence. It is not the purpose of this document to create a detailed historical narrative of the area, but to provide a focused assessment of the archaeological potential of the Site itself in accordance with the NPPF. A gazetteer of Kent Historic Environment Record data can be found in Appendix 2 and can be used to cross-reference the following text and figures with the dataset.

5.2 DESIGNATED ARCHAEOLOGICAL HERITAGE ASSETS

5.2.1. There are no World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens, Protected Wreck Sites, Registered Battlefields, or Conservation Areas within the 1km study area.

5.2.2. The same search area contains the following designated heritage assets, which are outside the scope of this report. This includes:

- Listed Buildings of all Grades: 5

5.2.3. This report comprises an Archaeological Desk Based Assessment only and these assets will only be discussed if directly relevant to the archaeological baseline of this report.

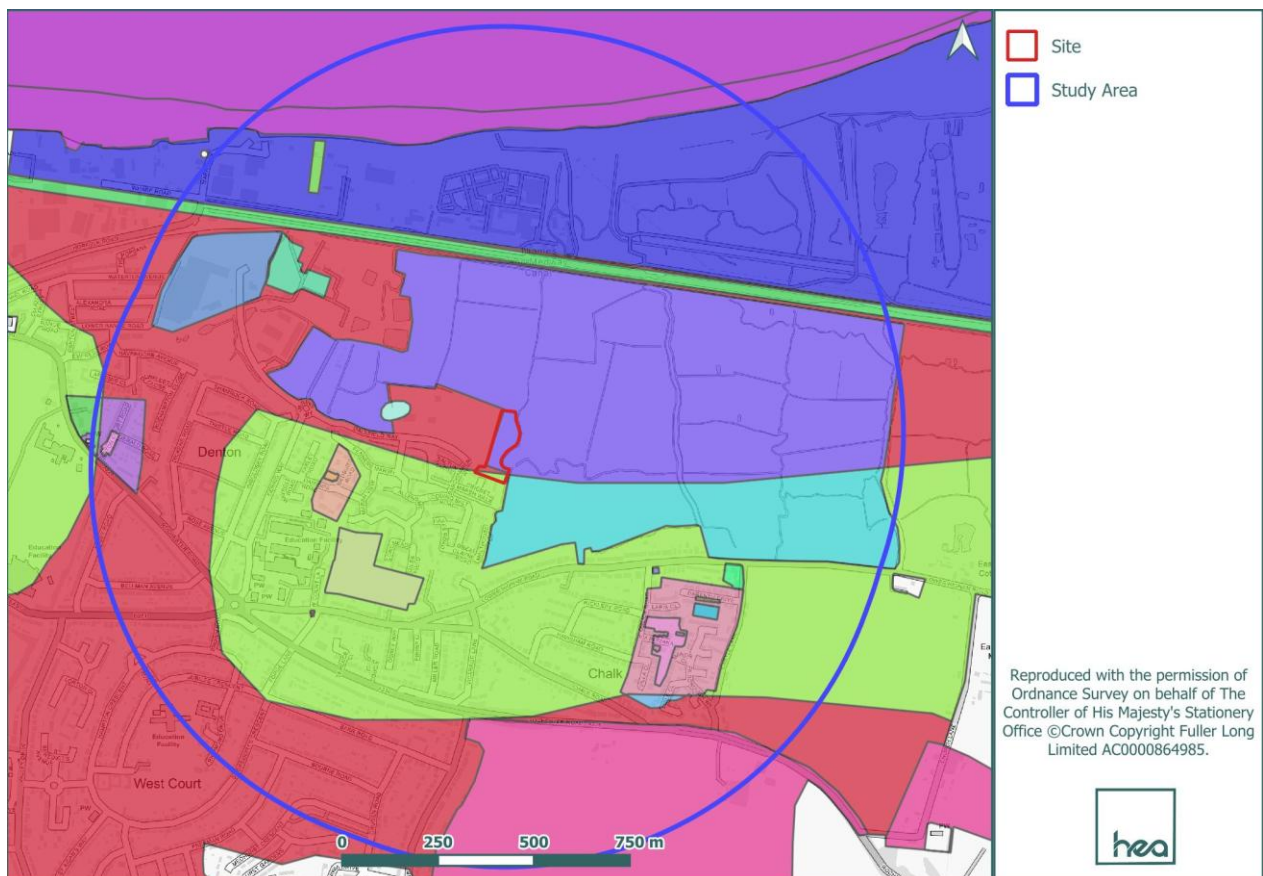


Figure 2 Relevant Archaeological Notification Areas (data from KHER)



5.3 ARCHAEOLOGICAL NOTIFICATION AREAS

- 5.3.1. The Kent County Council Archaeology Team advises Gravesham Borough Council on archaeological considerations associated with development applications. The Kent County Council Archaeology Team defines a series of areas of perceived or known archaeological potential across the various administrative authorities within the Kent.
- 5.3.2. The Site is located within three such Archaeological Notification Areas (ANAs). These ANAs are defined as follows:
- ANA at far south of Site: ‘Medium Palaeolithic Potential: Area of Multi-Period Background Potential’;
 - ANA also at far south of Site and to the immediate west: ‘Some Palaeolithic Potential: Area of Multi-Period Background Potential’; and,
 - ANA across majority of Site: ‘Some Palaeolithic Potential: Area of Prehistoric Activity on Westcourt Marshes’.
- 5.3.3. Within the wider study area, the KHER notes that there are 31 further ANAs.

5.4 ARCHAEOLOGICAL BACKGROUND

- 5.4.1. The following sections will present relevant archaeological and historic evidence for the Site and the defined study area, as available on the sources consulted and outlined previously. The archaeological time periods used throughout this assessment are detailed in Appendix 2. Professional judgement has been applied such that only the evidence relevant to an assessment of archaeological potential or historic development at the site have been summarised. Where possible, archaeological records have been grouped to create a more concise summary, for example where a series of records relate to the same settlement, landscape feature, or archaeological site. For the purposes of this assessment, archaeological evidence has been summarised as per the Historic England periods (available online).

RELEVANT PREVIOUS ARCHAEOLOGICAL EVENTS

- 5.4.2. The HER database contains 42 archaeological events within the study area and these events have been shown on Figures 3-4. Various of the recorded events were duplicated. The table below highlights the different types of events that have been undertaken. Only events relevant to this report are shown, and professional judgement has been applied to highlight which events can contribute towards an assessment of archaeological potential at the Site.

Table 1 Previous Archaeological Event Records

Type of Event	Total Number within Study Area	Number Shown on Figure 3
Desk Based Reporting (including archaeological reports, heritage reports, etc)	16	0
Excavations (including open area excavation, strip, map, and sample, etc	3	3
Intrusive Field Evaluation Work (including trial trenching, boreholes, etc)	16	16
Monitoring and Recording (including monitoring of groundworks, geotechnical works, etc)	5	5

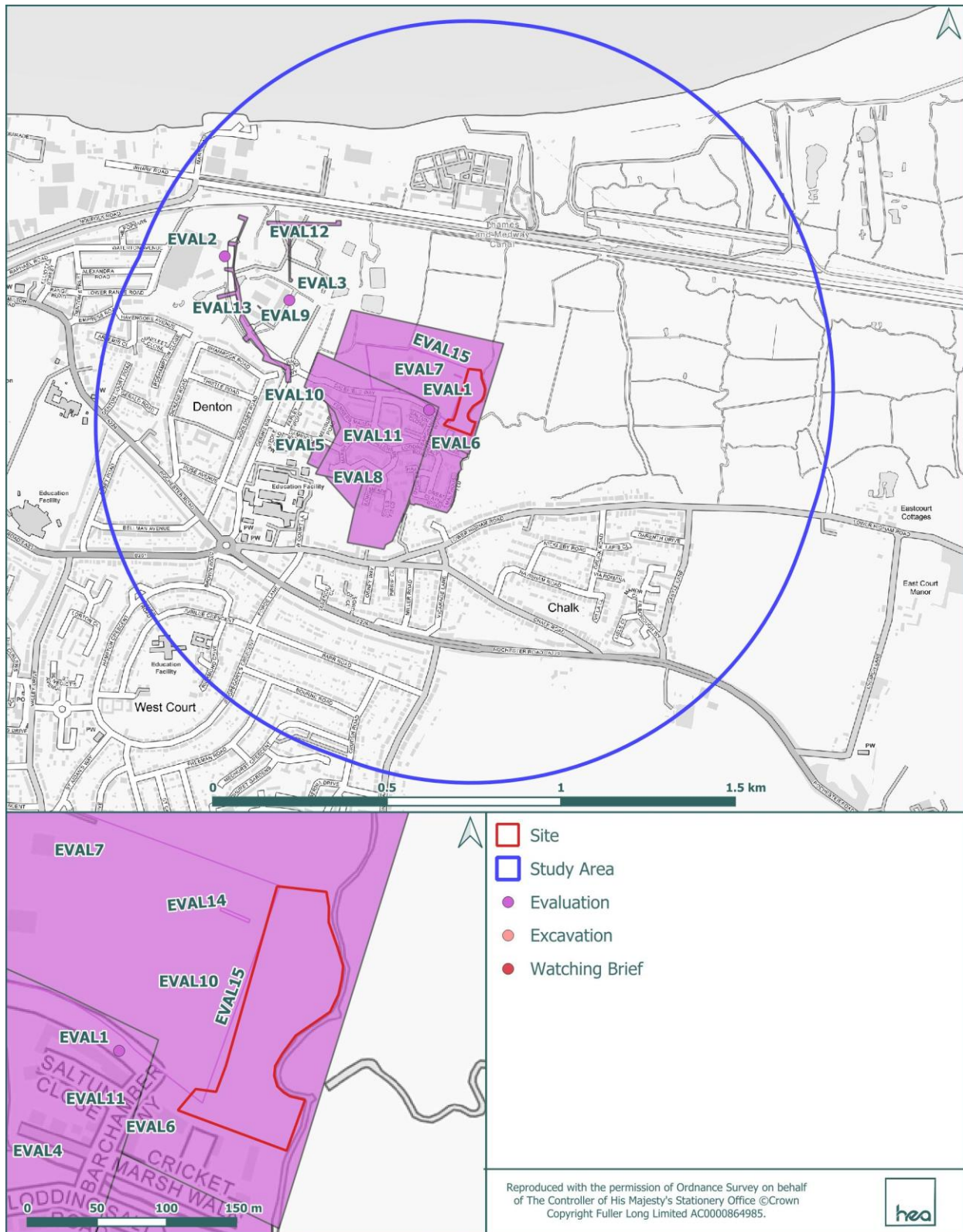


Figure 3 Relevant Previous Archaeological Events (data from KHER)

Evaluations

- 5.4.3. An archaeological and geoarchaeological investigation was conducted across land immediately to the south of the Site in 2016; this comprised the excavation of 44 trenches and only one trench contained archaeological evidence (HEA Ref: EVAL6, (Wessex, 2016)). This trench contained a singular Roman ditch, located c. 130m south west of the Site, along with ‘residual finds dating from the Late Bronze Age, Iron Age and Medieval to Modern periods retrieved from topsoil, alluvial and colluvial deposits’. The event record notes that ‘the Romano-British ditch is substantial in size and suggests the possibility of a significant level of activity within the local area’ and that geological variance is represented by a mix of made ground, alluvial deposits, and colluvial deposits. Despite the presence of the single feature and residual finds identified in this evaluation, the trenches located nearest to the Site did not contain any archaeological features.

