

## **Appendix 16B: NYCC Consultation**



**APPENDIX 16B: NYCC CONSULTATION**

This appendix sets out the comments received with regard to landscape and visual amenity following consultation on the Preliminary Environmental Information (PEI) Report and, subsequently, the draft Environmental Statement with North Yorkshire County Council and Selby District Council (as a joint response), and how these comments have been addressed by the landscape and visual impact assessment (LVIA).

Summary of consultee comments	Summary of response/ how comments have been addressed
<b>STAGE 2 CONSULTATION COMMENTS</b>	
<b>PEI Report Volume III Appendix 16A ‘Landscape and Visual Impact Assessment Methodology’</b>	
<p>Whilst the draft LVIA follows accepted guidance, the Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3) do allow considerable scope for using professional judgement. Considering the scale of the structures involved, the iconic nature of the existing coal-fired power station as part of a group visible from long distances, and the changes to the local scene this is unlikely to be a standard assessment. There could be some significant beneficial effects as well as adverse.</p>	<p>Noted.</p>
<p>Because there are different scenarios, involving the presence, demolition and then absence of the existing power station as well as the proposed development, the approach to assessment in the draft LVIA is necessarily fairly complex, but the results are then not always easy to follow. The Non-Technical Summary (NTS) is however perhaps too simplistic.</p>	<p>The approach to assessment with reference to the presence or absence of the existing coal-fired power station is set out in Chapter 2: Assessment Methodology (ES Volume I). This has also been added to the Non Technical Summary.</p>

<p>The parameters for the Zone of Theoretical Visibility (ZTV) are explained in more detail in the draft LVIA than in this Appendix. The modelling of existing large structures, perimeter bunds and vegetation is welcomed, but the resulting ZTVs do need some interpretation. Because of the screening on the boundaries the visibility appears to be less for areas close to the site, and it is the case that as the viewer moves further away, more and more of the power station will become visible until the screening itself is a negligible factor. However at closer distances the vegetation may only filter rather than block a view, and where visible the power station will be more dominating even if only part can be seen.</p>	<p>Comments noted.</p>
<p>More information is needed on the methodology for the cumulative LVIA. For the study area, paragraph 20.3.17 mentions a 15 km zone but it is not clear how this was identified. Paragraph 7.21 of the GLVIA suggest three possible approaches to defining the study area.</p>	<p>The 10 km study area identified for the LVIA has been expanded to cover an area of 15 km for the landscape and visual cumulative assessment (in Chapter 20: Cumulative and Combined Effects of ES Volume I) to identify any developments where, as a result of their height and scale, may give rise to cumulative effects with the Proposed Development.</p>
<p>In paragraph 16A.4.1 it is stated that GLVIA3 requires that the baseline includes only existing developments. However paragraph 5.18 of the GLVIA also states that evidence about change in the landscape, including in its condition, is an important part of the baseline. Paragraphs 7.19-7.24 anticipate that the baseline for the cumulative assessment would be wider than for the main project. The likely demolition of Ferrybridge C and the ongoing effects of mineral exploitation, landfill, countryside and climatic change are therefore also factors.</p>	<p>It is anticipated that due to distance, intervisibility and the scale (height) of the other proposed developments (see Chapter 20: Cumulative and Combined Effects of ES Volume I) it is highly unlikely that a cumulative assessment of proposed developments outside of the 15 km study area would give rise to significant effects.</p>

<p><b>Chapter 16.0 Landscape and visual amenity</b></p>	
<p><u>Landscape value</u></p>	
<p>The approach to establishing landscape value is discussed in Appendix 16 A, paragraph 2.6 onwards. The draft LVIA in the PEIR does not however ascribe any particular value to the existing Eggborough Power Station landscape which was designed in the early 1960s by the eminent landscape architect Brenda Colvin who also worked on a number of similar commissions for the CEGB at around the same time. It is considered to be one of her best industrial works, which at the time represented a bold new approach to integrating very large and intrusive structures into the landscape. Her original drawings are now in the Landscape Institute archives held by Reading University but Eggborough Power Ltd and/or Selby DC may have copies. Brenda Colvin’s Partner was Hal Moggridge, who may be able to help with this (email communication of 1st February 2017). The existing landscape design was mentioned in the recent Historic England decision not to list the Power Station.</p>	<p>The LVIA assigned a value of low to the existing Eggborough Power Station landscape. Although the scheme was originally designed by Brenda Colvin the landscape of the existing power station site has changed considerably over the years.</p>
<p>There is some confusion about Locally Important Landscape Areas (LILA). LILAs are mentioned in 16.2.15 (Brayton Barff and Hambleton Hough) but much of the Magnesian Limestone Ridge is also designated as LILA. They are mentioned in Table 16.6 which summarises the assessment of Value and Susceptibility but they appear under Doncaster, rather than Selby, and of the two areas mentioned only Brayton Barff is a LILA under Selby District Local Plan Saved Policy ENV 15. The other area, Byram, is a degraded Capability Brown landscape of which the only the core area is recognised under the Selby District Local Plan Saved Policy ENV16 Historic Parks and Gardens. A Locally Important Landscape is also mentioned in Tables 16.7 to 16.9 (assessment of landscape effects) but where this is located is not known.</p>	<p>Text has been amended within the relevant sections of Chapter 16: Landscape and Visual Amenity to exclude Byram and provide more clarification.</p>

