

NORTH YORKSHIRE COUNTY COUNCIL LANDSCAPE SUMMARY FOR 8TH JULY DEADLINE

1.0 Summary

- 1.1 The concerns of North Yorkshire County Council's (NYCC) and Selby District Council (SDC) about potential landscape impact have been expressed at pre-submission consultation stages, in the joint Local Impact Report, in the responses to the 1st Written Questions, and at the Hearing on 1st July 2015.
- 1.2 It is the view of NYCC/SDC that information provided in the Environmental Statement (and through subsequent dialogue) has not dispelled these concerns and NYCC/SDC considers that there are residual impacts which are not capable of being mitigated on site due to the restricted nature of the site. Appropriate off-site landscape works are therefore considered necessary to mitigate the residual impacts, and to offset those that are not capable of mitigation and are therefore sought. This submission outlines the basis for this.

2.0 Policy Framework

- 2.1 At the Issue Specific Hearing on 1 July 2015 consideration was given to National Policy Statement for Energy (EN 1), with specific attention drawn to paragraphs 5.9.5 (Applicant's Assessment), 5.9.8 (IPC decision making – Landscape impact) and 5.9.23 (Mitigation).
- 2.2 NYCC/SDC also considers that EN1 paragraphs 4.1.3 (General points, including need for measures to avoid, reduce or compensate for adverse effects), 5.8.13 (Heritage Assets), 5.9.15 – 17 (Development outside Designated Areas), and 5.9.18 and 5.9.20 (Visual Impact) are relevant to this application.
- 2.3 Para 5.9.5 (Applicants assessment) (EN 1) indicates that guidance is available on landscape and visual assessments, and it has been agreed with the applicant that the Landscape Institute/Institute of Environment Management and Assessment Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd edition (2013) is the appropriate methodology.
- 2.4 Whilst the guidelines are not prescriptive, they aim to encourage higher standards, clarity, proportionality and good practice generally. In this context NYCC/SDC have concerns regarding how the applicant has interpreted landscape matters.
- 2.5 Specifically, paragraphs 5.12-5.18 of GLVIA (3rd edition) emphasise the need for a critical review of existing landscape character assessments (LCAs) to see how useful they might be in informing the LVIA process; whether they need to be reviewed and interpreted; whether the scale is appropriate etc. It points out that even when there

are existing LCAs, 'it is still likely that it will be necessary to carry out specific and more detailed surveys of the site itself and perhaps its immediate setting or surroundings'.

3.0 Defining the Issues

- 3.1 The Drax Priory/Drax Abbey Farm 'island' lies immediately adjacent to the proposed raised platform and power station development with only the diverted PROW providing a linear viewpoint in between (Figure 6). Appropriate mitigation would ideally include the retention of an open floodplain landscape buffer but there is no opportunity for this within the site. NYCC/SDC believe, however, that there are opportunities for off-site mitigation of the impact of the project during its construction and operation.
- 3.2 A key issue to NYCC/SDC in landscape terms is therefore the loss of the existing open floodplain buffer which at present gives the Drax Priory/Drax Abbey Farm/former country house historic landscape site its legibility as an 'island'. The relationship between the former Augustinian Priory and its topography and natural features is mentioned a number of times in the Scheduled Monument listing description (see Appendix Figure 1 showing the site in 1853 with the WRCCS site 'subject to flood' and Figure 2 showing the an aerial photo of the site with the EA zone 2 floodplain and proposed power station superimposed, with SM list entry extracts below). The above-ground features associated with the former Drax Abbey country house and farm are the most visible features on this 'island' in the present day (see Appendix Figures 3a showing the 1890 1st edition OS map and Figure 3b with areas affected by development added, also Figure 4: 1958 map showing Drax Abbey house and Figure 5 showing images of the house). From the landscape perspective the character of the Drax Priory/Drax Abbey Farm site is the sum of all its past and present attributes as perceived by people, including their individual associations, knowledge and memories, which the designated heritage assets and more recent land uses all make a contribution to.
- 3.3 NYCC/SDC acknowledge the role of Historic England in the planning process., However, NYCC/SDC have a different role in assessing landscape impact. Guidance issued by Historic England is useful to NYCC/SDC in this role when considering the wider landscape impact of the proposed development. NYCC/SDC have assessed the proposed development using HE's guidance from the Authorities' own perspective.
- 3.4 Historic England's current guidance (The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 March 2015) makes it clear on page 4 under 'Cumulative change' that where significance has already been compromised by unsympathetic development affecting its setting, to accord with NPPF policies, consideration *still* needs to be given to whether additional change will further detract from the significance. In this case, although Historic England has not judged the impact on the scheduled monument with its buried archaeology to be

