

# The Drax Power (Generating Stations) Order

Land at, and in the vicinity of, Drax Power Station, near Selby, North Yorkshire

## Environmental Statement 8 – Historic Environment



The Planning Act 2008  
The Infrastructure Planning (Applications: Prescribed Forms and Procedure)  
Regulations 2009 – Regulation 5(2)(a)

### **Drax Power Limited**

Drax Repower Project

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## 8 HISTORIC ENVIRONMENT

### 8.1 Introduction

- 8.1.1. This Chapter reports the outcome of the assessment of likely significant effects arising from the Proposed Scheme upon the historic environment. The Chapter considers the changes to the settings of Designated Heritage Assets from the construction and operation phase of the Proposed Scheme; and the loss of, or disturbance to, known and potential Above and Below-Ground Heritage Assets from the construction of the Proposed Scheme.
- 8.1.2. The Chapter describes the assessment methodology, the baseline conditions at the Site and in the surrounding area, any primary and tertiary mitigation adopted for the purposes of the assessment, a summary of the likely significant effects taking into account national legislation and local planning policy, the further mitigation measures required to prevent, reduce or offset any significant negative effects, and the likely residual effects after these measures have been employed.
- 8.1.3. This Chapter (and its associated figures and appendices) is intended to be read as part of the wider ES, with particular reference to Historic Environment Desk-based Assessment (Appendix 8.1 and Figures 8.1 and 8.2)
- 8.1.4. This chapter also provides the information required under Regulation 5(2)(m) of the APFP Regulations, being a plan with accompanying information identifying any statutory or non statutory sites or features of the historic environment, including scheduled monuments, World Heritage sites, listed buildings and other historic structures, archaeological sites and registered battlefields, together with an assessment of any effects on such sites, features or structures likely to be caused by the proposed development.

### 8.2 Policy, Legislation and Guidance

#### National Policy Statement (NPS)

- 8.2.1. The power related NPS's include the NPS for Fossil Fuel Electricity Generating (EN2), NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) and NPS for Electricity Networks Infrastructure (EN-5). Section 5.8 in the Overarching NPS for Energy (EN-1)<sup>1</sup> is most relevant to Cultural Heritage and contains the following statements:
- 8.2.2. Paragraph 5.8.1 states that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment. Paragraph 5.8.2 defines the historic environment as "*including all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, landscaped and planted or managed flora. Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called "heritage assets"*". The policy defines a "heritage asset" as any building, monument, site, place, area or landscape, or any combination of these. The sum of the

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<sup>1</sup> Section 5.8 Historic Environment in the Department for Energy and Climate Change's (July 2011) Overarching National Policy Statement for Energy (NPS EN-1).

heritage interests that a Heritage Asset holds is referred to as its cultural heritage significance (this is different to significance of effect in EIA terms).

- 8.2.3. Paragraph 5.8.4 states that there *"are Heritage Assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance. These include:*
  - 8.2.4. *Those that have yet to be formally assessed for designation;*
  - 8.2.5. *Those that have been assessed as being designatable but which the Secretary of State has decided not to designate; and*
  - 8.2.6. *Those that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979."*
- 8.2.7. Furthermore, in paragraph 5.8.5 the policy considers that the *"absence of designation for such heritage assets does not indicate lower significance. If the evidence before the IPC [now the Secretary of State] indicates to it that a non-designated Heritage Asset of the type described in paragraph 5.8.4 may be affected by the proposed development then the heritage asset should be considered subject to the same policy considerations as those that apply to statutory designated heritage assets."*
- 8.2.8. Paragraph 5.8.6 concludes that the Secretary of State *"should also consider the impacts on other non-designated heritage assets, as identified either through the development plan making process (local listing) or through the IPC's [Secretary of State's] decision making process on the basis of clear evidence that the assets have a heritage significance that merits consideration in its decisions, even though those assets are of lesser value than designated assets."*
- 8.2.9. The policy considers (Paragraph 5.8.8) that as part of the applicant's assessment *"the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact."*
- 8.2.10. Paragraph 5.8.9 is concerned with Heritage Assets with an archaeological interest and states that the *"applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation"*. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.
- 8.2.11. Paragraph 5.8.10 states that the applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.
- 8.2.12. Paragraph 5.8.14 considers that there should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost heritage assets

cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II\* listed buildings; grade I and II\* registered parks and gardens; and World Heritage Sites, should be wholly exceptional.

- 8.2.13. Paragraph 5.8.15 states that any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. Where the application will lead to substantial harm to or total loss of significance of a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.
- 8.2.14. Paragraph 5.8.16 concludes that not all elements of a Conservation Area will necessarily contribute to its significance. The policies set out in paragraphs 5.8.9 to 5.8.15 above apply to those elements that do contribute to the significance. When considering proposals the Secretary of State should take into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole.
- 8.2.15. Paragraph 5.8.17 considers that where the loss of significance of any heritage asset is justified on the merits of the new development, the Secretary of State should consider imposing a condition on the consent or requiring the applicant to enter into an obligation that will prevent the loss occurring until it is reasonably certain that the relevant part of the development is to proceed.
- 8.2.16. Paragraph 5.8.18 states that when considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the cultural heritage significance of, the asset. When considering applications that do not do this, the Secretary of State should weigh any negative effects against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.

[National Planning Policy Framework, Section 12 Conserving and Enhancing the Historic Environment<sup>2</sup>](#)

- 8.2.17. Policy 126: *"Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:*

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<sup>2</sup> NPPF 2012 Section 12 Paragraphs 126-141

- *The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; and*
- *The desirability of new development making a positive contribution to local character and distinctiveness.*
- *Opportunities to draw on the contribution made by the historic environment to the character of a place."*

8.2.18. Policy 127: *"When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest."*

8.2.19. Policy 128: *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."*

8.2.20. Policy 129: *"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal."*

8.2.21. Policy 130: *"Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision."*

8.2.22. Policy 131: *"In determining planning applications, local planning authorities should take account of:*

- *The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *The desirability of new development making a positive contribution to local character and distinctiveness."*

8.2.23. Policy 132: *"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing*

*justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

- 8.2.24. Policy 133: *"Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
- The nature of the heritage asset prevents all reasonable uses of the site;*
  - No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
  - Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
  - The harm or loss is outweighed by the benefit of bringing the site back into use."*
- 8.2.25. Policy 134: *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."*
- 8.2.26. Policy 135: *"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*
- 8.2.27. Policy 136: *"Local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred."*
- 8.2.28. Policy 137: *"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably."*
- 8.2.29. Policy 138: *"Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole."*
- 8.2.30. Policy 139: *"Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets."*

- 8.2.31. Policy 140: *"Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies."*
- 8.2.32. Policy 141: *"Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted."*
- 8.2.33. Planning Practice Guidance (PPG) published by the DCLG alongside the NPPF is regularly updated to provide guidance on the implementation of the planning policies. The section with reference to Cultural Heritage is entitled Conserving and Enhancing the Historic Environment and was revised in 2014. It provides guidance to NPPF paragraphs 126 to 141.

