



Ms Alison Webster
Gravesham Borough Council

Direct Dial: 0207 973 3630

Our ref: PL00798295
25 March 2025

Dear Ms Webster

**REF 20250161 - Britannia Refined Metals Ltd, Botany Road, Northfleet,
Gravesend Kent.
REQUEST FOR EIA SCOPING: Wind Turbines X 3**

Thank you for contacting us on 26th February 2025 regarding an EIA scoping opinion in relation to the above site. We treat such requests as pre-application advice. On the basis of the latest information about the proposals, detailed below, we offer the following advice.

Advice

1. The Proposal

The proposal is for Britannia Refined Metals Ltd (BRM) to instal three c.140m tall wind turbines on their site at Gravesend in Kent, with foundations and associated crane pad hard standings. BRM wish to install the turbines to generate clean renewable electricity to help decarbonise its industrial processes at their Gravesend facility.

2. Significance

Development on this site has the potential to impact upon both designated and undesignated heritage assets and their settings (undesignated within the boundary of the proposed development area, and both designated and undesignated in the area around the site.)

Significance can be harmed or lost through alteration or destruction of a heritage asset, or through development within its setting.

In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development of this area might have upon those elements which contribute to the significance of these assets.

Our initial assessment of the Scoping Report shows that designated heritage assets within the near vicinity of the proposed development have been identified, however



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there are others beyond the suggested study area that also need consideration, on both sides of the River (in Essex and Kent).

We draw your attention in particular (but not exclusively), to the following highly designated heritage assets and conservation areas:

- The Hill, Northfleet Conservation Area
- Greenhithe Conservation Area
- Gravesend High Street Conservation Area
- Gravesend Riverside Conservation Area
- West Tilbury Conservation Area; Essex
- Church of St Mary the Virgin, Grade II* listed (NHL 1111628); Essex
- Church of St James, Grade II* listed (NHL 1111541); Essex
- Church of St Botolph, Grade I listed (NHL no 1054093)
- Church of Our Lady of the Assumption, Grade II* listed (NHL no 1081094)
- The Town Pier, Grade II* listed (NHL no 1089004)
- New Tavern Fort and Milton Chantry, scheduled and Grade II* listed (NHL nos 1013658 and 1261173)
- Gravesend Blockhouse, scheduled (NHL no 1005120)
- Tilbury Fort (scheduled) including Grade II* listed Officer's Mess (NHL nos 1021092 and 1375568); Essex
- Tilbury Riverside Station, Grade II* listed (NHL no 1111547); Essex
- Palaeolithic sites near Baker's Hole, scheduled (NHL no 1003557) and Neolithic sites near Ebbsfleet (NHL no 1004206)
- Aspdin's kiln, scheduled (NHL no 1004227)

The Hill, Northfleet Conservation Area with the Church of St Botolph, Grade I listed (NHL no 1054093) and Church of Our Lady of the Assumption, Grade II* listed (NHL no 1081094):

Northfleet Conservation Area is significant as a good example of a typical modest medieval settlement with clusters of mainly two storey historic buildings focussed around a road and a triangular green and two churches, the Grade I listed Church of St Botolph and the Grade II* listed Church of our Lady of Assumption.

Both churches have distinctive and highly visible towers which were designed to be seen as the settlement was approached, though the monumental tower of the Church of our Lady of Assumption is the more visible of the two. The prominence of the towers is therefore a deliberate aspect of their individual significance and makes an important contribution to the skyline of the Northfleet Conservation Area. We would wish to see both views towards the churches and the conservation area where the towers are appreciated, as well as views from the assets themselves within the heritage assessment and LVIA. Long views towards the application site from the south and



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south-east are likely to be impacted by the proposed turbines.

Greenhithe Conservation Area:

Greenhithe Conservation Area covers a historic riverside village which connects to the river through narrow lanes. A narrow high street runs parallel to the river, buildings are set hard on the edge of the footpath creating an intimate linear space. Long views from the river and across the river are important to appreciating the significance of the conservation area, in particular, its intimate scale as traditional village of set against a backdrop of trees and greenery. Views towards the conservation area from the west could be impacted by development and we wish to see these in the LVIA.

Gravesend High Street Conservation Area

The High Street Conservation Area is principally significant as the key commercial spine road which has connected the town to the river landing stage (later The Town Pier) since the medieval period. The Conservation Area is characterised by its length, gently rising ground and tight historic grain with continuous building lines. The Town Pier is the terminus of the High Street and adds historic value as a symbol of Gravesend's popularity in the nineteenth century for day trippers arriving by steamboat.

