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Director (Regeneration & Regulation)  
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Environment and Waste

Email:  
Ask for: Ms Wendy Rogers  
Your Ref: LDF/CS Issues and Options/MD  
Our Ref:  
Date: 27 November 2007

For the attention of Mr M Doyle

Dear Mr Burbidge

**Core Strategy Key Issues and Options Report  
The Kent Thameside Strategic Transport Programme and Tariff**

Thank you for consulting us on the above documents relating to the emerging LDF for Gravesham. We welcome this opportunity to provide comments on the historic environment. I will set down first some key points on the issues which relate to the historic environment. More detailed and specific comments follow as an attachment.

We welcome the clear recognition of the rich and diverse heritage of Gravesham. This positive and robust approach to the historic environment is reflected within the Key Spatial Objectives and specifically detailed as SO8. In addition, there is a specific section dedicated to *Heritage and the Historic Environment (Topic Paper 8)* and there is consideration of heritage issues across the Core Strategy. The approach advocated in many of the options, especially those specifically relating to heritage assets, will hopefully ensure that the historic environment plays an important and positive role in the regeneration of Gravesham, both for the large urban developments and the more rural initiatives. We positively support this approach by Gravesham Borough Council.

In *Topic Paper 8: Heritage & Historic Environment Key Options* - Option A is definitely the preferred option. It is this option that addresses sustainability issues and reflects the appreciation of the historic environment amongst residents and visitors to Gravesham. We positively welcome the proposal by Gravesham Borough Council to adopt option A as the initial draft preferred option.

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We welcome the reference to key guiding heritage documents mentioned within the Structure Plan and now being integrated into the emerging LDF. For example, the Historic Towns Survey for Gravesend (SPG3 Archaeology in Town Centres) will provide clear guidance on the historic characteristics and buildings of the town, possible constraints but also potential opportunities. We would welcome more specific mention of the issue of long term storage of archives and access to this resource. The archaeological archive will dramatically increase as redevelopment and regeneration within Gravesham progresses and the LDF should encourage developers to make a contribution towards these long term storage costs.

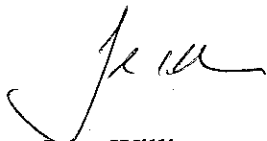
We thoroughly support the desire to seek opportunities to celebrate Gravesham's rich heritage, its distinctive character and the cultural diversity of today. There are already several heritage schemes progressing and I suggest that any proposals for a "heritage centre" should link in with the emerging strategy being developed for Kent Thameside. There are schemes for the display and interpretation of the historic environment at specific sites and within specific projects. There is also the Kentwide ARC (Archaeological Resource Centre) project which would address the acute lack of archive storage facilities and access to this material in Kent. Celebration of Gravesham's distinct riverside heritage merits particular attention but there needs to be an integrated and strategic approach to heritage within the Thameside area.

### **Kent Thameside Strategic Transport Programme**

- For any major scheme associated with this programme, I recommend there is a reasonable EIA process followed incorporating comprehensive consideration of the historic environment (archaeology, historic buildings and historic landscapes).

My comments have focused on archaeology and historic landscapes. Comments on historic buildings will be submitted by the Conservation Officer, Allan Cox, shortly. I would be pleased to discuss any of the above further.

Yours sincerely



John Williams  
Head of Heritage Conservation

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**Detailed Comments by the Heritage Conservation Group, Kent County Council on  
Core Strategy Key Issues and Options Report  
Gravesham Local Development Framework October 2007**

