

PLANNING ACT 2008  
INFRASTRUCTURE PLANNING  
(APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009  
REGULATION 5 (2) (a)

PROPOSED PORT TERMINAL AT  
FORMER TILBURY POWER STATION

# TILBURY2

TRO30003

VOLUME 6 PART B

ES APPENDIX 9.A: CONSULTATION EXERCISE FOR LVIA

DOCUMENT REF: 6.2 9.A



## TILBURY 2- NSIP LANDSCAPE AND VISUAL ASSESSMENT CONSULTATION EXERCISE

### 1. Draft Scoping Stage –March 2017

Consultee	Advice	How addressed
<p><b>Historic England</b> Deborah Priddy <a href="mailto:debbie.priddy@HistoricEngland.org.uk">debbie.priddy@HistoricEngland.org.uk</a> <a href="mailto:Peter.Kendall@HistoricEngland.org.uk">Peter.Kendall@HistoricEngland.org.uk</a></p>	<p>It is essential that setting is appropriately considered in both the Heritage and Landscape and Visual chapters.</p> <ol style="list-style-type: none"> <li>1. Tilbury and Coalhouse Forts;</li> <li>2. Views northwards from Gravesend across the River Thames and what these contribute to the individual significance of; <ul style="list-style-type: none"> <li>• New Tavern Fort</li> <li>• Henrician (Tudor) blockhouse</li> <li>• Town Pier and Royal Terrace Pier;</li> <li>• Gazebo at HM Customs and Immigration</li> <li>• Gravesend Conservation Area</li> </ul> </li> </ol> <p>Views southwards across the River Thames form the Essex shore towards the tower of the Church of St George, Gravesend.</p>	<p>Initial Zones of Theoretical Visibility studies have been carried out as well as a field-based assessment of the potential Zone of Significant Visibility.</p> <p>The field survey photographic record includes views towards and/or from heritage assets as appropriate. Potential effects on setting will be assessed in conjunction with CgMS.</p> <p>Representative viewpoints have been selected for consideration. Subject to agreement between the parties, these would be used as a basis for assessment.</p>
<p><b>Thurrock Council- Landscape 17<sup>th</sup> March 2017</b> Steve Plumb <a href="mailto:steve@plumb-associates.com">steve@plumb-associates.com</a></p>	<p>The proposed LVIA methodology is satisfactory.</p>	<p>-</p>
<p><b>Thurrock Council-Highway Information Team, Environment and Place</b></p>	<p>Agree with the applicant's proposal to review and assess the public rights of way within the vicinity of proposed development. Requests that consideration is also given to</p>	<p>Potential visual effects on users of these routes will be assessed.</p>

<p>Paula Watts  <a href="mailto:pwatts@thurrock.gov.uk">pwatts@thurrock.gov.uk</a></p>	<p>National Cycle Network Route Number 13 and the Councils desire to retain this Cycle Network Route along the river frontage.          Advise that Natural England are just commencing consultations with Thurrock Council with respect to the England Coast Path due to commence 2017 and the intention to travel along footpath 146.</p>	
<p><b>Gravesham Council- Planning and Regeneration Services</b>          Mrs W Lane  <a href="mailto:wendy.lane@gravesham.gov.uk">wendy.lane@gravesham.gov.uk</a></p>	<p>The visual impact of development as viewed from the southern shore including a key mixed-use regeneration site at Gravesend Canal Basin, the Riverside leisure Area, the eastern side of the town centre and a range of important heritage assets.</p> <p>Viewpoints should be agreed in advance of the preparation of the EIA, given these will also be relevant to assessing impact on heritage interest. Of particular concern are Gravesend Blockhouse and New Tavern Fort and their relationship with other defences including Tilbury Fort.</p> <p>Potential in-combination impacts during the construction and operational phases of proposed development and the location of the new Lower Thames Crossing- in the event a location for the latter is chosen.</p>	<p>Representative viewpoints will be selected and agreed with Gravesham Council and HE.</p> <p>Cumulative and in-combination effects will be considered.</p>
<p><b>Essex County Council- Strategic Planning, Housing Growth &amp; Development</b>          Graham Thomas</p>	<p>The approach and methodology to carry out the LVIA covers all the necessary aspects to assess the impact of the proposed development.</p> <p>It is recommended that the viewpoints to be used in the assessment of visual effects for the LVIA should be selected initially through discussions with the competent authority and other interested parties ideally at the scoping stage, if not when the Zone of Theoretical Visibility analysis (ZTV) has been carried out. The selection of viewpoints should also be informed by fieldwork, and by desk research on access and recreation, including footpaths, bridleways and public access land, tourism including popular vantage points and distribution of population.</p>	<p>The location of proposed representative viewpoints will be subject to consultation with the competent authority and others as appropriate.</p>
<p><b>Kent County Council- Environment, Planning &amp; Enforcement</b>          Sarah Platts  <a href="mailto:Sarah.Platts@kent.gov.uk">Sarah.Platts@kent.gov.uk</a></p>	<p>This scheme could have a major impact on the historic riverside town of Gravesend. Gravesend has a significant riverine and maritime heritage and its historic use of the river for trade, industry, leisure and communication is a key component of its significance. Along this side of the river, the Kent coast has several major forts including New Tavern Fort and Shornemead Fort. Further along, Cliffe Fort is a major promontory fortification. There are many other heritage</p>	<p>Initial Zones of Theoretical Visibility studies have been carried out as well as a field-based assessment of the potential Zone of Significant Visibility.</p>