<p><u>Landscape design principles</u></p> <p>The approach taken by Brenda Colvin on this and other power station schemes in the early 1960s broke new ground, but landscape design has evolved over the past 50 years. The final LVIA could set out the principles for a forward-looking approach to design which takes into account existing mature planting and new opportunities on land within the applicant’s control.</p>	<p>The space for the landscape scheme within the Site is limited but the Site boundary has been revised to include the existing trees north of Wand Lane as well as the landscaped embankment around the coal stockyard, so that this existing planting can be protected by DCO Requirement.</p>
<p><u>Existing landscape fabric</u></p>	
<p>It is recommended that the LVIA includes more information on direct effects on the fabric of the existing landscape. Appendix 10C PEA Report shows the distribution of Phase 1 habitats and provides useful descriptions from the ecological perspective. Identifying the need for protection of existing vegetation, management to ensure screening is maintained into the future, and scope for enhancement are particularly important given the role the power station site plays in the development of industrial landscape design (see below), and its value for mitigation of landscape impacts.</p>	<p>The Indicative Landscape and Biodiversity Strategy (Application Document Ref. No. 5.10) sets out the approach to protection of existing planting and proposed mitigation measures.</p>
<p>In paragraph 16.7.4 the existing power station is also an existing landscape feature which will be lost, creating a major change in the landscape as its replacement will be very different in character.</p>	<p>The removal of the existing coal-fired power station does not form part of this DCO application. However, the impacts on landscape character compared to the future baseline (without the existing coal-fired power station) have been assessed as part of the LVIA.</p>
<p>In terms of landscape capacity (paragraph 16.7.6) it is less clear whether in practice the coal stockyard does have the space needed to accommodate the proposed development since it already looks tight and the design is still evolving.</p>	<p>The indicative layout drawings (Figures 4.1a and 4.1b in the ES Volume II) show how the Proposed Power Plant can be accommodated within the coal stockyard.</p>

<p>The risks to the integrity of the existing landscape framework through future land uses, where known, and likely design changes under Design and Build contracts could be discussed in the LVIA since there is little scope for flexibility. Adequate protection and buffer zones need to be taken into account at an early stage in the design process rather than left to be identified as a DCO requirement.</p>	<p>The Indicative Landscape and Biodiversity Strategy (Application Document Ref. No. 5.10) sets out the approach with regard to existing and proposed planting and management on site.</p> <p>Protection and buffer zones for planting areas are identified in Annex A of the Indicative Landscape and Biodiversity Strategy (Arboricultural Report).</p>
<p><u>Landscape character</u></p>	
<p>The landscape characterisation could be better integrated and more project specific (with reference to GLVIA 5.15 to 5.18 and 7.22 to 7.23), taking further into account the changes to the site itself and the dynamic nature of Selby’s landscape. Where a landscape type overlaps an administrative boundary but has different names on each side, the continuity should be recognised.</p>	<p>The characterisation studies that cover the Site and study area are considered to be relevant. A Site specific landscape description is provided as part of the baseline.</p> <p>Additional text describing landscape types in relation to Landscape Character Areas (LCAs) has been added in Chapter 16: Landscape and Visual Amenity.</p>
<p>A minor point, with reference to paragraph 16.4.3 is that the North Yorkshire &amp; York Landscape Character Assessment does not ‘subdivide’ National Character Area 39. It is a County assessment (not regional as stated in 16.4.7) that covers part or all of a number of NCAs. It only identifies landscape character types (generic), not areas (geographically specific). The local landscape character assessments within the study area include the Selby LCA which is available from Selby DC or NYCC and is still in use.</p> <p>NCA 39 is very relevant, to provide the wider context for the study, particularly in relation to the cumulative effects, and to consideration of the context for mitigation. The NCA profile includes assessment of landscape trends and opportunities.</p>	<p>Chapter 16: Landscape and Visual Amenity Sections 16.4 and 16.6 have been amended to include Selby LCAs.</p> <p>The relevant sections of National Character Area (NCA) 39 have been reviewed in the preparation of the Indicative Landscape and Biodiversity Strategy (Application Document Ref. No. 5.10).</p>