significant, it is the view of NYCC/SDC that there will be substantial negative change which will further sever the link between the historic landscape and its original setting. The Historic England guidance, under 'Buried assets and setting' on page 4 advises that buried remains may "retain a presence in the landscape and, like other heritage assets, have a setting". There may be scope for some positive change which would enhance the significance of the asset to help offset the adverse impact through conservation, restoration, enhancement of views etc. The Historic England advice states under 'Appreciating setting' that significance is not dependent on the numbers of people visiting a heritage asset, but that "the potential for appreciation of significance may increase once it is interpreted or mediated in some way" or if access becomes possible. These are also possible through a future off-site landscape strategy and associated works.

- 3.5 Another key issue is that in many views, particularly from the north and east, the proposed power station will intrude into the open landscape of the River Ouse floodplain and will contribute to the incremental industrialisation of the wider landscape. Locally, it will result in an additional adverse visual impact on the amenity of recreational user of PROWs, including the Trans Pennine Trail, and on local minor roads, as well as on some residential properties. NYCC considers that the magnitude and significance of the visual impact on selected viewpoints may have been under-estimated as the findings do not differ much from the assessment of the impact of the former Ouse Renewable Energy Project where the main plant was very much smaller than the WRCCS development (see Appendix Figure 6). There may also be an under-estimate of impact because of the cumulative effects of sequential views from linear viewpoints and too much reliance on summer vegetation, and on backgrounding by the existing power station when in some views, illustrated by viewpoint 1 (Barmby Barrage), viewpoint 2 (Trans Pennine Trail) and viewpoint 14 (Pear Tree Avenue). The development would be seen as both dissimilar and geographically separated, with its magnitude in relation to the existing power station increased by proximity.

4.0 Interpretation of Policy

- 4.1 NYCC/SDC consider that the Environmental Statement does not provide sufficient assessment at the more detailed scale, and therefore considers that the conclusions from the evaluation of impact on landscape character are flawed. The setting of the Drax Priory/Drax Abbey Farm site depends on the retention of a flood plain with legibility as an 'island'. NYCC/SDC do not consider that the LVIA has picked up this issue due to not refining the LCA.
- 4.2 NYCC/SDC's assessment is that adverse landscape character effects will occur which will not be capable of being fully mitigated within the site. There is also an amenity issue because of the diversion of PROW 35.47/6/1 from which the Drax Priory/Drax Abbey Farm 'island' can currently be viewed across open floodplain farmland. The view of NYCC/SDC is based on detailed assessment drawn from site visits, Environment Agency floodplain evidence, old map evidence, and Historic

England scheduled monument listing description. Elsewhere the impact on views across the open floodplain of the River Ouse may have been under-estimated.

- 4.3 NYCC/SDC's conclusion (as expressed in its LIR) is that there are clearly adverse effects on the landscape that have not been adequately assessed in the LVIA, and that these need to be addressed through the application process.