**Selby District Local Plan (adopted February 2005)<sup>3</sup>.**

- 8.2.34. The following saved policies are relevant to the Proposed Scheme:
- 8.2.35. Policy ENV22 states that *"Development will not be permitted where it would have a detrimental effect on the character, fabric or setting of a listed building."*
- 8.2.36. Policy ENV25 states that *"Development within or affecting a conservation area will be permitted provided the proposal would preserve or enhance the character or appearance of the conservation area, and in particular:*
- *The scale, form, position, design and materials of new buildings are appropriate to the historic context;*
  - *Features of townscape importance including open spaces, trees, verges, hedging and paving are retained;*
  - *The proposal would not adversely affect the setting of the area of significant views into or out of the area; and*
  - *The proposed use, external site works and boundary treatment are compatible with the character and appearance of the area."*
- 8.2.37. Policy ENV27 states that *"Where scheduled monuments or other nationally important archaeological sites or their settings are affected by proposed development, there will be a presumption in favour of their physical preservation. In exceptional circumstances where the need for the development is clearly demonstrated, development will only be permitted where archaeological remains are preserved in situ through sympathetic layout or design of the development"*.
- 8.2.38. Policy ENV28 states that *"Where development proposals affect sites of known or possible archaeological interest, the District Council will require an archaeological assessment/evaluation to be submitted as part of the planning application. Where development affecting archaeological remains is acceptable in principle, the Council will*

<sup>3</sup> SDLP Section 4: The Built Environment, 61-70

*require that archaeological remains are preserved in situ through careful design and layout of new development. Where preservation in situ is not justified, the Council will require that arrangements are made by the developer to ensure that adequate time and resources are available to allow archaeological investigation and recording by competent archaeological organisation prior to or during development”.*

### **The Selby District Core Strategy Local Plan (2013)**

8.2.39. The policy in the strategic local plan relevant to the Proposed Scheme is Policy SP18 Protecting and Enhancing the Environment which states that the high quality and local distinctiveness of the natural and manmade environment will be sustained by:

- Safeguarding and, where possible, enhancing the historic and natural environment including the landscape character and setting of areas of acknowledged importance.
- Conserving those historic assets which contribute most to the distinct character of the District and realising the potential contribution that they can make towards economic regeneration, tourism, education and quality of life.

### **Legislation**

8.2.40. The applicable legislative framework is summarised as follows:

#### **Ancient Monuments and Archaeological Areas Act (AMAAA) 1979**

8.2.41. The Ancient Monuments and Archaeological Areas Act 1979 largely relates to Scheduled Monuments. Section 61 defines sites that warrant protection due to their being of national importance as 'ancient monuments'. A monument is defined by the Act as "any building, structure or work above or below the surface of the land, any cave or excavation; any site comprising the remains of any such building, structure or work or any cave or excavation; and any site comprising or comprising the remains of any vehicle, vessel or aircraft or other movable structure or part thereof."

8.2.42. Section 61 of the Act states that deliberate damage to a monument is a criminal offence and any works taking place within one would require Scheduled Monument Consent from the Secretary of State.

#### **The Infrastructure Planning (Decisions) Regulations 2010**

8.2.43. Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 sets out the obligations on the Secretary of State when deciding applications for development consent under the Planning Act 2008 affecting listed buildings (or their settings), conservation areas or scheduled monuments (or their settings). The obligations are:

- When deciding an application which affects a listed building or its setting, the Secretary of State must have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses;
- When deciding an application relating to a conservation area, the Secretary of State must have regard to the desirability of preserving or enhancing the character or appearance of that area; and
- When deciding an application for development consent which affects or is likely to affect a scheduled monument or its setting, the Secretary of State must have regard to the desirability of preserving the scheduled monument or its setting

## Hedgerows Regulations 1997

8.2.44. The Hedgerow Regulations Act (1997) presents the following criteria for determining important hedgerows (archaeology and history):

- The hedgerow marks the boundary, or part of the boundary, of at least one historic parish or township and for this purpose "historic" means existing before 1850;
- The hedgerow incorporates an archaeological feature which is: (a) included in the schedule of monuments compiled by the Secretary of State under section 1 (schedule of monuments) of the Ancient Monuments and Archaeological Areas Act 1979(7); or (b) recorded at the relevant date in a Sites and Monuments Record (now Historic Environment Record);
- The hedgerow is: (a) is situated wholly or partly within an archaeological site included or recorded as mentioned in paragraph 2 or on land adjacent to and associated with such a site; and (b) is associated with any monument or feature on that site;
- The hedgerow: (a) marks the boundary of a pre-1600 AD estate or manor recorded at the relevant date in a Sites and Monuments Record or in a document held at that date at a Record Office; or (b) is visibly related to any building or other feature of such an estate or manor; and
- The hedgerow is: (a) recorded in a document held at the relevant date at a Record Office as an integral part of a field system pre-dating the Inclosure Acts(8); or (b) is part of, or visibly related to, any building or other feature associated with such a system, and that system is (i) substantially complete; or (ii) is of a pattern which is recorded in a document prepared before the relevant date by a local planning authority, within the meaning of the 1990 Act(9), for the purposes of development control within the authority's area, as a key landscape characteristic.

### Guidance

8.2.45. The following guidance documents have been used during the preparation of this Chapter:

- Chartered Institute for Archaeologists (CIfA) 2014a Code of Conduct (Ref. 8.8).
- CIfA 2014b Standards and Guidance for Consultancy Advice (Ref. 8.9).
- CIfA 2014 Standards and Guidance for Historic Environment Desk-based Assessment (Ref. 8.10).
- Historic England 2017, The Setting of Heritage Assets, Historic Environment Good Practice in Planning: 3 (Second Edition) (Ref. 8.11).

## 8.3 Scoping Opinion and Consultation

### Consultation

Table 8-1 provides a summary of the consultation activities undertaken in support of the preparation of this Chapter.

Table 8-1 - Summary of Consultation Undertaken to Date (Historic Environment)

<b>Body / organisation</b>	<b>Meeting dates and other forms of consultation</b>	<b>Summary of outcome of discussions</b>
North Yorkshire County Council (NYCC)	16 April 2018	<p>After consideration of the geophysical and trial trenching results, the Planning Archaeologist (PA) from NYCC has made the following recommendations regards mitigation :</p> <p>There is no requirement for further archaeological trenching.</p> <p>A strip, map and record excavation should be undertaken prior to construction at the location of the AGI (at the location of the archaeological evaluation trenching).</p> <p>A watching brief (archaeological monitoring) should be undertaken during the excavation of the pipe trench, easements and also during ground moving activities associated with the installation of the temporary compound/laydown area and passing place along Rusholme Lane.</p> <p>The production of a Written Schemes of Investigation and the requirement for the fieldwork are to be secured via requirements contained in Schedule 1 to the draft DCO (document reference 3-1)</p>
North Yorkshire County Council (NYCC)	6 April 2018	Approval given of evaluation fieldwork report and of WSP's general approach of investigating the archaeological potential of the Site.
NYCC	9 February 2018	Approval of Written Scheme of Investigation for an Archaeological Evaluation
Historic England	28 November 2017	<p>Historic England confirmed that the 10 km Zone of Theoretical Visibility (ZTV) should be utilised in the setting assessment. It was highlighted that this distance would include a number of locations and settings which are unlikely to be affected by the proposed project.</p> <p>It was agreed the most appropriate mitigation strategy for Drax Augustinian priory (SM 1016857) should comprise enhancement measures such as the placement of interpretative signage on the PRoW.</p>

Body / organisation	Meeting dates and other forms of consultation	Summary of outcome of discussions
NYCC	14 November 2017	Discussions regarding the preliminary geophysical survey results concluded that trial trenching within the pipeline corridor should be carried out as part of the ES. An open area excavation would follow the trial trenching if archaeological remains of significance were found.
NYCC	24 October 2017	The Planning Archaeologist (PA) recommended that a programme of trial trenching within the footprint of the pipeline options should follow the geophysical survey. The extent of this investigation will be agreed pending the survey results.