	<p>assets located along the Kent coast including the entrance to the Thames and Medway Canal, post medieval wharfs and military installations, piers and ferry points. A fundamental part of the significance of military installations is the sightlines. There needs to be a thorough and comprehensive assessment of the sightlines of the military installations on both sides of the river and sound demonstration of how the scheme will impact on the significance of this military heritage.</p> <p>This part of the coast is traversed by the Saxon Shore Way. This is a long distance footpath which focuses on highlighting the historical and natural environment and views from the path are an important part of the enjoyment and educational value of this route. The impact of the scheme on the historical aspects of this route needs to be thoroughly considered, preferably as part of a historic landscape assessment for the Kent side.</p> <p>Given the scale of the proposal, there needs to be detailed consideration of the impact of the development on long distance views from the high ground in Kent. For example, views from Shorne Country Park should be realistically considered.</p>	<p>The field survey photographic record includes views towards and/or from heritage assets as appropriate. Potential effects on setting are being assessed in consultation with HE including HE (Kent)/Gravesham Council.</p> <p>Representative viewpoints have been selected for consideration. Subject to agreement between the parties, these would be used as a basis for assessment.</p>

**2. Specific consultations in respect of additional information supplied by DJA in respect of selected viewpoints:**

Consultee	Additional information supplied	Advice supplied	How addressed
<p><b>Historic England</b> Deborah Priddy Peter Kendall and Gravesham Council <a href="mailto:debbie.priddy@HistoricEngland.org.uk">debbie.priddy@HistoricEngland.org.uk</a> <a href="mailto:Peter.Kendall@HistoricEngland.org.uk">Peter.Kendall@HistoricEngland.org.uk</a></p>	<p>Following Historic England's pre-application advice in respect of a draft scoping report (letter to Mr Peter Ward dated 17<sup>th</sup> March 2017 applies), I would be grateful for additional comment/advice in respect of the current range of selected viewpoints.</p>	<p>Provide additional context in some views and additional viewpoints required from Tilbury and Coalhouse Forts.</p> <p>Peter Kendall/Gravesham Council. Request inclusion of</p>	<p>Additional context information supplied in part. Additional viewpoints will be supplied and assessed.</p> <p>Agreed- these viewpoints will form part of the LVIA.</p>

	<p>DJA are preparing the landscape and visual assessment. In line with your recommendations we are contributing to the assessment of potential effects on the setting of heritage assets in the locality currently being undertaken by CgMS, the appointed heritage consultant.</p> <p>Please find attached a copy of the following for consideration:</p> <ol style="list-style-type: none"> <li>1. Summary of LVIA related advice provided to date by consultees.</li> <li>2. An initial draft Zone of Theoretical Visibility (ZTV) and field-based predicted Zone of Significant Visibility (ZSV) study.</li> <li>3. Plan showing field survey viewpoints and proposed selected representative receptor locations.</li> <li>4. Copy of the field survey record.</li> </ol> <p>The ZTV is based on the tallest structures currently being considered (50.0m high silo's). Based on my field survey observations I anticipate these, combined with the remainder of proposed development, are likely to be significantly visible to varying extents within an area of approximately 48 square km as indicated. This also on the basis that the consented demolition of the remaining structures at Tilbury Power Station has taken place.</p> <p>Advice received to date identifies a number of heritage assets, many of which have amenity</p>	<p>some field survey locations as selected receptor viewpoints.</p> <p>(Consultation ongoing)</p>	
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	<p>related interest. I have attempted to record views from and towards these to assist assessment. This is reflected in the relatively high number of viewpoints in the vicinity of Tilbury Fort, the river frontage at Gravesend and further afield, including Coalhouse and Cliffe forts.</p>		
<p><b>Thurrock Council- Landscape 25<sup>th</sup> April 2017</b>  Steve Plumb  <a href="mailto:steve@plumb-associates.com">steve@plumb-associates.com</a></p>	<p>Further to your advice in respect of the draft scoping report (email dated 17<sup>th</sup> March 2017 to Tilbury2 Consultation), I attach the following for consideration:</p> <ol style="list-style-type: none"> <li>1. Summary of LVIA related advice provided to date by consultees.</li> <li>2. An initial draft ZTV and field-based ZSV study.</li> <li>3. Plan showing field survey viewpoints and proposed selected representative receptor locations.</li> <li>4. Copy of the field survey record.</li> </ol> <p>The ZTV is based on the tallest structures currently being considered (50.0m high silo's). Based on my field survey observations I anticipate these, combined with the remainder of proposed development, are likely to be significantly visible to varying extents within an area of approximately 48 square km as indicated. This also on the basis that the consented demolition of the remaining structures at Tilbury Power Station has taken place.</p>	<p>I have had an opportunity to check the viewpoints within Thurrock and consider that they are appropriate and include the main receptors. I was concerned that there was not a viewpoint from West Tilbury village on the high ground but accept that there are restricted views from public locations in that area. I didn't get a chance to look further along the public footpath leading east from VP 9 where there might be clearer views over the site – if you haven't it might be worth doing as there could well be objections from village residents and therefore it would be good to address this if possible.</p> <p>I note that you will be liaising with CgMS on potential effects on heritage assets. This is really important. As part of this I</p>	<p>Additional photographic record of viewpoints in this location will be considered subject to availability.</p>

