

The Eggborough CCGT Project

Document Ref: 7.4
PINS Ref: EN010081

The Eggborough CCGT (Generating Station) Order

Land at and in the vicinity of the Eggborough Power Station site,
near Selby, North Yorkshire, DN14 0BS

Statement of Common Ground with Historic England

The Planning Act 2008



Applicant: Eggborough Power Limited
Date: October 2017

DOCUMENT HISTORY

Document Number	7.4		
Revision	4.0		
Author	AECOM		
Signed	Clara Turlington (CT)	Date	10.10.17
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Signed	GB	Date	10.10.17
Document Owner	AECOM		

GLOSSARY

Abbreviation	Description
AGI	Above Ground Installation
CCGT	combined cycle gas turbine
CCR	Carbon Capture Readiness
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EP UK	EP UK Investments Ltd
EPH	Energetický A Prumyslový Holding
EPL	Eggborough Power Limited
ES	Environmental Statement
ES	Environmental Statement
HE	Historic England
km	kilometres
kV	kilovolt
m	metres
MW	megawatts
NG	National Grid
NSIP	Nationally Significant Infrastructure Project
NTS	National Transmission System
NYCC	North Yorkshire County Council
PA 2008	The Planning Act 2008
SDC	Selby District Council
SoCG	Statement of Common Ground
SoS	Secretary of State
the Order	Eggborough CCGT (Generating Station) Order
WSI	Written Scheme of Investigation

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1.0 INTRODUCTION

Overview

- 1.1 This Statement of Common Ground ('SoCG') has been prepared on behalf of Eggborough Power Limited ('EPL' or the 'Applicant') in respect of its application (the 'Application') for a Development Consent Order (a 'DC').
- 1.2 The Application has been submitted to the Secretary of State (the 'SoS') for Business, Energy and Industrial Strategy, under Section 37 of 'The Planning Act 2008' (the 'PA 2008'). It seeks consent for the construction, operation and maintenance of a new gas-fired electricity generating station with a gross output capacity of up to 2,500 megawatts ('MW') and associated works (the 'Proposed Development') on land at and in the vicinity of the existing Eggborough coal-fired power station, near Selby, North Yorkshire.
- 1.3 A DCO is required for the Proposed Development as it falls within the definition and thresholds for a 'Nationally Significant Infrastructure Project' (a 'NSIP') under Sections 14 and 15(2) of the PA 2008.
- 1.4 The DCO, if made by the SoS, would be known as the 'Eggborough CCGT (Generating Station) Order' (the 'Order').

EPL

- 1.5 EPL owns and operates the existing Eggborough coal-fired power station (the 'existing coal-fired power station'), near Selby, including a significant proportion of the land required for the Proposed Development.
- 1.6 EPL was acquired by EP UK Investments Ltd ('EP UK') in late 2014; a subsidiary of Energetický A Průmyslový Holding ('EPH'). EPH owns and operates energy generation assets in the Czech Republic, Slovak Republic, Germany, Italy, Hungary, Poland and the United Kingdom.

The Site

- 1.7 The Proposed Development Site (the 'Site') is located at and in the vicinity of the existing coal-fired power station south of Selby. The River Aire is located just to the north with the A19 immediately to the west. Eggborough Village is situated to the south-west.
- 1.8 The entire Site lies within the administrative boundaries of Selby District Council ('SDC') and North Yorkshire County Council ('NYCC').
- 1.9 The coal-fired power station was officially opened in 1970 and comprises four coal-fired boilers units, which together are capable of generating up to 2,000 MW of electricity. The existing coal-fired power station also includes a turbine hall and boiler house, an emissions stack (chimney) of approximately 198 m in height, eight concrete cooling towers of approximately 115 m in height, an administration and control block, a coal stockyard and a dedicated rail line for the delivery of coal, in addition to ancillary buildings, structures and infrastructure and utility connections.
- 1.10 The Site itself extends to approximately 102 hectares and comprises land within the operational area of the existing coal-fired power station for the new gas-fired generating station and electrical and groundwater supply connections; corridors of land to the north of the existing coal-

fired power station for the cooling water connections and gas supply pipeline; an area of land to the south-east of the main coal stockyard for surface water discharge connections; and corridors of land to the west and south of the operational area of the existing coal-fired power station for ground and towns water supply connections and access.

