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**Heritage Conservation
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Ask for: Casper Johnson
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14 July 2021

SENT BY EMAIL

Re: 2021 0757 – Custom House, The Terrace, Gravesend Kent DA12 2BW

Redevelopment of the site and conversion of the existing building to provide 27 residential units (6 x 1 bed, 12 x 2 bed and 9 x 3 bed) with associated landscaping, parking and vehicular access.

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

The application site comprises The Custom House (Grade II listed former HM Customs and Immigration Office) and associated buildings including the Grade II listed Gazebo adjacent to the Thames. The historic standing buildings and riverside structures at the site have archaeological interest. The site also has significant below-ground archaeological potential for remains associated with changing riparian activity and in particular the line of the former defences of the Milton Blockhouse which extended thorough the site. These western defences were subsequently removed to create the Terrace Gardens and subsequent housing.

The application has been submitted with a Design and Access Statement, Heritage Statement and Archaeological Desk-Based Assessment. The Heritage Statement sets out useful data about the history and development of the buildings at the site and how the proposed development would seek to conserve the most significant parts of the historic buildings.

The Archaeological Desk-Based Assessment is very limited and has not made use of historic mapping or local research and fails to address the issue noted above concerning the former defences of the Milton Blockhouse. The site and immediate surroundings have had a complex history of change since the mid-19th century and

there is significant potential for below-ground archaeological remains at the site to increase our understanding of former land use and defences at Gravesend and Milton.

The proposed development includes works that will impact on this below ground archaeological potential as well as the historic buildings and therefore I recommend that if planning permission is granted the following condition is attached to any forthcoming consent:

AR1 *No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written specification and timetable 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.

The programme of archaeological work would comprise two elements.

Firstly, historic building archaeological recording in the form of a watching brief by an appropriately qualified and experienced building's archaeologist with the production of a historic building record (HBR) report to Historic England Level 3 as a result. The HBR report would be lodged with the Kent Historic Environment Record for future research.

Secondly, an archaeological watching brief on all groundworks with the production of a report on the findings. The Written Scheme of Investigation for the archaeological watching brief would include a detailed assessment of the archaeological potential of the site, using a CAD drawing to create a potential model and impact assessment which would then be used to enable the watching brief recording.

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

Yours sincerely

Casper Johnson
Senior Archaeological Officer
Heritage Conservation