1. I suggest it would be useful if this document was accompanied by more plans attached to each main section, especially the sections on the major sites, the green infrastructure and the specific areas towards the end of the document relating to *Thames Riverside, The Countryside and Culverstone Valley Area*.
2. We welcome the clear recognition of the rich and diverse heritage of Gravesham. **Topic Paper 8** specifically on the *Heritage and the Historic Environment* is particularly welcome. The approach advocated in Option A will hopefully ensure that the historic attributes play an important and positive role in the regeneration of Gravesham, both for the large urban developments and the more rural initiatives.
3. One of the key issues within *Community Strategy, Regeneration and Transport* (page 9), notes a possible heritage centre within the Heritage Quarter. This needs to be carefully considered in terms of feasibility, long term management and sustainability, and needs to consider the implications for other heritage projects in Gravesham, especially those associated with the strategy being developed for Kent Thameside.
4. In the *Community Strategy, Jobs and Business* - We wholeheartedly support the encouragement of the farming industry to take up opportunities in sustainable land management. The agri-environment schemes, such as Environmental Stewardships, can offer opportunities to reduce damage to buried archaeological sites and historic landscape features and encourage positive enhancement of heritage assets in the countryside.
5. We welcome the inclusion within many of the key issues of the *Community Strategy* proposals to include, review and enhance the historic environment, whether the historic built environment or the countryside. The consideration of the historic environment is reflected in the *Key Spatial Objective SO8: Heritage and the historic environment*. This approach seems to acknowledge and recognise the positive and fundamental contribution Gravesham's past can make to Gravesham's 'Futureplace'. Understanding and using heritage assets can be a major contributor to achieving the goals of sustainability, encouraging developments with distinctive character and quality, providing that "sense of place" and ensuring a quality environment to live, work and play.
6. In **Topic Paper 1 Delivering the Major Development sites – the main focus of sustainable development in Gravesham**, Key Options – 1) Where should the main areas of growth be located? – One of the key documents to provide background for potential growth areas within Gravesham should be the Thames Gateway Study, currently under preparation by KCC Heritage. This study examines how the landscape has been used in the past and discusses options for the future.
7. The current HER records suggest Gravesham now has 9 Scheduled Monuments. Could this be taken into account when revising these LDF documents, for example in **Topic Paper 7 Built Environment Background** (page 98) and **Topic Paper 8 Heritage & Historic Environment Background** (page 108).
8. **Topic Paper 7 Built Environment, Objectives** – I suggest it would be useful to use heritage information to contribute to local distinctiveness and design of the public realm.

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9. **Topic Paper 7** on the *Built Environment* clearly acknowledges the historic built environment in the Background but there is no specific mention of the historic character of buildings and areas in the Objectives (page 99). I suggest an amendment to this paragraph:

“ ----which respond positively to local distinctiveness **and historic character** and their surroundings and ----“

10. I suggest that in **Topic Paper 7**, *Built Environment* Evidence Base there is specific mention of the Historic Towns Survey for Gravesend (KCC/EH 2003) or SPG3: Archaeology in Towns (July 2006).

11. We welcome the positive, detailed and direct consideration of Gravesham's historic environment in **Topic Paper 8**. It provides clear guidance on the significance of heritage and the important role it can play in the regeneration of the borough as well as addressing the sustainability targets of planning and the LDF process. I suggest that some of the Structure Plan guidance should be integrated into the emerging LDF, for example SPG3 on Archaeology in towns, and reference to the issue of long term storage.

12. In **Topic Paper 8: Heritage & Historic Environment** Gravesham's key heritage assets include as yet unknown heritage sites too. Gravesham clearly has a rich and diverse known historic environment but it is also clear that there are likely to be many buried archaeological sites not yet discovered; historic buildings not listed or identified as historic yet, especially ones representing the military and industrial heritage; and historic landscapes which are still to be identified and appreciated. I suggest this aspect needs to be added to the list on page 108, especially to inform the redevelopment and regeneration process.

13. **Topic Paper 8: Heritage & Historic Environment**, Objectives – I suggest this paragraph should include recognition of the importance of historic landscapes as well as “features”. I suggest the following re-phrasing:

“ To ensure that features **and landscapes** of architectural and heritage interest are preserved ----“

14. In **Topic Paper 8: Heritage & Historic Environment** Key Options - Option A is definitely the preferred option. It is this option that addresses sustainability issues and reflects the appreciation of the historic environment amongst residents and visitors to Gravesham. This option would also encourage developers and those involved with the regeneration process to bring forward well informed and well designed schemes which respect and enhance the historic environment and local distinctiveness. We strongly support Gravesham Borough Council in adopting this option.

15. In **Topic Paper 9 Green Infrastructure**, we would encourage consideration of the historic dimension and time depth of the landscape, countryside and “blue” elements, such as the Thames and Medway Canal. I suggest Option C (page 119) is very much the preferred option as it would encourage an integrated approach to the spaces in between new developments and ensure that regeneration includes appropriate and sustainable enhancement of green/blue assets, so important to residents and visitors in this 21<sup>st</sup> century and the future.

#### **Topic Paper 14, Thames Riverside**

16. Background - we welcome the consideration of ‘heritage interest’ as a constraint and as a positive aspect to be utilised. The Landscape/townscape, especially with regard to views, could also include the

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distinctive military heritage element with reference to the number of forts along the riverside and the importance of views between the military sites of Kent and of Essex.