- 1.11 The land required for the generating station and electrical and groundwater connections is owned by EPL, as well as the majority of the land for the cooling and towns water and surface water discharge connections. The majority of the land required for the gas supply pipeline is not owned by EPL.
- 1.12 The area surrounding the Site is predominantly flat and for the most part comprises agricultural land interspersed with small settlements and farmsteads. The area is however crossed by transport infrastructure, notably the A19 and railway lines, including the East Coast Mainline, in addition to overhead electricity lines associated with the existing coal-fired power station and other power stations within the wider area.

The Proposed Development

- 1.13 The main components of the Proposed Development are summarised below:
- an electricity generating station fuelled by natural gas with a gross output capacity of up to 2,500 MW, comprising:
 - a combined cycle gas turbine ('CCGT') plant, comprising up to three CCGT units, including turbine and heat recovery steam generator buildings, emissions stacks, cooling towers and cooling water treatment plant, administration/control building, ancillary buildings, plant and equipment;
 - a peaking plant and black start plant with a combined generating capacity of up to 299 MW, emissions stacks and ancillary buildings, plant and equipment; and
 - other ancillary buildings, enclosures, plant, equipment and infrastructure connections and works;
 - electrical connection works, comprising up to 400 kilovolt ('kV') underground cables to the existing National Grid 400 kV substation at the coal-fired power station site and works within the substation;
 - cooling water connection works, comprising works to the existing cooling water supply and discharge pipelines and intake and outfall structures within the River Aire;
 - ground and towns water supply connection works, comprising works to the existing ground and towns water supply pipelines and boreholes;
 - an underground gas supply pipeline to the National Transmission System ('NTS') for gas of up to 1,000 millimetres (nominal bore) in diameter and approximately 4.7 km in length running north, under the River Aire, to a connection point with the NTS to the south-west of Burn Village; and
 - an 'Above Ground Installation' ('AGI') to the south-west of Burn Village for the connection of the gas supply pipeline to the NTS.
- 1.14 The Proposed Development also includes a temporary construction laydown area for the accommodation of plant and materials and contractors' compounds and facilities during the

construction phase, which would last for approximately three years. This would be provided on land within the operational area of the coal-fired power station, north of the main coal stock yard.

- 1.15 In addition, land would be set aside adjacent to the new generating station to accommodate any future carbon capture plant, should the deployment of such technology become viable in the future. It is proposed that this 'reserve' land would be provided on the area to be used for temporary construction and laydown area during construction of the Proposed Development.

The purpose of the Statement of Common Ground

- 1.16 The purpose of this SoCG is to set out the agreement that has been reached between EPL and Historic England ('HE') in respect of a number of matters relating to the Proposed Development, including:
- scope of the assessment;
 - impact on archaeology;
 - impact on setting of heritage assets;
 - the existing Eggborough coal-fired power station; and
 - DCO requirements.

2.0 RELEVANT MATTERS

Scope of the assessment

- 2.1 HE's response to consultation on the scope of the Environmental Impact Assessment ('EIA') forming part of the DCO Application (dated 15 September 2016) (**Appendix 1**) states that HE agrees with the scope and approach outlined in EPL's EIA Scoping Report.
- 2.2 EPL subsequently based its Environmental Statement ('ES') on the scope set out in the Scoping Report.
- 2.3 HE provided some detailed comments on the Preliminary Environmental Information Report (PEIR) in a letter of 22 February 2017, suggesting some amendments to the assessment of setting and the contribution it made to significance. HE also clarified some points of fact. Following some amendments, HE was satisfied with the content of the assessment.
- 2.4 HE was informed by letter of 28 June 2017 from Dalton Warner Davis (agents for the applicant) that an application for a Development Consent Order has been made for the Eggborough CCGT Plant. HE responded stating that they have assessed the documents that constitute the application submission (May 2017) and considered the impact of the proposals on the historic environment, both within the site and the surrounding area. They agreed with the conclusions of Chapter 13 of the Environmental Statement that the proposed development is likely to affect the significance of some listed buildings as a result of development within their setting. They do not consider this harm would be substantial but should be taken into account in consideration of the order and weighed against the public benefits of the scheme.
- 2.5 HE welcomes the proposed mitigation measures and the intention to agree at the detailed design stage the details of archaeological mitigation with the Principal Archaeologist at North Yorkshire County Council. HE expects to have further engagement via the Principal Archaeologist, at the detailed design stage and prior to construction, in order to agree the overall archaeological strategy.

