

## ENGLISH HERITAGE

Mr Alan Ridley,  
EIA and Land Rights Advisor,  
Planning Inspectorate,  
3/18, Eagle Wing,  
Temple Quay House,  
2, The Square,  
Bristol,  
BS1 6PN

Direct Tel: 01904 601988

Direct Fax: 01904 601997

Our Ref: CHA 5342/0010

RECEIVED

24 DEC 2012

20 December 2012

Dear Mr Ridley,

INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
REGULATIONS 2009 SI2263 (as amended) (the EIA Regulations),  
PROPOSED WHITE ROSE CARBON CAPTURE AND STORAGE PROJECT (the project)  
PROPOSAL BY CAPTURE POWER LIMITED (the applicant),  
ENVIRONMENTAL IMPACT ASSESSMENT (EIA) – SCOPING REPORT.

Thank you for your letter of 10<sup>th</sup> December 2012 consulting English Heritage about the above EIA Scoping Report.

While English Heritage broadly welcomes measures to mitigate and adapt to the effects of climate change, we are aware that such developments have the potential to harm the significance of heritage assets and their settings. With this in mind English Heritage has drawn up guidance for planners and developers on climate change and renewable energy technologies, including *Wind Energy and the Historic Environment* available at [www.helm.org.uk](http://www.helm.org.uk).

To assist in the implementation of national planning policy<sup>1</sup> English Heritage has produced guidance on managing change within the settings of heritage assets. The guidance offers a framework for the consideration of setting<sup>2</sup>, applicable to designated and non-designated heritage assets, and for assessing the implications of development affecting the setting of a heritage asset. It provides the principal English Heritage advice on the issue of setting and should be used in conjunction with other relevant guidance. The *Setting of Heritage Assets* is available at [www.english-heritage.org.uk/publications/setting-heritage-assets/](http://www.english-heritage.org.uk/publications/setting-heritage-assets/).

Our initial review indicates that the proposed development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area. In line

<sup>1</sup> As set out in the National Planning Policy Framework together with the historic environment provisions of the National Policy Statements for nationally significant infrastructure projects.

<sup>2</sup> Setting of a heritage asset defined as "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral" NPPF (Annex 2).

with the National Planning Policy Framework (NPPF, paragraph 128), we would expect the Environmental Statement to describe the significance of any heritage assets affected, including any contribution made by their setting within an area up to 5 km from the application site. This is particularly necessary for any heritage assets which have a presence in the landscape, such as church towers and spires. The level of detail should be proportionate to the assets' importance and sufficient to understand the potential impact of the proposal on their significance.

We would draw your attention, in particular, to the following designated heritage assets:

- Scheduled Monuments
  - Drax Priory (1016857)
  - Drax Castle Hill (NHLE 1017455)
  - Scurff Hall NHLE 1017485)
  - Barlow Hall medieval settlement and early post medieval garden earthworks. (NHLE 1018403)
  
- Listed Buildings, specifically any churches which have 'presence' in the landscape.

We recommend you contact the local authority Historic Environment Record for further information on designated heritage assets, and including the relevant local authority for the location of conservation areas.

We reiterate that this is **not** an exhaustive list and other heritage assets may also be identified as part of the assessment process which would require appropriate consideration. In particular, we would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. We do not agree with the Scoping Report that the Outer Study Area should be set at 1km from the boundary of the Inner Study Area (para 6.7.2), but (as stated above) should instead consider an area 5km around the application site. Methodologies that can help to inform the extent of the study area include a Visual Impact Assessment and the production of a Zone of Theoretical Visibility (ZTV) in line with current guidance<sup>3</sup>. The ZTV of the proposed development should initially be based on topographical data before the impact of existing trees and buildings etc. on lines of sight is assessed.

Given the potential heights of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from this site itself.

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<sup>3</sup> The Landscape Institute/Institute of Environmental Management & Assessment 'Guidelines for Landscape and Visual Impact Assessment', Second Edition

We would also expect the Environmental Statement to consider the potential impacts which the proposals might have upon those heritage assets which are not designated. The NPPF defines a heritage asset as “a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest”. This includes designated heritage assets and assets identified by the local planning authority (including local listing). This information is available via the local authority Historic Environment Record ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)) and relevant local authority staff.

We recommend that you involve the Conservation Officer of Selby District Council and the archaeological staff at North Yorkshire County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

In general terms, English Heritage advises that a number of considerations will need to be taken into account when the proposals are assessed. This includes consideration of the impact of ancillary infrastructure, such as tracks and grid connections:

- The potential impact upon the historic character of the landscape, including landscape features which positively contribute to character.
- Direct impacts on heritage assets (buildings, monuments, sites, places, areas, landscapes), whether designated or not.
- Impacts on the settings of heritage assets since elements of setting can contribute to the significance of a heritage asset. An assessment of the impact on setting will be proportionate to the significance of the asset and the degree to which the proposed changes enhance or detract from its significance and the ability to appreciate the asset. In the consideration of setting a variety of views may make a contribution to significance to varying degrees. These can include long-distance views as well as the inter-visibility between heritage assets or between heritage assets and natural features. For further advice see *The Setting of Heritage Assets*.
- The potential for archaeological remains.
- Effects on landscape amenity from public and private land.
- The cumulative impacts of the proposal.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

Consideration should also be given to undertaking a practical exercise with either a crane or balloons erected at the height of the proposed structures so that all parties are to better able to understand the landscape impact of the proposals. We have been engaged in other major developments where this technique has been used and it greatly assisted the

identification of the key issues and impacts from which the resulting EIA was able to focus its assessment.

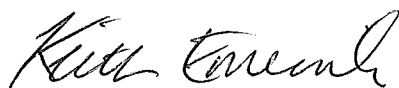
The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where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

We have the following comments to make regarding the content of the Scoping Report:

- A key issue is the future management of the Scheduled Monument of Drax Augustinian Priory, the mitigation of impact on its immediate setting and the requirement for sensitive landscaping,
- English Heritage has advised on past evaluations connected with the proposed bio-mass site on the land immediately south west of the Scheduled site, and although we are largely content with the results of those interventions and their relationship to the new proposals, further evaluation will be required,
- On the basis of the report prepared by Capture Power, further evaluations will be required for the area to the east of that already evaluated, in addition to evaluations required for the area identified as 'construction laydown'. This term and its implications needs to be carefully defined.
- Landscaping proposals for the

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

Yours sincerely



Do not hesitate to contact me should you wish to discuss any of the above.

Yours sincerely

Keith Emerick  
Inspector of Ancient Monuments,  
North Yorkshire and the City of York,  
National Planning and Conservation Team

E-mail: [keith.emerick@english-heritage.org.uk](mailto:keith.emerick@english-heritage.org.uk)

cc. Lucie Hawkins, Development Management Archaeologist, NYCC.