<p>The character of settlements affected by the proposals has not been assessed. However there is a Village Design Statement for Hensall and associated residential areas which could be a starting point. The proximity of large scale industrial development to small, formerly rural villages is an issue that could be examined further.</p>	<p>The scope is defined within the GLVIA3 guidelines and has been undertaken as per the Scoping Report dated August 2016.</p>
<p>Paragraph 16.3.7 refers to the ‘essential characteristics’ of a landscape. It is not clear what is meant by this, particularly when the context for the development contains strong contrasts and is undergoing much change. Paragraphs 16.7.8 refers to power stations as a characteristic element of the landscape. This is the case, but while the 1960s power stations resemble each other and as repeating features form a recognizable group, the new generation of power stations may have little in common in terms of appearance, and need to be assessed on their own merits as well as cumulatively. Paragraph 16.7.13 also makes assumptions that a new power station would be ‘congruous’ with its context. There could be a perception that even though it has been present for over 50 years the existing power station is incongruous – its setting to the north is still rural as are many other parts of the ZTV and some local people will remember the site before it was developed for power generation.</p>	<p>The text has been amended to refer to ‘key’ characteristics.</p>
<p><u>Visual impact and amenity</u></p>	
<p>With regard to paragraphs 16.7.17 and 16.7.19 representative viewpoints have been discussed with NYCC and SDC and feedback provided, but the final selection has not been agreed as in some cases the location was unclear. In paragraph 16.9.6, under Limitations or difficulties it is noted that not all of the potential viewpoints had been visited at the time of the PEIR. The draft viewpoint assessments will need to be checked as there appear to be one or two errors e.g. Viewpoint 1, impact during operation for residential receptors is considered to be major adverse but not significant.</p>	<p>Viewpoints were visited in September 2016 to inform the PEI Report but, as is standard practice, land not publicly accessible and outside the ownership of EPL was not accessed.</p> <p>Further consultation regarding the final selection of representative viewpoints to be assessed has been undertaken.</p> <p>Typographical errors in Chapter 16 of the PEI Report have been corrected in the final ES.</p>

<p>Assessment of impacts on road users, residential receptors and recreational users at selected viewpoints is provided separately, but in practice they may often be the same people going about their daily lives, experiencing multiple effects from different locations and at different times. This is different to the briefer (though sometimes lasting) impressions of the area that might be gained by visitors passing through on a motorway or on a train. Focusing on the residual effects on a relatively small number of selected viewpoints may underplay the effects that are experienced in practice by local communities.</p>	<p>The assessment follows the GLVIA3 guidelines and best practice and has been amended to provide an assessment of the impact on local road users.</p>
<p>An overview of effects on local settlements and minor roads close to the site would therefore be helpful for each scenario. The Selby Landscape Character Assessment (not referred to at present) and Hensall Village Design Statement may be relevant to assessment of local impact. Recreational routes have been assessed to some extent but the area is well used by cyclists, and both the Selby Canal and Aire &amp; Calder Navigation have potential for greater use. The power station will be visible from long sections of the Trans Pennine Trail. There are very open and direct views from the busy main line railway to the east of Hensall.</p>	<p>The scope is defined within the GLVIA3 guidelines and has been undertaken as per the Scoping Report dated August 2016. However in response to this comment Chapter 16: Landscape and Visual Amenity has been amended to provide an assessment of the impact on local road users.</p>
<p>Chapter 4 'The Proposed Development' refers in 4.2.26 to the potential for visible plumes if wet cooling towers are used. The effects may be less than half of the existing effects but that would still be a very large and very visible effect. Paragraph 16.9.7 considers the potential for visible plumes from the CCGT stacks to be very low. However the LVIA should also assess the worst case scenario i.e. plumes from wet cooling towers, if they are still a possibility.</p>	<p>An assessment of the impacts associated with visible plumes from cooling towers has been added to Chapter 16: Landscape and Visual Amenity (Table 16.11).</p>
<p>One aspect which may merit further assessment is the future visibility of the substation 400 kV pylons and overhead transmission lines when the existing power station has been removed.</p>	<p>This falls outside the scope of the DCO application. The existing National Grid sub station, pylons and overhead power lines will not be affected by the Proposed Development.</p>

<u>Mitigation</u>	
<p>With reference to development design and impact avoidance the first bullet point in paragraph 16.6.3 is very important. While at this stage detailed assessment of the proposed built development is not possible, general recommendations could be made in the final LVIA.</p> <p>However with reference to the second bullet point there are no industrial buildings or structures in the surroundings which it would be advisable to emulate so a fresh approach is needed. This will be a large and significant development in its own right. Reference could be made to existing studies of ‘colour in the landscape’, and consultation with NYCC could be included since they are working with SDC in respect of landscape. A final bullet point could be added on minimisation of visual clutter.</p>	<p>The text (now paragraph 16.5.8 in Chapter 16: Landscape and Visual Amenity) has been amended to exclude adjacent developments and state that the selection of finishes will minimise the visual impact of the Proposed Development and minimise visual clutter where possible.</p>
<p>The feasibility of further mitigation of the 400 kV transmission lines and substation, which may assume greater prominence in the landscape after demolition, could be discussed within the LVIA.</p>	<p>As described above, this falls outside the scope of the DCO application.</p>
<p>Further information is needed on the final form and extent of the AGI and compound and associated mitigation.</p>	<p>A description of the form and extent of the Proposed AGI is provided in Chapter 4: The Proposed Development (ES Volume I) and Figure 4.4 (ES Volume III). Mitigation planting is described in the Indicative Landscape and Biodiversity Strategy (Application Document Reference No. 5.10).</p>