Impact on archaeology

- 2.6 The assessment of the effects of the Proposed Development in relation to archaeology is set out in ES Volume 1, Chapter 13 'Cultural Heritage' (Document Reference: 6.2.13).
- 2.7 During the construction phase of the Proposed Development there would be the potential for direct physical damage to known and unknown archaeology within the Site. This is particularly so within the Proposed Gas Connection corridor where a geophysical survey carried out by EPL has identified features that are associated with the agricultural heritage of the landscape, including former field boundaries, ridge and furrow, field drains and water management earthwork features. These features are likely to be of local interest and are assessed to be of low significance (heritage value).
- 2.8 Notwithstanding the above, it is agreed that potential impacts on archaeology within the Site, including the Proposed Gas Connection corridor, would be mitigated by a staged programme of archaeological work, informed by an agreed Written Scheme of Investigation ('WSI').

- 2.9 Geophysical survey has already been carried out within the Proposed Gas Connection corridor, in accordance with a WSI that was reviewed and approved by the Archaeological Advisor at NYCC. It is agreed that any subsequent archaeological mitigation works would be informed by the results of the geophysical survey and any further evaluation works carried out on the Site in accordance with an agreed WSI. These works would focus upon areas considered to have an appropriate level of archaeological potential. Following the evaluation works, it is planned that a scheme for the mitigation works, as necessary, would be prepared in consultation with HE and NYCC. It is agreed that there would be sufficient time between the completion of evaluation works and the commencement of construction on the Project for the required mitigation to be implemented.
- 2.10 The ES (Volume 1, Chapter 13) concludes that successful implementation of an approved mitigation strategy would reduce any significant adverse effects to a level which is not significant (i.e. minor adverse or lower), because heritage assets would either be avoided by design or appropriately investigated and recorded.
- 2.11 In order to secure the archaeological mitigation works, the draft DCO (Document Reference: 2.1) includes a requirement at Schedule 2 (Requirement 16 'Archaeology') that would require the Applicant to obtain the approval of the relevant planning authority (following that authority having consulted with Historic England and the NYCC Archaeological Advisor) for a scheme of archaeological investigation at the Site.
- 2.12 It is therefore agreed that the approach to be taken to archaeology is acceptable and that appropriate controls are in place to secure mitigation.

Impact on the setting of heritage assets

- 2.13 The assessment of effects of the Proposed Development in relation to setting is set out in ES Volume 1, Chapter 13 'Cultural Heritage' (Document Reference: 6.2.13) and ES Volume 1, Chapter 16 'Landscape and Visual Amenity' (Document Reference: 6.2.16).
- 2.14 It is agreed that the 'Opening' assessment scenario is the worst-case scenario for heritage assets, as it represents the greatest magnitude of change to the baseline setting of cultural heritage assets. In this scenario (at 2022), it is assumed that the existing coal-fired power station will still be standing, in addition to the Proposed Development.
- 2.15 The assessment of impact on the setting of notable heritage assets within the agreed study area during Opening can be summarised as follows:

Roman Fort at Roall Hall 1017822

- The Proposed Development will have no physical impact upon buried archaeological remains associated with the fort, and there will be **no effect** on this component of the asset's setting.
- The Proposed Development will have no impact on the associative relationships between the Roman fort at Roall and contemporary features in the wider landscape, which form a vital component of its setting. There will be **no effect** on this component of the asset's setting.

