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Ask for: Casper Johnson
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**Re: 2025 0013 - Land To North And South Of Station Road Southfleet Kent
DA13 9PA**

Proposed construction, operation and maintenance of a Battery Energy Storage System (BESS) with associated infrastructure (including batteries in storage containers, a substation and inverters) and works including highway access, landscaping and biodiversity enhancements.

Thank you for your letter consulting us on the above planning application.

The site lies within an area of significant archaeological interest for all periods of human history from the Palaeolithic to the present day. The wider project site lies immediately adjacent to two scheduled monuments which define part of a Romano-British settlement and religious complex at Springhead. The evidence for the archaeological interest of the wider site and surrounding area is set out in a series of documents submitted by the applicant. These include geophysical survey and trial trenching reports and a Heritage Impact Assessment (Clearstone Energy 18.12.2024).

Field evaluation of the sites south of the A2 Watling Street indicates that there have been post-medieval and modern cultivation impacts and on the available evidence, archaeological interest would not be a reason to object to the proposed development. However, the results of the archaeological assessment and evaluation demonstrate a high potential for presently unrecorded below-ground archaeological evidence for all periods of human history, including Palaeolithic archaeology, to be present and these could be impacted by development.

The site which lies within Gravesham, to the north of the A2 Watling Street, has been subject to archaeological field evaluation with the excavation of a targeted area of an early post-Conquest rural medieval settlement of regional importance (Oxford

Archaeology 2001 and HER Ref. TQ 67 SW 258). Cable route and other infrastructure works linking the BESS to the existing substation site within Gravesham, may impact surviving below-ground archaeological remains.

Therefore, I recommend that if planning permission is granted, and to seek consistency with my recommendations to Dartford Borough Council regarding DA/24/01470/FUL and which relates to the same application, the following condition should be applied to any forthcoming consent:

To further evaluate and mitigate the impacts of development on archaeological remains:

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

B) Following completion of the Palaeolithic and geoarchaeological evaluation works, no development 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 further archaeological investigation 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, investigation and recording shall be carried out in accordance with the agreed specification and timetable.

D) Within 6 months of the completion of archaeological field work a Post-Excavation Assessment Report shall be submitted to and be 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. The assessment will include a consideration of the site's context with respect to the adjacent scheduled areas;***
- b. an Updated Project Design outlining measures to analyse and publish 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 interest are properly examined and recorded in accordance with local and national policy.

Should the project be granted planning consent, the applicant would develop a programme of archaeological work with Written Schemes of Investigation and these documents would satisfy planning conditions applied by both Dartford Borough Council and Gravesham Borough Council.

I hope that this is helpful and would be happy to discuss any of the above further.

Yours sincerely

Casper Johnson FRSA MCIfA FSA
Senior Archaeological Officer
Heritage Conservation