### Scope of the Assessment

- 8.3.1. This section explains how the scope of the assessment has developed, and re-iterates the evidence base for insignificant effects (which have therefore been scoped out of the assessment), following further iterative assessment.
- 8.3.2. An EIA Scoping Report was submitted to the SoS in September 2017, as presented in **Appendix 1-1**.
- 8.3.3. A Scoping Opinion was received by the Applicant from the Planning Inspectorate (on behalf of the SoS) on 23 October 2017, including formal responses from statutory consultees. The responses from the Planning Inspectorate/SoS in relation to the historic environment, and how those requirements should be addressed by the applicant, are set out below in Table 8-2 and responses from Historic England are set out in Table 8-3.

Table 8-2 - Scoping Opinion Summary Table (Historic Environment)

Section of Scoping Report	Applicant's Proposed Matter	Planning Inspectorate's Comments	Summary of Response
7.4.2	Potential effects on archaeological resource within the curtilage of Drax Power Station during demolition and construction.	The Inspectorate agrees that in those areas of the site where existing built development is/has been located, buried archaeological remains are unlikely to be present. However, the Inspectorate also notes from section 4.8 of the Scoping Report that there is '...the potential for	The potential effects on the archaeological resource outside the curtilage of the Existing Drax Power Station Complex have been assessed for the construction phase. Trial trenching has also been carried out prior to submission of the DCO Application to help inform

Section of Scoping Report	Applicant's Proposed Matter	Planning Inspectorate's Comments	Summary of Response
		<p><i>remains of both the Romano British and Medieval Periods to be present within the Site and the wider area'. Therefore, the potential effects on archaeological resource outside the curtilage of the power station should be assessed for the construction phase. The overall extent and approach to the archaeological surveys should be discussed and agreed with the local authority's archaeological advisors. The approach should be fully justified in the ES.</i></p>	<p>the pipeline route corridor, resulting in one route corridor being discounted.</p> <p>Site investigations that include geophysics and trial trenching have been discussed with the Principal Archaeologist (PA) at NYCC.</p>
7.4.2	Effects on the setting of designated heritage assets during operation of the Gas Pipeline.	The Inspectorate agrees that the operation of the buried Gas Pipeline is not likely to result in significant effects on the settings of heritage assets and that this can be scoped out of the ES. However, any impacts on setting from above ground structures associated with the gas pipeline should be identified and assessed where relevant.	The impacts of the Gas Pipeline on the setting of Designated Heritage Assets have been scoped out of the assessment. The impacts of the AGI and GRF on settings have been assessed
7.4.3	Loss or disturbance to known or unknown archaeological	Section 7.4.3 of the Scoping Report notes that effects will only be assessed during	Noted – scoped out of the assessment.

Section of Scoping Report	Applicant's Proposed Matter	Planning Inspectorate's Comments	Summary of Response
	assets during operation of the Gas Pipeline.	construction. No reference is made to the operational phase. However, given the nature of the project and the operational phase, the Inspectorate does not consider there would be likely significant effects and agrees that operational effects to archaeological assets do not need to be assessed within the ES.	
7.4.4	Study Area	Section 7.4.4 of the Scoping Report states that the desk based assessment would consider the application site and the immediate area within a 300m study area; however, it is noted that some of the sensitive receptors identified in section 7.4.1 are outside of this radius (according to section 4.8). The Applicant is advised to give due consideration to the Scheduled Monuments and listed buildings in proximity to the application site. The Applicant should consider using the Zone of Visual Influence (ZVI) developed for the Landscape and Visual Assessment (LVIA) to identify the potential extent of impacts on the settings of heritage assets. The Applicant's attention is also drawn to the comments of Historic England in this regard.	The setting assessment was carried out up to 10 km as per the ZTV produced by the landscape team, which takes account of the Pipeline Area. This was done in accordance with comments from Historic England.

Section of Scoping Report	Applicant's Proposed Matter	Planning Inspectorate's Comments	Summary of Response
		<p>The study area should be agreed with Historic England and the local authority and should be clearly identified and fully justified within the ES. The Inspectorate assumes that the proposed approach to the study area would apply in respect to the pipeline development as well as the proposed power station site.</p>	
7.4.4	Archaeological investigations	<p>The Scoping Report explains that a site visit will be undertaken for the purposes of identifying any previously unrecorded archaeological assets. It is unclear whether this would comprise solely a site walkover or other methods to identify unknown archaeology (for example, geophysical survey, trial trenching). The Inspectorate advises the Applicant to discuss and agree appropriate methods with the relevant consultees and directs the Applicant to the comments of North Yorkshire County Council and Selby District Council in this regard. It should be clear in the ES how the results of the desk-based assessment have informed the overall approach to the assessment and in identifying the need for any further investigation.</p>	<p>A geophysical survey has been undertaken prior to submission of the DCO within all areas of the Site outside the Existing Drax Power Station Complex, the results of which was used to inform the pipeline route corridor. Trial trenching has been carried out prior to submission of the DCO in the field containing the AGI and was used to inform the archaeological potential of this area.</p>

Section of Scoping Report	Applicant's Proposed Matter	Planning Inspectorate's Comments	Summary of Response
7.4.4	Valuation of assets	The ES should set out in clear terms how value is assigned for each type of heritage assets considered and confirm whether professional judgement and/or relevant guidance has been used. In determining value of heritage assets the Applicant should seek agreement with the local authority's heritage team and Historic England.	This has been addressed in the ES – See Table 8-5.
n/a	Written scheme of investigation (WSI)	The Scoping Report has not identified whether the Applicant intends to undertake further archaeological investigations post-consent (in line with any WSI). If the Applicant does intend to do so, this should be secured by a suitably worded DCO requirement and a draft version of any WSI should be appended to the ES and agreed with relevant statutory consultees.	NYCC have confirmed that no further archaeological investigations are required as part of the DCO application. NYCC have recommended the following mitigation measures to be undertaken post-submission: a watching brief to be undertaken during construction within the Pipeline Area, the carbon capture readiness reserve space A and Rusholme Lane Area. NYCC have also confirmed that a strip, map and record excavation should be undertaken post-submission/pre-construction within the field containing the AGI. NYCC have confirmed that a WSI for the fieldwork can be produced post-submission/pre construction. The requirement for this fieldwork has been included in the draft DCO

Section of Scoping Report	Applicant's Proposed Matter	Planning Inspectorate's Comments	Summary of Response
			<p>(document reference 3.1) which secures further archaeological mitigation fieldwork as required and in accordance with a WSI.</p> <p>The WSI is to be prepared substantially in accordance with this chapter of the ES and must identify those areas where archaeological mitigation fieldwork is required. The WSI is required to be approved by the relevant local planning authority in consultation with NYCC.</p>

Table 8-3 - Statutory Consultation Table (Historic Environment)

Body/organisation	Comments	Response
Historic England (HE)	HE have recommended that where harm is identified to highly graded assets, photomontages and wireframes are produced to show the cumulative impact of the proposed stacks with the existing power station.	Wireframes and photomontages have been produced and are contained in the ES Volume 1 Chapter 10 Landscape and Visual.
	Historic England have required further discussion on the results of the geophysical survey and are willing to participate in any on-going discussion as to what form the mitigation could take.	The geophysical survey and evaluation trenching fieldwork report has been issued to Historic England. As no remains of national significance were exposed or are expected, NYCC are advising on the archaeological mitigation strategy.
NYCC	"Sections 8.6.5 & 8.6.46 summarise the initial results of the geophysical survey as it applies to the eastern end of pipeline Option B. The survey has revealed anomalies consistent with Iron Age and	The results of the geophysical survey contributed to the decision to opt for Pipeline Option A so as to avoid potentially nationally significant remains.