Whitley Thorpe Moated Templar Grange 1017458

- The Proposed Development will have no impact on the historical relationship with Thorpe Manor and there will be **no effect** on this component of the asset's setting.
- The Proposed Development will not introduce change into the current baseline setting of the asset, in particular the views from Booty Lane, which make a positive contribution to the ability to appreciate and understand the monument's relevance and importance. It is assessed that this component of the asset's setting will not be impacted and therefore have no effect.
- The Proposed Development will have no physical impact upon buried archaeological remains associated with the moated site, and there will be **no effect** on this component of the asset's setting.
- The Proposed Development will have no impact on the historical relationship with Thorpe Manor and there will be **no effect** on this component of the asset's setting.
- The Proposed Development will not introduce change into the current baseline setting of the asset, in particular the views from Booty Lane, which make a positive contribution to the ability to appreciate and understand the monument's relevance and importance. It is assessed that this component of the asset's setting will not be impacted and therefore have **no effect**.

Thorpe Hall Moated Monastic Grange 1017460

- The Proposed Development will have no physical impact upon buried archaeological remains associated with the grange, and there will be **no effect** on this component of the asset's setting.
- The Proposed Development have no impact on the historical association with Selby Abbey, and there will be **no effect** on this component of the asset's setting.
- The Proposed Development will have no impact on the predominantly rural setting of the asset and its relationship with the surrounding countryside. There will be **no effect** on this component of the asset's setting.

World War II Bombing Decoy

- The baseline assessment has concluded that the vital component of the decoy's setting is its location, as this is key for understanding its relevance and significance.
- The Proposed Development will have no impact on this component of the asset's setting, and there will be **no effect** on its significance.

Listed Buildings

- In the Opening scenario the Proposed Development will be seen in conjunction with the existing coal-fired power station. This will result in the introduction of new buildings and structures into the existing visual setting of listed buildings in views towards the Site. This will result in a noticeable change in views from some locations and additional intrusion into the wider landscape.
- Not all listed buildings will be affected by the Proposed Development as the majority (due to intervening buildings and landscape features) have no visibility of the Site, or the setting does not contribute to significance of the assets. The existing coal-fired power station is

part of the setting of these assets. The scale of the Proposed Development means it has the potential to be highly visible and distracting. However, the introduction of new buildings and structures will not be incongruous with the existing visual setting of the listed buildings. The impact is therefore assessed to be very low, resulting in a **minor adverse** effect which is **not significant**.

Temple Manor (NHLE 1295905)

- The Proposed Development will have no physical impact on the archaeological remains associated with the Manor and there will be **no effect** on this component of the asset's setting.
- The Proposed Development will be seen immediately behind the existing coal-fired power station and will therefore introduce a new element into the visual component of its setting but it will not impact its relationship with the River Aire. The impact is assessed as being low, resulting in a **minor adverse effect**.
- The Proposed Development will have minimal impact on the predominantly rural setting of the asset and its relationship with the surrounding countryside and River but will introduce another industrial structure within the rural scene. The impact is assessed as being low, resulting in a **minor adverse effect**.

Church of St Pauls (NHLE 1295734, Grade II*), the Red House (NHLE 1148401, Grade II*), Hensall Primary School (NHLE 1148400),

- The Proposed Development will have no impact on the group value derived from the interrelated and co-dependant heritage assets or how they are experienced and understood as a group and there is no impact on this component of the assets' setting or significance, which will result in **no effect**.
- The Proposed Development will have a limited impact on the physical surroundings and views as the Proposed Development will be visible in views towards the Site on approach to the group of assets. This will see the introduction of another prominent stack within the sky line which may diminish the experience of the tower of St Pauls. However, the existing coal-fired power station is part of the setting of these assets. The scale of the Proposed Power Plant means it has the potential to be highly visible. However, the introduction of new buildings and structures will not be incongruous with the existing visual setting of the listed buildings. The impact that the Proposed Development will have upon the physical surroundings and views from and to the group is assessed to be low.
- In relation to Church of St Paul's the impact is assessed as low, resulting in **moderate adverse effect**.
- In relation to the Red House, the temporary impact is assessed as low, resulting in **moderate adverse effect**.
- In relation to the Hensall Primary School, the temporary impact is assessed as low, resulting in a **minor adverse effect**.