	<p>In conjunction with the appointed heritage consultant (CgMS), I will be contributing to an assessment of potential effects on the setting of numerous heritage assets in the locality. This is reflected in the relatively high number of viewpoints in Gravesend as well as at other heritage features in the area.</p> <p>I would be grateful for your comment/advice in respect of the selected viewpoints in due course.</p>	<p>think that it will be important to include a representative viewpoint for Coalhouse Fort.</p> <p>I have no comments to make on the viewpoints in Kent as I do not know the locations sufficiently well.</p>	
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**3. Comment from PINS Scoping Opinion:**

- Asks for clarity as to what Zone of Significant Visibility is and how it is developed
- Emphasises need to agree sensitivity of receptors to change, as well as their identity
- Luminaries need to be assessed.

**4. Draft PIER Consultation -July 2017**

Consultee	Summary of Advice	How addressed
<p><b>Gravesham Council- Planning and Regeneration Services</b> Mrs W Lane <a href="mailto:wendy.lane@gravesham.gov.uk">wendy.lane@gravesham.gov.uk</a></p>	<p><b>Key issues from a Gravesham viewpoint and comments on information provided in the PEIR</b></p> <p>Key issues on the project from a Gravesham viewpoint and comments on the information set out in the PEIR are set out below.</p> <p>An initial point that should be made however is that the properties identified as sensitive receptors on the southern shore should include an assessment of the waterfront immediately east of Gravesend Canal Basin in residential use rather than the current industrial. This is because the area is allocated as a key development site under adopted Gravesham Local Plan</p>	<p>This aspect of the potential future baseline will be included in the LVIA</p>

Core Strategy (2014) policy CS04: Gravesend Riverside East and North East Gravesend Opportunity Area.

Visual impact of development within the riverside landscape and light issues

The proposal will introduce a significant riverside development into an area which, although brownfield industrial land, has remained under-used and largely open for a considerable period of time.

The Anglia Water site and Stobart bio-mass operation to the west are predominantly low lying and relatively unobtrusive from the southern shore. Whilst the Tilbury B power station to the east is a massive and prominent structure on the riverside, this is currently being demolished (see our above comments on RWE's intentions for the site as recently advised). Further to the east, the marshes retain their openness, even where land raising has occurred and continues to occur.

The proposed Ro-Ro terminal, associated lighting columns, CMAT buildings, silo and jetty are likely to be the most prominent elements when viewed from the southern shore, with the impact changing depending on whether or not ships are moored on the jetty. There would also be a considerable impact depending on whether the site was being viewed during the day or at night- time given the introduction of lighting into an area which is currently dark.

Whilst the development would bring about a change in the landscape of the northern shore opposite Gravesend, it would introduce activity and interest that would be viewed at a distance of some 900 metres to the Tilbury2 jetty.

Table 9.12 in the PEIR lists visual mitigation and the reason mitigation is proposed. It advises that artificial lighting will be designed in accordance with guidance supplied by the Institute of Lighting Professionals. This is reassuring as currently the lighting impacts are restricted to subjective comments. These impacts need to be evaluated around objective standards as found in Institute of Lighting Professionals 2011 guidance notes for the reduction of obtrusive light, including evaluation of source intensity/glare of lights compared with current situation.

An assessment of the potential impact of obtrusive lighting forms part of the EA and will inform the LVIA assessment of the wider effects of artificial lighting.



The PEIR provides an initial assessment of that impact, concluding that, in landscape terms, such impacts are largely acceptable subject to suggested mitigation. However, there does not appear to be a proper assessment of the visual impact of the facility when viewed from the southern shore with ships in place.

