

FAO Tracey Williams
Ref EN010092
National Infrastructure Planning
The Planning Inspectorate
National Quay House
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2 The Square
Bristol BS1 6PN
thurrockfpg@planninginspectorate.gov.uk

Your Ref: EN010092

E-Mail: dm@thurrock.gov.uk

Date: 25 January 2021

Dear Ms Williams,

Planning Act 2008

Application by Thurrock Power Ltd for an Order Granting Development Consent for the Thurrock Flexible Generation Plant Project

Response to Procedural Deadline D

Further to the above I write to you in advance of Procedural Deadline D.

There are four bullet points raised in the Draft Examination Timetable for Procedural Deadline D as stated in italics below and I comment as follows to those points below:

- *Comments on the further information received at Procedural Deadline C;*

Further to the information received by the applicant following the Procedural Deadline C the Council wishes to comment on the Cultural Heritage information as it is still considered that additional information is needed to understand the impact upon the historic environment, please enclosed response below:



Chris Purvis
Development Management
Thurrock Council
Civic Offices
New Road
Grays
Essex
RM17 6SL

Date: 19th January 2021

Specialist Archaeological Advice

Dear Chris,

20/00273/DCO Thurrock Flexible Generation Plant, Fort Road, Tilbury

Thank you for providing the further details to the Historic Environment Advisor on the above application which has the potential for significant archaeological implications.

As previously stated the proposed development lies in a highly sensitive area of archaeological potential. The development is situated on the former grazing marsh of the Thames with elements of the scheme extending onto the gravel terrace to the north. The gravel terrace is known to have been occupied from the Mesolithic through to the modern day.

It is pleasing to see that in the documents provided in December that geophysical surveys have been undertaken on the majority of the development area. This provides basic data which can be built on to facilitate an understanding of the historic environment so that the inspector can make an informed decision on the impact of the development. It is disappointing that the applicant does not have the detailed results of the geophysics as the present document provides little detail on the results.

These results also need to be ground truthed to have an understanding as to what the features represent. Large scale developments in the area have shown extensive red hill (saltern) complexes surviving within the grazing marsh area. Similarly, the Lower Thames trial trenching, being undertaken to support their DCO submission has shown an extensive archaeological site of Roman date at the eastern end of this application.

Although recommendations were made to the applicants in 2018 that intrusive trenching would be required to provide an understanding of the extent and significance of archaeological sites which will be impacted by the proposal no work of this nature has been undertaken.

It is disappointing that the applicants have not entered into discussions with the local Authority and Historic England as the other DCO applicants have with in this area. We are still keen to have discussions with the applicant and their consultants to try and establish the historic environment impacts this development will have on the development area.

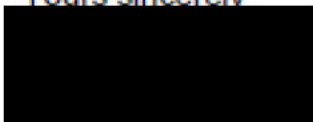
With regard the revised setting document Hannah has put together the following comments

- It is considered that, in some instances, the description of setting and the assessment of contribution of setting to importance included at Appendix 1, is not thorough enough or considered in enough detail in order to inform the assessment of impact.
- Reference has been made to figures/viewpoints within the LVIA in Appendix 1, however there are still a number of heritage assets from which viewpoints/photomontages/wireline images have not been taken. Additional plates have been included within the settings assessment document, however some of these show only the heritage asset itself and do not allow for an assessment of how setting contributes to significance.
- As such, it is considered that the assessment is not sufficient enough to understand the potential impact of the development.
- It is also noted that an assessment of the non-designated heritage asset Shornemead Fort has not been included (which was previously highlighted).

In conclusion the applicants although achieving some improvements to the information initially provided this has not achieved the level which is appropriate to determine an appropriate understanding of the impact on the historic environment. The lack of consultation with the historic environment advisors to Thurrock is especially surprising and disappointing especially when compared to the other DCO applications in Thurrock.

If you have any questions please do not hesitate to contact me.

Yours sincerely



Richard Havis
Principal Historic Environment Advisor

Telephone: 03330136849

Email: richard.havis@essex.gov.uk

NOTE : This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter

- *Written submissions, if required, from the Applicant and any Interested Party or Affected Persons on any changes that are considered necessary to the draft Examination Timetable;*

The need for additional information as stated above may require amendments to the draft Examination Timetable, unless this information can be provided in accordance with one of the deadlines in the existing draft Examination Timetable.

- *Requests to be heard orally at the Preliminary Meeting (Part 2), points you wish to make, and why these need to be made orally rather than in writing.*

This Council is not intending to make any oral representations at the Preliminary Meeting (Part 2), unless this is required in response to the comments raised above in regard to the Cultural Heritage information.

The Council reserves the right to comment on any matter raised at the Preliminary Meeting (Part 2) should the need arise.

- *Applicant's certification of compliance with the requirements of Annex A above.*

No comments from the Council on the above point.

I trust that this information is of assistance and should wish to contact me regarding the content of this letter then please use the email address provided.

Yours sincerely



Chris Purvis
Major Applications Manager