<p><u>Mitigation of residual effects</u></p> <p>The NTS paragraphs 12.2.2 and 12.3.3 explain that no specific mitigation measures are proposed in respect of the significant visual effects which are predicted at a number of viewpoints around the site “as it is largely not possible to avoid or reduce these effects due to the size and massing of the buildings and structures involved”. GLVIA3 states in paragraph 4.32 that “Where a significant adverse landscape or visual effect cannot be avoided or markedly reduced, consideration should be given to any opportunities to offset, remedy or compensate for such unavoidable effects”.</p>	<p>Section 2.65 of EN-2 states that “It is not possible to eliminate the visual impacts associated with a fossil fuel generating station. Mitigation is therefore to reduce the visual intrusion of the buildings in the landscape and minimise impact on visual amenity as far as reasonably practicable.” The LVIA notes that screen planting could be offered to some visual receptors to mitigate low level views, but this will be at the discretion of each affected receptor.</p>
<p><u>Potential for wider compensation and enhancement</u></p>	
<p>It is noted that most but not all of the original plantations are within the red line boundary. Some of those that are outside may also be relevant for mitigation. They need to be identified in the LVIA together with proposals for ensuring their continuity in the landscape.</p>	<p>The Site boundary has been amended and includes the key areas of existing plantations that provide screening for the Proposed Development, including trees north of Wand Lane that were not previously all included in the boundary shown within the PEI Report.</p>
<p>The proposed power station would be closer to Gallows Hill and Hensall than the existing one, and significant adverse effects have initially been identified. The existing planting is very tightly drawn around the development site with long term effectiveness not yet certain, whilst opportunities for compensation and mitigation through further planting within the red line boundary appear to be very limited.</p>	<p>The plantation woodland on Site has been surveyed and has a remaining contribution of between 50 and 100 years – see the Indicative Landscape and Biodiversity Strategy (Application Document Reference No. 5.10).</p>

<p>The Hensall area has been greatly disturbed over the past 50 years or so by the cumulative effects of power and mineral development and is in need of some regeneration so there is scope for some offsetting of effects. Proposals for mitigation could link with other initiatives to enhance the River Aire corridor e.g. in connection with the Leeds City Region Green Infrastructure Strategy, the North Yorkshire &amp; York Local Nature Partnership Strategy, Selby DC proposals for green infrastructure enhancement or other relevant initiatives, multiplying the benefits.</p>	<p>The Indicative Landscape and Biodiversity Strategy (Application Document Ref. No 5.10) focusses on land within the Site, to which DCO Requirements can be applied.</p>
<p><u>Landscape and Biodiversity Strategy</u></p>	
<p>The proposed Landscape and Biodiversity Strategy (one combined strategy rather than two separate strategies would be preferred) should be scoped and if possible a framework developed before DCO submission.</p>	<p>The Indicative Landscape and Biodiversity Strategy (Application Document Reference No. 5.10) is a combined strategy that supports the DCO application.</p>
<p>There could be justification for the Landscape and Biodiversity Strategy to encompass both long term on-site management, and also off-site compensation and enhancement. The latter could bring community benefits such as improvements to health and well-being through, for example, local green infrastructure and access improvement.</p>	<p>The Site includes all those areas that are necessary for the landscaping of the Proposed Development.</p>
<p>The Strategy could include a Concept Masterplan for the whole of the current Eggborough Power Station site and adjoining areas within the control of the applicant to help guide future site regeneration, including the area set aside for possible Carbon Capture development, the area occupied by the current coal-fired power station, and areas available for recreation, public access and habitat creation. Opportunities for mitigation within the existing power station footprint should be identified.</p>	<p>The wider existing coal-fired power station is not included within the Site and is outside the scope of the DCO. The Site includes all those areas that are necessary for the landscaping of the Proposed Development.</p>

<p>The Yorkshire &amp; Humber Cross Country Carbon Capture Pipeline NSIP has now been refused by the Secretary of State (decision 17th January 2017) and this may have implications for the area reserved for Carbon Capture adjacent to the proposed development. The Strategy could consider temporary use of the area for landscape and biodiversity mitigation and enhancement, including vegetation to support pollinators, which could be easily removed if needed.</p>	<p>CCR reserve land is required in accordance with legislation and is not affected by the status of the Yorkshire and Humber Carbon Capture Pipeline project.</p>
<p><u>Section 106 agreement</u></p> <p>Consideration could be given to achieving long term management of on-site landscape, and delivery and management of off-site works through a section 106 agreement, including a fund available to local communities which is proportional to the scale, duration and overall impact of the proposed changes and new development on the local area.</p>	<p>The Site includes all those areas that are necessary for the landscaping of the Proposed Development, which is set out in the Indicative Landscape and Biodiversity Strategy (Application Document Ref. No. 5.10).</p>
<p><b>Chapter 20 ‘Cumulative and Combined Effects</b></p>	
<p>There is an overlap between this chapter and Chapter 16.0 and mentioned in paragraph 20.5.86. In paragraph 20.5.85, Southmoor Energy Centre, which is consented, is scoped in but the proposed Kellingley Colliery Business Park is scoped out. However they are both part of the redevelopment of Kellingley Colliery, and will be seen together. Depending on the size, colour and surface finishes of the Business Park buildings they could potentially be quite intrusive in the flat open landscape, as the colliery itself was very visible. However, it is understood that the local planning authority is seeking to control these aspects of design, height and sighting. A further issue is that there will be cumulative effects with Knottingley Power Plant, which is diagonally opposite the Southmoor Energy Centre on the other side of the canal. The Knottingley Power Plant in its turn will visually close the gap between the colliery site and the west of Knottingley itself.</p>	<p>The development at Kellingley Colliery Business Park has been scoped out of the cumulative landscape and visual assessment due to the relatively low height of the structures and distance of the viewpoints to both developments.</p> <p>The other proposed developments considered in the cumulative impact assessment have been assessed alongside the Proposed Development (see Chapter 20: Cumulative and Combined Effects in ES Volume I).</p>