We are told how big these ships will be and the maximum that would be berthed there at any one time (i.e. 2 x Ro-Ro and 1 x aggregates ship) but none of the computer generated images in appendix 9F include them. We would suggest that the final ES include photomontages to illustrate the visual impact of the proposal from the southern shore with and without ships in place. The 'with ship' scenario should show the maximum number that can be berthed.

Although the lighting columns over the Ro-Ro contained storage area will be high relative to the stacks (50m compared to 15.5m) they will be relatively unobtrusive during the daytime due to their thin profile. However, the introduction of floodlighting into an area that is currently dark at night is anticipated to be a significant change, even if that lighting is carefully designed to avoid spillage, glare and glow into the sky. As highlighted above, we would suggest therefore that the design of any lighting should have regard to the Institution of Lighting Engineers, 'Guidance Notes for the Reduction of Obtrusive Light' (2011).<sup>7</sup> The final ES should also consider any potential impacts on navigational safety due to the lighting of the site and how it will be mitigated.

It is noted that Appendix 9G provides an initial assessment of the impact of an indicative lighting scheme that would meet operational requirements, based on the methodology set out in the Institution of Lighting Professionals, Professional Lighting Guide 04 – Guidance on Undertaking Environmental Lighting Impact Assessments (2013) [PLG04].

Table 5.1 of the Appendix suggests that the overall the impact of artificial lighting when viewed from the Gravesend waterfront would be broadly neutral. Appendix A1 to Appendix 9G also provides photographs showing daytime and night time views from the waterfront, indicating where additional lighting would be located.

	<p>However, the fact that there are likely to be ships moored at the jetty and that there could also be light sources associated with them appears to have been overlooked. It is suggested therefore that the final version of the document should take this into account when assessing night-time visual impact.</p> <p>It is also suggested that to provide an indication of the actual impact of area lighting as opposed to a desktop study, some temporary lighting be provided to a similar standard as assumed in Appendix 9G to assist during the examination.</p> <p>Overall, the 100m high silo for cement storage is a concern in terms of visual impact because it will represent a jarring feature close to the waterfront that will appear in stark contrast to the otherwise low horizontal profile of the remainder of the site. Neither the current existence of Tilbury B power station nor the fact that the 170m high chimneys there are fitted with lighting to meet Civil Aviation Authority requirements should be used to justify this feature as they are in the process of being demolished.</p> <p>It is strongly suggested therefore that the design of this part of the development be reconsidered as the alternatives of two 50m or three 35m high silos suggested within the PEIR may be more appropriate alternatives.</p> <p><u>Historic Environment</u></p> <p>Closely linked to landscape and light impacts are issues related to effect on the significance of designated (in particular) heritage assets through development within their setting. In this instance, the most direct effect would be on the group of heritage assets making up the Tilbury Fort complex. However, because these only make up part of the historic Thames Defences and there is an intimate relationship between Tilbury Fort and other installations to the north and south of the river, anything that affects the significance of one and the way it is appreciated, enjoyed and understood, stands to have an adverse impact (however marginal) on them all.</p>	<p>The LVIA will assess the potential effects of moored vessels at night time.</p> <p>The proposed cement silo is assessed in the context of the future baseline which excludes the presence of Tilbury B power station.</p> <p>Alternative silo designs and locations have been considered.</p>
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Gravesham would defer to the expert opinion of Historic England as to whether there is harm to the significance of designated heritage assets in this instance and the degree of that harm i.e. whether it is 'substantial' or 'less than substantial' and the tests that should be applied.

However, it is difficult to see how there would be no harm caused by the westward encroachment of the jetty and moorings closer toward Tilbury Fort and any associated increase in landside port activity at the Tilbury2 site that changes its character from relatively open to more intensive urban industrial.

This view is confirmed within section 12 of the PEIR, where potential adverse impacts not only on Tilbury Fort but a wide range of other designated heritage assets are recognised both during the construction and operational phases (see tables 12.10 and 12.11 of PEIR).

For example, one of the suggestions in the PEIR is that the Port should look at moving the jetty slightly further to the east, so that there is less conflict with Tilbury Fort. The most important point here is that the significance of Tilbury Fort as a designated heritage asset could be compromised if a jetty or moored ships blocked line of sight from the gun emplacements at the fort. We have found a map at the British Library<sup>8</sup> which shows the cross-fire patterns from Tilbury and New Tavern Forts as intended in 1778.

It is noted that your own experts rate the likely significance of effects being moderate to major adverse in relation to Tilbury Fort in both the construction and operational phases. In terms of the designated heritage assets on the southern shore in Gravesend, the majority would suffer a neutral to moderate adverse impact during the construction phase and a minor to moderate adverse impact during the operational phase. The potential for adverse impacts on Shornemead Fort, as a non-designated heritage asset, is also identified.

