



Delegated Report

Submission of Details Application

Planning Application No: 20240893

Location: Dalefield Industrial Park Dalefield Way Gravesend Kent

Description: Application for the approval of conditions 5 attached to planning permission reference number 20240199 relating to the implementation of archaeological field evaluation works in accordance with a Written Scheme of Investigation and timetable and any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a Written Scheme of Investigation and timetable.

Applicant: Mr Aaron McConnell, Keady Construction Ltd

Submitted Documents/Plans

Application Form

Thames Valley Archaeological Services Report dated September 2016

Email dated 02 November 2016 from Kent County Council confirming site sign off

Letter dated 23rd September from Thames Valley Archaeological Services

Relevant Planning History

Reference	Description	Decision	Decision Date
20240199	Erection of a new three storey office building, for use Class E and installation of solar panels to roof. Erection of a single storey storage building with integral roof lights, for use Class B8 and associated parking and landscaping.	30.08.24	Permitted

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS04 – Gravesend Riverside East and North-East Gravesend Opportunity Area
- CS07 – Economy, Employment and Skills
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Design and Development Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network

Paragraph 33 of the NPPF (2023) sets out that policies within adopted local plans should be reviewed to

assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- Section 2 – Achieving Sustainable Development
- Section 6 – Building a strong, competitive economy
- Section 9 – Promoting Sustainable Transport
- Section 11 – Making Effective Use of Land
- Section 12 – Achieving well-designed and beautiful places

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

Consultations, Publicity and Representations

Consultees

KCC Heritage

Comments received on 05/11/24 (First Comment):

The applicant has submitted the results of the field evaluation from 2016/7 by TVAS but as I noted (see my initial recommendations attached), these works were not sufficient to understand the archaeological potential of the proposed locations relevant to this development. The applicant will need to undertake specific fieldwork for the development, and I would be happy to agree a draft Written Scheme of Investigation for the field evaluation before formal submission.

Updated comments received on 27/11/24 (Final Comments):

I met up with Gary Collieran this morning and we talked through the issues.

Key factors:

My colleague Wendy Rogers wrote in 2016, following the TVAS field evaluation, that there would be no need for further phases of archaeological work at the site.

The location of the proposed building is outside, but closely adjacent to the former TVAS field evaluation area, where the results were negative – at least in respect of near surface archaeology.

The proposed building will have piled foundations and there will be no ground reduction. The total area of impact at depth from the piles will therefore be relatively limited.

Taking all these factors into account I think that it would be reasonable to withdraw my previous recommendation for archaeological field evaluation and conclude that it is unlikely that the proposed development would have a significant below-ground archaeological impact.

Officer's Analysis

Condition 5 of 20240199 is:

No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of

- i. archaeological field evaluation works in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the Local Planning Authority; and
- ii. following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure appropriate assessment of the archaeological implications of any development proposals and the subsequent mitigation of adverse impacts through preservation in situ or by record.

In order to discharge this condition, the Archaeological Evaluation from previous development, dated 2016 has been submitted alongside confirmation from KCC Heritage that sufficient archaeological information has been submitted at the time. Initially, when reviewing the information submitted to discharge this condition, KCC Heritage raised concerns that the 2016 information provided did not provide sufficient detail to understand the archaeological potential of the proposed locations relevant to this development. However, at the planning agents request, the KCC Heritage Officer contacted them to discuss the case. Following the discussions, the KCC Heritage Officer has withdrawn their previous concerns. They advise that the proposed works are reasonably close to the areas, where previous digs took place and produced a negative result in terms of near surface archaeology. In addition foundations would be erected using piling works with no reduction in ground levels, thus resulting in a limited area of ground impacts.

Conclusion & Recommendation

In conclusion, it has been appropriately demonstrated that the archaeological implications of any development proposals are unlikely to be significant and the KCC Heritage Officer is not objecting to the scheme. The details submitted are considered to be acceptable and therefore the recommendation is that condition 5 of planning approval reference 20240199 is discharged.

Case Officer:	Mrs Lisa Fisher	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	27th November 2024	Dated:	28 November 2024