



Historic England

The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
BRISTOL BS1 6PN

16 June 2018

Dear Sirs

**Re: Application by Port of Tilbury London Limited for an Order Granting Development Consent for a Proposed Port Terminal at the Former Tilbury Power Station ('Tilbury2') Planning Inspectorate Ref: TR030003**

**HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND  
(Historic England) Response to Second Written Questions ( 2.7.1) Cumulative and Combined Impacts [Rep3-027] - PoTLL DEADLINE 3 SUBMISSION - QUALITATIVE CUMULATIVE EFFECTS ASSESSMENT (CEA) OF TILBURY 2 WITH TILBURY ENERGY CENTRE AND LOWER THAMES CROSSING (POTLL/T2/E/92)**

Historic England offer the following comments on the CEA, on the degree to which the projects assessed are likely to contribute to the cumulative impact of the proposed development of Tilbury 2 on the significance of heritage assets.

**1.0 Built Heritage - The setting of Tilbury Fort:**

1.1 Tilbury Energy Centre (TEC): The CEA is based on published material, including the scoping report, published in April 2018. The proposals for the TEC include up to three CCGT generating units and up to two open cycle gas turbines or peaking units. The boiler house would be approximately 55 m high, excluding the stacks which would reach a maximum of 95 m high. Each boiler house will have a turbine house to the north which the cumulative assessment document suggests will be in the order of 40m high. The siting of the development would be to the east of the proposed Tilbury 2 container storage area.

1.2 It is considered unlikely that there will be any significant overlap between the construction period for Tilbury 2 and the TEC so that the cumulative impacts on the setting of Tilbury Fort would be principally associated with Tilbury 2 in operation.



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1.3 The cultural heritage assessment notes that the position of the container storage facility appears to align broadly to the middle of the Tilbury 2 site, making the TEC proposals *especially prominent in views of the wider area.... the boiler houses would be twice the height of the Rochdale envelope for Tilbury 2 in this location... and would affect the appreciation of the fort in its historically isolated setting.... in combination the two proposals would result in a substantial interruption of the horizon line which is appreciable from the bastions of the fort and potentially from other locations within the fort walls (4.66-4.70).*

1.4 The CEA concludes that the combined magnitude of effects would be medium adverse and the significance of effects will be major. While we concur that the cumulative significance of effects will be major, in line with all our advice on the Tilbury 2 proposals to date, we judge that the residual effect from the proposed development of Tilbury 2 itself would be major, due to the extent and height of built development which impedes the appreciation of the fort's landscape setting, leading to a degree of harm to its significance which we have judged to be severe. Cumulatively the significance of effect would continue to be major, but the harm to the significance of Tilbury Fort would be further exacerbated by the additional height and massing of the proposed TEC development within its landscape setting of the fort in views to the east.

1.5 The CEA landscape character and visual amenity assessment judges that predicted effects would be adverse and would combine with the effects of the Tilbury 2 proposals. In landscape and visual terms, the assessment concludes that the size and scale of the of the proposed development may be sufficient to affect the setting of some of the heritage assets and combine with the effects of Tilbury 2 on Tilbury Fort, New Tavern Fort and Coalhouse Fort and the combined developments could affect cultural heritage values associated with these designated heritage assets. Historic England does not agree with the subsequent premise *that the TEC would consolidate the presence of industry.... and that the cumulative effect on the cultural heritage value of Tilbury Fort would remain largely unchanged, given the established semi-industrial context (4.35).* We note that this assessment does not use the future baseline (4.43).

1.6 Lower Thames Crossing (LTC): The principal cumulative impact would come from a proposed new link road from a new junction some 1.5 km north-east of the Tilbury 2 development, connecting with the Tilbury 2 infrastructure corridor and Port of Tilbury. It is not clear whether this road will take the form shown in the Tilbury 2 DCO. The currently assumed route would require some land-take within the Tilbury 2 site, a new crossing of rail sidings on the north-east boundary of the Tilbury 2 site and access to the Tilbury 2 site from the LTC link via a new roundabout.