The National Policy Statement for Ports (2012) at 5.12 sets out how impact on the historic environment should be considered through the decision making process.<sup>9</sup> This largely reflects

that set out in the National Planning Policy Framework (NPPF, 2012), in that the decision maker should take into account the desirability of sustaining and, where possible, enhancing the significance of heritage assets and the contribution made to that significance by their setting in a positive way.

There is an implicit presumption within policy in favour of the conservation of designated heritage assets; with this increasing the more significant the asset is considered to be. It is also recognised that the significance of any heritage asset can be harmed or lost through alteration or destruction of the asset itself or insensitive development within its setting.

Loss of designated heritage assets requires clear and convincing justification, with the weight accorded their preservation increasing with their significance. Any harmful impact on the significance of designated heritage assets needs to be weighed against the public benefits of a development, having regard to the degree of harm caused. In so doing, regard also has to be had to the statutory requirements of sections 66 and 72 of the Planning (Listed Buildings and Conservation) Areas Act 1990 as these also have implications in terms of the weight to be accorded the preservation and enhancement of this historic environment in the decision making process.

Provided a case can be made that the public benefits of the proposal do outweigh the degree of harm caused and this has been minimised as far as is practicable through sensitive design and operation, we would expect to see a package of mitigation measures to offset residual harm. Whilst the PEIR sets out what could be done in relation to Tilbury2 and its interface with Tilbury

Fort in particular, there is no mention of how adverse impacts on designated and un-designated heritage assets in Gravesend would be mitigated. The Council has some ideas of potential mitigation for harm to heritage assets on the Gravesend shore as a result of Tilbury2.

	It may therefore be useful to discuss this in advance of submission in order to reach an agreed position to put before the Examination.	
<b>Thurrock Council- Environment and Place</b> Matthew Gallagher, Principal Planner (Major Applications).	Landscape Character and Visual Amenity – given the flat, low-lying landform adjacent to the River Thames, the proximity to residential receptors to the north, Tilbury Fort to the south-west and footpath links adjacent to the River Thames the potential impact of the proposals on landscape and visual receptors in Thurrock will be a key issue for consideration. No doubt Gravesham Borough Council will comment separately regarding the potential impact, particularly of riverfront development and activity, on receptors located south of the River Thames. Any mitigation proposals will need to be sensitive to the proximity to Tilbury Fort and the historic marshland setting.	Noted.
<b>Essex County Council</b> Spatial Planning Economies, Localities and Public Health Lesley Stenhouse, Principal Spatial Planner	<p><b>Public Rights of Way.</b>  ECC supports the proposal to improve the PRoW that forms part of the Thames Estuary Path.  ECC is supportive of the ambition the proposals set out in paragraph 5.53 (Highways and PROW) section) to permanently protect the Footpath along the foreshore from the tides to make this footpath and cycle way fully usable, as this forms part of the Thames Estuary path and the Two Forts way. The latter is a Thurrock Council cycleway ambition that we support. It is considered that the proposal for this section of the Thames Estuary path should improve the experience for the users.</p> <p><b>Landscape Character and Visual Amenity</b></p> <p>The PIER has comprehensively set out the baseline assessments and predicted impacts on landscape character, landscape features and elements, landscape value and visual amenity.-</p> <p><b>Table 9.14</b> sets out ‘Potential further mitigation or compensation’ measures which have been identified as part of the PEIR. These mitigation measures relate to the immediate environs of the proposed development and are in addition to those embedded elements set out in <b>Table 9.12.</b></p>	

	<p>The landscape strategy proposed to be prepared as part of the EIA process should set out all the elements of landscape mitigation proposed including any offsite measures. It is considered that the strategy will need to identify additional landscape mitigation measures which are required to deal with the residual landscape and visual impacts arising from the development, particularly the visual impacts arising from the proposed new road link, warehousing, CMAT facility and concrete silos.</p> <p>The predicted effects have been set out in <b>Table 9.17</b> but the assessment will need to consider these impacts and the necessary landscape mitigation in detail. Mitigation measures will need to be identified and these should be designed to accord with the key characteristics and qualities of the neighbouring landscape character areas. It is considered that the Tilbury urban area, West Tilbury, Tilbury Marshes and Chadwell escarpment LCA areas are likely to experience the most significant impacts and measures to mitigate impacts and reinforce the landscape condition should be designed accordingly. This should be explored with Thurrock Council.</p> <p>The proposals for landscape mitigation, offsetting works and agreed landscape enhancements will need to show that the wider context and character of the development area has been fully considered. Where the identified landscape measures fall outside the DCO boundary line then specific agreements to ensure that works are delivered (funded and implemented) and managed appropriately will need to be formulated.</p>	<p>A landscape strategy has been prepared. The strategy incorporates a range of additional landscape mitigation measures within and external to the site.</p> <p>The proposed landscape mitigation measures seek to address the combined predicted adverse effects of proposed development on local landscape character, visual amenity, the cultural heritage and ecology.</p>
<p><b>Natural England</b> Mr Jamie Melvin Planning Lead Advisor- West Anglia</p>	<p><b>Protected Landscapes – North Kent Downs Area of Outstanding Natural Beauty (AONB)</b> The proposed development is for a site approximately 4.6km from a nationally designated landscape namely North Kent Downs AONB. Natural England advises that the relevant AONB Conservation Board should be consulted. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB’s statutory management plan, will be a valuable contribution to the planning decision.</p>	<p>The predicted maximum extent of the Zone of Significant Visibility for proposed development extends to approximately 4.0km from the order limits boundary.</p>
<p><b>Historic England</b> Deborah Priddy</p>	<p><b>PEIR Report Section 12 and Appendix 12.B Built Heritage Assessment</b></p>	

