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Ask for: Casper Johnson
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23 September 2022

**Re: 20220733 – FM Conway Imperial Wharf Clifton Marine Parade Gravesend
The installation of two additional bitumen tanks, load out gantry and the installation of
a bitumen emulsion plant and alternative car parking.**

Thank you for consulting us on the above planning application and my apologies for the delayed response to this consultation.

The site is in an area of industrial archaeological potential and the application has been submitted with a very useful cultural heritage statement (AJA 2022) which sets out the potential and known archaeological background as well as considering the impact of the proposals on the setting of nearby designated and undesignated heritage assets. I limit my comments here to archaeological issues. The area of the site appears from historic mapping, as well as an understanding of present-day topography, to have been subject to quarrying for chalk in the 19th century and possibly from the 18th century or earlier. Quarrying is very likely to have removed any existing archaeological remains and therefore the archaeological potential rests with the 19th and 20th century industrial heritage of the site. This is set out in the applicant's archaeological desk-based assessment and I agree with the proposals for mitigation which include the following:

- 1) *A photographic record of the rail tracks to be made and their location verified against historic plans and a report submitted to the Kent HER that puts the tracks in their historical context. A local museum or group of enthusiasts (such as Kent Rail) may be interested in retaining the rails themselves.*
- 2) *Consideration should be given to the erection of an interpretation board that can be viewed from the public footpath on Clifton Marine Drive that sets out the industrial history of the site.*
- 3) *The men who worked at the mill were called up for service in WWI and 54 did not return. A war memorial was erected to their memory on The White House which was the main office building of the paper mill. Today this house's the Applicant's office and a third floor was added in the 1990s. The building also held a memorial plaque for Alfred Harmsworth (1st Viscount Northcliffe), who died on 14th August 1922. The two plaques have been recently stolen. A replica or new version of the war memorial*

should be made and reinstated. The building also held a memorial plaque to 1st Viscount Northcliffe and it may be possible to replicate this.

In addition, there is the potential for presently unknown remains of industrial heritage to survive below ground at the site and these may be exposed by groundworks. To cover this eventuality and secure the above listed mitigation, I recommend 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 a watching brief to be undertaken by an archaeologist approved by the Local Planning Authority so that the excavation is observed and items of interest and finds are recorded. The watching brief shall be in accordance with a written scheme of investigation (WSI) which has been submitted to and approved by the Local Planning Authority.

Reason: To ensure that features of archaeological interest are properly examined, recorded, interpreted and information displayed and disseminated appropriately.

Informative: The WSI will include details for the methods to record the rail tracks, their recovery and conservation (where possible) and the approach to reporting the findings of the archaeological watching brief. The archaeological watching brief report would then contain details about the proposed information board and two replica plaques.

I would be pleased to discuss the above further.

Yours sincerely

Casper Johnson
Senior Archaeological Officer
Heritage Conservation