Church of St Edmund (NHLE 1148402, Grade I)

- The Proposed Development will be viewed in conjunction with the existing coal-fired power station. The impact that the Proposed Development will have upon the physical surroundings and views from and to the group is assessed to be very low, resulting in a **minor adverse effect** to the baseline setting of the assets.

Church of St Mary's (NHLE 1316671)

- The Proposed Development will be visible in conjunction with the existing coal-fired power station but at a distance that the Proposed Development will merge into the existing and will not produce any greater visual mass. The impact that the Proposed Development will have upon the physical surroundings and views from and to the group will have **no effect**.
- The existing coal-fired power station is part of the setting of these assets. The scale of the Proposed Power Plant means it has the potential to be highly visible and distracting. However, the introduction of new buildings and structures will not be incongruous with the existing visual setting of the listed buildings. The impact is therefore assessed to be very low, resulting in a **minor adverse effect** which is not significant.

2.16 In the Opening assessment scenario it is assumed that the existing coal-fired power station will still be standing. This is assessed to be the worst-case scenario for heritage assets, as it represents the greatest magnitude of change to the baseline setting of cultural heritage assets. There would therefore be some minor and moderate adverse effects on setting during the Opening period. When the existing coal-fired power station is fully demolished and the Proposed Development is present in the absence of the coal-fired power station, it is likely that the adverse effects on the setting of heritage assets would be a reduced.

The existing Eggborough coal-fired power station

2.17 The existing coal-fired power station is anticipated to cease generation between 2017 and 2019, and demolition is anticipated to take approximately three years (with the earliest anticipated start in 2018), so it is likely that the demolition of the existing coal-fired power station will take place at the same time as construction of the Proposed Development and/or the start of the Proposed Development's operational phase.

2.18 HE's response to Stage 2 statutory consultation dated 22 February 2017 (**Appendix 1**) notes that the existing Eggborough coal-fired power station is a non-designated heritage asset. The response goes on to state that the existing station was considered for listing as part of a national project in response to the decommissioning of coal-fired power stations; however, that the existing station was not deemed to meet the 'high criteria' for listing. The response also acknowledges that the works to (including demolition of) the existing power station were outside the scope of that consultation.

2.19 It is agreed that, notwithstanding non-designated heritage asset status of the existing station, the decommissioning and demolition forms a separate project that is not part of the Proposed Development.

Correlation with the National Planning Policy Framework (NPPF)

2.20 Where adverse effects have been identified, it is agreed that under the NPPF, chapter 12, paragraph 134, that these would be equitable to less than substantial harm to the significance of the heritage assets.

DCO requirements

2.21 It is agreed between the parties that the following requirements contained at Schedule 2 of the draft DCO (Application Document Ref. 2.1) provide an appropriate means by which to secure

mitigation of the effects of the Proposed Development on archaeology and the setting of heritage assets:

Requirement 6 – Landscaping and biodiversity protection management and enhancement