EN1- Overarching National Policy Statement for Energy

- 4.4 Para 5.9.8 (Landscape Impact) accepts that virtually all nationally significant energy infrastructure projects will have effects on the landscape. The policy does, however, support assessment of local landscape character and quality and its capacity to accommodate change and expects that harm will be minimised and reasonable mitigation will be provided where possible and appropriate. This does not exclude off-site works (see comments in relation to para 5.9.23 below).
- 4.5 Para 5.9.15-16 (Scale and construction impacts) It is acknowledged that the national benefits of the project may outweigh the adverse impact on the local and wider landscape. NYCC/SDC, however, remain of the view that there will be both operational impacts, and substantial construction impacts over a potentially extended period. NYCC/SDC consider that the 5 year anticipated length and separate, but associated, land raising and CCS pipeline construction operations must also be borne in mind, which may be sequential, consecutive or overlapping. The residual adverse landscape impacts during the operational period are not likely to be reversed within any known timescale.
- 4.6 Para 5.9.17 (Design) NYCC/SDC consider that the landscape character assessment in the Environmental Statement has been broad and not project-specific, with inadequate attention paid to local landscape sensitivity, and the constrained site and design of the development has not allowed for adequate mitigation of impacts on local landscape character. The intention of this paragraph of EN-1 is not to exclude mitigation through off-site works.
- 4.7 Para 5.9.18 (Visual impact). Landscape is concerned with the relationships between people and place, and includes perceptual and experiential aspects as well as purely visual. Noise and disturbance are also part of the landscape impact on receptors around the WRCCS site. Even if the benefits of the WRCCS are considered to outweigh the landscape impacts, overall there is potential for reducing perceptions of impact, as well as screening views, through utilising opportunities available off-site.
- 4.8 Para 5.9.23 (Landscape and visual mitigation) advises that off-site landscaping may be appropriate to mitigate the impact on the landscape. NYCC/SDC are of the view that the applicant has not fully considered the need for off-site mitigation works, despite the acknowledgement that on-site mitigation can only be effective in mitigating views of lower-level infrastructure within the Order limits.

- 4.9 Even with an acceptable Landscape and Biodiversity Framework Plan for the application site, given the constrained space generally within the site boundaries, and in particular the change in levels adjacent to the subtly raised topography of the wider Drax Priory/Drax Abbey Farm 'island', it is not anticipated that NYCC/SDC's concerns can be alleviated without additional off site mitigation. NYCC/SDC remain of the view that off-site mitigation is needed as set out in the LIR.
- 4.10 Based on the evidence from our assessment of the landscape effects, an area of search for off-site mitigation has been identified, and is shown in Appendix Figure 7. This includes the Drax Priory/Drax Abbey Farm site and immediate setting of the WRCCS development, as well as key viewpoints from sensitive locations in the wider landscape. It also links with green infrastructure corridors of regional and local significance which will add to the value of proposed on-site mitigation. There are opportunities within this area of search to strengthen landscape character and to increase the screening effects of trees in the landscape.
- 4.11 An example is given in the policy of filling in gaps in existing tree and hedge lines to mitigate the impact when viewed from a more distant vista. This is only an example and NYCC/SDC feel that the applicant's interpretation of this paragraph is very prescriptive and does not allow for other solutions. NYCC/SDC feel that their interpretation and suggested proposals for off-site mitigation are supported in policy terms. In this case it is suggested that the existing trees associated with the former country house already provide partial screening to views of the site and also enhance the local landscape in the vicinity of the public footpath. NYCC/SDC consider that there may be potential in the context of this policy to reinforce this benefit and to improve the landscape experience in the area (particularly for users of the public footpath), through restoration of the former 'designed' landscape (subject to survey and research). This will be of increased value in the context of the urbanising effect of the development close to the project site boundary and the footpath.
- 4.12 Para 5.10.20 (Green infrastructure mitigation) supports improvement of the green infrastructure network in the vicinity of the site. The site lies within the River Ouse corridor of regional significance and is directly opposite the managed Derwent Valley project. Figure 7 shows some of the existing initiatives and projects in the vicinity and others are mentioned in the LIR.
- 4.13 Para 5.8.13 (Historic environment) mentions the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution they can make to sustainable communities and economic vitality. These would include the remnants of the Drax Priory and the former country house and its setting. The mitigation being sought will help to offset the loss of the open floodplain setting of the Drax Priory/Drax Abbey Farm site.