Body/organisation	Comments	Response
	Romano-British settlement. Although the exact significance of this cannot be understood without trial trenching the possibility of avoiding impact on these remains might be a contributing factor in the choice of pipeline routes.”	
NYCC	“There may be areas where the archaeological resource is still not properly understood following field evaluation and past experience would suggest that some level of archaeological monitoring will be beneficial in advancing our understanding of the archaeological resource across the chosen the pipeline route. The proposed mitigation strategy set out in Section 8.7.2 is agreed, i.e. that very significant remains should be avoided in the first instance. The level of flexibility to achieve this is not stated and it is unclear as to what measures might be taken to avoid significant archaeology. As mentioned above archaeological remains might play a factor in deciding on the pipeline option.”	NYCC have confirmed that it is unlikely that very significant remains will be present and those features that been identified (and any unexpected remains) could adequately be recorded in advance of, or during development. The Applicant's approach (DBA, geophysical survey and trial trenching) to investigating the potential for below-ground archaeological remains has been approved by NYCC and are secured via requirements contained in Schedule 2 to the draft DCO (document reference 3.1).

### Insignificant Effects

8.3.4. The following effects were considered insignificant at the scoping stage and have therefore not been considered within the ES:

- Due to previous ground disturbance, no impacts on below-ground archaeological remains are anticipated during construction within the curtilage of the Existing Drax Power Station Complex;
- The effects on the setting of Designated Heritage Assets during operation of the Gas Pipeline with the exception of the AGI and GRF;
- The loss or disturbance to known or unknown archaeological assets during operation of the Gas Pipeline; and
- The effects on setting during the Site Reconfiguration Works that include the demolition, removal and relocation of existing facilities at the Existing Drax Power Station Complex prior to the commencement of any further construction activities.

### Potentially Significant Effects

- 8.3.5. The following effects have been considered as potentially significant and are included for assessment in this Chapter. Harm to significance of the Heritage Asset is the basis of the assessment and this is reported in this Chapter.

#### Construction Phase

##### **Below-Ground Heritage Assets**

- 8.3.6. Potentially significant effects that have been assessed in the Chapter include harm to Below-Ground Heritage Assets within the footprint of the Gas Pipeline, Above Ground Installation (AGI), the Gas Receiving Facility (GRF), the Rusholme Lane Area, Development Parcel A within the carbon capture readiness reserve space.

##### **Above-Ground Heritage Assets**

- 8.3.7. One field boundary that is likely to be protected under the Hedgerows Regulations Act 1997 borders the Site. The boundary, comprising a hedge-lined drain, has been identified on 1853 ordnance survey mapping and therefore may be part of “*an integral part of a field system pre-dating the Enclosure Acts*”. The drain and the hedge that surrounds it will not be disturbed during the instalment of the pipe trench.

##### **Setting**

- 8.3.8. In support of the assessment of potentially significant effects resulting from the instillation of the GRF, AGI, the Pipeline and the construction of Unit X and Unit Y, a setting assessment was undertaken for all Designated Heritage Assets including conservation areas within a 10 km radius of the Proposed Scheme.

#### Operation

##### **Setting**

- 8.3.9. In support of the assessment of potentially significant effects resulting from a new built form during the operation of the GRF, AGI and Units X and Y, a setting assessment was undertaken for all Designated Heritage Assets including conservation areas within a 10 km radius of the Proposed Scheme.

## 8.4 Assessment Methodology and Significance Criteria

### Scenarios Assessed

- 8.4.1. A number of stages were assessed as part of the ES as summarised in Chapter 3 (Site and Project Description). For the purposes of the cultural heritage assessment, key assumptions were made associated with each Stage as summarised in Table 8-4 below. Five stages have been assessed :
- Stage 0 = Site reconfiguration works;
  - Stage 1 = Construction of Unit X;
  - Stage 2 = Operation of Unit X and construction of Unit Y;
  - Stage 3 = Operation of Unit X and Y; and
  - Stage 4 = Decommissioning

Table 8-4 - Stages and Cultural Heritage Assessment Assumptions

Stage	Title	Description	Assumptions
0	Site Reconfiguration works	<p>Works may be completed via two possible mechanisms as follows: A TCPA application, applied for in 2018. As part of the DCO Application. This ES considers the scenario where this is completed under the DCO.</p>	<p>The Site Reconfiguration Works include the demolition and relocation of existing facilities (the turbine outage stores, learning centre, contractor's compound and welfare facilities, leisure facilities (a private squash court)). A 10 m high cooling spray screen would be constructed between the relocated facilities and the southern cooling towers. All the structures to be demolished (and relocated) are under 18 m in height. The turbine outage store and learning / visitor centre are 18 m high with other structures varying from 2.5 to 5 m.</p> <p>All works would take place within the Existing Drax Power Station Complex. Works will be concentrated in areas of hardstanding and amenity grassland.</p>
1	Construction of Unit X	<p>This stage assumes that the Site Reconfiguration Works have been completed by either consenting route. This stage refers to the construction of Unit X, along with the construction of the Gas Pipeline, the Battery Storage Facility, GRF which includes the Compressor Building.</p> <p>There would be a new access point off Rusholme Lane to the AGI which consists of -a PIG Trap</p>	<p>The assessment assumes there is a construction period of approximately 34 months (per unit) followed by commissioning. Construction of Unit X would commence in 2019.</p> <p>The effects during construction associated with noise, lighting and traffic flow will be temporary.</p> <p>The extent of landtake outside the confines of Existing Drax Power Station Complex would</p>

Stage	Title	Description	Assumptions
		<p>Launching Station and a Minimum Offtake Connection. In addition there will be a temporary pedestrian bridge or alternative pedestrian crossing to avoid staff crossing New Road.</p> <p>During this stage one coal unit (either 5 or 6) continues to operate while Unit X is being constructed.</p>	<p>be the same for Stage 1 and 2.</p> <p>The construction of the AGI and GRF will necessitate ground disturbance.</p> <p>The Gas Pipeline will be installed using an open cut trench technique for most sections.</p>
2	Operation of Unit X and Construction of Unit Y	<p>The stage refers to the operation and maintenance of Unit X, the Gas Pipeline and the battery storage facility and the construction of Unit Y.</p> <p>The construction of Unit Y is assumed to take place 12 months after Unit X is complete, however this could be longer.</p> <p>If Unit Y is not built then this stage 2 is a worst case assessment of the operation of Unit X.</p>	<p>The assessment assumes there is a construction period of approximately 34 months (per unit) followed by commissioning. Unit X will be constructed with OCGT capability by 2012/22 and will be CCGT ready by 2022/23. Construction for Unit Y would commence in 2024 and be completed by 2027.</p> <p>The extent of landtake outside the confines of Existing Drax Power Station Complex would be the same for Stage 1 and 2.</p>
3	Operation of Unit X and Y	<p>This stage refers to the operation and maintenance of Unit X, Unit Y, the Gas Pipeline and the Battery Storage Facility.</p> <p>The construction laydown / parking areas would be reinstated after Unit Y is built.</p>	<p>Both units would be operating by 2027.</p>
4	Decommissioning	<p>Pipeline left in situ and all above ground infrastructure removed / reused / recycled etc</p>	<p>The assessment assumes that the decommissioning of the Proposed Scheme (which covers demolition and removal of the structures</p>

Stage	Title	Description	Assumptions
			comprising the Proposed Scheme) would take place approximately 25 years post Stage 3 of the Proposed Scheme. All structures would be removed other than the Gas Pipeline and AGI under National Grid's ownership which is assumed to remain in situ.

8.4.2. The assessment considers that the significance of effect on the setting of Designated Heritage Assets arising from Stage 2 would be similar to that arising from Stage 3, despite Stage 2 comprising a smaller mass of development and fewer elements.

