



EAST OF ENGLAND OFFICE

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Plant Team

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

Historic England Deadline 4 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 4 17th May 2021.

In terms of cultural heritage, Historic England believes there are three critical issues still relating to this application, about which we have serious concerns. These were presented at the Cultural Heritage Hearing on 28th April and a written summary is provided below.

1. Lack of trial-trenched evaluation

We believe the applicant has failed to adequately assess the significance of the below-ground archaeological remains that are suspected by geophysical survey to be present within the development area.

We strongly recommend the applicant should undertake trial-trenching before consent is granted, where groundworks have the potential to disturb and damage the significance of archaeological remains. This is normal practice in terms of the assessment of archaeological remains - proportionate, reasonable and justified in accordance with the NPS EN-1 - to identify whether any important archaeological remains are present that could preclude or modify the proposed development.

We understand the applicant has been advised that an application to undertake trial trenching on Walton Common ahead of consent was unlikely to be granted. As we have already stated in our Deadline 2 response, in our opinion section 38 of the Commons Act 2006 does not necessarily prevent trial trenching at this stage - and an application needs to be submitted for this work.

While we acknowledge that such work is ordinarily prohibited under Section 38 of the Commons Act 2006, we believe limited trial-trenching is in the public interest in this instance under Section 39, in order to assess the significance of archaeological remains within the area of Walton Common (and to inform the deregistration application). We would support an application for trial trenching in this instance to assess the significance of buried archaeological remains, given the unprecedented circumstances, if consulted by the Planning Inspectorate.

Furthermore, the main development site, Zone A, is significantly larger than the area of Walton Common and the Commons Act does not prevent trial-trenching across the remaining half of Zone A as well as in other parts of the proposed development area, where groundworks will be undertaken and where there is potential to disturb and damage buried archaeological remains, including Zones C, D, F and G.

Significance is influenced by the state of preservation and also the date of the archaeological remains, which cannot easily be established by geophysical survey - or indeed by geoarchaeological boreholes.

At this stage, we strongly suspect there are likely to be archaeological remains within the development area, as they have been indicated by the geophysical survey. These are potentially well-preserved in the area of the historic common - this is because of the relatively benign land use of commons and we know from elsewhere this can lead to the good preservation of the remains of earlier periods. Here, these can be easily and rapidly assessed by trial-trenching - as is currently being undertaken for the adjacent LTC project.

2. Setting of high-graded designated heritage assets

The proposed development lies in a highly sensitive area for the historic environment, within the setting of some highly-valued heritage receptors. We believe that the proposed development would result in harm that would be less than substantial in nature but of a relatively high degree; the ES concludes that the level of harm is towards the lower end of the scale (minor adverse), in terms of the magnitude of impact.

We believe the impact of the scheme has been represented as less than it is for the scheduled monuments known as 'Earthworks near church, West Tilbury' and also the Grade II* Listed Church of St James. In terms of the magnitude of impact on the scheduled monument, the ES states the scheme will comprise a minor change to the wider setting of the monument. The significance of effect of the scheme on the setting

of the scheduled monument will be minor adverse. For the church and churchyard, the impact magnitude is measured as moderate. The ES concludes the effect experienced by these receptors will be moderate adverse.

We believe the development would adversely affect the experience of these designated heritage assets in their landscape setting and would be more harmful; both the magnitude of impact and the significance of effect in both cases is moderate to high – and certainly not minor.

This is because the significance of both designated draws much from their setting, located in similar prominent and striking topographic locations. Indeed, the panoramic engraving of 1739 by Samuel and Nathaniel Buck, [The North Prospect of Gravesend in the County of Kent](#), views Tilbury Fort and Gravesend from a similar location to ES Viewpoint No. 7 on Hall Hill, from the scheduled monument known as ‘Earthworks near church, West Tilbury’.

In our opinion, the overall change to the built surroundings, skyline and the spatial quality of views would be dramatic due to the form, massing and height of the development and its industrial character. The proposed development would, we believe, significantly erode part of the setting, and compromise the appreciation, of both these designated heritage assets on a key sight line to the south-west towards Tilbury Fort.

We acknowledge the scheduled monument known as Bowaters Farm Battery is completely overgrown and we accept the monument is currently unreachable at the moment. We also acknowledge the applicant's attempts to provide viewpoints. However, this is still a key viewpoint, as stated in our response to Deadline D.