<p>In carrying out the cumulative impact assessment, the tendency of large scale structures to ‘line up’ and combine therefore needs to be considered, particularly along the River Aire corridor. The transmission lines, main roads and rail all exacerbate this effect. North-south views tend to be much more rural in nature, with large developments seen as isolated, although successive views of different developments may be experienced. There will be many roads and routes where there are direct views towards the development, or where frequent or occasional sequential views will be obtained.</p>	<p>Only visual receptors that are assessed to give rise to greater than a negligible significance of effect have been added to the cumulative sequential assessment.</p>
<p><b>Non-Technical Summary (NTS) and general</b></p>	
<p>Chapter 12.0 ‘Landscape and Visual Amenity’ could include a little more explanation of the different scenarios assessed in the LVIA. The draft LVIA is also rather unclear on this with its references to future baselines - paragraph 16.5.1 and elsewhere - or ‘modified baseline’ - paragraph 16.5.3. The non-technical reader might wish to know whether the anticipated landscape and impact of the future operational power station has been directly compared with that of the existing power station and whether the overall effect will be beneficial or not.</p>	<p>The approach to the consideration of future scenarios with the Proposed Development and with or without the existing coal-fired power station present are set out in Chapter 2: Assessment Methodology (ES Volume I) and a summary is also now included in the Non Technical Summary.</p>
<p>Paragraph 12.2.2 introduces the possibility that there might be a further scenario, which is the coal-fired power being demolished prior to the start of construction. There could well be landscape benefits in utilising the same footprint for the new power station, or in utilising part of the footprint as well as the coal stockyard area which is very constrained. These are issues which need to be covered in the ES, or their exclusion justified.</p>	<p>Chapter 6: Design Evolution and Alternatives (in ES Volume I) discusses the consideration of alternative locations and layouts within the existing coal-fired power station site and the reasoning behind the selection of the coal stockyard for the Proposed Power Plant Site.</p>

<p>Further information could be provided in the NTS and elsewhere on what the decommissioning and demolition of the existing power station are likely to involve. Whilst the actual demolition would be carried out as a separate scheme, it is within the site boundary, and there would need to be some dovetailing with the proposed development. It is not clear whether the requirements for laydown areas etc could overlap. Chapter 5.0 Construction programme and management mentions separate construction and demolition working zones in paragraph 5.3.1 and these could be shown on drawings.</p>	<p>The Site boundary has been refined since the publication of the PEI Report to include only those areas required for the construction and operation of the Proposed Development. As such there is now much more limited overlap between the two projects. As the two projects will be managed separately in terms of the Construction (Design and Management) (CDM) Regulations, separate (non-overlapping) CDM boundaries will be identified if the two projects occur concurrently and no sharing of laydown areas is proposed.</p>
<p>Clarification of the extent of land which is currently in the ownership of Eggborough Power Ltd would be helpful.</p>	<p>Land ownership is shown on the Land Plans (Application Document Ref. No. 4.2).</p>
<p>The conclusions summarised in 12.4 of the NTS (and also in 16.10 of the draft PEIR) may need further elaboration and justification. It seems likely that there will in fact be a noticeable change in the currently very distinctive character of the landscape, which is only partly industrialised, and there could be some wider landscape benefits from the changes as well as some significant local adverse effects.</p>	<p>The removal of the existing coal-fired power station does not form part of the DCO application, but the impacts on landscape character with the Proposed Development compared to a future baseline scenario with the existing coal-fired power station no longer present, has been assessed as part of the LVIA (referred to as the Operation scenario).</p>

