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**Heritage Conservation
GT EPE**

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Ask for: Casper Johnson
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25 January 2023

Re: 2022 1328 Pavilion, Bowling Green, Church Walk, Gravesend Kent

Demolition of existing bowls pavilion and erection of a 4- storey building to provide a 62-unit Use Class C2 retirement living complex, with a new access from Ellerslie, a new emergency access off Ellerslie, parking, landscaping and associated works.

Thank you for consulting us on this application.

The site lies within an area of multi-period, background, archaeological potential and has been little developed in the recent past except for the bowling green, pavilion and a sewer pipe. The archaeological potential of the site is presently unknown (there has been no field evaluation of the site) but the planning application is supported by a useful Archaeological Desk-Based Assessment (RPS, 2002) which presents the recorded information about the site and surrounding area. A low potential for all periods of archaeological interest is presented in the desk-based assessment, based on the limited available data in proximity to the site. The existing evidence (including taking account of past development impacts) does indicate that it is unlikely that development of the site would have a significant below-ground impact and I would not object to the development on archaeological grounds. However, without field evaluation, I do not think it is possible to be certain that the site has no archaeological interest, given the site's location on the historic routeway (Milton Road) and the site's proximity to the medieval Milton church of St Peter and St Paul. Taking account of the past impacts at the site, I consider that in this case it would be reasonable to mitigate development impacts through an archaeological watching, targeted on specific areas, and recommend that if planning permission is granted 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 an archaeological

watching brief to be undertaken by an archaeologist approved by the Local Planning Authority so that groundworks are observed and items of interest and finds are recorded. The watching brief shall be in accordance with a Written Scheme of Investigation, which has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that features of archaeological interest are properly examined and recorded.

I will leave detailed comments and recommendations on built heritage and setting matters to your Conservation Officer but would note that the development of the site as a bowling club in the early 20th century is of heritage interest to the development of Gravesend and Milton, contributing a recreational facility within the context of the neighbouring church, rectory, school, drill hall, hospital and expanding residential development. If the site is developed and the existing structures are to be demolished, it would be helpful for future research if a record (to Historic England Level 3) of the pavilion and associated green and facilities could be made, to be lodged with the Kent Historic Environment Record.

I hope that this is helpful and would be happy to discuss further.

Yours sincerely

Casper Johnson
Senior Archaeological Officer