Although there are no visualisations to support assessment, the ES concludes that both the impact and the significance of the effect of the proposed development on Bowaters Farm Battery is also minor adverse. In our view, again, the harm would be of a relatively high degree, at the upper end of less than substantial, and the significance of the effect of the scheme would probably be high – although it is difficult to be confident in the absence of visualisations.

We believe the development would adversely affect the experience of this designated heritage asset and would be more harmful; both the magnitude of impact and the significance of effect would be moderate to high. The significance of this monument draws much from its setting, in this case the area it defended. Bowaters Farm Battery is located in a prominent location, with panoramic views to the west and southwest across Tilbury Marshes, a low-lying and open landscape, directly towards Zone A and the site of the proposed powerstation.

The National Character Area Profile for this area (81. Greater Thames Estuary) states, ‘Extensive open spaces within a predominantly flat, low-lying landscape give heightened importance to the skyscape and dominating skylines’. The Profile also states, ‘the distinctive military landmarks along the coastline are a defining feature of the estuary and reflect the historical importance of the area in protecting London from invasion by the sea’.

The National Character Area Profile also states, 'it is important to protect and provide interpretation of these features, and other historical assets to preserve the sense of history of the area.' Consequently, we believe the construction of a new powerstation at this location is likely to result in a significant effect and a relatively high degree of harm to the landscape and historic environment, not minor adverse as maintained by the applicant.

3. Historic landscape character

We also believe the proposed development will result in a serious level of harm to the historic landscape – specifically, the complete loss of an early historic common - one of five contiguous commons that survive remarkably intact in the West Tilbury Marshes.

Walton Common, also known historically as 'Worden', 'Waddam' and 'Wotton' Common, is an historic estuarine marsh common which survives as a complete landscape entity within the former West Tilbury Marshes. The irregular ditched boundaries reflect ancient creek patterns.

Walton Common is one of five historically interlinked historic commons on West Tilbury Marshes, along with Tilbury Fort Common, Fort Road Common, Hallhill Common and Parsonage Common. Exceptionally, all five commons survive almost intact within the modern landscape, and this elevates their significance in terms of their group value. The earliest recorded survey is 1584 and, in a detailed landscape history of West Tilbury parish,¹ it has been stated that they may be much earlier and pre-conquest in origin. Bingley (2006, 205) suggests Walton Common is possibly associated 'with Saxon grazing or fishing zones upon the yet-unreclaimed alluvial marsh.'

There is also a surviving trackway or driveway on the north side of Walton Common, defined by two parallel linear N to S aligned ditches, that connects Walton Common with Parsonage Common (although this has been bisected by the construction in the late 19th century railway). The trackway, known historically as 'Walton' or 'Waddam Wall', is one of a number of green 'walls', sometimes called 'manorways' or 'causeys', which ranged outwards from West Tilbury's hills. Bingley (2006, 138) states that 'Walton Wall' was probably pre-conquest in origin, connecting West Tilbury Hall next to St James' Church and its sheepwalks.

The commons are exceptionally rare survivals of a farming practice that developed during the medieval period. These are the zones of grassland reserved for the commoners of the township – those who held the copyholds (or later freeholds) of the dozen or more farms within the parish. In this case, they relate to the historic exploitation, and management, of the historic grazing marshes. Bingley (2006, 204) states, 'the presence of these old pastoral commons...is of especial interest to us insofar as West Tilbury is one of the very few Essex areas where, right to the close of the 20th century, relatively large tracts remained under similar husbandry to that pertaining at the Conquest'.

¹ Bingley, Randal, 2006, *Behold the Painful Plough. Country Life in West Tilbury, Essex, 1700-1850*. Thurrock Unitary Council Museum Service.

HER-2 DEADLINE 2 – FURTHER INFORMATION, 2.11, asserts that the historic landscape significance of Walton Common has been ‘already substantially degraded by the surrounding industrialisation in its immediate vicinity and its separation and bisection from its historic context by the electrified railway line.’

We acknowledge the rationale for the siting and arrangement of Zone A was to locate the development as close as possible to the existing Tilbury Substation to the south of the site to minimise the grid connection distance and minimise impact in the Green Belt. We also acknowledge that some parts of the landscape have been industrialised around the proposed development site. We do not, however, believe the construction of the railway in the late 19th century has completely severed the connection between, or the understanding of, the commons.