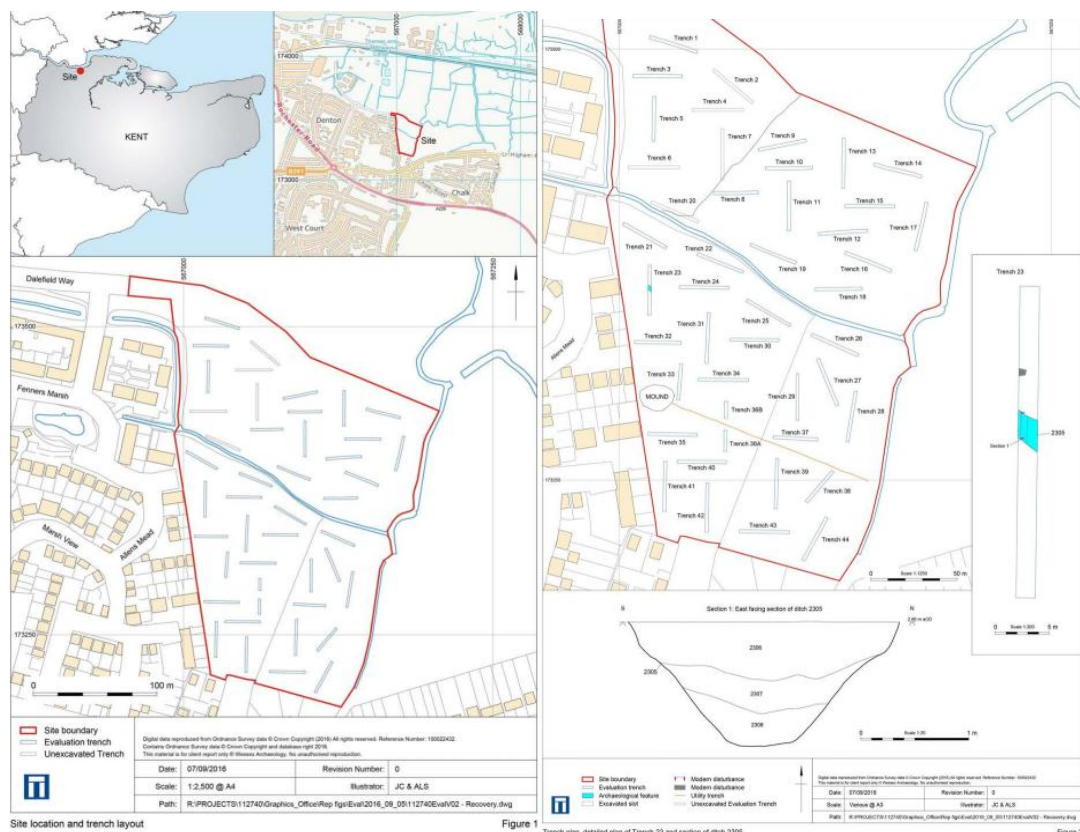


Figure 4 Evaluation of the Land South of Dalefield Way (HEA Ref: EVAL 6; reproduced from Wessex Archaeology 2016)

- 5.4.4. A further evaluation of 39 trenches across land to the immediate west of the Site, including adjacent to the north western Site boundary, identified no archaeological finds or features (HEA Refs: EVAL7, EVAL14, EVAL15, (TVAS, 2016)).
- 5.4.5. Evaluation comprising 22 trenches across the area south west of the Site also found no archaeological remains (HEA Refs: EVAL1 and EVAL4, (MoLAS, 2001)).
- 5.4.6. A ground investigation survey in 1994 comprised 11 machine dug trial pits at depths from 2.5 – 5m. This reached a peat layer but found no archaeological features or finds (HEA Ref: EVAL10). The HER locates this survey across a wide area which included the Site at its eastern end.
- 5.4.7. Evidence of Late Iron Age, Roman, and Post Medieval land use was discovered at the land adjacent to the North West Kent College Playing Fields, c. 280m south west of the Site (HEA Ref: EVAL8).

- 5.4.8. An evaluation of the line of the Denton Relief Road, c. 510m west of the Site, revealed evidence of three worked flints of a possible Mesolithic or Neolithic date and a small number of features which contained Roman and Prehistoric material (HEA Ref: EVAL13).
- 5.4.9. A field evaluation at the Gravesend Wastewater Treatment Works, c. 550m north west of the Site, revealed Romano-British pottery and other Roman finds (HEA Ref: EVAL12). These discoveries indicate that the area was used for dumping domestic refuse.
- 5.4.10. At the Lion Business Park, c. 615m north west of the Site, evidence of late Neolithic and early Bronze Age activity, specifically associated with flint knapping, was discovered alongside beaker pottery during an evaluation in 2007 (HEA Ref: EVAL9).
- 5.4.11. Various investigations within the study area did not record any archaeological evidence (HEA Refs: EVAL2, EVAL3, EVAL5, EVAL11).

Watching Briefs

- 5.4.12. A watching brief during construction work c. 530m north west of the Site was conducted to 'clarify the nature of Roman deposits in the NE part of the site, and recover further material', however no further Roman deposits were observed during this investigation (HEA Ref: WB5).
- 5.4.13. Four further watching briefs were carried out within the study area; all of these investigations failed to observe any evidence of archaeological significance (HEA Refs: WB1, WB2, WB3 and WB4).

Excavations

- 5.4.14. Evidence of a possible Medieval ditch and of West Court Manor, a Post Medieval building, was recorded during an excavation c. 330m south west of the Site (HEA Ref: EX3).
- 5.4.15. Similarly, an excavation c. 590m south east of the Site during 1959 and 1961 was associated with the Chalk Roman Villa, however further details are not provided on the event record (HEA Ref: EX2).
- 5.4.16. An excavation was undertaken c. 715m south of the Site in 1982, however the details of this activity are not provided in the KHER event record (HEA Ref: EX1). A late Iron Age site is recorded as an associated monument for this event.

Lower Thames Crossing

- 5.4.17. The route of the now consented Lower Thames Crossing (LTC) is located on a north-south alignment in the far eastern part of the study area, c.700m from the Site, and will link Tilbury on the Essex side of the River Thames with Gravesend on the Kent side. The draft archaeological mitigation strategy to ensure a record of any archaeological remains within the consented route prior to development has been reviewed as part of this assessment to understand the associated finds which are not yet on the HER database (Highways, 2023).
- 5.4.18. The route of the new road cross the Rochester Road A226 at the far south east corner of the study area, to the east of Filborough Way. In the fields to the north of this, and south of Lower Higham Road, Prehistoric, Roman, and Medieval activity has been identified. This includes a Roman period enclosure, along with outlying dispersed pits, ditches, and postholes. Bronze Age, Iron Age, and Medieval activity has been identified immediately south of Lower Higham Road, along with phases of prehistoric activity within colluvial buried land surfaces.
- 5.4.19. In the field to the south east of the Site, north of Lower Higham Road, the strategy notes a potential for deeply buried archaeological remains within alluvium or peat deposits. The strategy notes that there will be no construction groundworks associated with LTC in the field to the immediate east of the Site.

5.4.20. The geoarchaeological deposit model associated with the Lower Thames Crossing has also been reviewed (Bates, 2022) to inform this report. The area either side of the route was included within the modelling, and the Site was located within modelled Zone 3a. This zone was described as a narrow zone at the edge of the Thames floodplain location, with a chalk bedrock. Superficial deposits were identified as buried Thames gravels, which were thought likely to contain sands and gravels as well as finer grained deposits in the upper parts of the Gravel units. These superficial deposits are overlain by wedges of Holocene alluvium and organic peat horizons. It was suggested that preserved Mesolithic land surfaces could be buried at depth within this zone, in particular sealed beneath later peat deposits, with later Prehistoric land surfaces also potentially preserved successively towards the margins of the modern floodplain.

5.4.21. The results of these previous archaeological events will be discussed in more detail where relevant below within each archaeological time period section.

RELEVANT ARCHAEOLOGICAL MONUMENTS

5.4.22. The KHER database contains 84 archaeological monuments within the study area. An archaeological “monument” may refer to an individual archaeological feature or findspot, or a grouping of features and / or finds. The table below highlights the number of archaeological monuments contained on the KHER database, split by archaeological time period. Where not relevant to the site, most usually Modern buildings known from cartographic sources, archaeological monument records have not been discussed.

Table 2 Total Archaeological Monument Records

Period	Total Number within Study Area	Number Shown on Figures 5-8
Palaeolithic	0	0
Mesolithic	1	1
Neolithic	2	2
Bronze Age	1	1
Iron Age	5	5
Roman	10	10
Anglo-Saxon/Early Medieval	2	2
Medieval	2	2
Post-Medieval	16	6
Modern	24	14
Undated or General Prehistoric	9	9

5.4.23. The following sections will summarise the archaeological data by time period.

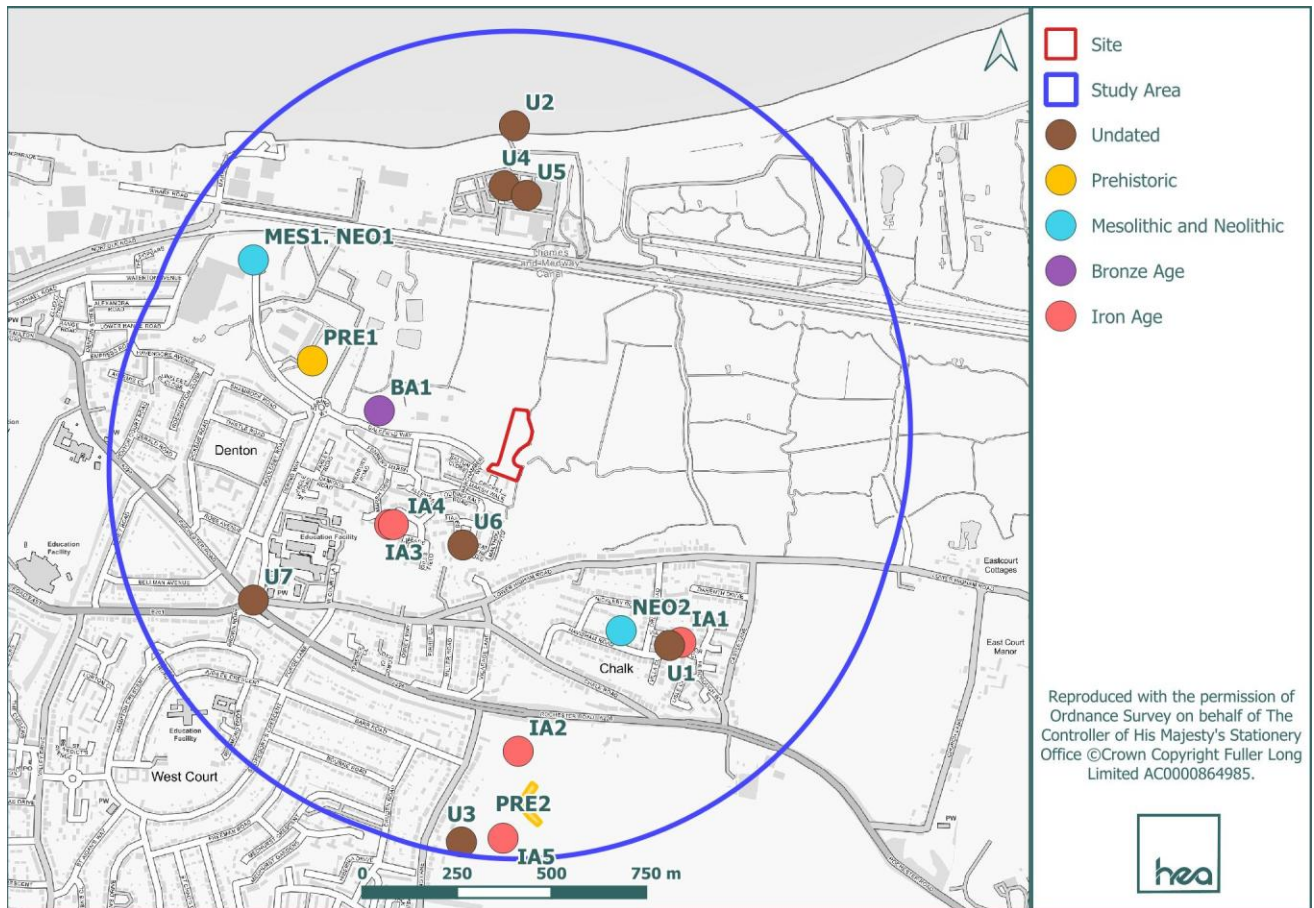


Figure 5 Undated and Prehistoric Archaeological Evidence within the Study Area (data from KHER)

UNDATED FINDS AND FEATURES

- 5.4.24. The Portable Antiquities Scheme notes an undated hoard c. 600m south of the Site (HEA Ref: U1).
- 5.4.25. An undated oval stone bank is recorded c. 750m north of the Site (HEA Ref: U2).
- 5.4.26. A linear feature shown as a cropmark is shown c. 970m south of the Site; this earthwork is suggested to be an Iron Age rectangular enclosed settlement but is ultimately an undated feature (HEA Ref: U3).
- 5.4.27. Ridge and furrow features are located c. 590m north of the Site (HEA Ref: U4). These features are presently not dated. Nearby, salt workings of unknown date are also recorded (HEA Ref: U5).
- 5.4.28. A brick built structure was identified during a walkover survey c. 210m south of the Site (HEA Ref: U6). The structure is presently undated, but has been interpreted as being in use as a water tank.
- 5.4.29. The site of two possible Anglo-Saxon, but ultimately undated, burials, are recorded c. 740m south west of the Site (HEA Ref: U7). These skeletons were discovered in 1937.

GENERAL PREHISTORIC RECORDS

- 5.4.30. A number of HER database records relate to finds dated only generally to the Prehistoric periods and are therefore outlined below. Where possible these will be assigned to a particular archaeological time period.

5.4.31. Prehistoric evidence is recorded c. 550m west of the Site at the Lion Business Park (HEA Ref: PRE1). Evidence of this time period includes 'pieces of worked flint and fragments of burnt unworked flint, animal bones, waterlogged plant remains and carbonised plant remains, charcoal and Neolithic/Bronze Age pottery sherds'.

