

Comments from KCC Archaeology 22/09/2022

The response from the RSPB is helpful but there remain some significant concerns.

The desk-based assessment needs to be based on up-to-date information from the Kent Historic Environment Record and the HER needs to be contacted to provide this information. The present assessment is based on data from 2005 and the online information, which is meant to be informative only and not for commercial research. As noted at the end of the RSPB document, a scheme of this potential magnitude of change and impact, should be supported by an Archaeological Desk-Based Assessment. I agree that such an assessment is produced and that the archaeological contractor requests the HER data. I would be happy to liaise directly with the RSPB to help them create the appropriate assessment.

What remains uncertain is firstly, below-ground archaeological potential (the presently unknown sites) which may be impacted by groundworks. The Archaeological Desk-Based Assessment (mentioned above) needs to include an assessment of the geoarchaeological potential of the area and an assessment of potential impacts. If the applicant has any geotechnical or ground investigation data, this should be made available to the archaeological contractor producing the desk-based assessment.

Secondly, it is uncertain how the setting of heritage assets will be impacted by the proposed landscape-scale changes. The archaeological assessment will need to include a section on the proposed change of setting of designated and un-designated heritage assets that would result from the proposed works, drawing on data sets from the Kent HER such as Historic Landscape Characterisation. This assessment of setting would need to consider undesignated heritage assets within the site and the designated heritage assets outside the site but for which this area of landscape provides a setting. In particular this would relate to Cliffe Fort and the designated Priory remains and listed buildings at Church Street. The setting impact assessment would need to follow Historic England guidance.

Depending on the extent and depth of below-ground impacts it may be necessary to then undertake field evaluation in advance of groundworks, and/or it may be the case that an archaeological watching brief on groundworks could form the approach to mitigation. A decision on this would depend on the impact assessment work.

It would be preferable if the planning decision timetable could allow for this work to be undertaken but I must apologise, of course, for my delayed response in this process.

In the event that a planning decision needs to be made soon, I recommend that the following condition is applied to any forthcoming consent:

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.

I hope that this is helpful and would be happy to discuss further and to comment on draft documentation before formal submission.

Gravesham Borough Council