



Heritage Conservation

Ethan Bonthron
Development Management
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Heritage Conservation
Kent County Council
Invicta House
Maidstone
ME14 1XX

Ask for: Casper Johnson
Email: casper.johnson@kent.gov.uk

17 March 2025

2025 0167 – Milton Place Car Park, Gravesend, Kent

Construction of 76 dwellings and associated infrastructure

Dear Ethan,

Thank you for consulting us on the above application.

The site lies within an area of multi-period archaeological and heritage interest, immediately south of the designated New Tavern Fort (which includes two Grade II* listed components) and within the setting of other designated and non-designated heritage assets. I will defer to Historic England and to your Conservation Officer in respect of built heritage advice and here focus on the below-ground archaeological interest.

The application has been made with a useful Historic Environment Impact Assessment (GHC Archaeology and Heritage, February 2025) which sets out, and considers, the existing archaeological data for the site and its surroundings. I broadly agree with the findings of the assessment which conclude that the potential for the survival of significant archaeological remains of prehistoric to post-medieval date is limited within the area of proposed development, in part as a result of development impacts in the 19th and 20th centuries. These included the construction of the former Holy Trinity Church, a school, swimming pool, air raid shelter and other structures, all of which have no surviving above ground elements. Whilst of relatively modern date, these features of Gravesend's 19th and 20th century development, along with any surviving early archaeological remains, have archaeological interest and, where impacted by the proposed development, should be subject to appropriate levels of professional archaeological recording and reporting.

I therefore recommend that if planning permission is granted, ground works are subject to a targeted archaeological watching brief secured by the following condition:

To ensure that features of archaeological interest are properly examined and recorded during development works:

A) Prior to any development works the applicant (or their agents or successors in title) shall secure an archaeological watching brief so that excavations and other development groundworks are observed and heritage assets with archaeological interest are recorded. The watching brief shall be undertaken by an archaeologist approved by the Local Planning Authority and in accordance with a Specification which has been submitted to, and approved in writing, by the Local Planning Authority.

B) The archaeological watching brief, recording, post excavation assessment, analysis and reporting shall be carried out in accordance with the agreed Specification.

C) Within 6 months of the completion of the watching brief a Report shall be submitted to and approved in writing by the local planning authority.

REASON: To ensure that features of archaeological interest are properly examined and recorded in accordance with local and national planning policy

I would be happy to discuss any of the above further.

Yours sincerely

Casper Johnson FRSA MCIfA FSA
Senior Archaeological Officer
Heritage Conservation Team
Environment, Planning & Enforcement