5.4.32. Cropmarks of possible Later Prehistoric boundaries are recorded c. 810m south of the Site (HEA Ref: PRE2).

PALAEOLITHIC (1,000,000-10,000 BC)

5.4.33. The Palaeolithic period is the broadest and earliest archaeological period. Palaeolithic people lived as non-sedentary hunter-gatherers, likely focused along river systems which would have provided a wide variety of resources (Bahn, 2002). As a result of their non-sedentary lifestyle, the presence of Palaeolithic artefacts is difficult to predict, and generally depends on an appropriate underlying geology sequence such as river terrace deposits. Palaeolithic artefacts generally comprise redeposited finds of lithics such as hand axes, flakes, and cores which are usually recovered from river terrace gravel deposits.

5.4.34. There is an absence of Palaeolithic evidence recorded within the study area.

MESOLITHIC (10,000-4,000 BC)

5.4.35. Similar to the Palaeolithic, Mesolithic deposits or artefacts are most common along river valleys and in areas with topographical prominence. Artefacts dating to this period generally comprise redeposited lithics (Bahn, 2002).

5.4.36. A find described as a tranchet axe, likely Mesolithic or Neolithic, was discovered during an evaluation c.800m north west of the Site in 1999; three pieces of worked flint were also discovered of possible Mesolithic or Neolithic date (MES1).

NEOLITHIC (4,000-2,200 BC)

5.4.37. During the Neolithic period, human lifestyle shifted from the hunter-gatherer non-sedentary lifestyle of the Palaeolithic and Mesolithic periods into sedentism. Domestication of livestock and crops resulted in the establishment of settlement sites, generally concentrated close to rivers and natural bodies of water. As a result of the shift towards landscape settlement and 'place making', this period is dominated by landscape monuments including causewayed enclosures, henges and funerary barrows (Bahn, 2002).

5.4.38. A possible Neolithic causewayed enclosure allegedly existed c. 480m south east of the Site (HEA Ref: NEO2). The actual nature and location of this feature remain unknown as there is a limited amount of evidence.

5.4.39. As above, a possible Mesolithic or Neolithic tranchet axe is recorded c. 800m north west of the Site (HEA Ref: NEO1). This axe was discovered with pieces of worked flint.

BRONZE AGE (2,200-800 BC)

5.4.40. The Bronze Age period is defined by the adoption of bronze as the primary material for tools and weapons. The Bronze Age is also characterised by an increase in trade which is illuminated by the use of bronze as a material, as the copper and tin ores required to produce bronze do not generally naturally occur in proximity to each other. Similarly to the Neolithic period, landscape monuments are also established during this period with round barrows being the most numerous (Bahn, 2002).

5.4.41. During the excavation of 44 trenches across the area c. 130m south west Site (HEA Ref: EVAL6, (Wessex, 2016)), residual finds dating from the Late Bronze Age were retrieved from topsoil, alluvial and colluvial deposits.

5.4.42. A Bronze Age feature is recorded by the KHER within the study area c. 340m west of the Site (HEA Ref: BA1). Four circular cropmarks were identified which have been suggested to be related to a Bronze Age enclosure.

IRON AGE (800 BC TO AD 43)

- 5.4.43. The Iron Age period is characterised by its agrarian economy and established settlements. Features dating to this period are generally associated with the field systems, cattle enclosures, and roundhouses which developed during this period (Bahn, 2002).
- 5.4.44. As noted above, residual Iron Age finds were found within topsoil, alluvial, and colluvial deposits during trenching in the area c. 175m south west of the Site (HEA Ref: EVAL6, (Wessex, 2016)).
- 5.4.45. A late Iron Age pit containing animal bone and structural daub is recorded c. 290m south west of the Site (HEA Ref: IA3). Nearby, Iron Age ditches are also recorded (HEA Ref: IA4). These features are interpreted to be of 1st century date and suggested as to have been part of a field system.
- 5.4.46. Various features recorded at the Chalk Roman Villa, c. 610m south east of the Site, may be dated to the Iron Age (HEA Ref: IA1). The features include several pits, graves, and a rubbish tip which contained pottery of the Iron Age period.
- 5.4.47. At the Thamesview School, c. 715m south of the Site, earth moving operations undertaken in 1982 revealed significant amounts of occupational debris including late Iron Age pottery, mammalian bone, human remains, a bronze brooch, a loom weight, and iron slag (HEA Ref: IA2).
- 5.4.48. Cropmarks depicting a possible Iron Age settlement enclosure were identified via aerial photography c. 945m south of the Site (HEA Ref: IA5).

ROMAN (AD 43-410)

- 5.4.49. During the Roman period, important areas of settlement were connected by a formal road network (English Heritage, 2025). The development of a road system also led to development of new settlements, particularly in areas where multiple roads or travel routes converged. The highest concentration of Roman finds and features can be found within these settlements and along these roads.
- 5.4.50. The Site does not lie in the vicinity of any known or projected major Roman road. The closest Roman road to the Site is Watling Street located c. 3.1km south of the Site, on a NW-SE alignment (Margary, 1955, pp. 44; Allen, et al., 2016). This road connected Rochester (Durobrivae) to London (Londinium). The Roman town of Rochester is also the closest known major settlement, situated c. 11.9km south east of the Site.
- 5.4.51. A Romano-British ditch containing pottery of the same date was recorded c. 130m south west of the Site (HEA Ref: R5, EVAL6, (Wessex, 2016; see Figures 3 and 4). This ditch was aligned north west to south east and 'suggests the possibility of a significant level of activity within the local area'. A series of ditches suggested to have been part of a Roman field system are recorded c. 290m south west of the Site (HEA Ref: R9). The ditch was not aligned such that it is likely to interact with the Site.
- 5.4.52. Roman pottery with graffiti was recorded during excavations in 1961 c. 460m south of the Site (HEA Ref: R4).
- 5.4.53. In the Denton Marshes, c. 560m north west of the Site, a heap of pottery dating to the 2nd century AD, including Samian ware, was discovered during earth moving activity (HEA Ref: R1). An evaluation undertaken c. 760m north west of the Site revealed Roman remains within a possible Roman feature (HEA Ref: R7); nearby, Roman finds were discovered during an evaluation, however the details of these finds are not presently outlined within the monument record (HEA Ref: R6).
- 5.4.54. A Roman building known as the Chalk Roman Villa was excavated in 1962 c. 610m south east of the Site (HEA Refs: R8 and R3). The building was confirmed to have been destroyed by fire sometime in the 3rd century AD; within the villa complex, graves of three infants and a rubbish dump were also discovered alongside a chalk wall, hypocaust and a number of tiles. A further monument record relates to a Roman poppy-headed beaker discovered in the same area (HEA Ref: R2).
- 5.4.55. Cropmarks of Roman field boundaries are recorded c. 800m south of the Site (HEA Ref: R10).

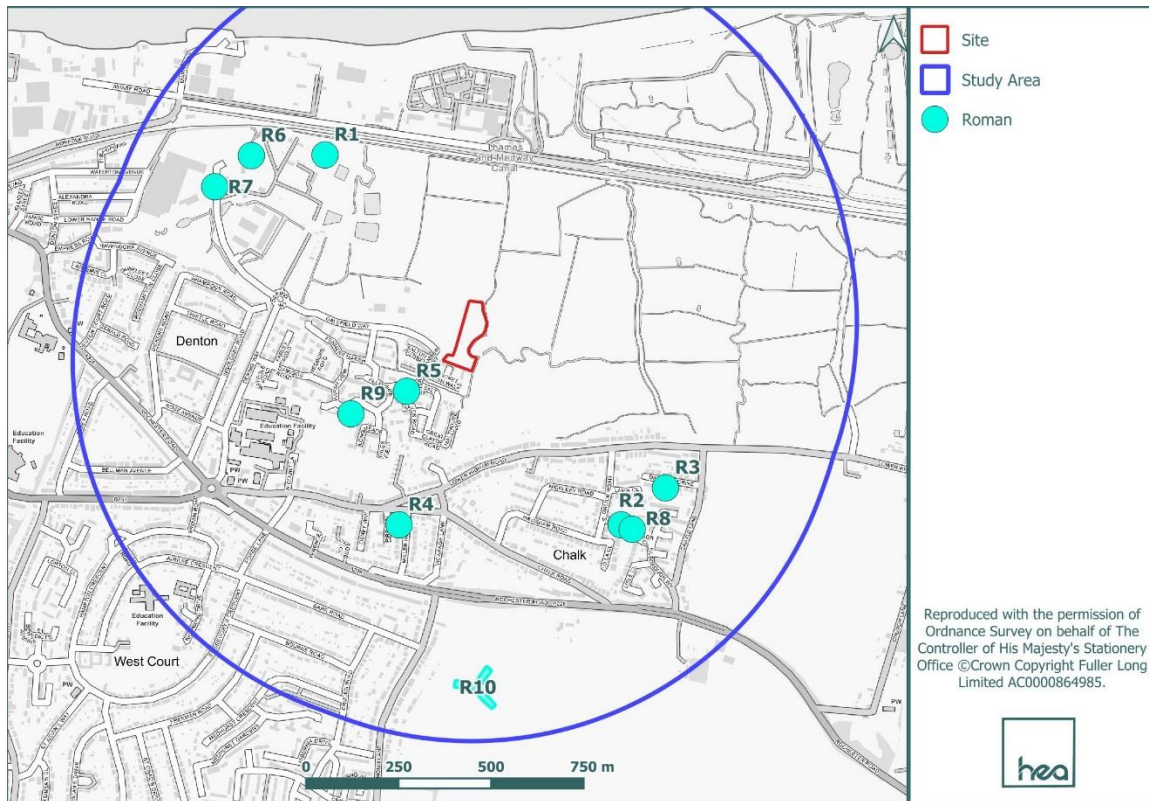


Figure 6 Roman Evidence within the Study Area (data from KHER)

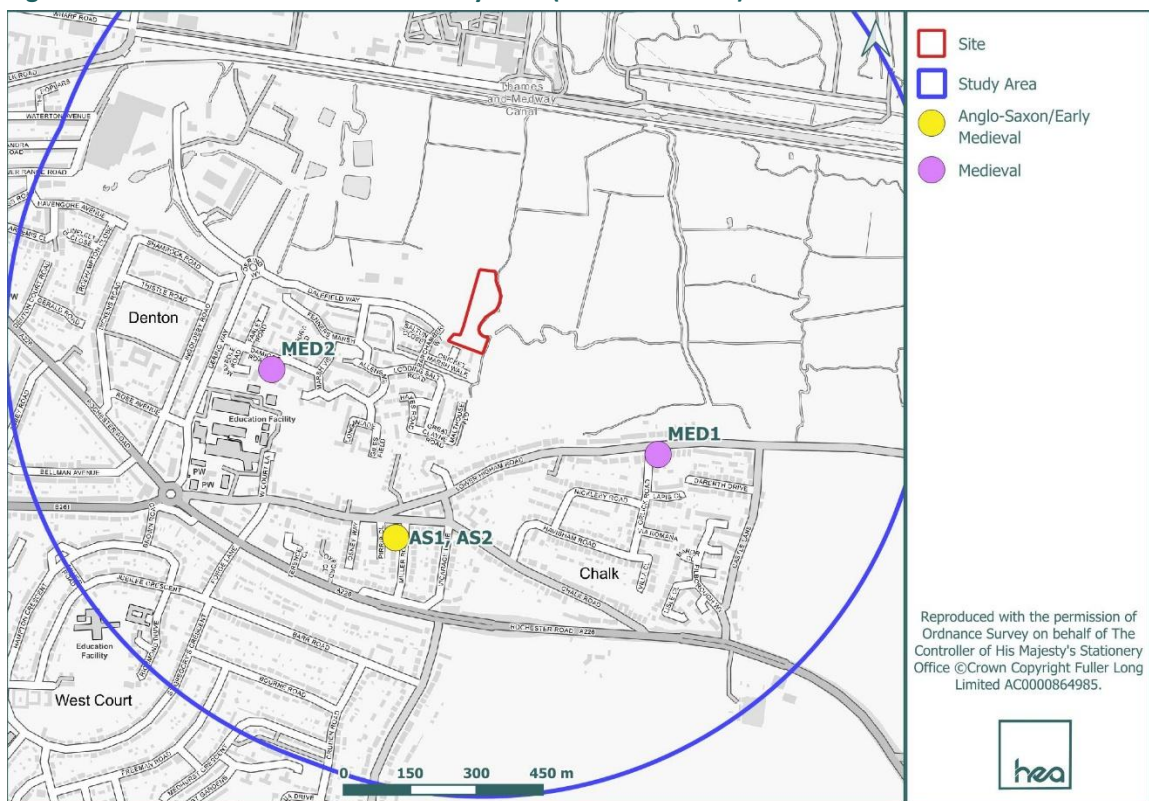


Figure 7 Anglo-Saxon/Early Medieval and Medieval Evidence within the Study Area (data from KHER)



ANGLO-SAXON/EARLY MEDIEVAL (AD 410-1066)

- 5.4.56. After the decline of Roman rule in the 5th century, Germanic peoples from northern Europe crossed the North Sea and settled in eastern Britain (Morris, 2022). Whilst the population of migrants is generally considered to be small, they had a lasting impact on the development of England. The Old Germanic languages they brought with them developed into Old English, and they established a series of kingdoms which would later unify to form England (Stenton, 1970). Furthermore, during this period the prevailing religion of the population changed from paganism to Christianity (Yorke, 2006).
- 5.4.57. Two Anglo-Saxon silver pennies are recorded c. 460m south of the Site (HEA Refs: AS1 and AS2). The circumstances of these finds are presently unknown.