Collectively, long riverside views contribute to significance as they illustrate the historic associative relationship between Gravesend, Tilbury and the River Thames.

Gravesend Riverside Conservation Area

The Gravesend Riverside Conservation Area, situated at the eastern shore of the town, is primarily significant for its Scheduled fortifications (16th century Gravesend Blockhouse and 18th century New Tavern Fort) and their fields of fire designed into the landscape. These heritage assets are historically significant in the wider riverscape by working in concurrence with other military assets, including Tilbury Fort, to strategically protect the mouth of the Thames from attack.

Milton Chantry, Gravesend's oldest building, symbolises the foundation for settlement stands at the heart of the conservation area.

Long views which show the development site in the context of the riverside conservation area and heritage assets should be assessed as part of the LVIA, including any effects the development might have on the ability to read fields of fire and communication key to the significance of the military assets.

The Town Pier, Grade II* listed (NHL no 1089004)

The Town Pier (Grade II*) has international historic significance as the earliest



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surviving cast iron pleasure pier in the world. Constructed by the civic engineer W.T. Clark in 1831, the structure has historic associative value. The riverscape is a setting key to understanding the significance of the pier as a working pontoon and pleasure building. Long views which show the pier within its riverside context at the heart of Gravesend' shore from the from the east towards the development site will be aid assessment of impact.

Tilbury Fort

Tilbury Fort is England's most spectacular surviving example of a late 17th century coastal fort, designed at a time when artillery had become the dominant feature of warfare and therefore built with massive low earthworks, resilient to the shock of bombardment, instead of stone fortifications. The layout and construction was geared to the optimum siting of cannon at the forward batteries which, in conjunction with batteries on the opposing bank of the Thames, could create a field of fire spanning the estuary providing defence for the river itself and the capital. Its siting and relationship with other defensive structures on the River is therefore a very important part of its significance. Features at Tilbury which represent its later military phases (including the pillbox on the western perimeter of the site), are considered to be an integral part of the fort's history.

We think it likely the Fort would have some intervisibility with the proposed wind turbines and this will need to be explored further, and any impact to its significance clearly identified.

Tilbury Riverside Station

Tilbury Riverside Station was completed in 1924 to designs by Sir Edwin Cooper for the Port of London Authority and replaced an earlier station dating from 1854. The new complex was envisaged as the centre of passenger operations in London and comprise the Riverside Station, Baggage & Customs Hall, Ticket Office, floating Landing Stage and Refreshment rooms.

It is likely that the proposed wind turbines will be visible on views out of the station. The visual effects on the setting of this asset and potential impacts on its significance as a result would need to be understood.

Churches of St Mary the Virgin and St James

Church of St Mary the Virgin, built in 1170, is one of the pilgrim churches along the River Thames, placed at the edge of the marshes, as customary in the settlements in this part of Essex. The Church of St James is similar; it was built on the edge of the marshes, marking the settlement of West Tilbury.



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Aspdins Kiln

The monument includes a mid-19th century downdraught kiln, surviving as upstanding and below-ground remains. The surviving kiln is part of a much larger 19th century cement works which extended along the south bank of the River Thames. It currently sits amongst industrial warehouse buildings, but its setting is due to be improved through a new development, where it would become a focal point within the scheme.

Neolithic and Palaeolithic sites near Ebbsfleet/Bakers Hole

These are important prehistoric archaeological sites that survive as below ground remains. Both are isolated within former quarry and industrial areas, and survive as remnants of relict human landscapes with associated occupation activity. Bakers Hole site is on the Historic England Heritage at Risk Register due to problems with scrub and vegetation growth.

Grays Beach Riverside Park

Additionally, and although outside of Historic England's remit, but in close proximity to the development site and with potential to be affected by it, we would like to note Grays Beach Park, Essex:

An Edwardian public recreation park situated on the Thames riverside designed by A.C. James, Borough Surveyor. It provides evidence of the ethos which gave rise to the provision of green open spaces in urban environments from the end of the nineteenth century; the riverside park maintains its original Edwardian outline. The park comprises three distinct areas: the original planned riverside park including play area, the riverside promenade and beach area, and the former miniature golf course; all areas were linked by paths and steps.