5.0 Mitigation Required

- 5.1 NYCC remains of the view that off-site mitigation/compensation is needed as set out in the LIR.
- 5.2 Following discussions with the applicant that have taken place to date, consideration has been given to the landscape opportunities that could be available as part of the off-site ecological mitigation at Barlow Common and Skerne wetlands. While the opportunities at these sites are welcomed from an ecological perspective, they are considered to provide only limited opportunity for effective landscape mitigation, in part due to their location some distance from the application site. NYCC/SDC do not therefore consider this approach is to be suitable for mitigating/compensating the landscape effects.
- 5.3 NYCC/SDC consider that further discussions with the Applicant about the need for further off-site mitigation as suggested above would assist, to ensure that the remaining landscape character in this area can be strengthened. The aim would be to carry out works within the wider landscape to maximise reductions in visual impact whilst strengthening existing landscape character. NYCC/SDC consider that there are a number of ways in which off-site mitigation can be secured.
- 5.5 A current project being considered from the list of other potential projects in the LIR is based around the Drax Priory/Drax Abbey Farm site for which further survey and research and a conservation management plan is initially needed. The project could potentially be delivered through an extension to the existing Yorkshire Gardens Trust Selby Research and Recording Project, with input from Historic England. For the wider area, a steering group is already in place for the Selby Local Nature Partnership Priority Area within which the WRCCS site sits. The wider area of search for the Landscape Project also overlaps with the existing Lower Derwent Valley Project and generally the opportunity to work with other partners including landowners, the YWT, the EA and local IDB could increase the potential benefits of the s106 contribution.
- 5.5 NYCC/SDC feel that a S106 Agreement would be an appropriate mechanism to deliver the off-site landscape mitigation.

APPENDIX

Figure 1 The Drax Priory/Drax Abbey (country house and farm) 'island' in 1853, showing the contrast with open farmland subject to flooding

