



## Heritage Conservation

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### **2023 1313 – Eastcourt Marshes Electricity Substation, Mark Lane, Gravesend, Kent DA12 2HR**

**Proposed construction of a new cable tunnel beneath the River Thames between Gravesend and Tilbury to provide additional transmission capacity. Above-ground infrastructure in the form of a new Cable Sealing End compound and a new head house building along with associated electricity infrastructure, access, parking, boundary treatment and two overhead gantry structures for future overhead lines. Temporary compound for the duration of the project to provide parking, staff welfare facilities, delivery vehicle parking, and equipment and machinery storage, including boundary treatment and lighting.**

Dear Rebecca,

Thank you for consulting us on this application.

The part of the proposed development site south of the Thames, lies within an area of multi-period archaeological potential and is underlain by alluvial, waterlogged deposits with archaeological and palaeo-environmental interest dating from the late glacial to the post-medieval period. It also lies within the western end of the non-designated 19<sup>th</sup> century Milton Rifle Range. The range consists of a succession of low earthen mound firing points, a target mound and markers' gallery, as well as a weather shelter. The butts were modified in the 1890s and perhaps afterwards and part of the range is still in use today. The range saw continuous use, including for rifle practice during the First and Second World Wars as well as mortar firing practice. Although the formation of the Metropolitan Police Training Facility has involved further modifications to the southern end of the butts and firing points, there are substantial survivals of the original range structures.

The application has been made with an Environmental Statement (ES Volume IV – Chapter 17). This chapter is supported by appendices (ES Volume VI) and figures:

- Appendix 9.1: Historic Environment Desk Based Assessment
- Appendix 9.2: Desk-Based Geoarchaeological Deposit Modelling Report
- Appendix 9.3: Written Scheme of Investigation for Geoarchaeological Deposit Modelling and Borehole Investigation
- Figure 17-1: Designated Heritage Assets
- Figure 17-2: Non-designated Heritage Assets; and
- Figure 17-3: Previous Archaeological Investigations

My comments and recommendations focus on matters related to non-designated archaeology and the paleo-environmental interest of the site. No doubt your Conservation Officer, as well as Historic England, will comment on the application in relation to matters related to the built heritage and designated heritage assets.

The studies undertaken by the applicant in support of the ES are helpful and include the over-arching Historic Environment Desk-Based Assessment and the site-specific Desk-Based Geoarchaeological Deposit Modelling. The results of these desk-based studies highlight the archaeological and palaeo-environmental interest of the site and the potential for groundworks associated with the proposed development to impact on both surface-level, and below-ground features and deposits of archaeological and palaeo-environmental interest.

To further understand the surface-level archaeological interest (likely to be, but not exclusively, related to the use of the site as a rifle range) detailed earthwork survey, LiDAR survey and archaeological trial trenching is recommended. A detailed, interpretative record of the rifle range, combining the results of fieldwork with documentary research (involving relevant specialists) should be produced to mitigate development impacts. Mitigation of impacts to the rifle range should also include the provision and dissemination of heritage information about the site.

To understand the deeper, below-ground archaeological and palaeo-environmental interest of the site, two geoarchaeological boreholes are proposed, one in each of the two areas of deeper below-ground development impacts. The application is supported by a Written Scheme of Investigation for Geoarchaeological Deposit Modelling and Borehole Investigation, the results of which would provide information about the deeper deposit sequence and its archaeological and palaeo-environmental potential and significance.

I am supportive of the proposed approach to site-specific field evaluation, which acknowledges the limitation to the present basis for our understanding of the archaeological and palaeo-environmental interest of the site. It is recognised that the results of field evaluation will be used to agree detailed mitigation, which could include options for preservation *in situ*, mitigation by

design refinements and/or through detailed archaeological excavation and recording, analysis, reporting, dissemination and archiving of the results for public benefit.

It is recognised that the development would impact surface-level and below-ground deposits with archaeological and palaeo-environmental interest, the non-designated Milton Rifle Range and other, presently unidentified archaeological remains and I therefore 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 and palaeo-environmental 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 and work with the applicant to design the Specification for field evaluation.

Yours sincerely

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Heritage Conservation Team  
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