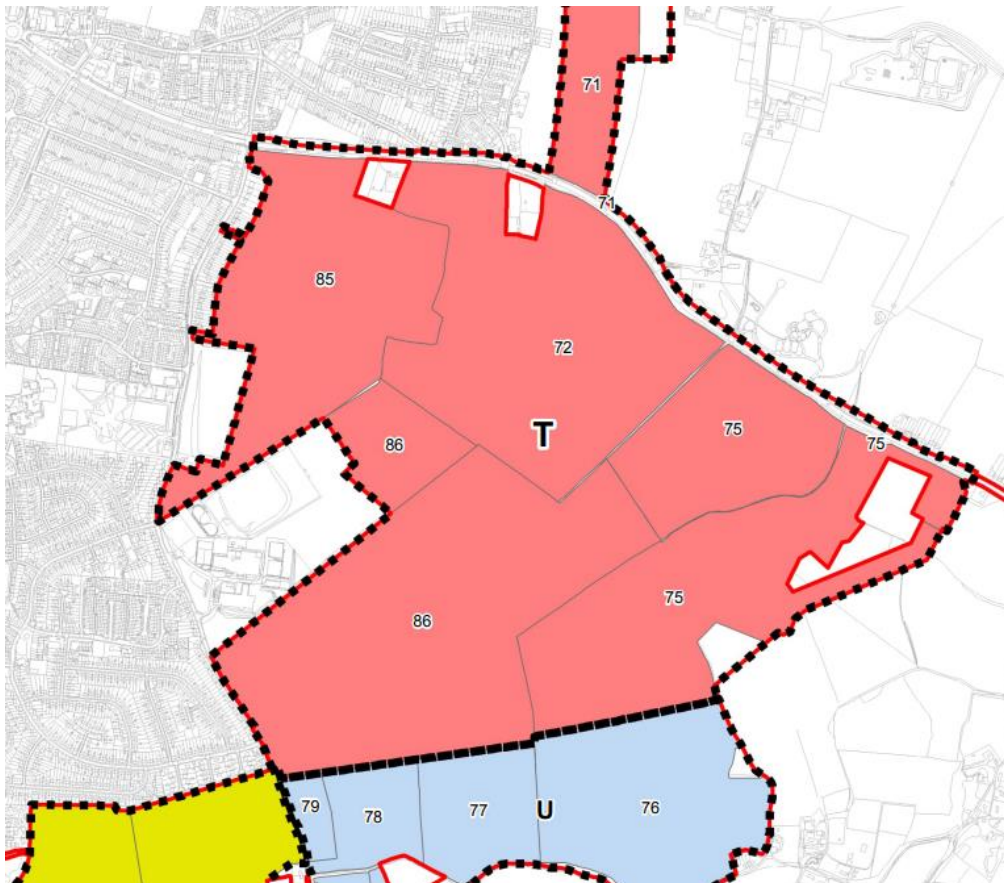


### Q12.1.11 Missing Archaeological Fieldwork

No archaeological fieldwork appears to have been undertaken in the area immediately east of Thong Lane, to the north of the Cascades Leisure Centre. There is potential for the land to contain iron age assets, which may be harmed or lost when the land is subsequently regraded to form Chalk Park. Can Gravesham Borough Council (GBC) advise when they would like this assessment undertaken and how they would like to see this captured in the oWSI (APP-367)? Can the Applicant explain any constraint to undertaking such fieldwork?

Whilst GBC would defer to the expert advice of KCC when it comes to archaeology, this is an outstanding issue that was raised with the applicant at the Statutory Consultation stage in 2018. The area of concern broadly corresponds with parcel 85 on the plan below, within which it is understood that trial trenching was not undertaken prior to submission. Neither the Geophysical Surveys (APP-360 + 361) or the Trial Trenching Reports (APP-362 to 366) appear to cover this area.



Plan from APP-369 – National Highways: Scheme wide Written Scheme of Investigation for Trial Trenching south of the River Thames