Walton Common is a complete historic landscape entity and part of a larger surviving historic landscape, and this is highly unusual. Across the country in general, loss of historic common land has been dramatic, particularly in the well-populated south and east of the country where the pressure for agricultural improvement has been greatest. Between the 1840s and 1980s, many areas in East Anglia are estimated to have lost 50% of their pre-18th-century landscape features (in some areas it is much higher).

Bingley (2006, 1) states, ‘nowhere in the Thameside area of South Essex...is the survival of an old farming landscape more tangibly, more agreeably observed’. Moreover, the ES quotes the Essex Thames Gateway Historic Environment Characterisation Project (Essex CC 2007) that states, ‘the rural landscape [of this zone, character Zone 117_3] consists of small, rectilinear fields with extensive drainage ditches on the grazing marsh to the south...The zone has not been developed to any extent during the 20th century’ (Vol. 6 Appendix 7.1, 4.5.7).

HER-2 DEADLINE 2 – FURTHER INFORMATION, 5.8, asserts that the assessment of Essex Historic Grazing Marshes (Essex CC 2014) concluded, ‘Walton Common and its surrounding landscape is already considered to have been ‘lost’’. However, in fact the 2014 assessment makes no reference to Walton Common and that assessment was focussed specifically, and only, on surviving grazing marshes - while the West Tilbury Marshes are an extensive area of reclaimed (former) grazing marsh.

HER-2 DEADLINE 2 – FURTHER INFORMATION, 2.12, states that the residual significance of effect of the common land exchange is certainly no greater than minor adverse. Based on the information presented here, we believe it is difficult to understand how the magnitude of impact is considered to be minor and has, according to the ES, ‘good legibility to withstand change’. Indeed, the ES concludes, ‘elements of the existing landscape within Zone A would be lost, but there would otherwise be little or no change to landscape elements’ (Vol. 3, Chap. 7, 4.1.192).

We believe the removal of Walton Common is a significant effect and the magnitude of impact is major adverse. This is because the specific parcel of land that is Walton Common will be almost entirely removed as a meaningful landscape entity by the proposed powerstation.

In our opinion, in terms of the historic landscape character, the proposed common land exchange will not have a meaningful association with Parsonage Common and West Tilbury, in the same way that Walton Common, as stated in the applicant's Deadline 2 submission (HER-2 DEADLINE 2 – FURTHER INFORMATION, 2.12). The proposed common land exchange will not be adequate as it fails to maintain the unique historic character of this landscape.

We acknowledge that Walton Common is a non-designated heritage asset. However, Historic England is a statutory consultee in relation to the Historic Environment with regards to development on, and proposed de-registration of, common land under the Commons Act 2006. Moreover, this type of historic landscape feature falls outside of the current scheduling system that operates under the Ancient Monuments and Archaeological Area Act 1979, i.e. it does not satisfy the 1979 Act's definition of a monument despite being of importance. Moreover, the common is also part of the context for the designated heritage assets, situated in the zone between Tilbury Fort and St James' Church. We believe it is, therefore, appropriate for Historic England to provide comments, and express serious concerns, about the proposed development on Walton Common.

The impact of the removal of the common is likely to result in a significant effect and a high degree of harm to the landscape and historic environment. In our opinion, the Examining Authority should consider whether the applicant has taken all possible steps to establish the significance of this area, and to minimise the harm the development would cause to the significance of the historic landscape character.

Conclusion

In conclusion, Historic England still has serious concerns about the level of information that has been provided in the ES.

We believe that insufficient information has been provided in terms of below-ground archaeology for the effect of the proposed development to be assessed and for the balance to be weighed proportionally by the Examining Authority.

We also believe that the impact of the proposed development on several highly-graded heritage assets has been downplayed, thereby failing to adequately assess the impact on the significance of these heritage assets.

In terms of the proposed development on Walton Common, we believe the common makes an important contribution to the character and local distinctiveness of the area. We continue to have serious concerns about the total loss of Walton Common by the proposed development, and to the particular siting of the powerstation within an area of landscape that is previously undeveloped and, we believe, historically important.

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



Historic England

Yours sincerely

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