MEDIEVAL (AD 1066-1540)

- 5.4.58. During the Medieval period settlements developed, both within areas that had been settled in earlier periods (London, Colchester etc) and in entirely new areas. These settlements, which were generally focused around manors, trade routes and churches, are the origin of many hamlets, villages and towns throughout the country (Historic England, 2018). Around these settlements, agricultural hinterlands were established to provide resources for use within these settlements, and commodities to trade with the wider area.
- 5.4.59. The Domesday Book is a detailed record of manorial landholdings which was compiled in 1086 (Williams, 1999). Denton, presently located c. 650m to the west of the Site, is the closest recorded estate to the Site and was under the ownership of the Bishop of St Andrew at Rochester (Powell-Smith, 2025). It had a recorded population of 10 households which is below average for the period and the land and resources were described as ploughland, meadow, and woodland. The Domesday Book also mentions the presence of one church.
- 5.4.60. As noted above, residual Medieval finds were found within topsoil, alluvial, and colluvial deposits during trenching in the area south west of the Site (HEA Ref: EVAL6, (Wessex, 2016).
- 5.4.61. The remains of a Medieval manor house is recorded c. 400m south west of the Site (HEA Ref: MED2). The building was demolished sometime between 1730-1780 after the property was replaced with a new manor house called West Court in 1739.
- 5.4.62. A Medieval timber-framed house known as 'Readers' is located c. 460m south east of the Site (HEA Ref: MED1). This property dates to the 15th and 16th centuries.

POST-MEDIEVAL (AD 1540-1901) AND MODERN (AD 1901 TO PRESENT)

- 5.4.63. The former site of the manorial house known as West Court is located c. 370m south west of the Site (HEA Ref: PM1). The manor house was constructed in the 18th century, and replaced an earlier Medieval manor house; it was demolished in 1991.
- 5.4.64. A quay and jetty of Post Medieval date are located c. 960m north west of the Site (HEA Refs: PM2 and PM3).
- 5.4.65. The cropmark of a possible Post Medieval chalk pit can be seen c. 670m south of the Site on aerial photographs (HEA Refs: PM4). Similarly, the earthworks of a Post Medieval water channel can also be seen on aerial photographs c. 470m north east of the Site (HEA Ref: PM5) and of a former sea wall c.430m east of the Site (HEA Ref: PM6).
- 5.4.66. Various pillboxes dating to the Second World War are recorded within the study area (HEA Refs: MOD1, MOD2, MOD3) alongside various military associated features including air raid posts, road blocks, batteries, anti-aircraft headquarters, and search lights (HEA Refs: MOD4-MOD14). The closest Modern monument record is located c. 65m east of the Site, an air raid warden post (HEA Ref: MOD4).

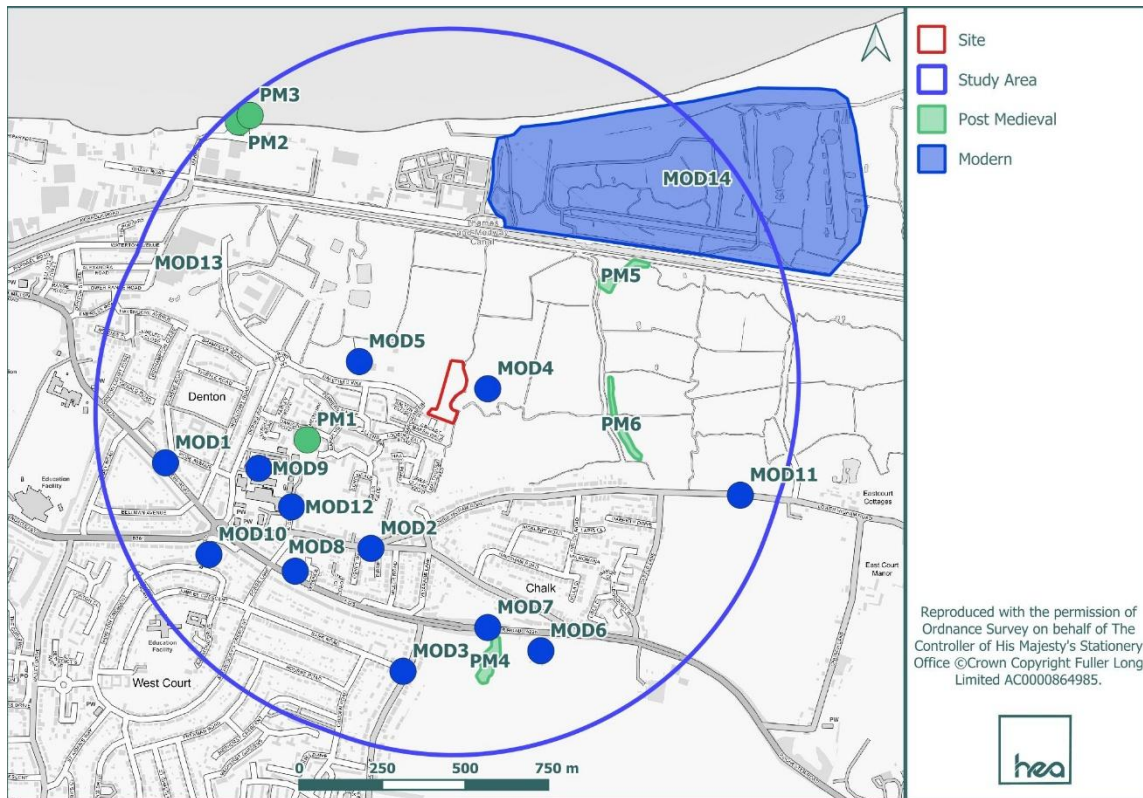


Figure 8 Post Medieval and Modern Evidence within the Study Area (data from KHER)



Figure 9 1788 Faden Map

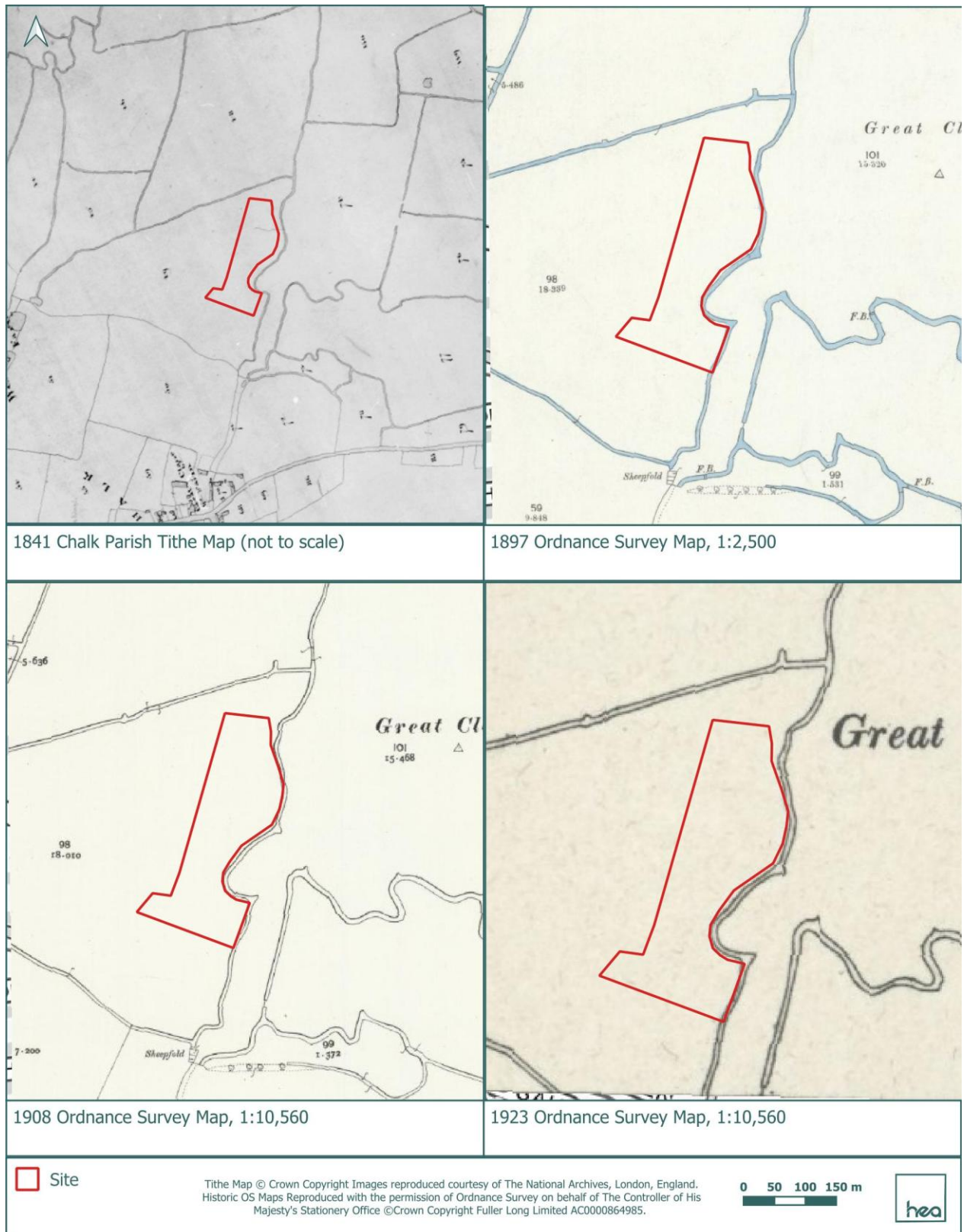


Figure 10 1841-1923 Historic Mapping (OS Maps reproduced with the permission of the National Library of Scotland)

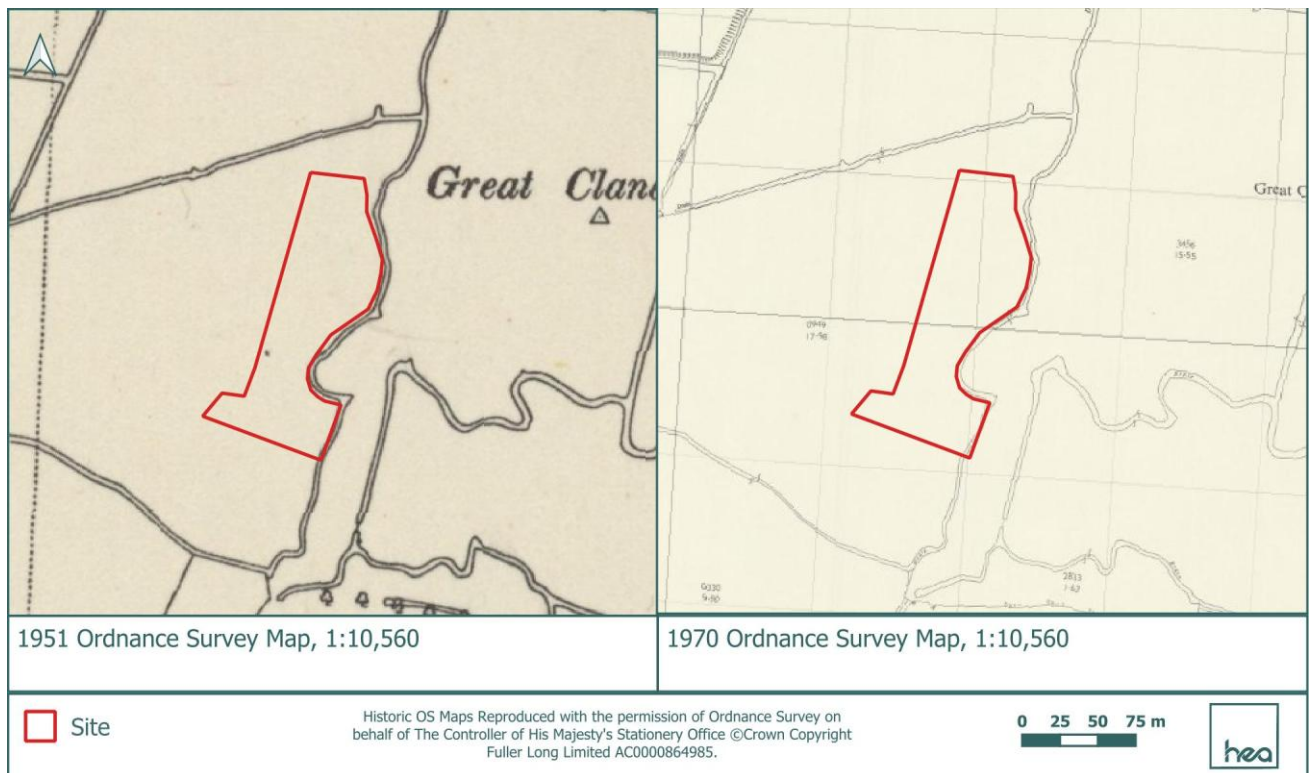


Figure 11 1950-1972 Historic Mapping (OS Maps reproduced with the permission of the National Library of Scotland)
MAP PROGRESSION