“6.—

- (1) No part of the authorised development must be commenced until a landscaping and biodiversity protection plan for that part has been submitted to and, after consultation with North Yorkshire County Council and the Yorkshire Wildlife Trust, approved by the relevant planning authority.*
- (2) The plan submitted and approved pursuant to sub-paragraph (1) must include details of—*
 - (a) measures to protect existing shrub and tree planting that is to be retained; and*
 - (b) biodiversity and habitat mitigation and impact avoidance.*
- (3) The plan submitted and approved pursuant to sub-paragraph (1) must be implemented as approved throughout the construction of the authorised development unless otherwise agreed with the relevant planning authority.*
- (4) No part of the authorised development must be commissioned until a landscaping and biodiversity management and enhancement plan for that part has been submitted to and, after consultation with North Yorkshire County Council and the Yorkshire Wildlife Trust, approved by the relevant planning authority.*
- (5) The plan submitted and approved pursuant to sub-paragraph (4) must include details of—*
 - (a) all new shrub and tree planting;*
 - (b) measures to enhance existing shrub and tree planting that is to be retained;*
 - (c) measures to enhance biodiversity and habitats;*
 - (d) an implementation timetable; and*
 - (e) annual landscaping and biodiversity management and maintenance.*
- (6) Any shrub or tree planted as part of the approved plan that, within a period of five years after planting, is removed, dies or becomes, in the opinion of the relevant planning authority, seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted unless otherwise agreed with the relevant planning authority.*
- (7) The plan submitted and approved pursuant to sub-paragraph (4) must be in accordance with the principles of the indicative landscaping and biodiversity strategy.*
- (8) The plan must be implemented and maintained as approved during the operation of the authorised development unless otherwise agreed with the relevant planning authority.”*

Requirement 16 – Archaeology

“16.—

- (1) *No part of the authorised development must commence until a scheme of archaeological investigation for that part has been submitted to and, after consultation with North Yorkshire County Council in its capacity as the relevant archaeological body, approved by the relevant planning authority.*
- (2) *The scheme submitted and approved must be in accordance with the principles set out in chapter 13 of the environmental statement.*
- (3) *The scheme must identify any areas where further archaeological investigations are required and the nature and extent of the investigation required in order to preserve by knowledge or in-situ any archaeological features that are identified.*
- (4) *Any archaeological investigations implemented must be carried out—*
 - (a) *in accordance with the approved scheme; and*
 - (b) *by a suitably qualified person or organisation approved by the relevant planning authority unless otherwise agreed with the relevant planning authority.”*

Areas of disagreement

2.22 There are no areas of disagreement between the parties.

Signed: *Emma Sharpe*

Print name and position: Emma Sharpe, Assistant Inspector of Historic Buildings and Areas

On behalf of Historic England

Date: 10 October 2017

Signed: 

Print name and position: Geoff Bullock, Partner, Dalton Warner Davis LLP

On behalf of Eggborough Power Limited

Date: 11 October 2017

APPENDIX 1: HISTORIC ENGLAND STAGE 2 CONSULTATION RESPONSE



Historic England

YORKSHIRE OFFICE

[REDACTED]
Dalton Warner Davis
21 Garlick Hill
London
EC4V 2AU

Direct Dial: [REDACTED]

Our ref: PL00040260

22 February 2017

Dear [REDACTED]

EGGBOROUGH POWER LIMITED- THE EGGBOROUGH CCGT PROJECT, LAND WITHIN AND TO THE NORTH OF THE EGGBOROUGH PWER STATION SITE, NEAR SELBY, NORTH YORKSHIRE, DN14 0BS

Thank you for consulting Historic England on the Eggborough CCGT Project at this stage. Please see below our comments in relation to the Preliminary Environmental Information Report and the proposals as a whole.

Historic England Advice

Preliminary Environmental Information Report Volume 1:
Chapter 13 (Cultural Heritage)

We welcome the scope and format of the report and the general approach it takes to identifying the Cultural Heritage Baseline. We have some specific comments which we think could improve the more analytical aspects of this chapter and we outline these below. As this is a preliminary report we hope these comments will be useful in compiling the full Environmental Statement that will form part of the Development Consent Order application.

Assessment of setting 13.4.3-13.4.47- we welcome the inclusion of references to setting within the consideration of the existing baseline. Currently this is presented as a description of the existing setting, a statement of the facts rather than a critical assessment.

As part of the Environmental Statement we would expect an assessment of the contribution setting makes to the significance of the individual heritage assets, in line with the guidance in Historic England GPA3: The Setting of Heritage Assets. We appreciate there are a large number of assets within the study area but the assessment does not need to be overly long. We would be happy to provide further advice on this and comment on a draft of the ES once it is available.