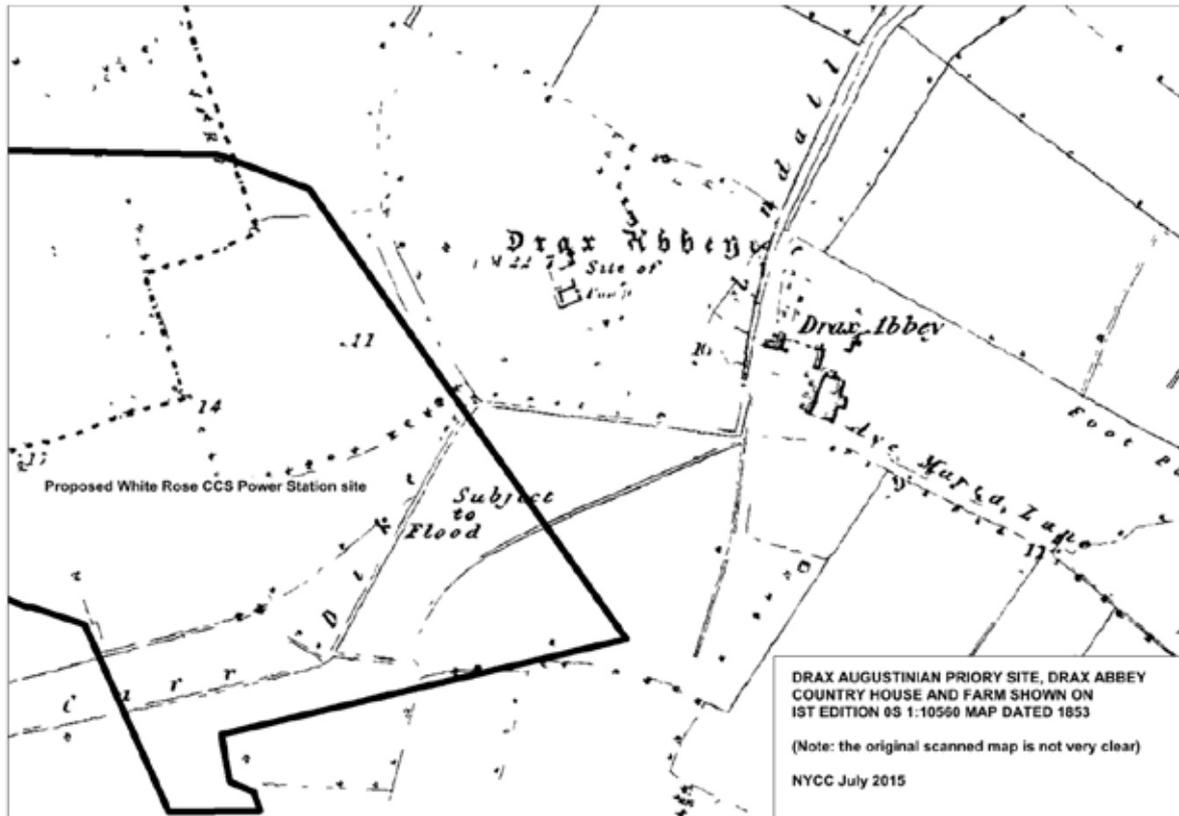
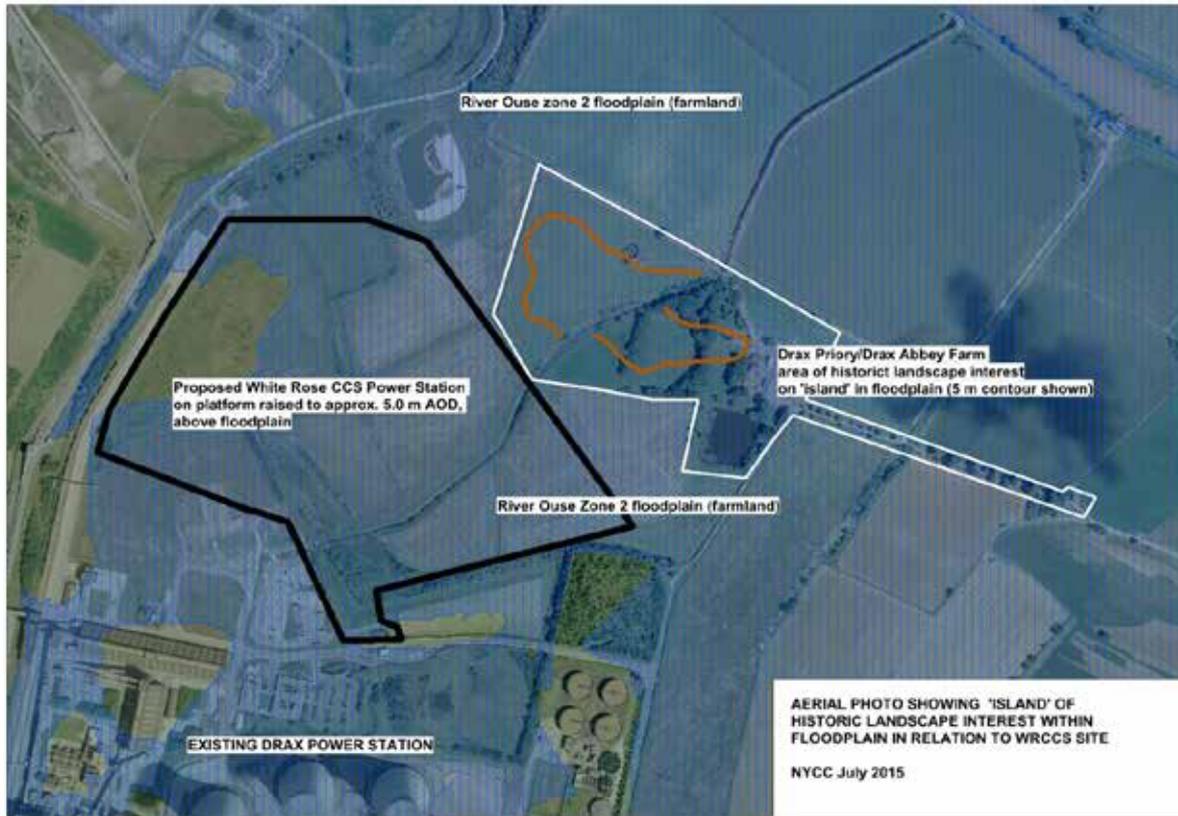


Figure 2 The Drax Priory/Drax Abbey Farm 'island' shown on aerial photo (c2000) with current zone 2 floodplain superimposed, showing how its open buffer will be lost.



EXTRACTS FROM DRAX AUGUSTINIAN SCHEDULED MONUMENT LIST ENTRY

“Significant buried archaeological remains of Drax Augustinian priory are considered to survive across the **island** of high ground.”

“The monument includes buried and earthwork remains of an Augustinian priory sited on an **island** of high ground which is now partly occupied by Drax Abbey Farm, just south of the River Ouse.”

