



Heritage Conservation

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Ask for: Casper Johnson
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2023 0668 – Eastcourt Marshes Electricity Substation, Mark Lane, Gravesend, Kent DA12 2HR

Request for a screening opinion in accordance with The Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of the one new shaft headhouse and one new cable sealing end compound

Thank you for consulting us for a screening opinion on the proposed development at East Court Marshes.

The site lies within an area of multi-period archaeological potential adjacent to the Thames. The site is underlain by alluvial deposits which have the potential to contain, or overlie, nationally important, waterlogged archaeological remains from the late glacial to the post-medieval period. The site also includes the western end of the non-designated 19th 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 and was used intensively for rifle practice during the First and Second World Wars and mortar firing practice was also carried out. Although the formation of the Metropolitan Police Training Facility has involved some further modifications to the southern end of the butts and to some of the firing points, there are substantial survivals of the original range structures.

The application for a Screening Opinion has been made with an Historic Environment Desk Based Assessment (Aecom, 2023) which usefully records the presently known heritage and archaeological data for the site and immediate surrounding area. The Historic Environment DBA recognises the important palaeoenvironmental potential, and the need for geoarchaeological field evaluation as a next step in understanding the archaeological potential of the site and to allow an appropriate assessment of the impact of the proposals. I am not in agreement, however, with statements in Section 7.2.2 of the DBA, that the site contains no non-designated heritage assets, nor that the Milton Rifle Range lies immediately east of the site boundary. In my opinion, the Milton Rifle Range should be considered as a non-designated heritage asset and the development site boundary lies within the western end of the original range, as is illustrated in the DBA figure 11.

The development has the potential to impact on significant, potentially nationally important, below-ground archaeological remains, as well, potentially having a significant negative impact on the non-designated Milton Rifle Range. The project should, in my opinion, be subject to EIA and the impact assessment process should include the use of purposive field evaluation data to investigate the below-ground archaeological potential and a detailed assessment of the full extent of the historic rifle range and the impact of the proposed development.

I would be happy to discuss the scope of field evaluation, and any other aspects of my comments above, with the applicant.

Yours sincerely

Casper Johnson FSA

Senior Archaeological Officer

Heritage Conservation Team

Environment, Planning & Enforcement