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**Heritage Conservation
GT EPE**

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Ask for: Casper Johnson
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28 February 2024

Re: 2024 0013 - Former St Joseph's Convent Preparatory School , 46 Old Road East, Gravesend, Kent DA12 1NR

Conversion of existing Victorian building into 6 flats. Demolition of existing outbuildings. Erection of a 3 storey medical centre. Erection of a building containing 7no flats. Erection of 41no houses. Associated works to include; access, public open space and landscaping.

Thank you for consulting us on the above planning application. My comments here are focussed on matters related to below-ground archaeological interest.

The application site lies within an area of multi-period archaeological potential though there have been relatively few recent archaeological investigations close to the site and whilst the applicant's Cultural Heritage Assessment (RPS 2023) concludes that the archaeological potential for all periods of human history is low, I think it important to note that our present understanding is limited and uncertain. In addition it would appear that much of the site may not have been heavily impacted by modern development and thus any below-ground archaeological remains may have survived relatively undisturbed, although it should be noted that even where there have been modern building, it is possible that below-ground archaeological remains may survive.

On the basis of the existing evidence for the site and area and the fact that development would include a significant amount of groundworks which could adversely impact any below-ground archaeological remains, I recommend that if planning permission is granted the following condition is applied to any forthcoming consent:

To evaluate and mitigate the impacts of development on heritage assets with archaeological interest:

A) Prior to any development ground works the applicant (or their agents or successors in title) shall secure and have reported a programme of archaeological field evaluation works, in accordance with a Specification and written timetable which has been submitted to and approved in writing by the local planning authority.

B) Following completion of archaeological field evaluation works, no development groundworks shall take place until the applicant or their agents or successors in title, has secured the implementation of any safeguarding measures to ensure preservation in situ of important archaeological remains and/or archaeological mitigation excavation and recording in accordance with a Specification and timetable which has been submitted to and approved by the local planning authority.

C) The archaeological safeguarding measures, mitigation excavation and recording shall be completed in accordance with the agreed Specification and timetable.

D) Within 6 months of the completion of archaeological works a Post-Excavation Assessment Report shall be submitted to and approved in writing by the local planning authority. The Post-Excavation Assessment Report shall be in accordance with Kent County Council's requirements and include:

- a. a description and assessment of the results of all archaeological investigations that have been undertaken in that part (or parts) of the development;***
- b. an Updated Project Design outlining measures to analyse, report and disseminate the findings of the archaeological investigations, together with an implementation strategy and timetable for the same;***
- c. a scheme detailing the arrangements for providing and maintaining an archaeological site archive and its deposition following completion.***

E) The measures outlined in the Post-Excavation Assessment Report shall be implemented in full and in accordance with the agreed timings.

Reason: To ensure that features of archaeological and palaeo-environmental interest are properly examined and recorded in accordance with relevant Local and the National Planning Policy.

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

Yours sincerely

Casper Johnson MCIfA FSA
Senior Archaeological Officer
KCC Heritage Conservation