17. Background - within consideration of 'heritage interest' there is a need to recognise the Kent Marshes for their heritage value as well as for their nature conservation importance.
16. Development of the Ebbsfleet (page 167) needs to consider the sensitive nature of important buried archaeological sites along the valley, some of which are Scheduled Monuments.
19. Policy Base – add SPG 3- Archaeology in Towns (Historic Towns Survey for Gravesend).
20. Key Options, North Kent Marshes east of the Metropolitan Police Training Centre (MPTC) (page 170) – we welcome the consideration of Shornemead Fort as a heritage site and the proposals for 'environmental improvements'. Current work with the RSPB at Shornemead Fort highlights some potential challenges for "environmental improvements" of a heritage site. For example increase of public access needs to be carefully considered in order to ensure there is no detrimental impact on the heritage resource, especially with regard to safety issues.
21. Key Options, Royal Clarendon Hotel/Clarendon Lawn to Town Pier - it is very important to get the relationship between the historic town centre and the River Thames right and ensure the redevelopment schemes are well informed, sustainable and enhance the historic environment.
22. Key Options, Baltic Wharf to Imperial Wharf – redevelopment of this area provides an opportunity to review the historic land uses and character as well as the current land uses and encourage redevelopment schemes which enhance the local character and the surviving historic assets here, such as the piers.
23. Key Options, Northfleet Embankment West (NEW) – we welcome consideration of the industrial heritage of this area and reference to the Scheduled Monument. There is also a need to highlight the potential for important below ground remains associated with the development of the Portland Cement industry.
24. Key Options, Swanscombe Peninsula – guidance for the redevelopment of this area needs to state the need for suitable assessment of heritage issues, such as the survival of early cement industry works.
25. Key Options - we welcome the consideration of heritage aspects within most of the Key Options of the Thames Riverside section. The Rosherville Gardens are mentioned several times but there seems to be no direct reference to identifying their historic extent and extant remains or how they could be incorporated into the redevelopment/regeneration of Northfleet Embankment East (NEE).
26. Responses to previous consultations - there were "calls to do more to celebrate heritage and cultural diversity." and there is mention of a possible museum of the River Thames. We thoroughly support the desire to seek opportunities to celebrate Gravesham's rich heritage, its distinctive character and the cultural diversity of today. There are already several schemes with a similar aim and I suggest that any proposals for a "heritage centre" should link in with the developing strategy for Kent Thameside. There are schemes for the display and interpretation of the historic environment at specific sites and within specific projects. There is also the Kentwide ARC (Archaeological Resource Centre) project which would address the acute lack of archive storage and research facilities in Kent. Celebration of

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Gravesham's distinct riverside heritage merits particular attention but there needs to be an integrated and strategic approach to heritage within the Thameside area.

27. Initial draft preferred option and rationale (page 180) - we welcome the general approach to redevelopment along the river front and the proposal to encourage small foci each with its own "distinctive flavour" rather than replicating the currently predominant industrial sites. Furthermore we welcome the proposal to improve and increase access to the riverside. One paragraph is slightly confusing in that it suggests "historic patterns of development in Gravesham has tended to divorce people from the waterside". Could this be clarified to reflect that it is only in the recent past, 19<sup>th</sup> and 20<sup>th</sup> centuries, that industrial developments have gradually restricted access to the riverside and "divorced people from the waterside". The "historic pattern" prior to the 19<sup>th</sup> century was more mixed uses, leisure and residential as well as industrial. I suggest there is an amendment to the last paragraph of page 180

"The result of 19<sup>th</sup> and 20<sup>th</sup> century patterns of development in Gravesham has tended to divorce people from the waterside, -----"

28. Initial draft preferred option and rationale (page 181) – I suggest the new approach to spatial planning of the waterfront to facilitate better public access is guided by the Thames Gateway Study.

29. Potential Areas of Change over LDF Period (page 183) – reinstatement of sections of the former Thames and Medway Canal need to be done sensitively and based on well informed specialist historic environment guidance.

30. Potential Areas of Change over LDF Period - Northfleet Embankment West (NEW) (page 185) – the approach to redevelopment of this area needs to be integrated with the general redevelopment of Ebbsfleet Valley. There does not seem to be any specific section on the redevelopment of the Ebbsfleet Valley except the proposal to consider enhancing the Ebbsfleet River itself. I suggest there needs to be more indication of how the area of the Ebbsfleet Valley will be treated within the emerging LDF.

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