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We broadly accept the assessment of significance and sensitivity of the built heritage assets detailed in these reports. The computer visualisations submitted as part of the PEIR consultation are not fit for the purpose of making an assessment of the impacts of the proposed development on the setting of built heritage assets. Comments based on wire frame images submitted within the last week of the consultation have not been included in this response as insufficient time has been allowed for us to circulate these and review before the 28 July. Notwithstanding this, our reading of these assessments suggests that the effects on Tilbury fort will clearly be at the very least moderate. An assessment of harm to its significance based on the removal of the power station would not be assured, were this facility to be redeveloped. The proposed constructions, in particular the silo, new pontoon/ moorings (and their vehicular access) and berthed shipping would also be prominent in views, from the fort, whilst the CMAT facilities and road/rail corridor will erode and partially close inland open views.

The terminal will be operational 363 days per year (lorry movements and ships docked). CMAT to operated six days per week, 312 days pa, including Saturday mornings; >5 trains a day entering and leaving site. Part of the Two Forts Way ( Byway98 or FP 146) which links the forts at Tilbury and Coalhouse and may be diverted or temporarily closed during construction and proposed construction working hours are 8-6 weekdays and 8-4 weekend with no piling at weekends.

The very substantial increase in activity from berthed shipping, rail and road movements, lighting, noise, pollution, possible closure of rights of way would also be particularly damaging to the amenity of visitors to the fort, which is managed by English Heritage as a visitor attraction for its archaeological interest ( also acknowledged in 9.174 of the Landscape and Visual Section).

This will also apply to the domestic tenants in the Officers' Barracks. It is not clear in PEIR Section 17-18 that the existence of residents in the fort has been noted?

**Visualisations:** The predicted visual effects visualisations show only one ship moored whereas the ro-ro will accommodate two at any one time, in which case worst case scenario should be shown ( viewpoints 44, viewpoint 59).

This receptor has now been included within the LVIA.

A full set of draft wireline imaging representing potential effects from all identified representative viewpoint locations was supplied to HE on