- 5.4.67. In the Post Medieval and Modern periods, cartographic sources and aerial photographs are useful in illustrating the development of the Site and study area over time. It is possible to use these sources to understand the development and land use changes at the Site starting from the earlier mapping and progressing through to the present day.
- 5.4.68. Pre-Tithe mapping shows that the Site was located within the Gravesend Marshes (Figure 8, 1788 Faden Map). The Faden Map shows that the Site was located to the east of Gravesend which is shown as a large settlement and to the north of the settlement at Chalk; the Tilbury Fort is shown to the north across the River Thames.
- 5.4.69. Tithe maps were prepared following the Tithe Commutation Act 1836, which facilitated the payment of tithes in money as opposed to goods. They were accompanied by a schedule, known as apportionments, which gave the names of all owners and occupiers of land in the relevant parish, as well as descriptions of land use (The National Archives, 2025).
- 5.4.70. The Site is located within plot 49 on the 1841 Chalk Parish Tithe Map; this plot was owned by The Right Honourable John Stuart Earl of Darnley and occupied by William Brown, the plot is named as 'Rushey Marsh' with a state of cultivation marked as pasture. The distinctive drainage channel which forms the Site's eastern boundary to the present day was evident in 1841. Further drainage channels forming areas of marshland pasture are evident in the surrounding area. The nearest settlement was located along what is now Lower Higham Road c.330m south of the Site. The manor at West Court was shown to the south west.
- 5.4.71. The 1897 Ordnance Survey Map shows that Site as unchanged and located within the area known as the Great Clane Lane Marshes. There is no change shown to the Site in 1908 or throughout the 20th century. A 1940 aerial photograph (not reproduced confirms the Site in use as marshland pasture at that time.

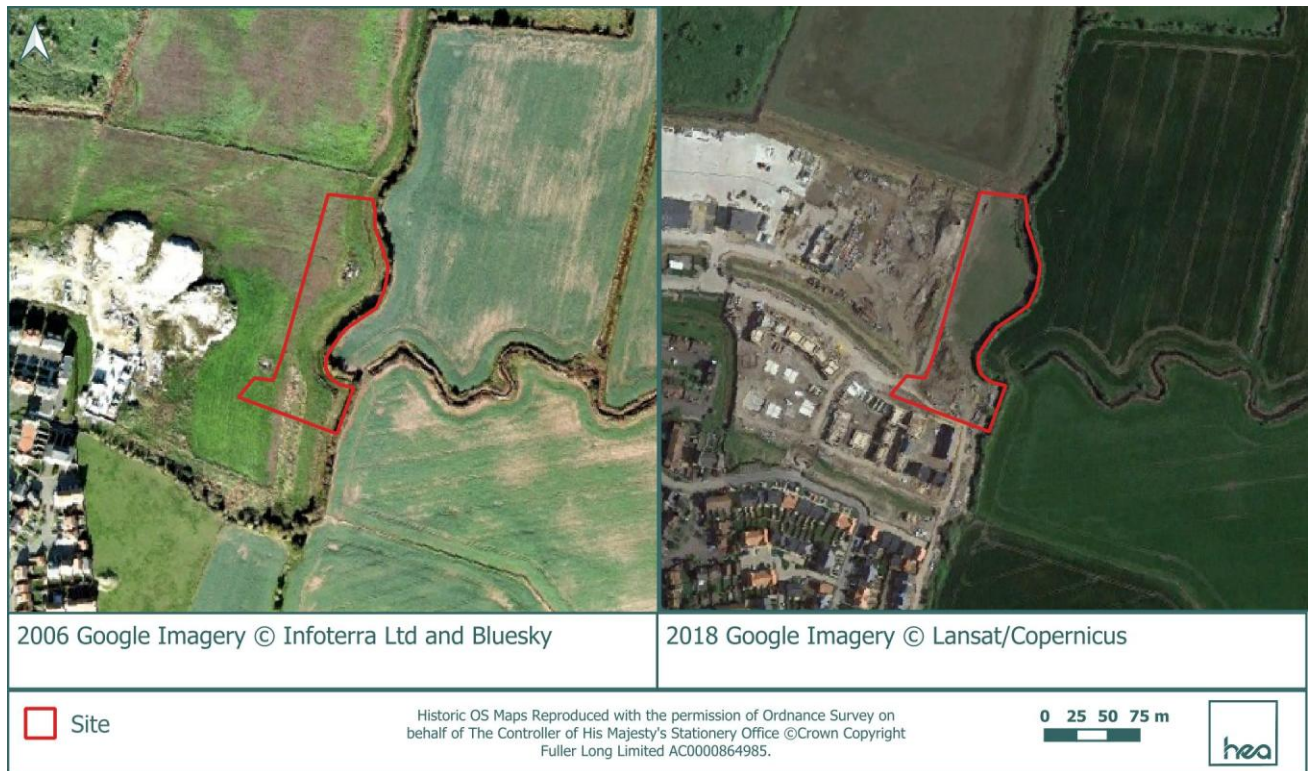


Figure 12 Aerial Photographs

- 5.4.72. Aerial photography (not reproduced) from 1990 shows that the residential development seen to the south and the west has extended closer to the Site; by 2006 the areas immediately adjacent to the Site to the west had undergone earth movements, with extensive spoil heaps shown on land to the immediate west. By 2018, the land immediate adjacent to the western boundary of the Site had been redeveloped for the existing external storage facility. The southern part of the Site showed extensive spoil heaps at that time, either related to the development to the west or to residential development to the south. The Site has since remained open grassland.

IMPACTS OF PREVIOUS SITE DISTURBANCE

- 5.4.73. Historic mapping and aerial imagery indicate that the Site comprised marshland pasture throughout its mapped history to the 21st century. Any disturbance would have likely been either shallow or localised in the form of drainage channels or land drains. It has since been subject to some potential earth moving activities in the form of spoil heaps at the southern part of the Site which may have caused some disturbance or build up. It is likely that spreads of made ground will be present at the Site given the extent of previous development immediately adjacent, however it is anticipated that the natural sequence would survive underlying this.

6 SUMMARY OF ARCHAEOLOGICAL POTENTIAL & ASSESSMENT OF SIGNIFICANCE

6.1 ARCHAEOLOGICAL POTENTIAL AND SIGNIFICANCE

6.1.1. The archaeological potential of the Site, as well as the likely significance of any archaeology which may be anticipated, is summarised below, by archaeological time period. This potential will be defined as one of: Nil, Negligible, Low, Medium, High, or Certain.

6.1.2. Significance is a concept that forms the foundation of conservation philosophy. The NPPF states that heritage ‘assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations’. This significance will be defined as one of: Nil, Negligible, Low, Medium, High, or Very High.

EARLY PREHISTORIC – LOW POTENTIAL FOR FEATURES AND FOR FINDS

6.1.3. Evidence of Early Prehistoric (Palaeolithic, Mesolithic, and Neolithic) activity within the study area is sparse. There is an absence of recorded Palaeolithic remains, and only a small quantity of possible Mesolithic or Neolithic material has been recovered to the northwest, including a tranchet axe and worked flint flakes. An unconfirmed causewayed enclosure is located to the southeast. The potential for Palaeolithic artefacts is considered to be low.

6.1.4. Geoarchaeological deposit modelling associated with the Lower Thames Crossing suggests the potential for buried land surfaces of Mesolithic date throughout the area, although these would be buried at great depth.

6.1.5. Further land surfaces of later Prehistoric date may be anticipated towards the outer edges of the modern Thames floodplain, with finds of Neolithic date also likely to be buried at great depth.

6.1.6. Overall, the underlying alluvial sequence could contain buried archaeological finds or palaeoenvironmental evidence, however this will likely be buried at great depth. Consequently, the potential for Early Prehistoric features or artefactual material within the Site is assessed as low. It is anticipated that any Early Prehistoric evidence discovered at the Site would be of low significance.

LATER PREHISTORIC – LOW POTENTIAL FOR FEATURES AND LOW TO MODERATE FOR RESIDUAL FINDS

6.1.7. In the area south west of the Site, an evaluation conducted in 2016 identified residual finds from the late Bronze Age and Iron Age from within the topsoil, alluvial, and colluvial deposits. Additionally, evidence for Later Prehistoric (Bronze Age and Iron Age) activity is present within the surrounding area, including possible Bronze Age enclosures identified as circular cropmarks, and a concentration of Iron Age activity to the south and southwest comprising pits, ditches, animal bone, and structural material interpreted as part of a field system. Iron Age pottery, metalwork, and slag recovered from multiple sites suggest a well-utilised landscape during this period. As noted above, the potential for preserved land surfaces of later Prehistoric date at great depth within the Site cannot be discounted.

6.1.8. It is possible that evidence for exploitation of marshland resources could be present, as well as residual finds within topsoil and alluvial deposits. Overall, given the recorded finds and the presence of activity nearby, the Site is considered to have a low to moderate potential for residual finds within the underlying alluvial sequence and a low potential for features of these periods. The geoarchaeological potential is considered to be high in association with the anticipated alluvial sequence. If present, any evidence of the Bronze Age or Iron Age at the Site is anticipated to be of low significance.



ROMAN – LOW POTENTIAL FOR FEATURES AND LOW TO MODERATE FOR RESIDUAL FINDS

- 6.1.9. A 2016 evaluation recorded a substantial Roman ditch in the area south west of the Site. Additionally, the wider area contains evidence of Roman occupation, notably the Roman villa complex at Chalk to the southeast, as well as ditches, pottery scatters, and possible field systems recorded within c. 1km of the Site. The proximity of Watling Street, located approximately 3.1km to the south, suggests that the region was relatively connected during the Roman period.
- 6.1.10. Despite the presence of the singular known Roman feature to the south west, the Site's position within former marshland likely limited settlement; peripheral activity associated with exploitation of the marshland environment cannot be discounted, however the potential for features is likely to be low. Residual finds may be present within the underlying alluvial sequence, assessed as low to moderate. Any finds or features dating to the Roman period discovered at the Site are anticipated to be of low significance.

ANGLO-SAXON/EARLY MEDIEVAL AND MEDIEVAL – LOW POTENTIAL FOR FEATURES AND FOR FINDS

- 6.1.11. Anglo-Saxon/Early Medieval and Medieval evidence within the study area is limited to isolated coin finds and references to local manorial estates. The Domesday Survey records the nearby settlement of Denton as a small agricultural community under ecclesiastical ownership, and the remains of a Medieval manor house and later properties attest to activity concentrated to the southwest and southeast beyond the marshland. No features or finds of this period have been recorded within or immediately adjacent to the Site during previous archaeological work, and its marshland character would have constrained development and occupation. The potential for Anglo-Saxon/Early Medieval or Medieval features or finds within the Site is therefore considered to be low, with an anticipated low significance of any evidence of these periods.

POST MEDIEVAL AND MODERN – HIGH POTENTIAL FOR FEATURES AND FOR FINDS

- 6.1.12. From the Post-Medieval period onwards, the surrounding landscape underwent significant transformation through agricultural improvement, estate development, and industrial exploitation of the marshland environment. The establishment of West Court manor house to the southwest, alongside the creation of drainage channels, sea walls, and water management infrastructure, reflects an intensively managed landscape.
- 6.1.13. Although the Site itself appears to have remained largely open and undeveloped, its proximity to these features and its position within a historically managed marshland landscape suggest that subsurface evidence of drainage works and marshland management may survive. Accordingly, the Site is considered to have a high potential for Post-Medieval and Modern archaeological features and finds, however such finds would most likely have nil to negligible significance.

ARCHAEOLOGICAL POTENTIAL AND ANTICIPATED SIGNIFICANCE SUMMARY TABLE

- 6.1.14. The identified archaeological potential of the Site is therefore summarised in the following table:

Table 3 Archaeological Potential & Anticipated Significance of Finds or Features

Period	Potential	Anticipated Significance of Finds or Features (if present)
Early Prehistoric	Low for features and for finds	Low
Late Prehistoric	Low for features and Low to Moderate for residual finds	Low
	High geoarchaeological potential	



Roman	Low for features and Low to Moderate for residual finds	Low
Anglo-Saxon/Early Medieval	Low for features and for finds	Low
Medieval	Low for features and for finds	Low
Post-Medieval	High for features and for finds	Nil to Negligible
Modern	High for features and for finds	Nil to Negligible



7 SUMMARY OF POTENTIAL DEVELOPMENT IMPACTS

7.1 DEVELOPMENT PROPOSALS

- 7.1.1. The planning application proposed the Site for an industrial external storage area (use class B8), with associated access, temporary buildings, hard landscaping, and areas of soft landscaping. Below ground excavations are likely to be generally limited in depth as no permanent structures are proposed. The only identified area of potential greater depth of excavation is the petrol interceptor proposed in the northern part of the Site.

