



Historic England

Ms Genna Henry
Gravesham Borough Council
Civic Centre
Windmill Street
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Kent
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Direct Dial: 02079733015

Our ref: PL00786643

6 September 2022

Dear Ms Henry

**Re: NORTHFLEET HARBOURSIDE ENVIRONMENTAL IMPACT ASSESSMENT
(EIA) SCOPING REPORT**

20220852 - Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application with all matters reserved, except for means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works, and the development of up to 3,500 residential units (Use Class C3), up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages and up to 18,000 sqm (GEA) office floorspace, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F), delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road. Redevelopment of the site will also include some sui generis uses, with hard/soft landscaping, car and cycle parking, highways works, infrastructure provisions with ancillary works. | Land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesend

Thank you for your letter of 16 August 2022 consulting us about the above EIA Scoping Report.



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This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

The Scoping Report separates archaeology (which is taken to be below-ground assets) and built heritage (which is taken to be above-ground assets).

This separation of 'above' and 'below' ground heritage assets is inappropriate in this case. The scheduled monument of Aspdin's Kiln (1004227), which survives well above ground is part of a much larger 19th century cement works which extended along the south bank of the River Thames. The industrial archaeology of the site and area will comprise both above and below-ground heritage assets with archaeological interest. Historic England consider that the archaeological assessment cannot therefore be limited to below ground remains.

The site lies within the Ebbsfleet Valley at its confluence with the Thames and clips the edge of the higher ground, east of Grove Road. This location has potential for deeply buried waterlogged archaeology and evidence about the changing past environment from all periods and in particular later prehistoric remains similar to that found on the northernmost of the Neolithic Sites near Ebbsfleet (NHLE 1004206) scheduled monument. Such nationally important but undesignated archaeology would be of equivalent importance to that of scheduled sites and, according to the NPPF footnote 68, must be treated in a similar way.

Given the potential for remains of all periods, including waterlogged artefacts and palaeoenvironmental evidence, to survive within deep stratified sediments a geoarchaeological approach is needed to inform the ES. This should include assessment of existing boreholes, drilling of additional boreholes, test pits and deep penetrating geophysics (e.g. electro-magnetic and earth resistance surveys) all feeding into a deposit model, to define areas within the site of different archaeological and palaeoenvironmental character and significance. Historic England's deposit modelling guidance should be referred-to:
<https://historicengland.org.uk/images-books/publications/deposit-modelling-and->





archaeology/. The assessment should also be prepared by suitably experienced specialists, familiar with the area.

Non-designated but nationally important waterlogged remains relating to the prehistoric, Roman, Saxon and Norman periods were found within the Ebbsfleet Valley during work on HS1 and similar remains should be anticipated on the present site. Such remains owe their survival to waterlogging. Therefore, direct and indirect impacts, in particular from changes in hydrology during construction and operation, might impact on their burial environment adversely affecting state of preservation and significance. Historic England's guidance on preserving archaeological remains should also be used in preparing the impact assessment to inform the ES: <https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>

We note that archaeology is to be scoped into the ES for demolition and construction, but not for the completed operational development. We consider that there is also the potential for operational impacts through:

- changes to the hydrology of the site, and therefore potentially on non-designated archaeological remains of national significance, and
- development within the setting of Aspodil's Kiln and the non-designated industrial archaeology of the site.

This should be scoped in and considered within the ES.

The Scoping Report is not consistent in how it proposes to assess impact on built heritage. For example, the section on Townscape, Visual and Built Heritage states that landscape and visual receptors will be scoped in, but that built heritage receptors are to be scoped out of the EIA, with the provision of a standalone heritage impact assessment provided for the planning application (paragraph 359). However, in Table 3 (paragraph 61) all of 'Landscape, Visual, and Built Heritage' are to be 'scoped in', and there is no mention of the provision of a separate heritage impact assessment document. Furthermore, paragraph 250 states that 'above ground heritage assets will be assessed separately in ES Volume 2: Townscape and Visual Impact Assessment of the ES', which is contradictory to built heritage being scoped out.





Despite this contradictory information, Historic England understand that it is not proposed to scope in built heritage to the ES and that a TVIA would be produced and appended to the ES. While we acknowledge that the effects in EIA terms on nearby designated built heritage could be low, we do not agree that this means it should be scoped out of the ES as the information available at this stage is not sufficient to make this assessment with any certainty.

The 1km study area has been used for both archaeological remains and built heritage. Historic England agree that the 1km study area is likely to be proportionate for the below-ground archaeology topic, however we also think that the 1km study area for built heritage is far too restrictive for a development of this scale. We suggest this must be significantly enlarged and should include, but not be limited to, the following:

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

We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

In addition to scoping in built heritage we also think it would be helpful to submit a TVIA, as described in the scoping report, but suggest it include views from more distant designated heritage assets, in addition to those the applicant already intends to assess.

We would also expect the ES to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record





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(www.heritagegateway.org.uk <<http://www.heritagegateway.org.uk>>) and relevant local authority staff.

The ES should include consideration of potential positive benefits of the scheme to learn more about the heritage of the site and the opportunities to promote and communicate this heritage to residents and visitors.

We would strongly recommend that you involve the local authority Conservation Officer and the archaeological staff at Kent County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Christina Reade
Inspector of Ancient Monuments
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cc: Casper Johnson, Senior Archaeological Officer, Kent County Council



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