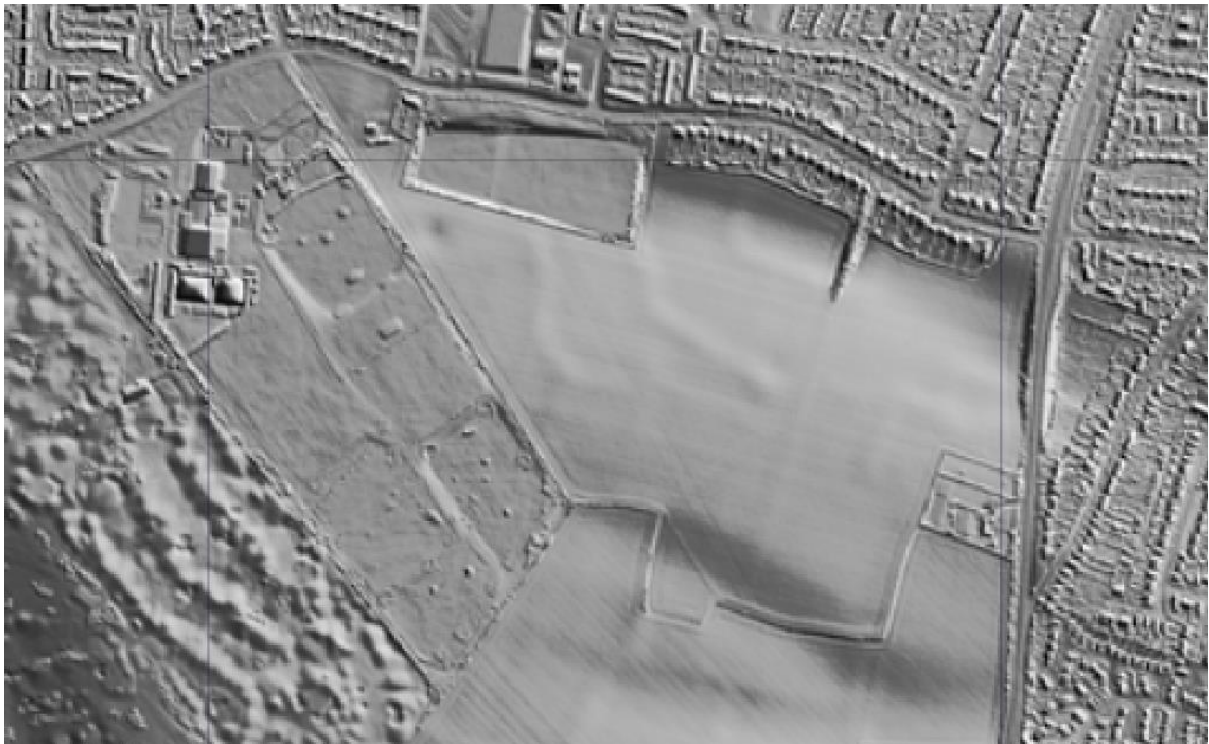
Plans submitted with the application identify extensive archaeological targets within this area (APP-185 and APP-186), ranging from pre-historic, iron age and Roman, to medieval. The evolution of this part of the site is therefore complex and interesting and presumably has a relationship with archaeology (that has been subject to detailed investigation through trial trenching etc) to the east.

For information, the ExA attention is drawn to the 1939 Luftwaffe aerial photo of this part of the site, which shows extensive surviving earthworks to the east of Thong Lane within Parcel

85. The A226 Rochester Road can be seen on the right-hand side of the photograph, with Thong Lane running across the top, to what was then the built complex of RAF Gravesend.



Whilst much of these earthworks appear to have been ploughed out, they are still visible on LiDAR images of the area taken from <https://houseprices.io/lab/3d-lidar>. The earthworks continue northwards across the A226 into the GBC allotment site opposite, the A226 having been built on a low embankment across the fields in the 1930s.



GBC has looked at the oWSI (APP-367) and note that under Table 9.1 that mitigation ranges from strip, map and sample excavation; detailed excavation; and archaeological topographic/earthwork survey.

Whilst it is noted that the oWSI includes the potential to preserve important archaeology in-situ, this area is intended to be used for storage of spoil, as part of the Southern Portal

construction site and thereafter as part of the earthworks to form Chalk Park. Presumably, as part of these works, topsoil will need to be removed for later re-use.

GBC notes that in the case of the Nitrogen Deposition sites, the applicant has indicated it will seek to avoid important archaeology through the design of the mitigation. However, in the case of the area to the east of Thong Lane, it appears to be assumed that the need to take all this area for the construction site and for the disposal of spoil should take precedence over cultural heritage impacts.

Currently, the only information that appears to be available for Parcel 85 is the desktop study. Given trial trenching on land to the south and east revealed important archaeology that warranted changes to the scheme so that it could be preserved in-situ, the possibility of the same approach needing to be applied here cannot be ruled out.

All GBC is suggesting therefore is that sufficient flexibility be built into the dDCO to allow for preservation of archaeology in-situ, in a way that is commensurate with its significance and that the final design and layout of the construction site/Chalk Park only be agreed once the necessary archaeological fieldwork has taken place and the results reviewed by KCC archaeology.

Should the ExA agree with this approach, it is respectfully suggested that the applicant be requested to draft revisions to the dDCO and Works Plans etc. to provide a mechanism by which this objective can be achieved. This assumes that the applicant has not already commissioned the necessary archaeological fieldwork post submission to provide evidence upon which the matter can be resolved before the close of the examination.