<p><b>DRAFT ENVIRONMENTAL STATEMENT CONSULTATION COMMENTS</b></p>	
<p><b>16.4 Baseline Conditions</b></p>	
<p>16.4.3 Further amendment needed - the Study Area is covered at a local (district) scale by the Wakefield, East Riding, Doncaster and Selby LCAs.</p> <p>Note that the acronym ‘LCA’ can be used for both Landscape Character Areas and Landscape Character Assessments – in this case it is Areas and clear enough. In some other cases e.g. 16.7.12 it is less clear what is meant.</p>	<p>The text has been amended at paragraph 6.4.2 of Chapter 16: Landscape and Visual Amenity (ES Volume I) to clarify the local level Study Area.</p> <p>The abbreviation ‘LCA’ refers to the Landscape Character Areas (written in full at paragraph 16.3.7)</p>
<p>16.4.28 The inclusion of the plantations north of Wand Lane within the current red line boundary is welcomed as they were part of the original scheme.</p>	<p>Noted.</p>
<p>16.4.34 and <i>Table 16.4: Non landscape designated areas/features</i>. The Eggborough Power Station site as a whole would ideally have a separate assessment as it is different in character from the area to the north where the pipeline corridors are located.</p>	<p>The text has been amended at paragraphs 16.4.23 to 16.4.28 of Chapter 16: Landscape and Visual Amenity to separate out the different parts of the Site.</p>
<p>See comments on Appendix 16A: Methodology in relation to the value of the landscape of the Power Station. Table 16.4 could be amended to take its value as a non-designated (modern) historic landscape into account. Under Conservation Interests the landscape features are within the curtilage of the non-designated heritage feature that is mentioned, were designed at the same time, and are part of its immediate setting. The Cultural Heritage chapter should also similarly include reference to the power station landscape. Under Perceptual Aspects access also includes minor roads, used recreationally by cyclists.</p>	<p>Text within paragraph 16.3.33 and Table 16.4 of Chapter 16: Landscape and Visual Amenity has been amended to reflect the historic nature of the existing landscape scheme at the existing coal-fired power station site. The history of the existing power station, including landscaping, is also discussed in Chapter 13: Cultural Heritage (paragraphs 13.4.134 to 13.4.141).</p>

<p>16.4.44 The existing power station is particularly prominent in views from the main line railway to the east of Hensall, seen silhouetted against the sky with no intervening screening for several kilometres.</p>	<p>This is noted in the description of viewpoint 6 in Table 16.6 (Chapter 16: Landscape and Visual Amenity). Drax Power Station is also clearly visible within views from the East Coast Main Line railway, as discussed at paragraph 16.6.25.</p>
<p><b>16.6 Development Design and Impact Avoidance:</b></p>	
<p>16.6.1 Some existing vegetation is directly impacted by the proposed development (2 ha of plantation as stated in 16.7.14 plus 77 m of hedgerow and 18 trees).</p>	<p>The text at paragraph 16.5.1 (formerly paragraph 16.6.1) has been amended to state that the majority of existing vegetation is not directly impacted by the Proposed Development.</p>
<p>16.6.3 – 16.6.7 The additional information on lighting is welcomed although the Indicative Lighting Strategy referred to has not yet been received.</p>	<p>Noted.</p>
<p>16.6.8 With reference to the first two bullet points, since the use of suitable materials, finishes and colours for external surfaces of built features is key to minimising visual intrusion into the wider landscape, it is recommended that objectives and guidance should be discussed early in the design process and referred to in the Indicative Landscape and Biodiversity Strategy. The finishes do not need to be informed by adjacent developments (although if specific developments are being referred to this could be clarified) as the power station is of a different nature, is in a separate location, has a greater vertical scale and mass, and is more likely to be seen from open countryside.</p>	<p>The text at paragraph 16.5.18 (formerly 16.6.8) has been amended to remove reference to adjacent developments. The approach to the use of suitable materials, finishes and colours for external surfaces is set out in the Indicative Landscape and Biodiversity Strategy (Application Document Ref. No. 5.10).</p>

<p><b>16.7 Likely Impacts and Effects</b></p>	
<p>16.7.10 and 12: Demolition of the existing power station will have a more of an impact on landscape character than is stated, as demonstrated by some of the photomontages. This is because of the reduced scale of the proposed power station (the current one can be glimpsed from as far away as the Pennines), leading to a decreased perception of industrialisation of the countryside.</p>	<p>The text at paragraphs 16.6.10 and 16.6.11 (formerly 16.7.10 and 16.7.11) has been amended to reflect the change to the landscape character as a result of the future baseline with the existing coal-fired power station no longer present.</p>
<p>16.7.12 - 13 Whilst it is agreed that the type of proposed development is congruous with its context, the setting is also quite rural, especially if viewed from the north.</p>	<p>Noted, although Drax and Ferrybridge Power Stations are often visible within the local landscape and the influence that the existing coal-fired power station and the Proposed Development has diminish with distance at these locations.</p>
<p><i>Table 16.6 Landscape sensitivity assessment:</i> the addition of landscape features is noted although it is not clear why they are referred to as ‘landscape types’. To the north, the hedgerows and trees within the pipeline corridors are no longer as characteristic or commonplace as they may once have been because of agricultural intensification (and those remaining are vulnerable - the Arboricultural Report mentions that some have been damaged by farm machinery) and so removal would consequently have a greater effect.</p>	<p>Table 16.6 has been amended to refer to Landscape Character Areas. The LVIA has assessed the impact of the Proposed Development on the current baseline and the number of trees that will be affected by the construction operations to the gas pipeline corridor is assessed to be low. Hedgerows affected by the construction of the Proposed Gas Connection will be reinstated following construction.</p>