	<p><b>PEIR Section 9 Landscape and Visual</b></p> <p>9.75 Tilbury Fort and views across the river to Gravesend are attractors.</p> <p>9.121 it is noted that, notwithstanding its industrial context, the open nature of much of the landscape within the study area renders it highly sensitive to development of the proposed scale and type.</p>	<p>18<sup>th</sup> August 2017. The imaging shows the maximum number of vessel moorings.</p> <p>This section of the draft LVIA refers to attracting or detracting features in the landscape which are likely to draw the eye of the casual observer. Tilbury Fort is not such a feature, having a low profile and set at a low level in the locality and within a landscape containing many tall structures. The wooded hilltop above Gravesend on the other hand, is a feature and draws the eye from many local vantage points.</p> <p>The full wording in the PIER reads as follows:</p> <p><i>“The open nature of much of the landscape within the study area renders it potentially highly sensitive to development of the proposed scale and type, particularly any type involving large scale buildings or tall</i></p>
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	<p>9.165 states that it is likely that the area of the Tilbury Marshes forming the immediate setting and context of Tilbury Fort will be separated from the remaining extents of the character areas to the north and east, which will be of moderate significance and adverse ( also see 9.168). Those open parts of the landward setting of the fort would be diminished, to the detriment of an appreciation of how its landward landscape setting related to the exceptional system of moats and outworks and would be very harmful to its significance.</p> <p>Table 9.11 As noted above, it is not clear that the demolition of Tilbury Power station will not be followed by further large scale development.</p> <p>9.147 Notes the need for particular emphasis on the appropriate siting of individual elements within the order limit site, particularly in relation to the fort. We note this and would wish to discuss issues relating to the siting and size of components ( for example the location and size of the silo, open aggregate storage and processing plant, as well as lighting, potential further mitigation outlined in Table 9.14) after the PEIR consultation.</p>	<p><i>structures. That said, industrial development will still be present following consented demolition of Tilbury B power station (substation, jetty and hv distribution network) as well as buildings contained within the Anglian Water Treatment Works. Considerations of sensitivity need to take this immediate industrial context into account."</i></p> <p>The potential effect on the setting of the fort will be examined in more detail allowing for the mitigation measures.</p> <p>The future baseline excludes consideration of further development within the Tilbury B power station site as no such proposals have been submitted to the Planning Authority.</p> <p>The siting of individual components is largely determined by operational and commercial requirement. Where alternatives are available, these have been incorporated into the masterplan. Discussions have</p>
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		been held between HE and the applicants built heritage advisor.
<b>Thurrock Council</b> Environment and Place S Dobson (Mrs) Chairman, Thurrock Local Access Forum	<p>This Local Access Forum is concerned with the protection and enhancement of the Public Rights of Way network in accordance with our Rights of Way Improvement Plan, currently under review, and would like to make the following comments on the proposals.</p> <p>It is noted in the proposal documentation that the existing rights of way are acknowledged, and we ask that at an early stage in the process that consideration is given to both protect and enhance these rights of way, currently of footpath status. This Forum aims to increase and open up its network to as many users as possible and as such, upgrading the existing path to Bridleway status, (either following its existing route or revised according to the practicalities of the site) would ensure that pedestrians, cyclists and equestrians are able to access this. It is an aim within the ROWIP review that a fully-accessible link between Tilbury Fort and Coalhouse Point is created (forming the Two Forts Way) linking in with an existing Bridleway at Coalhouse Point and Coalhouse Fort.</p> <p>Looking at the proposals for the site, it would also be beneficial for vulnerable road users to be able to access East Tilbury from the Tilbury Fort area, and as such a safe crossing, either over or under the proposed road and rail links, should be created.</p> <p>We would welcome being kept up to date with this project and if possible have an involvement in any meetings arranged which may relate to public access on the site and in this regard, a member of your team would be welcome to attend one of our Local Access Forum meetings or a separately-arranged meeting if this would be more appropriate.</p>	A draft 'Active Travel Option', defining proposed walking and cycling improvements, is being discussed with Thurrock Council and forms part of the landscape strategy.
<b>North Kent Yachting Association</b> <b>Steven Davies, Chairman</b>	<p><u>Lighting</u>  We would hope that light spillover, especially to the south, is kept to a minimum. In particular, any navigation lights should not be swamped by other light sources.</p> <p><u>Visual Impact</u>  One hopes that, from the water, the development will be no less visually attractive than the existing power station!</p>	

	<p>For small boats, the existing power station chimneys are a useful landmark, and we will be sorry to see them go. I understand that a fairly conspicuous silo is proposed; something of comparable height to the chimneys would be welcome.</p>	<p>The potential beneficial effect of the proposed cement silo being used as a replacement landscape feature/landmark has been considered.</p>
<p><b>Place Services Essex County Council Nicolas Page Historic Buildings Consultant</b></p>	<p>6) All assessments, including visualisations, should consistently assess the proposed Port at maximum capacity to demonstrate 'worst case scenario'. This includes all ships docked simultaneously, containers stacked 6 high, aggregate stockpiles c.15m in height and with maximum required lighting.</p> <p>7) Long sections showing site and Tilbury Fort together would clearly demonstrate sightlines and also facilitate a more detailed discussion on mitigation through vegetation and heights of Silo and other buildings.</p>	<p>The worst case scenario forms part of the assessment baseline.</p> <p>Visualisations have been prepared showing potential effects of development as viewed from Tilbury Fort at the request of Historic England. Where there is scope for mitigation this has been identified and incorporated into the landscape strategy.</p>
<p><b>Landscape and Ecology Thurrock District Council</b></p>	<p>The LVIA generally provides a comprehensive assessment of the landscape character north and south of the river and includes visual links such as between Tilbury Fort and New Tavern Fort.</p> <p>The report outlines measures that seek to minimise the effects of the development e.g. by careful siting of taller structures etc. There is however a number of potential mitigation measures that include woodland and tree planting which could be argued to be out of character with the historic marshland landscape. This is particularly significant closer to Tilbury Fort and its environs as there still is a fragment of relatively open marshland.</p> <p>The feature that is likely to be of particularly high significance is the new infrastructure corridor as it runs closest to the Fort as well as the town centre. The lack of details at this stage means that it is hard to assess its potential effects.</p>	<p>The proposed landscape mitigation measures within the order limits site balance the occasionally competing requirements of general amenity, visual amenity, landscape character, the cultural heritage and ecology. Wherever practicable they have been designed to be sympathetic to</p>

