



EAST OF ENGLAND OFFICE

Rory Cridland and the Thurrock Flexible Generation
Plant Team

Our ref: PL00490033

Your ref: EN010092

By Email Only

ThurrockFPG@planninginspectorate.gov.uk

Telephone 01223 582769

12th April 2021

**PLANNING ACT 2008 : THURROCK POWER, PROPOSED THURROCK FLEXIBLE
GENERATION PLANT**

Historic England Deadline 3 Response

Dear Mr Cridland

The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, are the government's advisor on the historic environment and we provide independent advice on heritage matters. We have a duty to conserve as well as promote public understanding and enjoyment of the historic environment.

Confirmation of Historic England Comments at Deadline 3 12th April 2021.

Historic England has provided the following comments to the Applicant's Response to the ExA's First Written Questions (Deadline 2):

Question 1.4.1

We disagree with the statement that St Katherine's Church has no relationship with West Tilbury Marshes.

However, we acknowledge the additional viewpoints that have been prepared by the applicant (Viewpoints 4a and 4b in HER-2) and we agree that these now demonstrate that the setting of this asset would not be affected by the proposed development.

Question 1.4.4

Historic England disagrees with the applicant about the level of information that needs to be submitted in the draft DCO. We recommend that more detailed information is included in the DCO for archaeology. We have provided the applicant with examples

of other more detailed DCO's (The Progress Power (Gas Fired Power Station) Order 2015, The East Anglia ONE Offshore Wind Farm Order 2014 and also the draft DCO for East Anglia One North), in relation to archaeology, from this region and we have provided further advice in our own response to the ExA's First Written Questions (Deadline 2). These examples are more detailed, and in our opinion more robust, than the wording proposed for Thurrock Power and we have advised that a similar approach should be taken here.

If the scheme is consented without trial-trenched evaluation, contra to our advice, we would recommend that Historic England should be also consulted on each stage of work given, in our opinion, the lack of adequate assessment – and because there is a risk of encountering previously unknown but important archaeological remains, which will require careful, and a potentially enhanced level of, mitigation.

Historic England should be consulted by the MMO in terms of advice about any written schemes of investigation relating to the Marine and Intertidal aspects of the project.

Question 1.4.5

We have worked closely with the applicant and Essex County Council to provide a more robust outline WSI and our concerns have been addressed. However, as previously advised, we would strongly recommend that the trial-trenching is undertaken in advance of the granting of the DCO.

Question 1.4.8

We note the projects that have been provided by the applicant to show that the approach proposed (i.e. field surveys being undertaken post-consent and pre-commencement) is one commonly adopted on other large infrastructure projects.

We are unable to comment on the detail of these specific cases from across the country. In terms of Tilbury2, which is adjacent to the current proposal, we agreed with the advice of Essex County Council – because the brownfield development was on the site of the redundant Tilbury Power Station – and therefore the risk of encountering significant archaeological remains at this location was much lower. The circumstances were different, and each project must be assessed on the specific circumstances.

We would instead compare the current project to the approaches taken in this region at two comparable projects - Progress Powerstation, Eye, Suffolk (2015) and at Milbrook Gas Fired Generating Station, Bedfordshire (2019). In both these cases, the greenfield parts of the proposed developments were evaluated with trial-trenched evaluation in advance of the DCO, while brownfield parts were investigated post-consent (similar to the approach taken at Tilbury2).

We would also compare the current project to the approach with the LTC, which has undertaken (or is in the process of undertaking) trial-trenched evaluation as part of the

assessment. In our opinion, the approach at Thurrock Flexible Generation Plant should be consistent with the LTC.

Question 1.4.9

We acknowledge the additional visualisations that have been prepared for the raised embankment (sea wall) near viewpoint 31 and at St Katherine's Church. We are satisfied that these are adequate assessments for these viewpoints. We also agree that these demonstrate the impact on the significance of the heritage assets would be minor.

Question 1.4.10

We acknowledge that the scheduled monument known as 'Second World War anti-aircraft battery at Bowaters Farm' (LEN: 1012185) is completely overgrown and accept the monument is currently unreachable at the moment. We acknowledge the applicant's attempts to provide viewpoints.

However, this is still in our opinion a key viewpoint as stated in our response to Deadline D (see paragraphs 5.6, 5.35-7). Although there are no visualisations, in our view, the harm would be less than substantial but of a relatively high degree, i.e. at the upper end of less than substantial.

Question 1.4.11

The data that has been collected within, and adjacent to, the proposed development Site must be presented for assessment with this application. It is not satisfactory to base the assessment on 'pers. comms. with the consultants'.

We note that further archaeological evaluation works are being planned by the LTC project this summer – and note that the work is to accompany the LTC application, to be submitted as part of a full assessment of the historic environment parameters for that project.

Draft SOCG

We can confirm that we have had positive and ongoing dialogue with the applicant concerning the draft SoCG, although a number of matters are not agreed:

We believe that the impact of the scheme has been represented as less than it is for Earthworks near church, West Tilbury, Church of St James and Second World War anti-aircraft battery at Bowaters Farm (even though we accept this equates to less than substantial in the terminology of the NPS).



Historic England

We do not agree that an adequate assessment of below-ground archaeological remains has been undertaken prior to the DCO application being accepted for examination.

We have serious concerns that the applicant has not taken all possible steps to establish the significance of Walton Common. Historic England objects in principle to the proposed removal of Walton Common on heritage grounds.

If there are any further material changes to the proposals, or you would like further clarification in relation to our advice, please contact us.

Yours sincerely

Jess Tipper

Dr Jess Tipper

Inspector of Ancient Monuments

E-mail: jess.tipper@historicengland.org.uk