<p><i>Table 16.7 Assessment of landscape effects - construction:</i> When the assessment changes from one Landscape Character Assessment landscape character areas or types the actual Assessment could be noted as in Table 16.6 as it would help to geographically locate the areas or types and explain the change in terminology.</p> <p>In some cases a landscape character ‘area’ is assessed but the text says ‘type’ – this could be checked (and the column heading changed to reflect the different nature of the locations being assessed, which include Locally Important Landscape Areas. The difference could be explained either in the LVIA or in the ES glossary. The Eggborough Power Station site could be considered a character area in its own right – this would be more appropriate than just picking out areas of tree planting, since it was designed as a whole and is very different in nature to its surroundings.</p> <p>Where the assessment states “affect the landscape character, perception and tranquillity”, ‘perception’ is not the appropriate term. Perhaps replace with ‘perceptual qualities including tranquillity’?</p>	<p>Table 16.7 has been amended to highlight changes to LCA areas.</p> <p>Table 16.7 has been amended to clarify LCAs and LCTs.</p> <p>The landscape of the existing coal-fired power station has been assessed based on its historic value and screening function.</p> <p>The text in Table 16.7 has been amended to refer to perceptual qualities and tranquillity.</p>
<p><i>Table 16.8 Assessment of landscape effects – opening: as above</i></p>	<p>Table 16.8 has been amended as per Table 16.7 above.</p>
<p><i>Table 16.9 Assessment of landscape effects – operation: as above.</i> There would be beneficial effects compared with the baseline of an operational existing power station and also compared with when it is still present or undergoing demolition – how are these to be picked up as the final assessments are nearly all ‘negligible adverse’ . On the power station site there would be a residual net loss of planting so a ‘moderate beneficial’ assessment for this aspect needs more justification. In the pipeline corridors there could also be a residual net loss, depending on constraints for replanting and whether 1 to 1 replacement or a more generous scheme replacement ratio is adopted.</p>	<p>The assessment presented in Table 16.9 has taken into consideration the absence of the existing coal-fired power station as part of the future baseline (against which the impacts of the Proposed Development are assessed). The demolition of the existing coal-fired power station does not form part of the Proposed Development, so any associated landscape benefits cannot be considered to be benefits of the Proposed Development.</p>

<p><i>Table 16.10 Assessments of effects on visual amenity and Table 16.11 Summary of effects on visual amenity:</i> As a general point the assessments need to take into account the worst case scenario of the plume(s) that will be present for some of the time, and which is/are likely to draw the eye.</p>	<p>The assessment in Table 16.10 has been undertaken using the worst case scenario, including the impact of wet plumes from the cooling towers. The text has been amended to highlight this where relevant.</p>
<p>Viewpoints 1-9: No comments other than above</p>	<p>Noted.</p>
<p>Viewpoint 10: The AGI is mentioned as being visible but is not shown on the photograph.</p>	<p>The photographs of viewpoint 10 (Figures 16.26 and 16.27) have been amended to show the Proposed AGI Site location.</p>
<p>Viewpoint 11: No comments</p>	<p>Noted.</p>
<p>Viewpoint 12: Whilst it is difficult to get a view from publicly accessible locations in Kellington, there will be many properties on the edge of the village that could have views to the power station.</p>	<p>The assessment in Table 16.10 considers views from the edge of Kellington, although the text has been amended following review to increase the assessed magnitude of impact on visual amenity at operation from ‘very low’ to ‘low’ resulting in an increase of effect from ‘negligible adverse’ to ‘minor adverse’.</p>
<p>Viewpoint 13: Road users have a direct view towards the power station so it might be a primary focus for passengers at least.</p>	<p>The assessment in Table 16.10 considers the impact on road users as a receptor group as a whole and does not differentiate between drivers or passengers.</p>

<p>Viewpoint 15: Should there be another viewpoint photo showing the proposed power station? This viewpoint provides a clear and relatively close view of much of the development including for residents on the edges of Hensall as well as recreational users so a higher sensitivity and impact significance during construction and opening where there is maximum cumulative impact could be considered.</p>	<p>The viewpoint photograph for viewpoint 15 is included as Figure 16.36 (ES Volume II).</p> <p>The text in Table 16.10 has been amended to raise the susceptibility of the receptor at this location to 'high', although the assessed 'medium' sensitivity remains as a result of the value of the view.</p>
<p>16.7.21-3, and 16.7.28 Weeland Road immediately to the south of the proposed power station site has very open and close views, although oblique, and this could be mentioned. There are also minor roads to the south that have very open views, although at a greater distance. There's possibly a gap in the assessment regarding this southern area, although it is would have been difficult to select any one location as a particular viewpoint.</p>	<p>The text at paragraph 16.6.20 (formerly 16.7.20) states that the direction of the view will change as passengers move around the area.</p>
<p>16.7.25 The current power station is a very striking feature in the open views from the main rail line to the east of Hensall, and appears particularly uncluttered from that direction and distance. I feel that the construction and opening stages may have more effect than is mentioned although relatively small scale at that distance. The plume(s) of the proposed power station would draw the eye.</p>	<p>The text at paragraph 16.6.25 (formerly 16.7.25) states that there is high visibility of the existing coal-fired power station. Drax Power Station is also clearly visible within views from the main line railway, as discussed at paragraph 16.6.25 (formerly 16.7.25).</p>
<p>16.7.31-32 The additional information on the height and likely percentage of time visible of plumes from hybrid and wet cooling towers is welcomed. They aren't mentioned in the assessments though. The plumes from cooling towers are mentioned but what about the stack? With the existing power station there were plumes (of a different nature) from cooling towers and stack. However the situation has already changed.</p>	<p>The assessment in Table 16.10 now includes reference to visibility of plumes from the cooling towers. The emissions from the stack(s) will not be visible.</p>