#### Embedded Mitigation

8.4.3. The Proposed Scheme seeks to retain North Station Wood (north of the materials handling entrance) and a 15 m wide woodland buffer within the Power Station Site, adjacent to the northern boundary. This will provide a continuous belt of woodland during the construction and operation of the Proposed Scheme (without CCS) which would reduce the harm to the setting of Drax Augustinian Priory. This can be classed as embedded mitigation for as long as CCS is not required. A 15 m wide buffer zone should be considered between the retained woodland in Development Parcel B and the laydown area to protect it during construction.

#### Extent of the Study Area

8.4.4. Although the focus of the assessment is the Site, the essential archaeological and historic background extends into its immediate environs to provide a context for the Proposed Scheme. An inner search area of approximately 300 m extending out from the Site Boundary was applied for the assessment of all types of Heritage Assets (designated, non-designated and potential) and a second wider search area of 10 km was applied for the setting assessment of Designated Heritage Assets. Where the archaeological background identifies the presence of known archaeological remains this then suggests potential for further but not yet identified archaeological remains to be present. The extent of the inner study area is in accordance with best practice and professional judgement based on the nature of the Proposed Scheme and the extent of the outer study area utilises the ZVT for landscaping as recommended by Historic England in the scoping opinion. The outer study area is presented on Figure 8.1 and the inner study area is presented on Figure 8.2.

#### Method of Baseline Data Collation

8.4.5. The Cultural Heritage Desk Based Assessment (DBA) in Appendix 8.1 includes a narrative of the archaeological and historical context of the Site and its immediate environs. A search for Designated Heritage Assets was undertaken up to 10 km from the Site and for all types of assets up to 300 m. It includes the results of a site visit which was undertaken for the purposes of identifying any previously unrecorded archaeological assets, the condition of known assets, and for assessing the effect of the Proposed Scheme on the settings of Designated Heritage

Assets. In accordance with NPS EN-1 (paragraph 5.8.8) the DBA presents the significance of assets on which there is a predicted impact from the Proposed Scheme using the prescribed NPS EN-1 and NPPF heritage values (aesthetic, archaeological, architectural and historical).

8.4.6. The following sources were consulted during the data-gathering process:

- North Yorkshire Historic Environment Record (NYHER);
- National Heritage List for England (NHLE) as maintained by Historic England (Ref. 8.12);
- Historic maps including Ordnance Survey (Ref. 8.13); and
- Online sources (Ref. 8.14)

### Surveys

8.4.7. A geophysical survey and archaeological evaluation trenching was undertaken as part of the consideration of pipeline route options, the results of which are presented in Appendix 8.2 and 8.3.

### Assessment Methodology

8.4.8. The potential impact on Below-Ground and Above-Ground Heritage Assets during the construction, operation and decommissioning stages of the Proposed Scheme have been assessed and consider the following items: the Gas Receiving Facility (GRF), the Above Ground Installation (AGI) the Gas Pipeline, Development Parcel A and the Rusholme Lane Area (detailed in Chapter 3 (Site and Project Description). The assessment has been undertaken in line with the principles set out in the NPPF, based on the combination of the potential value of any assets identified and the magnitude of harm.

8.4.9. The potential impact on the setting of Designated Heritage Assets during the construction, operation and decommissioning stages of the Proposed Scheme has been assessed and considers the following items: the up to four bypass stacks, the up to four stacks associated with the Heat Recovery Steam Generators, the gas compressor building, and the Gas Pipeline (including the AGI and the GRF). The assessment has been undertaken in accordance with Historic England's The Setting of Heritage Assets (Ref. 8.15)

8.4.10. The assessment presents a strategy for further proportionate site investigation where necessary; and outlines suitable mitigation measures, where possible at this stage, to avoid, reduce, or remedy adverse impacts.

### Cultural Heritage Significance and the Importance of an Asset

8.4.11. Planning Practice Guidance (Ref 8.2) relates cultural heritage significance to the importance of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic.

8.4.12. Cultural Heritage Significance cannot be quantified and is presented as a statement of Cultural Heritage Significance using the prescribed values for those assets or their settings that will be subject to significant harm by the Proposed Scheme in Section 8 of Appendix 8.1. The Cultural Heritage Significance contributes to the importance/sensitivity of the assets which ranges from very high to unknown and by using the criteria presented in Table 8-5 below, is it possible to quantify this.

Table 8-5 - Criteria Used to Determine Importance/ Sensitivity of Heritage Assets

Cultural Heritage Importance/Sensitivity	Criteria
Designated Heritage Assets	
International (High)	<ul style="list-style-type: none"> <li>• World Heritage Sites.</li> <li>• Sites of International Importance.</li> </ul>
National (High)	<ul style="list-style-type: none"> <li>• Scheduled Monuments.</li> <li>• All Grades of Listed Buildings.</li> <li>• Registered Parks and Gardens.</li> <li>• Conservation Areas.</li> <li>• Areas of Archaeological Importance.</li> <li>• Protected wreck sites.</li> <li>• Registered battlefields.</li> <li>• <b>Non-designated heritage assets</b> of archaeological interest that are demonstrably of equivalent significance to scheduled monuments.</li> </ul>
Non Designated Below and Above Ground Heritage Assets	
Regional / County (Medium)	<ul style="list-style-type: none"> <li>• Locally listed buildings/structures.</li> <li>• Archaeological sites and remains which contribute to regional research objectives.</li> <li>• Historic buildings/structures that contribute to regional character either through architectural interest or a specific function.</li> <li>• Assets which contribute to regional or cultural understanding of the area.</li> </ul>
Local / Borough (Low)	<ul style="list-style-type: none"> <li>• Archaeological sites and remains with a local or borough interest for education, cultural appreciation.</li> <li>• Assets which contribute to local or cultural understanding of the area.</li> </ul>
Neighbourhood (Negligible)	<ul style="list-style-type: none"> <li>• Relatively numerous types of remains, of some local importance.</li> <li>• Isolated findspots with no context.</li> <li>• Areas in which investigative techniques have revealed no, or minimal, evidence of archaeological remains, or where previous large-scale disturbance or removal of deposits can be demonstrated.</li> </ul>
Unknown / Potential	<ul style="list-style-type: none"> <li>• Potential archaeological sites for which there is little information. It may not be possible to determine the importance of the site based on current knowledge. Such sites are likely isolated findspots, place names or cropmarks identified on aerial photographs.</li> </ul>

8.4.13. Table 8-5 above is a general guide to the sensitivity or importance of cultural heritage assets based on their value, and it should be noted that not all the qualities listed need be present in every case and professional judgement is used in balancing the different criteria and levels of importance or sensitivity.