13.4.3-13.4.7- investigations in the area and particularly at Castleford have revealed more about Roman activity in the area. There is a large fort and civilian settlement at Castleford, and recently discovered evidence for quite intensive industrial processes



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with some items found in the Roman Empire only known to have been produced in Castleford. The implication of this is that we might need to think again about the context of the Roman fort at Roall Hall and the potential for undiscovered road connections. We would be happy to discuss this further if that would be helpful.

13.4.20- this is a particularly important group of heritage assets in which the significance of each is enhanced by its relationship with the others. It is therefore good that they are considered as a group. The report indicates that the proposed power plant would be highly visible from these assets and we therefore recommend a detailed assessment of the contribution setting makes to the significance of each and the group is undertaken. The impact of this visibility on the setting and consequently significance of the assets should then be thoroughly assessed.

13.4.21- part of the significance of the Church of St Edmund, Kellington is related to British Coal mining a new seam under the church in 1991. As a result of structural issues, the tower was rebuilt (with advice from English Heritage) and the whole of the interior and a 2m strip around the exterior of the church was archaeologically excavated. This was quite a well-known and novel piece of work which would be worth referencing.

13.6 Likely Impacts and Effects- several paragraphs in this section indicate that ‘the site does not contribute to, or form part of the setting of the heritage asset’. It is unclear whether this means the site is not visible from the assets. It would be beneficial if this could be clarified in each case.

13.6.43-13.6.45- this section would benefit from a more detailed analysis of the contribution setting makes to the significance of the heritage assets. The impact of the proposals should also be assessed in more depth, especially given that the proposed development will be highly visible within the setting of the assets.

13.7- we do not have any additional comments on the archaeological mitigation and welcome the acknowledgement of the need to consult the County Archaeologist. We have a query about 13.7.3 in that, until the geophysical survey has been undertaken it is difficult to say that there would be no significant effects.

General Comments on the Proposed Development

The existing Eggborough coal-fired power station has a negative impact on a number of heritage assets in the surrounding area. Given the proximity of Eggborough to the other power stations at Ferrybridge and Drax, there is also a cumulative impact on some assets from multiple power stations being visible within their setting. Once the existing power station is decommissioned and demolished, there would be an improvement in the setting of some of these assets, which will in most cases lead to a reduction in the harm caused to their significance.



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It is therefore necessary to assess the impact of the proposed CCGT power station in this context. If the existing power station is harmful to the setting of a designated heritage asset, it is not sufficient to say that the proposed CCGT power station will only have a minimal 'additional' impact. It should be borne in mind that if the proposed CCGT power station were not built there could be a substantial improvement in the setting of these heritage assets. We would argue that the harm should therefore be measured from this improved situation, and the fact that harm to the assets through development within their setting could be continued for at least another generation should be acknowledged.

That said, we acknowledge that from the visualisations we have seen, the proposed CCGT plant would appear to be less visually prominent and therefore has the potential to impact on fewer heritage assets than the existing coal-powered station.

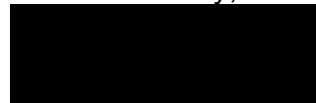
The report acknowledges that the existing Eggborough Power Station is a non-designated heritage asset. You may be aware that the station was considered for listing as part of a national project in response to the decommissioning of coal-fired power stations. Eggborough was not deemed to meet the high criteria for listing but the report does acknowledge its historic value and that recording prior to any demolition would capture this value for the future. Although the works to the existing power station are outside the scope of this current consultation, we refer you to the following publications by way of background and context:

- Introduction to Heritage Assets: 20th-Century Coal- and Oil-Fired Electric Power Generation
- England's Redundant Post-War Coal- and Oil-Fired Power Stations: Guidelines for Recording and Archiving Their Records

Next Steps

We would welcome the opportunity of providing further advice and would be happy to comment on a draft of the Cultural Heritage Chapter of the Environmental Statement once that is available. In the meantime if you have any queries please do get in touch.

Yours sincerely,



Assistant Inspector of Historic Buildings and Areas