<b>16.8 Mitigation and Enhancement Measures</b>	
<p>The possibility of offering screen planting to some visual receptors is mentioned where a significant adverse effect on visual amenity has been identified. However the viewpoints are only a representative selection, so there may be other residential properties where further screening is desirable (also, individuals may not be aware of the difference between a perceived adverse effect and an adverse effect that is significant by EIA standards). As previously mentioned, GLVIA3 states in paragraph 4.32 that <i>“Where a significant adverse landscape or visual effect cannot be avoided or markedly reduced, consideration should be given to any opportunities to offset, remedy or compensate for such unavoidable effects”</i>.</p>	<p>Section 2.65 of EN-2 states that <i>“It is not possible to eliminate the visual impacts associated with a fossil fuel generating station. Mitigation is therefore to reduce the visual intrusion of the buildings in the landscape and minimise impact on visual amenity as far as reasonably practicable.”</i> The LVIA notes that screen planting could be offered to some visual receptors to mitigate low level views, but this will be at the discretion of each affected receptor.</p>
<p>This section needs to be expanded and linked to the Indicative Landscape and Biodiversity Strategy and the Arboricultural Report.</p>	<p>The text in Section 16.7 (formerly 16.8) has been amended to include more cross references to the Indicative Landscape and Biodiversity Strategy (Application Document Ref No. 5.10).</p>
<b>16.10 Residual Effects and Conclusions</b>	
<p>The conclusions are brief and only refer to a few viewpoints. It would be helpful to have an assessment on the effects on local settlements.</p>	<p>The residual effects only deals with identified ‘significant’ effects on landscape and visual amenity, as per all technical chapters of the ES.</p>

**APPENDIX 16A LVIA Assessment Methodology**

Landscape value:

The low value assigned to the Eggborough Power Station landscape is questioned. It ticks a number of boxes in relation to the factors listed in the GLVIA (copied in Appendix 16A para 2.6 onwards), so consideration could be given raising this to a medium value on the basis of this and the criteria in para 16A.2.8. The landscape is undesignated but is recognised as having some important associations and its values could also be further discussed. The factors listed are not exhaustive, and in this case historic landscape value is a further aspect, picked up to some extent in the draft Cultural Heritage chapter (the two need to be complementary in relation to the site landscape). GLVIA3 paras 5.7-5.11 cover links between cultural heritage and historic landscape and confirm relevance to the LVIA. There is a need for liaison between topic areas on this aspect of the site including the extent to which Historic England’s advice on recording prior to demolition/removal of the 1960’s power station also applies to the associated landscape.

Most of the existing mounding and planting which forms the landscape structure is to remain in the current proposals. Establishing the value, character and any special qualities of the site is important since this should influence the approach taken by the Landscape and Biodiversity Strategy. It needs to be kept in mind that the application site is part of a larger designed landscape, and that areas outside the current red line boundary also contribute to value and indirectly contribute to mitigation.

The Ecology assessment found the planting had low nature conservation value and there is a question mark over the condition of some areas, as described in the Arboricultural Report. However the planting has present day landscape value for its contribution to landscape character as it can be perceived as a further area of woodland complementing those already present in the River Aire valley - although the woodland composition, the design and the landform are different. It has value as an established and relatively mature scheme for its functions in screening low level power station infrastructure, providing a base for the larger power station buildings as seen in the wider landscape, and softening views of them from closer locations, and in this sense it is sensitive to change. An additional point is that the original landscape also

Chapter 16: Landscape and Visual Amenity has been amended at Section 16.6 (landscape assessment) to acknowledge the historic importance of the modern designed landscape. This landscape has been assessed as having a ‘high’ sensitivity as a result of the historic value and the screening function of the woodland belts located around the edges of the coal stockyard and north of Wand Lane.

<p>catered for the amenity, health and well-being of the workforce, including the provision of a large recreational area (which is to be retained outside the red line boundary). This aim can be carried forward to the future power station landscape.</p> <p>We understand that Historic England has considered its potential historic value as a post 1945 ‘modern’ landscape however there may have been some changes to the original design’s planting. In discussion with Historic England representatives, they have indicated that in assessing it in connection with the potential listing of the power station buildings they found it ‘notable’ but not of sufficient interest to merit designation. In addition, regarding the non-statutory HE Register, it has been clarified by Historic England that industrial landscapes are generally not eligible for designation in their own right. In terms of significance, a) it may be a good representative of its period although not the earliest b) it is the work of a C20th designer of national importance, and c) there is good documentation about the scheme. The degree of integrity/authenticity has not been assessed as such though while the overall concept survives it is now known that there has been much replanting and changes to planting mixes (as revealed by the findings of the Arboricultural Report when compared with the original planting plans).</p>	
<p><b>16B: NYCC CONSULTATION</b></p>	
<p>The Appendix consists of a table of previous NYCC comments and response on how they have been addressed. Any remaining concerns related to this have been picked up in the above comments and in the comments on the Indicative Landscape and Biodiversity Strategy.</p>	<p>Noted.</p>