#### Potential Impact

- 8.4.14. Both the NPS EN-1 and the NPPF consider the level of harm (defined in this chapter as an effect of inappropriate interventions on the heritage values of a Heritage Asset) to the Cultural Heritage Significance (see Glossary) of a Heritage Asset is the basis of assessing impact. Key impacts have been identified as those that would potentially harm the Cultural Heritage Significance (combined heritage interests) of the Heritage Asset. Each potential impact will be determined as the predicted deviation from the baseline conditions, in accordance with current knowledge of the Proposed Scheme.
- 8.4.15. The magnitude, or scale of an impact is often difficult to define, but will be termed as substantial harm and then "less than substantial harm", which covers moderate harm, slight harm, or negligible, as defined in Table 8-6 below. In this ES the magnitude of impact as defined by NPPF equate to large, medium, small and negligible.
- 8.4.16. In *Conserving and Enhancing the Historic Environment* (Ref. 8.2) NPPG states that “*..in determining whether [the Proposed Scheme] will constitute substantial harm [to a Designated Heritage Asset], an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or heritage interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.*”
- 8.4.17. *While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all .... Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.”*
- 8.4.18. In paragraph 5.8.14 in the *Overarching NPS for Energy (EN-1)* it states that “*...there should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II\* listed buildings; grade I and II\* registered parks and gardens; and World Heritage Sites, should be wholly exceptional...”.*
- 8.4.19. Paragraph 5.8.15 states “*... that any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. Where the application will lead to substantial harm to or total loss of*

*significance of a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm..”.*

Table 8-6 - Criteria Used to Determine Level of Harm Showing Equivalent Magnitude of Change

Level of Harm	Description
<b>Substantial harm* (Large Adverse)</b>	Complete destruction of the asset or its setting (i.e. total loss of significance); change to the asset or its setting resulting in loss to significance which fundamentally changes our ability to understand and appreciate the resource. Minor works which adversely impact on heritage values which are intrinsic to the significance of the asset/setting have the potential to cause substantial harm.
<b>Less than substantial</b>	Graded below.
<b>Harm (Medium Adverse)</b>	Change to the asset or setting (some loss of significance) resulting in an appreciable change in ability to understand and appreciate the resource. Some heritage interest remains unaffected.
<b>Slight harm (Small Adverse)</b>	Change to the asset or setting (some loss of significance) resulting in a slight change in ability to understand and appreciate the resource. Overall, the heritage interests remain unaffected.
<b>Negligible</b>	Negligible change or no material changes to the asset or setting. No real change in our ability to understand and appreciate the resource. The heritage interests remain unaffected.

*Derived from DMRB guidance and \*as outlined by the Overarching NPS for Energy (EN-1) paragraphs 5.8.14 and 5.8.15*

### Setting

- 8.4.20. The definition of setting used in this document is taken from the NPPF which states that setting is *“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral”.*
- 8.4.21. HE in their Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (Ref.8.11) considers that the importance of setting lies in what it contributes to the cultural heritage significance of the heritage asset. This depends on a wide range of physical elements within, as well as perceptual and associational attributes pertaining to, the Heritage Asset’s surroundings.

8.4.22. HE discusses several other general considerations including: cumulative change; change over time; appreciating setting; buried assets and setting; designated settings; setting and urban design; and setting and economic and social viability. They have provided a stepped approach to the assessment and importance of setting to heritage assets.

- Step 1: The identification of the heritage assets.
- Step 2: Assessing whether, how and to what degree the settings make a contribution to the cultural heritage significance of the heritage assets.
- Step 3: Assessing the effect of a proposed development on the setting, and the resulting implications for the cultural heritage significance of the heritage asset(s).
- Step 4: Maximising enhancement and minimising harm (mitigation).

8.4.23. Step 2: In assessing whether, how and to what degree the settings make a contribution to the cultural heritage significance of the heritage assets, a number of potential attributes of a setting are considered. These attributes are presented below in Table 8-7:

*Table 8-7 - Potential Attributes of Settings to Consider*

<b>Potential Attributes / Factors to Consider</b>
<p><b>Topography:</b>                      Other heritage assets (archaeological remains, buildings, structures, landscapes, areas or archaeological remains);                      Definition, scale and ‘grain’ of surrounding streetscape, landscape and spaces;                      Historic materials and surfaces;                      Land use;                      Openness, enclosure and boundaries; functional relationships and communications;                      Green spaces, trees and vegetation;                      History and degree of change over time;                      Integrity;                      Issues, such as soil chemistry and hydrology</p>
<p><b>Experience of the asset:</b>                      Surrounding landscape and town character;                      Views from, towards, through and across, including the asset;                      Visual dominance, prominence or role as focal point;                      Intentional intervisibility with other historic and natural features;                      Noise, vibration and other pollutants and nuisances;                      Tranquillity, remoteness, ‘wildness’;                      Sense of enclosure, seclusion, intimacy or privacy;                      Dynamism and activity;                      Accessibility, permeability and patterns of movement;                      Degree of interpretation or promotion to the public;                      The rarity of comparable survivals of setting</p>
<p><b>The asset’s associative attributes:</b>                      Associative relationships between heritage assets;                      Cultural associations;                      Celebrated artistic representations;                      Traditions</p>

8.4.24. Table 8-8 presents definitions of settings and the contribution these settings make to the cultural heritage significance of an asset. The examples should not be seen as exhaustive.

*Table 8-8 - Criteria for determining the contribution that setting makes to the Cultural Heritage Significance of Heritage Assets*

Criteria	Contribution of setting to cultural heritage significance
A defined setting that is contemporary with and historically and functionally linked with the heritage asset, may contain other heritage assets of international or national importance, has a very high degree of intervisibility with the asset and makes a very substantial contribution to both the cultural heritage significance of the heritage asset and to the understanding and appreciation of the cultural heritage significance of the asset.	Very substantial (high)
Contemporary with and historically and functionally linked with the heritage asset, with minor alterations (in extent and/or character), has a high degree of intervisibility with the asset and which makes a substantial contribution to both the cultural heritage significance of the heritage asset and to the understanding and appreciation of the significance of the asset.	Substantial (high)
Contemporary with and/or historically and/or functionally linked with the heritage asset but with alterations which may detract from the understanding of the heritage asset, and/or with a moderate degree of indivisibility with the asset and/or which makes a moderate contribution to the cultural heritage significance of the heritage asset and/or a moderate contribution to the understanding and appreciation of the significance of the asset.	Moderate (medium)
Largely altered so that there is very little evidence of contemporaneous and/or historic and/or functional links with the heritage asset, and/or with a low degree of indivisibility with the asset and/or which makes a minor contribution to both the cultural heritage significance of the heritage asset and to the understanding and appreciation of the significance of the asset.	Minor (low)

8.4.25. Step 3: Following Step 2, the level of harm or benefit on the setting of a Heritage Asset can be identified by considering the potential attributes of a proposed development. These are outlined in Table 8-9.

*Table 8-9 - Step 3 – Potential Attributes of a Proposed Development*

Attribute of a Proposed Development	Factors to Consider
Location and siting of the scheme	Proximity to asset; Extent; Position in relation to landform;

Attribute of a Proposed Development	Factors to Consider
	Degree to which location will physically or visually isolate asset; Position in relation to key views
The form and appearance of the scheme	Prominence, dominance, or conspicuousness; Competition with or distraction from the asset; Dimensions, scale and massing; Proportions; Visual permeability; Materials (texture, colour, reflectiveness, etc.); Architectural style or design; Introduction of movement or activity; Diurnal or seasonal change
Other effects of the scheme	Change to built surroundings and spaces; Change to skyline; Noise, odour, vibration, dust, etc.; Lighting effects and 'light spill'; Change to general character (e.g. suburbanising or industrialising); Change to public access, use or amenity; Change to land use, land cover, tree cover; Changes to archaeological context, soil chemistry or hydrology; Changes to communications/accessibility/permeability
Permanence of the scheme	Anticipated lifetime/temporariness; Recurrence; Reversibility
Longer term or consequential effects of the scheme	Changes to ownership arrangements; Economic and social viability; Communal and social viability

8.4.26. Once the contribution of the setting has been determined and the potential attributes of a proposed development upon it have been identified, the level of harm or beneficial impact of the potential scheme needs to be evaluated.

8.4.27. The criteria for assessing the level of harm of impacts on setting are presented below (Table 8-10). This presents definitions of varying scales of harm or benefit to the contribution of the setting.