7.2 POTENTIAL DEVELOPMENT IMPACTS

- 7.2.1. Previous archaeological work in the immediate area to the south and west has identified very limited archaeological activity, including a large Roman ditch and residual finds of later Prehistoric, Medieval, and Modern date. Therefore, this assessment has identified a limited archaeological potential at the Site for archaeological artefacts and features to be present, with any potential instead more pertinently related to palaeoenvironmental remains associated with the underlying alluvial sequence. Any archaeological evidence would most likely be of at most low significance.
- 7.2.2. Development impacts are anticipated to be generally shallow but widespread, comprising installation of hardstanding and landscaping. This is likely to impact only the topmost levels of the underlying sequence, potentially contained within topsoil / subsoil / made ground deposits with limited impact on the underlying alluvial sequence.
- 7.2.3. Overall, it is considered unlikely that there would be any archaeological constraint to development and this assessment is therefore considered sufficient to support the planning application. The Council will confirm their position when consulted and as advised by the County Archaeologist.

8 CONCLUSIONS

INTRODUCTION

- 8.1.1. HEA has been commissioned by O'Halloran & O'Brien to produce an Archaeological Desk-Based Assessment (ADBA) in support of a current planning application (Ref: 20250763) for development at Land at Dalefield Way (East), Gravesend. This report draws together the available archaeological, historical, topographical, and land use information in order to clarify the archaeological potential of the Site. It is the intention that this report will address the information requirements as set out in the NPPF and the Gravesham Borough Council local planning framework.

DEVELOPMENT PROPOSALS

- 8.1.2. The planning application proposed the Site for an industrial external storage area (use class B8), with associated access, temporary buildings, hard landscaping, and areas of soft landscaping. Below ground excavations are likely to be generally limited in depth as no permanent structures are proposed. The only identified area of potential greater depth of excavation is the petrol interceptor proposed in the northern part of the Site.

RELEVANT ARCHAEOLOGICAL ASSETS

- 8.1.3. There are no designated archaeological assets that require consideration as part of this report. The Site is located within three locally defined Archaeological Notification Areas.
- 8.1.4. Previous archaeological work in the immediate area to the south and west has identified very limited archaeological activity, including a large Roman ditch and residual finds of later Prehistoric, Medieval, and Modern date. Therefore, this assessment has identified a limited archaeological potential at the Site for archaeological artefacts and features to be present, with any potential instead more pertinently related to palaeoenvironmental remains associated with the underlying alluvial sequence. Any archaeological evidence would most likely be of at most low significance.

SUMMARY & RECOMMENDATIONS

- 8.1.5. Development impacts are anticipated to be generally shallow but widespread, comprising installation of hardstanding and landscaping. This is likely to impact only the topmost levels of the underlying sequence, potentially contained within topsoil / subsoil / made ground deposits with limited impact on the underlying alluvial sequence.
- 8.1.6. Overall, it is considered unlikely that there would be any archaeological constraint to development and this assessment is therefore considered sufficient to support the planning application. The Council will confirm their position when consulted and as advised by the County Archaeologist.



9 ACKNOWLEDGEMENTS

- 9.1.1. The author(s) would like to extend thanks to all those involved in the production of this report, including but not limited to the Historic Environment Record officer and colleagues here at HEA.
- 9.1.2. This report has been prepared for the exclusive use of our client in line with our instruction. No other party may use, copy, make use of, or rely on the contents of this report. HEA has undertaken this report in accordance with the scope of work agreed with our client and accepts no liability or responsibility for the use of this report by any third party unless otherwise agreed. All copyright and intellectual property rights are retained by FullerLong Limited.
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APPENDIX ONE: RELEVANT LEGISLATIVE & POLICY CONTEXT

In determining any planning application, the Local Planning Authority (LPA) will be guided by current national legislation and planning policy, as well as the policy and guidance set by the relevant LPA at either a regional or local level. The legislative and policy framework insofar as it relates to the historic environment, as well as industry guidance, applicable to this assessment is summarised below.

NATIONAL LEGISLATION, POLICY & GUIDANCE

ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979, AS AMENDED

National legislation regarding archaeology is contained within the Ancient Monuments and Archaeological Areas Act (AMAAA) 1979, and as amended by the National Heritage Act 1983, and updated in 1997 and 2002. These Acts provide specific protection for archaeological monuments of national significance.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The National Planning Policy Framework (NPPF) was first published in March 2012 and has since been periodically updated. The Framework sets out the Government's planning policies for England and how these should be applied. The Framework recognises the need for the planning system to contribute to the achievement of 'sustainable development', through achieving three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Paragraph 11 states that 'plans and decisions should apply a presumption in favour of sustainable development'.

Section 16, paragraphs 202 to 221, sets out the national planning policy basis for conserving and enhancing the historic environment.

Heritage assets are defined in the NPPF (Annex 2) as 'a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)'.

Paragraph 202 recognises that heritage assets are an irreplaceable resource and requires the significance of heritage assets to be considered in the planning process, whether designated or not.

Paragraph 207 states that '*in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.*' This paragraph further states that the relevant historic environment record database should be consulted as a minimum and assessed by professionals with appropriate expertise. An appropriate desk based



assessment, and where necessary field evaluation, will be required on sites for which development includes, or has the potential to include, heritage assets with archaeological interest.

It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain elements could accommodate change without affecting the significance of the asset. Change is only considered harmful if it erodes an asset's significance. Understanding the significance of any heritage assets affected and any contribution made by their setting is therefore fundamental to understanding the scope for and acceptability of change.

Annex 2 provides a number of definitions which are relevant to this assessment:

- The Historic Environment is defined as 'all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.'
- Archaeological Interest is defined as a heritage asset which 'holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point'.
- A Designated Heritage Asset comprises a: 'World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation'.
- Significance (for heritage policy) is defined as 'the value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'.
- Setting of a heritage asset is defined as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.

In accordance with the NPPF, this report is intended to provide a proportional assessment of the potential development impacts on relevant heritage assets. Paragraphs 212-215 relate to potential harm to designated heritage assets and require that 'any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.' Paragraph 216 states that '*in weighing applications that...affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of harm or loss and the significance of the heritage asset.*'

Where an application is permitted, Paragraph 218 states that developers will be required to '*record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact.*' This paragraph also states that the 'ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.' In practice, this means that development consents should include a requirement to advance our understanding of the significance of the archaeological resource within a development site in a proportionate manner. It is important to note that the ability to undertake such measures is not a factor in the determination of a planning consent.

NATIONAL PLANNING PRACTICE GUIDANCE

The National Planning Practice Guidance (PPG) was published in support of the NPPF and is available on the Government Gateway website. The PPG is separated into categories of which the relevant category for this report is the Historic Environment category, first published in April 2014 and has since been periodically updated. These categories build upon the framework outlined in the NPPF for 'decision-making in respect of applications...to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development.'



The guidance states that, ‘where the complete or partial loss of a heritage asset is justified... the aim then is to capture and record the evidence of the asset’s significance which is to be lost, to interpret its contribution to the understanding of our past, and to make that publicly available.’

The significance of a heritage asset is further defined in the PPG, relative to its archaeological, architectural and artistic, or historic interest as follows:

- archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

The setting of a heritage asset is also further defined in the PPG. It is stated that all heritage assets have a setting, irrespective of their survival and designation. In addition to a visual relationship, the way in which we experience an asset and its setting can also be influenced by other factors such as noise, dust, smell, vibration from nearby land uses, and historic relationships.

The PPG further states that where potential harm to heritage assets is identified, it should be categorised as either less than substantial harm or substantial harm in line with the NPPF. It is the degree of harm to the asset’s significance rather than the scale of development that is to be assessed. Harm may arise as a result of works directly to the asset or within its setting. To be considered “substantial harm” is a high bar and may not arise in many cases. This judgment is to be made by the decision-maker, with regard to the circumstances of the case and relevant policy.

Where any harm is identified, this is to be weighed against the public benefits of the development proposal. The PPG defines public benefits as anything that delivers economic, social or environmental objectives as described in the NPPF. It is important to note that public benefits do not always have to be visible or accessible to the public and could, for example, comprise works to secure the ongoing preservation or enhancement of a privately owned heritage asset.

LOCAL PLANNING POLICY

Gravesham Borough Council adopted the Gravesham Local Plan Core Strategy in 2014.

Policy CS20: Heritage and Historic Environment is relevant to this assessment. It states that:

‘5.16.10 The Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk through neglect, decay or other threats. Securing viable, sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present.

5.16.11 Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough. These include



- Gravesend Town Centre, its development as a heritage riverside town and its setting;
- The Borough's urban and rural conservation areas; and
- Surviving built features and archaeology relating to the Borough's maritime, military, industrial and transport history.

5.16.12 When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset'.

APPENDIX TWO: METHODOLOGY & BASELINE DATA COLLATION

ASSESSING ARCHAEOLOGICAL POTENTIAL

The following table adds additional detail to the criteria used in this report to assess the archaeological potential of the Site to contain remains dating to each relevant archaeological time period:

Table 4 Definition of Levels of Archaeological Potential

	Definition
Certain	Archaeological heritage assets are known to be present
High	It is very likely that currently unknown archaeological heritage assets will be present
Medium	It is likely that currently unknown archaeological heritage assets will be present
Low	It is unlikely that currently unknown archaeological heritage assets will be present
Negligible	It is very unlikely that currently unknown archaeological heritage assets will be present
Nil	There is no possibility that currently unknown archaeological heritage assets will be present

It is acknowledged that these time periods are only approximately utilised across the various archaeological and historic databases, and that there may be differences across the country. For the purposes of this assessment, archaeological evidence has been summarised in line with the archaeological time periods as used by Historic England (Historic England, 2025a) as follows:

Table 5 Archaeological Time Periods

Archaeological Period	Archaeological Sub-Period	Date Range
Early Prehistoric Periods		
Palaeolithic	Lower Palaeolithic	1,000,000 to 150,000 BC
	Middle Palaeolithic	150,000 to 40,000 BC
	Upper Palaeolithic	40,000 to 10,000 BC
Mesolithic	Early Mesolithic	10,000 to 7,000 BC
	Late Mesolithic	7,000 to 4,000 BC
Later Prehistoric Periods		
Neolithic	Early Neolithic	4,000 to 3,300 BC
	Middle Neolithic	3,300 to 2,900 BC
	Late Neolithic	2,900 to 2,200 BC

Bronze Age	Early Bronze Age	2,600 to 1,600 BC
	Middle Bronze Age	1,600 to 1,200 BC
	Late Bronze Age	1,200 to 700 BC
Iron Age	Early Iron Age	800 to 300 BC
	Middle Iron Age	300 to 100 BC
	Late Iron Age	100 BC to AD 43
Cultural Periods		
Roman	n/a	AD 43 to 410
Early Medieval	n/a	AD 410 to 1066
Medieval	n/a	AD 1066 to 1540
Post Medieval	The Post Medieval period is divided into various sub-periods named after ruling monarchs.	AD 1540 to 1901
20-21st Century	n/a	AD 1901 to the present day

ASSESSING HERITAGE SIGNIFICANCE

According to Historic England's Conservation Principles document (Historic England, 2008), discerning the significance of a place requires initially understanding its physical structure and the reasons behind its evolution over time. Subsequently, it involves considering:

- Understand the fabric and evolution of the place;
- Identify who values the place, and why they do so;
- Relate identified heritage values to the fabric of the place;
- Consider the relative importance of those identified values;
- Consider the contribution of associated objects and collections;
- Consider the contribution made by setting and context;
- Compare the place with other places sharing similar values;
- Articulate the significance of the place.



The guidance outlines various heritage values that facilitate a systematic determination of asset significance, with four primary "heritage values" being Evidential, Historical, Aesthetic, and Communal. These values can be summarised as follows:

- **Evidential Value:** this derives from the potential of a place to yield evidence about past human activity. The evidential value of a place is largely derived from physical remains, these remains maybe archaeological (below ground), embedded in upstanding remains within the landscape or within built heritage (above ground remains).
- **Historical Value:** this derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.
- **Aesthetic Value:** derives from the ways in which people draw sensory and intellectual stimulation from a place.
- **Communal Value:** this derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical value but tend to have additional and specific aspects that establish a more direct relationship between a group or groups both in the past and or present.
- **Setting:** this is defined in the NPPF as *'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'* Setting is not an asset in itself.

Historic England's guidance concerning the management of change within the setting of heritage assets aims to offer a definition for the term 'setting' while providing councils and applicants with direction on assessing the impact of development on the setting of heritage assets (Historic England 2017).