“William, who was a major landowner and held the manor of Drax, granted an **island** in the marsh known as Hallington and Middleholme for a priory of Augustinian canons dedicated to St Nicholas.”

“Drainage works have converted the marsh into farmland, with the original **island** granted to the Augustinians now standing around 3m to 4m above the surrounding area. This high ground is orientated WNW to ESE and is at most 7m above sea level, typically only 4-5m. The priory is thought to have occupied all of this **island**, with buildings located within a precinct enclosure.”

Figure 3a 1st edition 1:2500 map dated 1890 showing Drax Abbey country house and associated landscape features, some of which are still present or could be restored

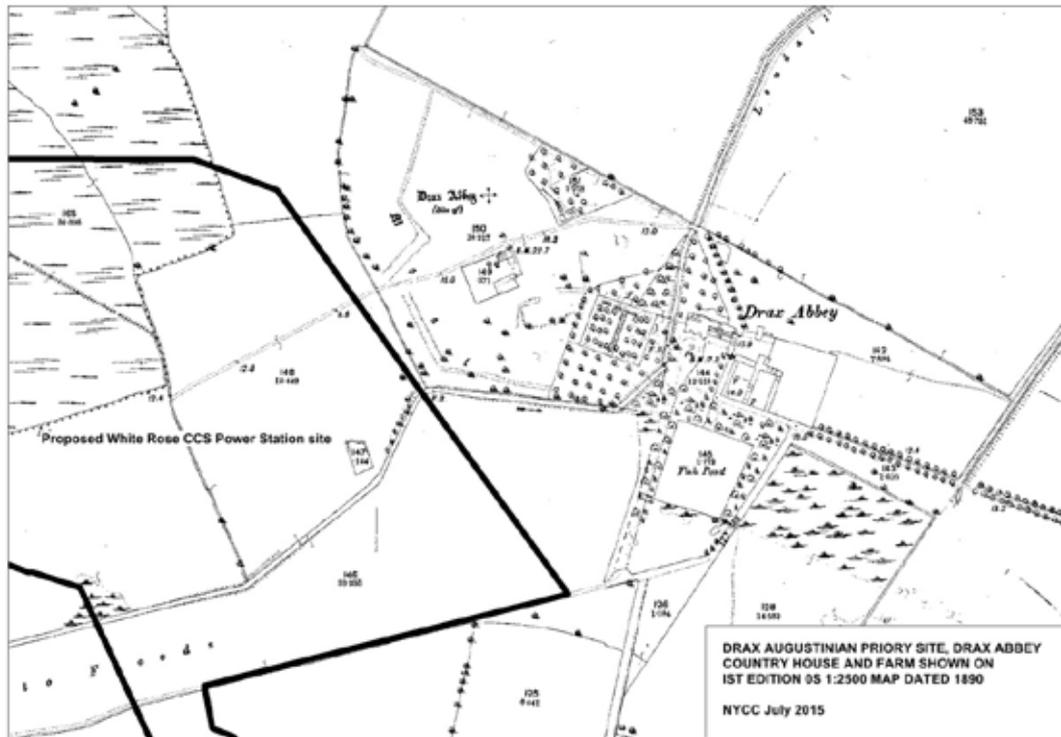


Figure 3b 1st edition 1:2500 map dated 1890 with proposed WRCCS power station and temporary construction and laydown areas superimposed showing their proximity to Drax Priory/Drax Abbey country house