*Table 8-10 - Step 3 – Criteria for Assessment of the Level of Harm / Benefit to the Contribution of the Setting to the Cultural Heritage Significance of a Heritage Asset (Showing Equivalent Magnitude of Change)*

Major beneficial	The contribution of setting to the cultural heritage asset's significance is considerably enhanced as a result of the development; a lost relationship between the asset and its setting is restored, or the legibility

	of the relationship is greatly enhanced. Elements of the surroundings that detract from the asset's cultural heritage significance or the appreciation of that significance are removed.
Moderate beneficial	The contribution of setting to the cultural heritage asset's significance is enhanced to a clearly appreciable extent as a result of the development; as a result the relationship between the asset and its setting is rendered more readily apparent. The negative effect of elements of the surroundings that detract from the asset's cultural heritage significance or the appreciation of that significance is appreciably reduced.
Minor beneficial	The setting of the cultural heritage asset is slightly improved as a result of the development, slightly improving the degree to which the setting's relationship with the asset can be appreciated.
Negligible	The setting of the cultural heritage asset is changed by the development in ways that do not alter the contribution of setting to the asset's significance.
Minor harm (Small Adverse)	The contribution of the setting of the cultural heritage asset to its significance is slightly degraded as a result of the development, but without adversely affecting the interpretability of the asset and its setting; characteristics of historic value can still be appreciated, the changes do not strongly conflict with the character of the site, and could be easily reversed to approximate the pre-development conditions.
Harm (Medium Adverse)	The contribution of the setting of the cultural heritage asset to its significance is reduced appreciably as a result of the development. Relevant setting characteristics can still be appreciated but less readily.
Substantial harm (Large Adverse)	The contribution of the setting of the cultural heritage asset to its significance is effectively lost or substantially reduced as a result of the development, the relationship between the asset and its setting is no longer readily appreciable.

8.4.28. Changes may occur to the settings of an asset that neither affect their contribution to the Cultural Heritage Significance of the asset, nor the extent to which its Cultural Heritage Significance can be experienced. In such instances it will be considered that there is a negligible impact upon the contribution that the setting has on the cultural heritage significance of an asset.

8.4.29. Step 4: Approaches to maximising enhancement and minimising harm to the setting and significance of the assets as appropriate are presented in Section 8-7 Mitigation.

#### Significance Criteria

8.4.30. The interaction of the sensitivity of the Heritage Asset (Table 8-5) or its setting (Table 8-8) and the potential magnitude of change (Table 8-6 or Table 8-7) produce the significance of effect (Table 8-11). This may be calculated by using the matrix shown below, which is included to allow an objective assessment to be presented.

Table 8-11- Matrix for Determining Significance of Effect

		SENSITIVITY OF THE HERITAGE ASSET OR ITS SETTING			
		High	Medium	Low	Negligible
MAGNITUDE OF CHANGE	Large	Major	Moderate – Major	Minor – Moderate	Negligible
	Medium	Moderate – Major	Moderate	Minor	Negligible
	Small	Minor – Moderate	Minor	Negligible – Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

### Effect Significance

8.4.31. The following terms have been used to define the significance of the effects identified:

- Major effect: where the Proposed Scheme could be expected to have a very significant effect (either positive or negative) on receptors;
- Moderate effect: where the Proposed Scheme could be expected to have a noticeable effect (either positive or negative) on receptors;
- Minor effect: where the Proposed Scheme could be expected to result in a small, barely noticeable effect (either positive or negative) on receptors; and
- Negligible: where no discernible effect is expected as a result of the Proposed Scheme on receptors.

## 8.5 Baseline Conditions

### Current Baseline

#### Archaeological and Historical Background

8.5.1. Section 4.2 in Appendix 8.1 presents a summary of the archaeological and historical background of the local environs of the Site. This has been compiled in order to place the Site into a wider archaeological context. Section 4.3 in Appendix 8.1 presents details on archaeological interventions within or near the Site Boundary.

#### Gazetteer of Heritage Assets

8.5.2. A total of 509 Heritage Assets are present within the inner and wider study areas. Of these 500 are Designated Heritage Assets including 19 Scheduled Monuments, 11 Grade I, 17 Grade II\*, 440 Grade II Listed Buildings and 13 Conservation Areas. Of the nine Non Designated Heritage Assets present, one lies on the border of the Site and is an historical field boundary.

8.5.3. A gazetteer of all the Designated and Non Designated Heritage Assets is presented in Tables 8-12 to 8-17 below, and the locations of the Non Designated Heritage Assets are presented on Figure 8.2 and the Designated Heritage Assets including conservation areas are presented on Figure 8.1. For the ease of presentation, the Grade II buildings have been

grouped according to settlement (in Table 8-15) and the full list of these assets is presented in Appendix 8.1.

Table 8-12 - Scheduled Monuments within the 10 km wider study area

HE Ref Number	Name	Archaeological/ Historical Period
1004181	The Abbot's Staithes	Date Unknown
1005210	Wressle Castle	Late Medieval
1005226	Howden Minster, ruined portions	Date Unknown
1005227	Bishop's Manor	Date Unknown
1015304	Moated site at Manor Farm, Portington	Late Medieval
1015307	Kings Manor moated site, 450 m south of Little London	Late Medieval
1016857	Drax Augustinian priory	Late Medieval
1017455	Castle Hill moated site, 350 m south of St Peter and St Paul's Church	Late Medieval
1017460	Thorpe Hall moated monastic grange	Late Medieval
1017485	Scurff Hall moated site	Late Medieval
1017581	Warren Hall moated site	Late Medieval
1017822	Roman fort 600 m west of Roall Hall	Romano-British
1017823	Hall Garths moated site, immediately south of St Mary's Church	Late Medieval
1018403	Medieval settlement and early post-medieval garden earthworks around Barlow Hall	Multi-period
1018601	Round barrow on Skipwith Common, 810 m south of Skipwith Church	Prehistoric
1018602	Round barrow on Skipwith Common, 690 m north west of Horseshoe Pond	Prehistoric
1018603	Danes Hills square barrow cemetery, 300 m south of Adamson Farm	Prehistoric
1018604	Round barrow on Skipwith Common, 800 m south east of Adamson Farm	Prehistoric
1018605	Round barrow on Skipwith Common, 830 m south east of Adamson Farm	Prehistoric

Table 8-13 - Grade I Listed Buildings within the 10 km wider study area

HE Ref Number	Name	Archaeological/ Historical Period
1083170	Ruins of Wessle Castle	Late Medieval
1083323	Cowick Hall	Multi-period
1132537	Church of St Wilfred	Late Medieval
1132591	Church of St Mary and St Germain (Selby Abbey)	Multi-period
1148397	Church of St Peter and St Paul	Multi-period
1148462	Church of St Mary the Virgin	Late Medieval

1160491	Minster Church of St Peter and St Paul and the Chapter House	Late Medieval
1161899	Church of St Lawrence	Late Medieval
1173983	Camblesforth Hall	Post-Medieval
1295955	Carlton Towers	Post-Medieval
1310699	Church of All Saints	Late Medieval

Table 8-14 - Grade II\* Listed Buildings within the 10 km wider study area

HE Ref Number	Name	Archaeological/ Historical Period
1083181	The Bishop's Manor	Multi-period
1083182	The Langley Archway	Late Medieval
1083214	Boat House on south side of South Dock	Industrial Period
1083235	Knedlington Old Hall	Post-Medieval
1103307	Goole Hall	Industrial Period
1132559	Corunna House	Post-Medieval
1148399	Church of St Mary (Roman Catholic)	Industrial Period
1148401	The Red House	Industrial Period
1148486	Holmes House	Post-Medieval
1160360	Church of St Mary	Multi-period
1160523	Howden Hall	Multi-period
1160652	The Bakehouse at Wressle Castle approximately 30 m north of ruins of Wressle Castle	Late Medieval
1167663	Abbots Staith buildings	Multi-period
1203298	Saltmarshe Hall	Modern Period
1295734	Church of St Paul	Industrial Period
1310687	Lowther Hotel	Industrial Period
1346710	Railway Swing Bridge over River Ouse	Industrial Period