The park is included in the Essex Gardens Trust Inventory of Historic Designed Landscapes of Essex, which makes it a non-designated heritage asset.

3. Setting assessment

Given the scale of the proposed development and the range of designated heritage assets in the area, it is possible that development in this location could be visible from these assets, and as a result may affect their significance.

Dependent on the topography of the proposed development area, heritage assets further afield could also be affected.

We recommend close collaboration of cultural heritage and landscape/visual



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impact assessment, in order to adequately address issues in relation to setting of designated heritage assets. Techniques such as photomontages, computer generated views analysis imagery, and verified views with wireframes are a useful part of understanding visual impacts.

Analysis of key views from within the site boundaries, out of, and across the key site areas in relation to designated heritage sites will be important.

Setting may also form a part of the wider conceptual significance of a heritage asset and how it is experienced, and the report must therefore additionally reflect these more nuanced aspects of setting in order to fully take account of impact.

We note that buried archaeology also has a setting and this needs to be considered equally.

Direct impacts can be both physical and originate from setting issues; we would class indirect impacts as other aspects such as noise, vibration or changes in ground water that may inadvertently affect heritage assets. We do not therefore support the statement in the scoping report that there will be no direct effects on any designated heritage assets.

Further guidance on setting can be found at our website:

(<<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>>). Version 4 of this document is currently under review.

4. Overall approach

An integrated approach to assessment is required for this project that demonstrates an understanding of how all the individual elements of the historic environment come to together to form a 'special place', and which fully analyses how the development proposals may impact upon the specialness of the area, and the assets within it. We think it essential that an integrated *landscape approach* to assessment of heritage assets (both designated and undesignated) is undertaken and translated into the report. The military, industrial, and leisure landscape of the river is particularly pertinent here.

The assessment should also take account of the potential impact which associated development activities (such as construction, servicing, maintenance, and associated traffic) might have upon perceptions, understanding, and appreciation of the heritage assets in the area.

The assessment should also consider the likelihood of alterations to drainage and ground water patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments. This is particularly relevant here where the proposal area is in a transitional zone between land and river, and with SSSI status for



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adjacent ground that includes geological deposits, which could lead to higher levels of preservation of organic archaeological remains. Deeper interventions such as the foundations for the wind turbines, could impact on such deposits.

The Conservation Areas, the majority of the Listed Buildings (Grade II), and other non-designated heritage will also be a matter for the Local Authority. Impacts on these heritage assets will also need to be examined within the heritage baseline assessment and ES chapter.

5. Undesignated heritage assets

We would expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place.

This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff. We recommend a consultation with Essex HER as well as the Kent HER (ref scoping report 8.2) for undesignated heritage records. For example, key early human remains and material culture were encountered during the excavation of Tilbury Docks that are relevant to understand this reach of the Thames and the archaeological potential of the application site. An HER search radius that extends across the Tilbury Docks site would be appropriate.

We strongly recommend that you involve your own conservation and archaeological staff at both Gravesham, and Kent County Council (archaeology), in the development of this assessment. They are well placed to advise on: local historic environment issues and priorities; the nature and design of any required mitigation measures (as decided at a further stage in any project); and opportunities for securing wider benefits for the future conservation and management of heritage assets.

The Historic England SE Science Advisor is also able to comment on geoarchaeology, and scientific techniques of analysis, in support of the KCC Archaeological Officer as required.

The ES should also include a consideration of potential non-designated heritage assets and views on whether these would meet the criteria for national or local designation.

6. Policy

There will be a requirement through planning policy (NPPF and local policy) to avoid and minimise harm to heritage assets, provide clear and convincing justification for any harm, and there will be a presumption in favour of conserving designated assets



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(and their settings where these contribute to their significance).

By following planning policy and guidance we would also additionally expect the project to consider how it may offer enhancement to heritage assets, and how the project might deliver public (heritage) benefit.

Given the importance of the heritage assets within the area, we would expect to provide further advice in due course on this application.

Recommendation

We urge you to address the above issues, and recommend that production of an Environmental Statement should continue in accordance with national and local policy guidance, and following your expert conservation advice. If you have any queries about any of the above, or would like to discuss anything further, please contact me for further advice.

Yours sincerely,

Rebecca Lambert
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cc:County Archaeological Officer

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List of information on which the above advice is based:

Request for scoping opinion from Gravesham BC, dated 26th February 2025

BRM draft Scoping Report; SLR Consulting Ltd, dated 3rd February 2025



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