



Historic England

EAST OF ENGLAND OFFICE

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BY EMAIL

Our ref: PL00793582
Your ref: Scoping

Telephone 01223 582710
31st July 2023

**Request for Scoping Opinion regarding Environmental Impact Assessment.
Town and Country Planning (Environmental Impact Assessment) (England and
Wales) Regulations 1999, for the TKRE Cable Tunnel Replacement Project
Tillbury (Essex) to Grain (Kent)**

Dear Rebecca

Thank you for your e-mail dated 19th July 2023 with a formal request for a scoping opinion in accordance with Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

Historic England, as the governments lead advisors on the historic environment would like to offer our comments on this proposal, taking into consideration the information provided by the applicant.

This is the TKRE Cable Tunnel Replacement Project Environmental Screening Report (June 2022)

Historic England Advice

Our primary remit would be the impact of the development upon the significance of designated assets either through physical impacts or through a development within their setting. This would be either highly graded listed buildings or scheduled monuments.

We confirm that the report is detailed, thorough and adequate for the purposes of this assessment, and we acknowledge there are limited numbers of designated heritage assets affected. We also confirm we broadly support the assessment, the list of the key receptors, cumulative impacts and summary of effects as set out in the Historic Environment section.



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We are however mindful of the potential for non-designated heritage assets and archaeological matters within the red line boundary. Specifically, in this case it is the likelihood of archaeological and palaeo environmental remains associated with the Thames foreshore and the former marshlands.

We note this potential has been identified in the report but in our view these deposits should be ascribed a high-value because of the potential provide information on a range of indices, specifically things like climate change, the evolution of the Thames as well as human interaction with that landscape. Although this would not change the need for further assessment and the need for an appropriate approach to mitigation, we do consider the values and assessment of impacts are amended to reflect the significance of these deposits.

Overall, we agree that the historic environment represents a potentially significant issue in EIA terms. We note the applicant has confirmed the historic environment would be fully assessed which is appropriate and which we would support.

Please note however that the setting of heritage assets is not just restricted to visual impacts and other factors would also need to be considered. Noise, light, traffic and landscape assessments for example. Cultural heritage assessment would also need to be cross-referenced against other studies and impacts recorded accordingly

We strongly recommend that the applicant involve the county's specialist advisers on archaeological matters. We recognise that they are best placed to provide advice on non-designated heritage assets and to give advice on how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment. They should also be asked to advise on mitigation and on any opportunities for securing wider benefits for the future conservation and management of heritage assets.

Likewise, the LPA's Conservation Officer will need to be consulted in relation to the Grade II listed buildings. Advice on these assets is broadly outside of the remit of Historic England.

Any assessment would also need to be carried out in accordance with established policy and guidance, including the National Policy Statements and National Planning Policy Framework, Planning Practice Guidance on heritage and we highly recommend as stated above use is made of the advice set out in GPA3 when considered the setting of heritage assets.

Whilst standardised EIA matrices are considered in some planning practices to be useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems.

Historic England therefore recommends that these should be seen as material only to support a clearly expressed and non-technical narrative argument of harm and benefit, which is set out within the cultural heritage chapter. The ES should therefore address ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.

We would also be looking for appropriate mitigation for any impacts and this could include actions that enhance the situation of any affected designate heritage assets or would provide an improved understanding of heritage matters.

Recommendation

We support the approach taken to compile this report and agree that the historic environment is an important consideration. We recommend it is scoped into any further assessment in order to fully address the impact on the historic environment.

If you have any queries about any of the above, or would like to discuss anything further, please contact me

Yours sincerely,

Will Fletcher

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