



Historic England

Ms Rebecca Harrison
Gravesham Borough Council
Civic Centre
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Direct Dial: 01223 582710

Our ref: P01572104

9 February 2024

Dear Ms Harrison

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**EASTCOURT MARSHES ELECTRICITY DISTRIBUTION SITE MARK LANE
GRAVESEND KENT DA12 2HN
Application No. 20231313**

Thank you for your letter of 30 January 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England can confirm we have given advice to the applicant at the pre-application stage with regards to the options appraisal and the design approach

Summary

The project proposes the construction of a new cable tunnel beneath the River Thames between Gravesend and Tilbury to provide additional electricity transmission capacity. Above-ground infrastructure will include a new Cable Sealing End compound, head house building, and associated electricity infrastructure including overhead gantry structures.

Historic England Advice

Significance and Impact

As set out in the Environment Statement (Vol III, Chapter 9 Historic Environment - Gravesend: dated December 2023) the nearest designated heritage assets to the development are a small number of Grade II listed vernacular dwellings along Lower



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Higham Road in Chalk.

These are essentially older dwellings, cottages and farmsteads that pre-existed the widespread development in this area in the late C20. For example, Filborough Farmhouse and barns to the east of the study area. These buildings represent and reflect the pre-industrial rural land use. A range of non-designated heritage assets have been recorded from all periods, and include the Milton Rifle range to the east of the development area.

The potential harm here would be to the significance of the designated heritage assets through changes to their setting. In this case changes to the existing pylon array, and from new permanent structures at the substation and tunnel head. There will also be construction impacts during the development with the potential to recover archaeological material.

We also note construction impacts in terms of changes to the setting of the designated heritage assets but accept these will be temporary for the duration of the project.

Policy

In policy terms we note the application is being considered under both National Planning Statement (EN_1) and the NPPF

Broadly speaking the avoidance of conflicts between the conservation of a heritage asset's and the impact of an application are at the heart of the policies of the NPS and are mirrored in the policies of both EN_1 (e.g. 5.9.22) and NPPF (Para 201). This includes the contribution made to the significance of a heritage asset from its setting.

In all cases where there is harm, whether or not this is substantial or less than substantial, the policy is still clear that 'any' harm requires a clear and convincing justification (EN_1 5.9.26 and NPPF 206) and that harm will need to be weighed appropriately by the decision maker against the public benefits of the proposal (EN_1 5.9.30 and NPPF 208). This is mindful that 'great weight' needs to be given to a designated heritage asset's conservation, and that the more important the asset the greater the weight should be (EN_1 5.9.25 and NPPF 205).

In relation to non-designate heritage assets planning policy (EN_1 Para 5.9.7 and NPPF 209) direct the decision maker to consider the impacts on non-designated heritage assets and where an application will directly affect non-designated heritage assets, a balanced judgement will be required with regards to harm and any loss



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significance. (see EN_1 5.9.31 and NPPF 209)

Historic England's Position

Historic England have been in pre-application discussion with the applicant and confirm we have been fully consulted prior to this application for planning permission. We have no in principle objection to the scheme and we have supported the tunnel option.

We acknowledge the study area was limited in scope, but we are aware a substation which includes sealing end compounds and pylons already exist at this location.

As set out above we are however aware the development would bring several changes to the existing substation and would add new permanent structures at the tunnel head. There will also be construction impacts during the development.

We can also confirm that heritage issues have also been considered at all stages of the scheme, and this is documented in the ES provided with the application. We support the provision of an Environmental Statement (ES) to support the planning application and can confirm that the ES has not identified any significant effects for either designated or non-designated heritage assets from the permeant changes. We broadly agree with the conclusions and do not have any additional comments.

We agree with the applicant that the development has the potential to have an adverse effect during the development phase, however the final operations phase of the development will only have a relatively modest overall change to the setting of those designated heritage assets. Given the affected assets are all Grade II listed buildings we would therefore defer to your conservation advisors.

We note and confirm the construction effects will be temporary for the duration of the project and we have not considered these issues further.

The proposal does however have the potential for unknown archaeology or non-designated heritage assets to be present from the footprint of the tunnel head and compound. We note the ES outlines an approach for dealing with both non-designated heritage and archaeological matters and we would defer to your archaeological advisors in that regard.

The deep excavation for the tunnel will also likely interact with important Thames side palaeoenvironmental deposits (ref: ES Volume VI Appendix 9.2: Desk-Based Geo-



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archaeological Deposit Modelling Report). These deposits have relative significance in term of the valuable information they contain, and, in this context, we would consider them to be of equivalence to a non-designated heritage asset.

The application has made provision for managing and investigation the deeper Thames side deposits. This includes the provision of a deposit model, and an outline WSI for the geo-archaeological works. We reviewed the Geo-archaeological WSI at the pre-application stage and confirm our comments have been taken on board and incorporated in the document.

We therefore confirm our view that this would be suitable to underpin mitigation against likely impacts and we support this approach.

We recommend the local planning authority take advice from their archaeological advisors with regards to non-designated and archaeological matters. We also recommend a suitable condition or other mechanism is applied to the permission to secure the programme of archaeological and geoarchaeological works. This would also address policy considerations in both EN-1 and NPPF for non-designated heritage assets.

Recommendation

Historic England has no objection to the application on heritage grounds. There are however some safeguards outlined in our advice that need to be addressed in order for the application to meet planning policy requirements (See paragraphs 5.9.30 and 31 of NPS EN_1, and 208 and 209 of the NPPF), specifically with regards to the mechanism for securing a programme of archaeological and geo-archaeological work.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely

Will Fletcher

Development Advice Team Leader

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