	<p>It is considered that rather than focusing purely on a landscape buffer beside this corridor it would be much more beneficial to try to look at the wider area around the Fort and work with the adjacent land owners to try to achieve a scheme that makes a positive benefit to the setting.</p> <p>This is a point that can be applied to the wider area whereby off-site landscape improvements could make a more positive benefit than the proposed mitigation measures squeezed around the periphery of the site and which are likely to be out of character in their form e.g. tree planting and bunding.</p>	<p>the local landscape and setting and appreciation of Tilbury Fort.</p> <p>The measures extend beyond the Order limits and include improved access in the locality, including to the fort, subject to ongoing discussions between PoTLL, Thurrock Council and English Heritage.</p>
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#### 5. Draft Environmental Statement-September 2017

Consultee	Summary of Advice	How addressed
<p><b>Essex County Council</b>  <b>Lesley Stenhouse, Principal Spatial Planner</b>  <a href="mailto:Lesley.stenhouse@essex.gov.uk">Lesley.stenhouse@essex.gov.uk</a></p>	<p>Comments are provided on the Landscape and Visual Assessment Preliminary Environmental Information Report Version 6 dated 29<sup>th</sup> September 2017 and the Landscape Strategy Figure 9.9 Sept 2017.</p> <p>Landscape Strategy Figure 9.9 (Sept 2017)</p> <p>There are two versions of this plan differing slightly in content and in the key. The two saved dates are 05 September and 25<sup>th</sup> September. The later plan appears to show reduced areas of bunding/landscape mitigation. Clarity will be needed in the final submitted version.</p>	<p>The versions supplied reflect the iterative design process. Proposed mitigation has been adjusted to meet essential operational constraints.</p>
	Table 9.14 Further Mitigation	

	<p>In addition to the landscape strategy plan Table 9.14 outlines Potential further mitigation which may be achieved. The detail of this will require further clarity.</p> <p>The main focus of landscape mitigation is the infrastructure road and rail corridor where some planting/bunding is indicated in narrow strips either along or between these routes.</p>	<p>Additional detail has been supplied within the Landscape and Ecological Management Plan and further detail will be submitted as deemed appropriate in accordance with any requirement of the DCO.</p>
	<p>Paragraph 9.205</p> <p>The paragraph refers to:  <i>Proposed mitigation scrub planting associated with the rail chord as part of the embedded mitigation would achieve approximately 7.0 metres height 25 years following completion. It would provide filtered screening to views of the lower levels of the CMAT processing and aggregates storage areas during winter and more complete screening during the growing season. The primary function of mitigation in this location is ecological and excess tree or scrub planting would affect its wildlife value. Consequently the degree of planting proposed is restricted to a narrow width of scrub species.</i></p> <p>It is not clear in these situation whether this form of narrow planting will provide suitable mitigation as it is unlikely to reach height of 7 metres. Plant species are not yet indicated but most scrub species e.g hawthorn, blackthorn, and dogwood is unlikely beyond 3/4 metres without becoming very straggly.</p> <p>Where height of seven metres is required to provide effective mitigation then the structure planting referred to will need width of space to develop, mature and provide density and height. It is not entirely clear from the strategy plan whether suitable space for such mitigation has been achieved.</p> <p>Thurrock DC Landscape and ecology officer has made a valid point about the need for offsite planting adjacent to the corridor to be considered. Whilst Tilbury 2 have accepted the need for this, and for it to form part of S106 agreement proposals have not yet been put forward.</p>	<p>The proposed planting associated with the rail chord north of the main site includes woodland and scrub species. Some of these species will be capable of achieving the heights specified. The aim is to achieve a balance between landscape, visual and ecological mitigation within the available space.</p>
	<p>Paragraph 9.227</p>	

	<p>We support the summary provided in paragraph 9.227 below, however the LEMP is likely to apply to the DCO order limits only:</p> <p><i>9.227 The embedded and proposed additional mitigation measures are summarised below in Table 9.14 and shown on the Figure 9.9- Landscape Strategy and will be secured in the long term by a Landscape and Ecological Management Plan. The strategy also refers to representative viewpoints to assist understanding of specific mitigation relating to visual amenity.</i></p> <p>We still consider that there may be a need to consider wider landscape mitigation measures to deal with residual adverse visual impacts and to reinforce the neighbouring landscape character areas. It is considered that the Tilbury urban area, West Tilbury, Tilbury Marshes and Chadwell escarpment LCA areas are likely to experience the most significant impacts and measures to mitigate impacts and reinforce the landscape condition should be designed accordingly. This could be achieved through the combination of the use of a legal agreement and funding provided through a Landscape and Environmental fund established to deal with identified enhancement projects.</p> <p>This matter should be explored with Thurrock Council but we are also prepared to discuss further detail and provide support if this is requested.</p>	<p>The measures extend beyond the Order limits and include improved access in the locality, including to the fort, subject to ongoing discussions between PoTLL, Thurrock Council and English Heritage.</p>
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