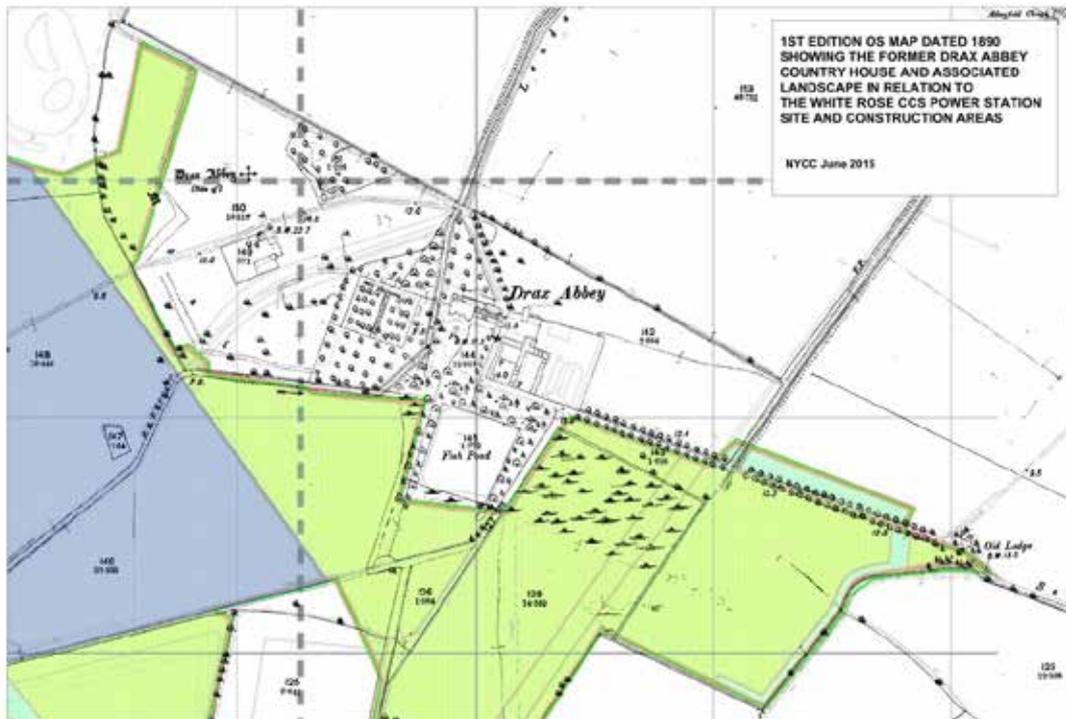


Figure 4 Epoch 5 1:10,000 scale map dated 1958 showing Drax Abbey country house still within open landscape

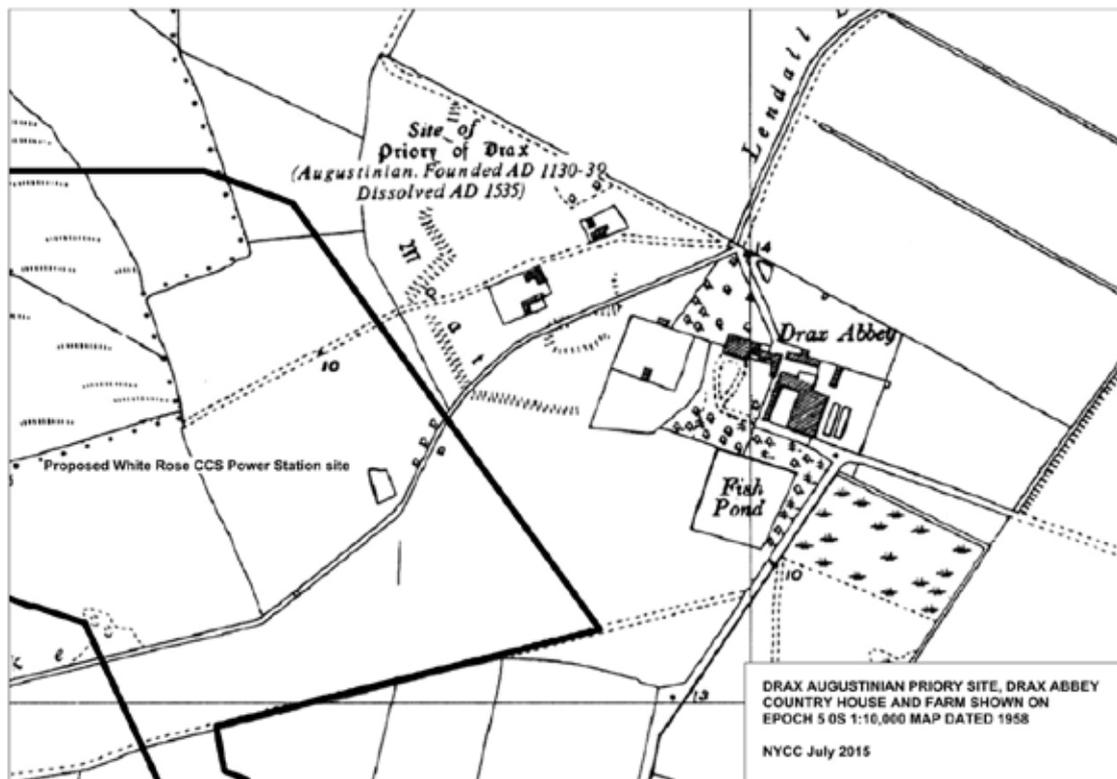


Figure 5 Images of the former Drax Abbey country house (of local landscape importance rather than of archaeological significance)