1.7 As with the TEC there would no overlap in the construction phases so that the effects would relate to the operational phase of Tilbury 2.

1.8 The CEA notes that the cumulative effects of the LTC link road are unclear until such time as it is known whether significant changes would be made to the submitted design of the infrastructure corridor, and therefore the difficulty of determining





changes in the significance of effects. However, the direct linkage of the infrastructure corridor to the Lower Thames Crossing would result in increased traffic. In addition to any increased impacts from a revised design for the road itself, the CEA flags that the cumulative effect most readily experienced in the setting of Tilbury Fort would be due to visual impacts, increased noise and air quality, as experienced from the Fort and its landward earthwork defences. We concur with this assessment that even using the road design as set out in the Tilbury 2 DCO, the cumulative effects would further mar the appreciation of the fort in its setting and increase the harm to the significance of the Tilbury Fort. However, we find the comparison of the likely cumulative impacts of increased traffic noise with an imagined noise level associated of the historic use of the fort unconvincing, and the comparison with a place of worship unhelpful.

#### 1.9 Cumulative CEA – Setting of Other Built Heritage Assets:

- **TEC:** The cumulative impact of Tilbury 2 and the TEC, on the settings of heritage assets on the south bank of the Thames (New Tavern Fort, Gravesend Fort and Conservation Area) would increase the visual dominance of buildings of considerable massing and height on the north bank and would exacerbate the prominence of industrial development in views to the north. Though this would not have any additional impact on the maintenance of lines of cross-fire between the fortifications north and south of the river, it would further impair views from these fortifications and the conservation area, which contribute to an appreciation of the landscape setting of Tilbury Fort, as experienced from the south bank. The significance of the combined developments in views from south of the Thames is predicted to be greater than that for Tilbury 2 alone, particularly in views from the south west. The combined effects of artificial lighting from the two developments would be increased and would extend over a larger area. The TEC would be located to the east of Tilbury 2 and would therefore be more prominent in views from Coalhouse Fort, and from Coalhouse Point. It would also include a further small OCGT installation on the eastern part of the site which would be closer to Coalhouse Fort. The LTC would also increase the predicted levels of impact on the setting of Coalhouse Fort.
- **LTC:** We concur with the assessment that cumulative impact on views north from heritage assets south of the River is difficult to assess without information on the vertical alignment of the highway and that these would be greater were the route to be raised. There would be a cumulative impact on the setting of Coalhouse fort in which views of the LTC would be experienced.

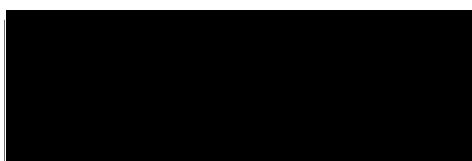
**1.10 Combined CEA- Built Heritage:** The combined CEA (Section 6.0) unsurprisingly concludes that in most respects the combination of effects on built heritage from Tilbury 2, TEC and LTC will be greater than any of the individual projects. However, the individual assessments, on which we have commented above, provide a fuller picture of the likely cumulative effects on the significance of Tilbury Fort, other heritage assets, notwithstanding the paucity of information currently available.



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1.11 Combined CEA - Archaeology: The adverse cumulative effect of the developments on terrestrial archaeology is judged to be comparable to that from the Tilbury 2 proposals, but would extend the area over which buried archaeological remains might be harmed. This would be mitigated through an archaeological mitigation strategy, similar to that for Tilbury 2, although the areas over which these assets might be harmed would be increased. We concur with the CEA assessment on the predicted combined effects on archaeology with the exception that, as we have previously stated, the information gain from archaeological mitigation should not be weighed as a beneficial residual effect since the preferred option would be the physical preservation of those heritage assets.

Yours Faithfully



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