This document offers guidance on pragmatic and balanced decision-making concerning proposed development and the impact on the setting of heritage assets. It emphasises that safeguarding a heritage asset's setting does not necessarily hinder change and highlights that decisions should be guided by the nature, extent, and level of the significance of the heritage asset, while also considering the potential public benefits of the proposals. Additionally, it notes that change within the setting of a heritage asset could yield positive or neutral effects.

The guidance outlines a five-stage process for evaluating the effects of proposed development on the setting of heritage assets:

1. Identify which heritage assets and their settings are affected. The guidance indicates that if a proposed development location has the potential to alter the contribution of a heritage asset's setting to its significance or the understanding of its significance, it can be categorised as part of the asset's setting. It is crucial to note that an impact on the setting does not always equate with harm and could be beneficial or neutral. This assessment of impact relies on a thorough comprehension of the particular heritage asset's significance, to which the contribution made by its setting may be variable.
2. Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. This hinges on comprehending the site's history and evolution, utilising cartographic sources when available. Additionally, this evaluation should consider the asset's physical surroundings, including its interactions with other heritage assets, how it is experienced, and its associations and patterns of use. All of this information contributes to assessing the impact of a proposed development on the significance of a heritage asset.
3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it. Based on the data collected in Stage 2, it becomes feasible to pinpoint various impacts that

development might have on setting, which will be assessed as beneficial, neutral, or harmful to the significance of the heritage asset. Factors such as the location, extent, form, appearance, permanence, and other consequences of proposals will guide the assessment procedure.

4. Explore ways to maximise enhancement and avoid or minimise harm. Strategies to mitigate harm might involve relocating all or portions of a development, adjusting the layout, implementing screening measures, and more. In cases where harm cannot be completely removed, the design quality of the proposed development could become a key consideration in weighing the balance between harm and benefit. If modifications to the development are unfeasible and some level of harm to the setting of heritage assets is unavoidable, appropriate screening might be necessary to minimize the extent of the harm incurred.
5. Make and document the decision and monitor outcomes. Decisions are made on an individual basis, acknowledging that not all heritage assets carry the same weight in terms of significance, and that the contribution made by their setting to their significance can vary.

A Court of Appeal judgment (Ref: [2018] EWCA Civ 1697) confirmed that whilst issues of visibility are important when assessing setting, other factors should also be considered.

Professional expert opinion has been used to assess heritage significance, based on historic, archaeological, architectural or artistic interest, and the heritage values set out in Historic England Conservation Principles (Historic England, 2008) and Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015b).

ASSESSING POTENTIAL DEVELOPMENT IMPACT AND HARM

In line with the NPPF, the following levels of harm to designated heritage assets can be identified:

- Substantial harm or total loss - It has been clarified in a High Court Judgement of 2013 (Ref: [2013] EWHC 2847 (Admin)) that this would be harm that would *'have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced'*;
- Less than substantial harm - Harm of a lesser level than that defined above. The PPG stipulates that the extent of the harm within this category should be clearly articulated. Where less than substantial harm might be identified, a scale of such harm will be considered at negligible, low, medium or high; and
- No harm (preservation) - The principle that preserving means doing no harm was clearly articulated by the House of Lords in 1992 (Refs: [1992] 2 W.L.R. 204 and [1992] 2 A.C. 141), as well as a High Court Judgement of 2014 (Ref: [2014] EWHC 1895 (Admin), 2014 WL 2558107) which concluded that with regard to preserving the setting of a Listed Building or preserving the character and appearance of a Conservation Area, 'preserving' means doing 'no harm'. This can also be applied to other designated heritage assets.

With regard to an evaluation of (any) harm to significance through changes to setting, the assessment should follow the methodology provided in 'The Setting of Heritage Assets', as described above.

In determining the effects of the Proposed Scheme this report is cognisant of case law. Including the below:

A ruling at Flag Station, Mansel Lacy ([2015] EWHC 2688 (Admin)) has emphasised the primacy of the 1990 Planning Act – and the fact that it is up to the decision makers in the planning system to 'have special regard to the desirability of preserving the [listed] building or its setting'. As stated by HH Judge David Cooke in a judgment of 22 September 2015 regarding the impact on the setting of a listed building:

'It is still plainly the case that it is for the decision taker to assess the nature and degree of harm caused, and in the case of harm to setting rather than directly to a listed building itself, the degree to which the impact on the setting affects the reasons why it is listed.'



The judgment was agreed at the Court of Appeal ([2016] EWCA Civ 1061), a ruling which stated that:

'It is also clear as a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to be paid to the desirability of not harming the setting of a listed building, that cannot mean that any harm, however minor, would necessarily require planning permission to be refused.'

It should be noted that potential impacts can be beneficial as well as harmful. Beneficial effects can be assessed in the same manner, i.e. substantial benefit or less than substantial benefit. It has been established in relevant case law ([2020] EWHC 2292 (Admin)) that heritage benefits should be considered as public benefits for the purposes of the tests outlined in the NPPF.

Therefore, in accordance with relevant guidelines and using the above criteria, this assessment undertakes a staged approach to understanding the significance / heritage value of relevant heritage assets, the impact of the development proposals, and the resultant significance of the effects arising from the proposed development.

COLLATION OF BASELINE DATA

The table below provides a summary of the key data sources used to inform the production of this Archaeological Desk-Based Assessment.

Table 6 Sources of Information

Source	Data	Comment
Historic England	The National Heritage List of England (NHLE) includes information on statutorily designated heritage assets	Statutory designations (scheduled monuments; statutorily listed buildings; registered parks and gardens; registered battlefields; protected wreck sites) can provide a significant constraint to development.
Kent Historic Environment Record (KHER)	Monument and event data	Monument data comprises finds and features associated with the archaeological and historic built environment. Event data comprises previous investigations including archaeological desk-based assessments, trial trench evaluations, excavations and watching briefs. To inform the production of this report, a 1km search of the HER was requested.
Local Planning Authority	Locally defined areas such as Archaeological Priority Areas, Conservation Areas, Locally Listed Buildings Previous and ongoing planning application which may contain relevant data.	These defined areas can provide a constraint to development or an indication of potential known or anticipated heritage assets that required consideration. Previous or ongoing applications may include information on previous archaeological work or consultations.

Kent Archaeological Research Framework	Regional research priorities.	The archaeological research framework will include information on research priorities and objectives for the region within which the Site is located. This can inform an assessment of the significance of any archaeological remains if present.
Cartographic and Aerial Photographic Sources	Ordnance Survey maps from the 1st edition (1860–70s) to present day. Other such sources including Ordnance Survey Drawings, Tithe Mapping, Enclosure Mapping, Parish Surveys, Site Sales Particulars, Manorial Estate Plans, Building Plans, Aerial Photographs.	Provides an indication of the development of settlements/ landscape through time as well as the possible date of any buildings on the site. Provides a good indication of past land use, the potential for archaeology and impacts which may have compromised archaeological survival.
Literary & Documentary Sources, including previous archaeological reporting	This may include historic documentary primary sources, or secondary sources.	This may include particular sources or reports which clarify the development of the Site, its relationship with nearby heritage assets, and its archaeological potential.
Internet	Web-published local history; Archaeological Data Service	Many key documentary sources, such as the Victoria County History, the Domesday Book, and local and specialist studies are now published on the web and can be used to inform the archaeological and historical background. The Archaeological Data Service includes an archive of digital fieldwork reports.
The client	Planning data	Plans, Sections and Elevations of the existing site / building(s) and proposed development.

A further list of cartographic sources reviewed as part of this report is as follows:

Table 7 Cartographic Sources

Year	Source / Description	Details
1778	Tillbury Fort, Gravesend and Parts Adjacent	Not reproduced
1788	Faden Map of Twenty-Five Miles Round London	Not reproduced to scale



1841	Chalk Parish Tithe Map	Not reproduced to scale
1897	Ordnance Survey Map	Scale 1:2,500
1908	Ordnance Survey Map	Scale 1:2,500
1923	Ordnance Survey Map	Scale 1:10,560
1940	Google Earth Image	Not reproduced
1951	Ordnance Survey Map	Scale 1:10,560
1970	Ordnance Survey Map	Scale 1:10,560
1999	Google Earth Image	Not reproduced
2003	Google Earth Image	Not reproduced
2006	Google Earth Image	Infoterra Ltd and Bluesky
2018	Google Earth Image	Landsat/Copernicus
2024	Google Earth Image	Landsat/Copernicus



APPENDIX THREE: GAZETTEER OF SELECTED RECORDED HERITAGE ASSETS

DESIGNATED HERITAGE ASSETS

	Name	Asset type	Grade	HE and HER Refs
	54-58, VICARAGE LANE	Listed Building	II	1089005
	READERS	Listed Building	II	1089019
	1, CHALK ROAD	Listed Building	II	1089043
	44, CHALK ROAD	Listed Building	II	1341493
	THE OLD FORGE	Listed Building	II	1341520

ARCHAEOLOGICAL NOTIFICATION AREAS

	Name
	Some palaeolithic potential ; Area of multi-period background potential
	Medium palaeolithic potential ; Site of grounds and historic buildings surrounding former site of Denton Manro
	Some palaeolithic potential ; Coastal and inter tidal zone east of Gravesend
	Some palaeolithic potential ; Site of grounds and historic buildings surrounding former site of Denton Manro
	Some palaeolithic potential ; Area of Prehistoric activity on Westcourt Marshes
	Some palaeolithic potential ; Area of Roman and Prehistoric activity on Westcourt Marshes
	Some palaeolithic potential ; Area surrounding Chalk Roman Villa
	Some palaeolithic potential ; Area of multi period archaeological potential
	Medium palaeolithic potential ; Graveyard surrounding church of St Mary
	Medium palaeolithic potential ; Site of Medieval Westcourt
	Medium palaeolithic potential ; Open Ground immediately surrounding Chalk Roman Villa
	Medium palaeolithic potential ; Site of Possible Roman cemetery
	Medium palaeolithic potential ; Site of Possible Roman cemetery
	Some palaeolithic potential ; Thames and Medway Canal
	Some palaeolithic potential ; Former site of isolation hospital

	Some palaeolithic potential ; Site of Anti-Aircraft Battery
	Some palaeolithic potential ; Former site of Denton Manor
	Some palaeolithic potential ; WWII Batteries
	Medium palaeolithic potential ; Medieval Church of St. Mary
	Medium palaeolithic potential ; Medieval Building - Readers
	Area of background multi-period potential
	Area of background multi-period potential
	Medium palaeolithic potential ; Former site of grounds and buildings surrounding Medieval westcourt
	Medium palaeolithic potential ; Former site of Darnley House
	Medium palaeolithic potential ; Former site of Darnley House
	Medium palaeolithic potential ; Area of multi-period background potential
	Medium palaeolithic potential ; Area of multi-period background potential
	Medium palaeolithic potential ; Early Post Medieval Forge - The Old Forge House
	Medium palaeolithic potential ; Area of Prehistoric activity on Westcourt Marshes
	Medium palaeolithic potential ; Area of Prehistoric activity
	Medium palaeolithic potential ; Area surrounding Chalk Roman Villa

ARCHAEOLOGICAL EVENTS

HEA Ref	Name	Type of Investigation	HER Ref
EVAL1	Evaluation at Westcourt Marshes, Gravesend	Evaluation	EKE8749
EVAL2	Ground Investigation for the Denton Relief Road, Gravesend	Evaluation	EKE9781
EVAL3	Borehole survey at Denton Marshes, Gravesend	Evaluation	EKE9782
EVAL4	Evaluation at Westcourt Marshes, Gravesend	Evaluation	EKE10622
EVAL5	Evaluation at Damigos Road	Evaluation	EKE11511



EVAL6	Archaeological Evaluation Report, Land at Dalefield Way, Gravesend, Kent	Evaluation	EKE15826
EVAL7	Dalefield Way, Denton, Gravesend, Kent, Archaeological Evaluation	Evaluation	EKE15872
EVAL8	Evaluation of land adjacent to North West Kent College playing fields, Dering Way, Gravesend	Evaluation	EKE8607
EVAL9	Evaluation at Lion Business Park Near Gravesend	Evaluation	EKE9270
EVAL10	Report on condition of ground sub-surface at Westcourt Marshes, Gravesend, for Fort Knight plc prior to construction	Evaluation	EKE9779
EVAL11	Ground Investigation off Lower Higham Road, Gravesend	Evaluation	EKE9780
EVAL12	Field Evaluation at Gravesend WTW	Evaluation	EWX6586
EVAL13	Evaluation of the line of Denton Relief Road, Gravesend	Evaluation	EWX6628
EVAL14	Dalefield Way, Denton, Gravesend, Kent, Archaeological Evaluation	Evaluation	EKE15872
EVAL15	Dalefield Way, Denton, Gravesend, Kent, Archaeological Evaluation	Evaluation	EKE15872
EX1	THONG LANE,EAST GRAVESEND	Excavation	EKE3945
EX2	CHALK	Excavation	EKE3947
EX3	Investigation at Damigos Road, Gravesend	Excavation	EKE8797
WB1	Watching brief at 7 Manor Close, Chalk, Nr. Gravesend	Watching Brief	EKE8432
WB2	Watching Brief at Comma Works, Mark Lane, Gravesend	Watching Brief	EKE8633
WB3	Watching Brief and Borehole Survey, Denton Relief Road, Gravesend	Watching Brief	EKE8724
WB4	Watching brief along the Thames and Medway Canal, Gravesend	Watching Brief	EKE11241