View of Drax Abbey c.1930, framed by young/mature trees with the lake (still existing) and landing stage for small boats

(From <http://www.drakesfamily2.webspace.virginmedia.com/id64.htm>)



Photograph from Lost Heritage website showing Drax Abbey country house c 1950 (demolished in the 1950s)(See http://www.lostheritage.org.uk/graphics/houses/lh_yorkshire_draxabbey_fs.jpg)

Figure 6: Extent of currently proposed White Rose CCS development (grey area) with former Ouse Renewable Energy Plant main plant area (red outline) showing disparity in scale, not taken sufficiently into account in the LVIA.

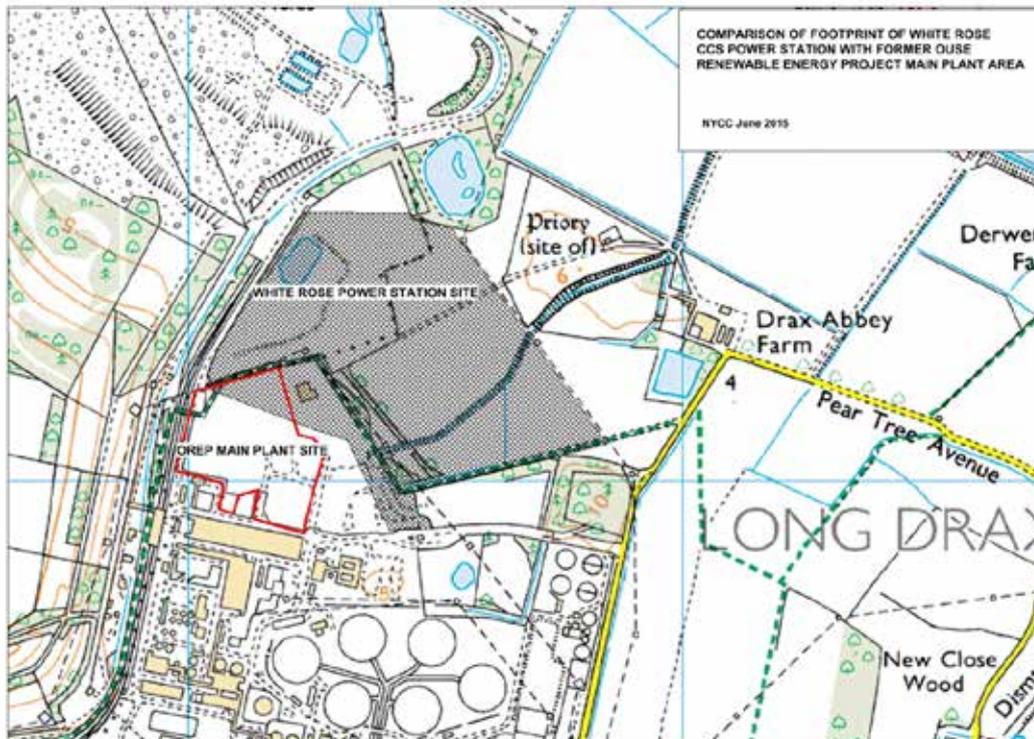


Figure 7: Area of focus for mitigation and offsetting of landscape impacts, subject to further appraisal and discussion.

This area, containing the Drax Priory/Drax Abbey 'island' is also a key nodal point in the regional green infrastructure network (River Ouse/River Derwent) which the WRCCS development intrudes into, and has been identified as a priority area in the Local Nature Partnership. Off-site mitigation could help compensate for lost floodplain, reduce visual impact and strengthen green infrastructure links.

