

PINs Registration and Relevant Representation Form

Section 56 Planning Act 2008

Response deadline: 23rd Feb 2023 Our ref: PL00217262

Project: Lower Thames Crossing PINs Ref: TR010032 lowerthamescrossing@planninginspectorate.gov.uk Registration ID 20035689

Response by: Dr Will Fletcher Telephone: 01223 582710

Historic England

The Historic Buildings and Monuments Commission for England (HBMCE) is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England, including historic buildings and areas, archaeology and historic landscapes. We have a duty under statute to promote conservation, public understanding and enjoyment of the historic environment. We are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Culture, Media and Sport (DCMS).

The Proposal

The scheme consists of two new 4 km (2.6 miles) tunnels which would run under the Thames from Tilbury to Gravesend and an additional 23 km (14.5 miles) of new road which would connect the new tunnels to the existing road network. This would require a new interchange with the A13 in Essex and improvements to Junctions 28 of the M25 and Gravesham Junctions of the A2.

Representation

We summarise our representation regarding this proposed project as follows. Please note we will be submitting full written representation at the appropriate deadline and have registered as an interested party.

1. Introduction

The applicant has provided a full Environmental Statement, which includes Historic Environment Chapters, reports and appendices. We can confirm Historic England has been party to extensive pre-application discussions and the documentation provided for the examination reflects these discussions.

2. Historic Environment Assessment







The proposed development lies in a highly sensitive area for the historic environment and will impact upon a wide range of heritage receptors. It was agreed during the preapplication process that detailed assessment of the impact of the scheme upon the historic environment would be required. This work has been undertaken, and additional survey work including geophysics, building recording and trial trenched evaluation has informed the ES. The information provided is of a good standard and we broadly accept the results of the assessment as presented in the ES.

Our full written representation will provide further detailed comments on the following areas.

3. Impacts on designated heritage assets

Our primary consideration in relation to this scheme is the impact of the proposal on the designated heritage asset (SM1) known as 'Crop mark complex, Orsett' (LEN 1002134) and the demolition of the three listed buildings 1 and 2 Grays Corner Cottages (LEN 1337056), Murrells Cottage (LEN 1337096) and the Thatched Cottage (LEN 1111644). The proposal will in our view result in a total loss of significance of all these assets which is equivalent to substantial harm in policy terms.

The loss of any designated heritage assets is highly regrettable. We understand the scheme cannot proceed without incurring their loss and following discussions with the applicant a range of mitigation has been proposed. This does not however fully compensate for the loss of these assets, and we will therefore provide further advice and comment on the policy consideration, and the balance between public benefit and harm.

Further advice will also be offered in relation other highly graded and designated heritage assets affected by the scheme. This would be the impact upon the significance of a range of assets through development within their setting. These are scheduled monuments situated in and around the proposed A2 junction in Kent and associated with the section from the Northern portal to the A13 junction in Essex as well as the impact upon the significance of the Conservation Areas at Thong, and West and East Tillbury.

We will also provide comments on the PQDM and Holocene reports where we have additional scientific expertise. Given our remit however we will not be commenting in detail on the majority of the grade II designated assets, the mitigation for non-designated and archaeological assets with the exception of a few specific sites. For example, asset number (247) which directly relates to the scheduled monument (SM1) and is of equivalent value in policy terms







We have also noted and will provide comments on the demolition of a number of significant but non-designated buildings at North Ockendon.

4. Transport Works Order

In the event of the project being consented, we would also want to ensure that there is adequate mitigation and we will be providing comments on the TWO wording, and the REAC and OWSI documents.

Dr Will Fletcher

@historicengland.or.uk