WB5	Watching brief during construction, Gravesend WTW	Watching Brief	EWX6597
N/A	Desk based assessment of land north of Dalefield Way, Gravesend	Desk Based Assessment	EKE13035
N/A	Comma Oil & Chemicals Limited, Gravesend - Report On Soil Investigation	Desk Based Assessment	EKE8295
N/A	Desk based assessment at Eastcourt Marshes, near Gravesend	Desk Based Assessment	EWX9136
N/A	Desk based assessment of Westcourt Marshes, Gravesend	Desk Based Assessment	EWX9176
N/A	Historic Building Record of Bailiff's Cottage, off Lower Higham Road, Gravesend, Kent	Desk Based Assessment	EKE19944
N/A	Gravesend Waste Water Treatment Works, desk based assessment, 1996	Desk Based Assessment	EKE21323
N/A	Historic Environment of the North Kent Coast: Rapid Coastal Zone Assessment Survey Phase 1, 1999-2000	Desk Based Assessment	EKE10278
N/A	St John's Roman Catholic Comprehensive School, Gravesend, Kent	Desk Based Assessment	EKE10939
N/A	Historic landscape characterisation and historic seascape characterisation, Hoo Peninsula Historic Landscape Project	Desk Based Assessment	EKE13239
N/A	Hoo Peninsula, Kent. Hoo Peninsula Historic Landscape Project	Desk Based Assessment	EKE15020
N/A	Hoo Peninsula, Kent. Hoo Peninsula Historic Landscape Project	Desk Based Assessment	EKE15021
N/A	Hoo Peninsula, North Kent Coast, Thames Estuary:45 A Palaeoenvironmental Review of the Development of the Peninsula	Desk Based Assessment	EKE15400
N/A	Desktop study of proposed development on Eastcourt Marshes, Gravesham	Desk Based Assessment	EKE9777



N/A	Archaeological survey of mineral extraction sites around the Thames Estuary	Desk Based Assessment	EKE14761
N/A	Desk based assessment of the Thames and Medway Canal	Desk Based Assessment	EKE12218
N/A	Historic landscape characterisation and historic seascape characterisation, Hoo Peninsula Historic Landscape Project	Desk Based Assessment	EKE13239
N/A	North Kent Coast Rapid Coastal Zone Assessment Survey Phase II: Field Assessment (Pilot)	Desk Based Assessment	EWX8094
N/A	Survey, North Kent Coastal Zone: Phase II, Year Two	Desk Based Assessment	EWX8626

OTHER SELECTED RECORDED HERITAGE ASSETS

HEA Ref	Name	Period	HER Ref
U1	Hoard	Undated	MKE113306
U2	Oval stone bank on foreshore by the Sea Training Centre, Gravesend	Undated	TQ 67 SE 1044
U3	Linear Feature, Cropmark	Undated	TQ 67 SE 75
U4	Ridge and furrow, near Gravesend	Undated	TQ 67 SE 1019
U5	Salt workings near Gravesend	Undated	TQ 67 SE 1013
U6	Brick Tank	Undated	TQ 67 SE 278
U7	Site of two burials, Brown Road, Denton, Gravesend	Undated	TQ 67 SE 17
PRE1	Prehistoric evidence from Lion Business Park Near Gravesend Kent	Prehistoric	TQ 67 SE 286
PRE2	The cropmarks of possible Later Prehistoric or Roman field boundaries can be seen on aerial photographs taken in 2011	Prehistoric	TQ 67 SE 1290
MES1	Mesolithic or Neolithic flintwork,. Denton	Mesolithic	TQ 67 SE 41
NEO1	Mesolithic or Neolithic flintwork,. Denton	Neolithic	TQ 67 SE 41
NEO2	Possible Causewayed Enclosure - Chalk	Neolithic	TQ 67 SE 1320



BA1	Cropmarks, Westcourt Marshes	Bronze Age	TQ 67 SE 277
IA1	Chalk Roman villa	Iron Age	TQ 67 SE 15
IA2	Late Iron Age site, Thong lane	Iron Age	TQ 67 SE 40
IA3	Late Iron Age Pit, Gravesend	Iron Age	TQ 67 SE 238
IA4	Late Iron Age - Roman Field Boundaries, Gravesend	Iron Age	TQ 67 SE 239
IA5	Circular enclosed settlement with entrance to west	Iron Age	TQ 67 SE 74
R1	Roman pottery findspot	Roman	TQ 67 SE 36
R2	Roman beaker	Roman	TQ 67 SE 44
R3	Romano-British burial found AD 1959	Roman	TQ 67 SE 18
R4	Three Roman graffiti	Roman	TQ 67 SE 42
R5	Romano-British ditch, east of Allen's Mead, Gravesend	Roman	TQ 67 SE 382
R6	Roman finds from evaluation at Gravesend WTW	Roman	TQ 67 SE 1001
R7	Roman/Prehistoric remains and possible Roman feature, Denton	Roman	TQ 67 SE 1003
R8	Chalk Roman villa	Roman	TQ 67 SE 15
R9	Late Iron Age - Roman Field Boundaries, Gravesend	Roman	TQ 67 SE 239
R10	The cropmarks of possible Later Prehistoric or Roman field boundaries can be seen on aerial photographs taken in 2011	Roman	TQ 67 SE 1290
AS1	Anglo-Saxon silver penny, Chalk	Anglo-Saxon/Early Medieval	TQ 67 SE 352
AS2	Anglo-Saxon silver penny, Chalk	Anglo-Saxon/Early Medieval	TQ 67 SE 351
MED1	READERS	Medieval	TQ 67 SE 242
MED2	Medieval Manor House (Site of) Gravesend	Medieval	TQ 67 SE 1114
PM1	Former site of West Court	Post Medieval	TQ 67 SE 241



PM2	Quay, near to the 'Ship & Lobster', Denton	Post Medieval	TQ 67 SE 1018
PM3	Jetty, near to the 'Ship & Lobster', Denton	Post Medieval	TQ 67 SE 1040
PM4	The cropmark of a possible post medieval chalk pit can be seen on aerial photographs taken in 2011.	Post Medieval	TQ 67 SE 1287
PM5	The earthwork of a post medieval water channel can be seen on aerial photographs taken in 1950	Post Medieval	TQ 67 SE 1292
PM6	The slight earthwork remains of a former sea wall on Filborough Marshes can be seen on aerial photographs taken in 1950	Post Medieval	TQ 67 SE 1310
MOD1	George V pillar box, Colonial PH, Rochester Road	Modern	TQ 67 SE 317
MOD2	George V pillar box, XPO, 75A Lower Higham Road, Chalk	Modern	TQ 67 SE 307
MOD3	George VI pillar box, Barr Road East / Thong Lane	Modern	TQ 67 SE 322
MOD4	Air raid warden post, Gravesend	Modern	TQ 67 SE 346
MOD5	Second World War searchlight battery, formerly interpreted as a Bronze Age settlement	Modern	TQ 67 SE 89
MOD6	'Polperro' Second World War, anti-aircraft headquarters, Rochester Road, Chalk	Modern	TQ 67 SE 1214
MOD7	Chalk Second World War Defended Locality DL20	Modern	TQ 67 SE 1158
MOD8	White Hart Inn Second World War Battle Headquarters, Rochester Road, Chalk	Modern	TQ 67 SE 1182
MOD9	Maltings Second World War searchlight position, Lower Higham Road, Chalk, Kent	Modern	TQ 67 SE 1156
MOD10	Brown Road Second World War air raid wardens post, Gravesend	Modern	TQ 67 SE 1146
MOD11	Lower Higham Road Second World War road block, Chalk	Modern	TQ 67 SE 1161
MOD12	The Cottage Second World War road block buoys, West Court Lane, Chalk	Modern	TQ 67 SE 1254
MOD13	Denton Heavy anti aircraft battery, Mark Lane, Denton, Gravesend, Kent	Modern	TQ 67 SE 1209



MOD14	Milton 19th/20th century rifle range, Eastcourt Marshes, Gravesend	Modern	TQ 67 SE 1185
N/A	Bridge No. 3 over the Thames and Medway canal	Post Medieval/Modern	TQ 67 SE 343
N/A	Swing bridge on Thames and Medway Canal	Post Medieval/Modern	TQ 67 SE 49
N/A	Malthouse farm (site of)	Post Medieval/Modern	TQ 67 SE 218
N/A	Malt house, Chalk	Post Medieval/Modern	TQ 67 SE 231
N/A	No.54-58 (1700 to 1975)	Post Medieval/Modern	TQ 67 SE 1104
N/A	No. 1 Chalk Road Gravesend	Post Medieval/Modern	TQ 67 SE 1102
N/A	No.44 (1700 to 1799)	Post Medieval/Modern	TQ 67 SE 1082
N/A	THE OLD FORGE	Post Medieval/Modern	TQ 67 SE 1076
N/A	Denton Sewage Works Battle Headquarters, Mark Lane, Gravesend	Post Medieval/Modern	TQ 67 SE 1196
N/A	Malthouse Second World War sandbagged position, Lower Higham Road, Chalk	Post Medieval/Modern	TQ 67 SE 1220
N/A	Lower Higham Road Second World War Police Telephone Box	Post Medieval/Modern	TQ 67 SE 1153
N/A	Rochester Road Second World War Police Telephone Box, Chalk, Nr. Gravesend	Post Medieval/Modern	TQ 67 SE 1148
N/A	Brown Road Second World War National Fire Service Action Station, Gravesend, Kent	Post Medieval/Modern	TQ 67 SE 1165
N/A	Northcourt School Second World War Emergency Feeding Centre, Dickens Road, Denton near Gravesend, Kent	Post Medieval/Modern	TQ 67 SE 1229
N/A	Site of Denton Halt	Post Medieval/Modern	TQ 67 SE 217
N/A	Malthouse Farm	Post Medieval/Modern	MKE84360
N/A	West Court	Post Medieval/Modern	MKE84361
N/A	Great Clane Lane	Post Medieval/Modern	MKE84362
N/A	Yard north of Readers	Post Medieval/Modern	MKE84363
N/A	Site of Milton Range halt	Post Medieval/Modern	TQ 67 SE 342



N/A	Site of Denton Manor House	Post Medieval/Modern	TQ 67 SE 223
N/A	Two concrete platforms near the Sea Training Centre, Gravesend	Post Medieval/Modern	TQ 67 SE 1045
N/A	Denon Wharf, Gravesend	Post Medieval/Modern	TQ 67 SE 1005
N/A	Causeway, Gravesend	Post Medieval/Modern	TQ 67 SE 1032
N/A	Mission Hall, Dickens Road, Denton, Gravesham	Post Medieval/Modern	TQ 67 SE 1
N/A	Boundary Stone, A226, Denton/Chalk.	Post Medieval/Modern	TQ 67 SE 1265
N/A	Site for Bailiff's Cottage, West Court, Church Lane, Chalk	Post Medieval/Modern	TQ 67 SE 1286
N/A	The earthwork remains of a Twentieth century golf course on Filborough Marshes are visible on aerial photographs taken in 1950	Post Medieval/Modern	TQ 67 SE 104
N/A	A group of possible Second World War allotments can be seen on aerial photographs taken in 1946	Post Medieval/Modern	TQ 67 SE 1279
N/A	A group of possible Second World War allotments can be seen on aerial photographs taken in 1946	Post Medieval/Modern	TQ 67 SE 1278
N/A	A group of possible Second World War allotments can be seen on aerial photographs taken in 1946	Post Medieval/Modern	TQ 67 SE 1280
N/A	Two groups of Second World War allotments can be seen on aerial photographs taken in 1946	Post Medieval/Modern	TQ 67 SE 1282
N/A	Site of Port of London Sanitary Hospital, Manor Road, Denton	Post Medieval/Modern	TQ 67 SE 208
N/A	Thames and Medway Canal	Post Medieval/Modern	TQ 67 SE 20
N/A	Denton Heavy anti aircraft battery, Mark Lane, Denton, Gravesend, Kent	Post Medieval/Modern	TQ 67 SE 1209
N/A	NORTH KENT RAILWAY	Post Medieval/Modern	TQ 57 SE 277



Thank you for viewing our Archaeological Desk-Based Assessment.

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If you have any queries or would like to discuss anything further with us please don't hesitate to get in contact hello@hea-llp.com