Table 8-15 - Number of Grade II Listed Buildings per settlement in the 10 km wider study area

Settlement	Number of Grade II listed buildings
Cliffe	13
Laxton	4
Howden	61
Spaldington	1
Wressle	7
Bubwith	14
Goole	27
Hook	2
Asselby	9
Barmby on the Marsh	10
Kilpin	2
Snaith and Cowick	50

Rawcliffe	9
Swinefleet	5
Eastrington	1
Reedness	3
Airmyn	6
Goole Fields	7
Pollington	5
Barlow	1
Thorpe Willoughby	2
Selby	144
Carlton	10
Brayton	3
Temple Hirst	2
Hensall	3
Hemingbrough	15
Barlby with Osgodby	6
Sykehouse, Doncaster	4
Thorne, Doncaster	2
Gowdall	3
Chapel Haddlesey	2
Drax	1
Newland	2
Kellington	2
Wistow	1
Gateforth	2
Burn	1
Camblesforth	1
West Haddlesey	1
Balne	1

Table 8-16 - Conservation Areas within the 10 km wider study area

<b>Conservation Areas</b>
Armoury Road and Brook Street
Leeds Road
Millgate
Selby Town
Brayton
Hemingbrough
Howden
Airmyn
Goole Town
Goole Hook Road
Rawcliffe
Snaithe

Table 8-17 - Non Designated Heritage Assets within the 300 m inner study area

HER Ref Number	Name	Sensitivity	Archaeological/Historical Period	Outside or Inside the Site
MNY10085	Ha Ha feature to the South of Scurff Hall	Local	Industrial	Outside
MNY10104	Rusholme Hall	Local	Late Medieval	Outside
MNY10105	Ridge and Furrow South of Rusholme Hall	Regional	Late Medieval	Outside
MNY10089	Ridge and Furrow North of Scurff Hall	Regional	Unknown	Outside
MNY10090	Ridge and Furrow South of Scurff Hall	Regional	Unknown	Outside
MNY10115	Field Boundary, Barlow	Local	Modern	Outside
MNY10069	Field boundaries west of Drax Abbey Farm	Local	Unknown	Outside
MNY10070	Fishpond south of Drax Abbey Farm	Local	Unknown	Outside
N/A	Field boundary	Local	Unknown	Outside

### Fieldwork Investigation

#### Geophysical Survey

- 8.5.4. In consultation with the PA for NYCC, a programme of non-intrusive geophysical survey has been conducted. The results of the geophysical survey are presented in Appendix 8.2. A summary of the findings is below.
- 8.5.5. The geophysical survey was undertaken in two phases between November 2017 and January 2018 and was part of the assessment of alternative pipeline options. The investigation identified two small archaeological complexes in fields approximately 1km south of the Gas Pipeline (Option A). The first comprised rectilinear enclosures set either side of a trackway, but no clear settlement evidence apart from a couple of possible pits. The second area of interest comprised a series of conjoined enclosures, three of which contained clear ring ditch features. A number of pit-like responses were also identified. The results provide a plan of an Iron Age / Romano-British complex, first identified during construction of the Asselby to Aberford pipeline which bisects the features.

- 8.5.6. Within the footprint of the Gas Pipeline (Option A), the survey produced results for a number of historical field boundaries that can be aligned with historical mapping in addition to land drains, plough marks and a number of geological anomalies.

### **Evaluation Trenching**

- 8.5.7. In the light of the results obtained from the geophysical survey, and following consultation with the PA for NYCC, it was recommended that a programme of intrusive archaeological evaluation investigation was carried out for the preferred pipeline route. This programme aimed to confirm the presence of archaeological remains, and establish their extent, date and significance, and to enable an appropriate mitigation strategy to offset the harm of development on the archaeological resource.
- 8.5.8. It was further recommended that the scope of the archaeological evaluation allowed for a 2% sample of the specified area, which equated to the excavation of seventeen 30 m x 2 m trenches. The evaluation was limited to the field that will contain the AGI associated with the Gas Pipeline.
- 8.5.9. The results of the evaluation trenching are presented in Appendix 8.3 and a summary of the findings are detailed below.
- 8.5.10. The archaeological evaluation has concluded that buried remains dating to the 13th / 14th century, together with a series of undated and enigmatic features survive within the field evaluated. These probably relate largely to medieval field systems, boundaries, drainage and associated features, although given the recovery of a sherd of Iron Age / Romano-British pottery, there is potential for at least some of these features to be of prehistoric / Romano-British date, potentially of regional importance.

### **Future Baseline**

- 8.5.11. This assessment has not been applied to the future baseline. No change to the cultural heritage baseline is anticipated as a result of the conversion of a fourth unit to biomass.

## **8.6 Assessment of Likely Significant Impacts and Effects**

### **Stage 0 – Site Reconfiguration Works**

- 8.6.1. The Site Reconfiguration Works will include the demolition, removal and relocation of existing facilities at the Existing Drax Power Station Complex. It is considered that there will be no significant impacts and effects on the setting of Heritage Assets or on Below-Ground Heritage Assets during this stage, due to the localised nature of the works within the curtilage of the Existing Drax Power Station Complex.

### **Stage 1 – Construction of Unit X, Gas Pipeline, AGI and GRF.**

#### **Below-Ground Heritage Assets**

- 8.6.2. Evaluation trenching carried out at the location of the AGI at the east end of the Gas Pipeline has confirmed the presence of potentially regionally significant archaeological remains from the Prehistoric Period onwards. It is expected that ground disturbance associated with the instalment of the Gas Pipeline, the Gas Receiving Facility, and Development Parcel A will disturb further similar, related remains of the same significance. The presence of any such remains will be determined through a mitigation strategy to be undertaken prior to or during

construction of the Gas Pipeline, AGI and GRF (as secured by a requirement to the draft DCO (document reference 3.1).

- 8.6.3. All direct impacts on Below-Ground Heritage Assets will be permanent and irreversible. Works that have the potential to result in the whole or partial loss of remains present include the excavation of the Gas Pipeline trench; ground levelling and topsoil stripping associated with the construction of the AGI, GRF, temporary carparks, compounds, passing places and haulage roads; the installation of infrastructure items such as lighting columns, manholes, culverts or chambers, utilities cables, drainage pipes, and so forth; and any form of landscaping, including the planting of trees for screening, also has the potential to disturb buried archaeological remains.
- 8.6.4. The sensitivity of unknown Below-Ground Heritage Assets outside the location of the AGI is currently not known, however, based on the results of the geophysical survey and evaluation trenching, are expected to range from low to medium along the Gas Pipeline route. The magnitude of change prior to mitigation, is considered to be large adverse. Therefore, there is likely to be a **direct, long-term adverse effect of moderate or minor significance** on Below-Ground Heritage Assets prior to the implementation of mitigation measures.

### Setting

- 8.6.5. Harm to the settings of Designated Heritage Assets during Stage 1 have been assessed against the instalment of the Gas Pipeline, the AGI, the GRF, the construction of Unit X and the use of Development Parcel A and B as a temporary construction/compound areas.
- 8.6.6. It is anticipated that the settings of Drax Augustinian Priory (SM1016857) and Scurff Hall Moated Site (SM1017485) will be slightly harmed during Stage 1. The setting assessments for these assets are presented in full in Section 8 of the Cultural Heritage Desk Based Assessment (Appendix 8.1) and the results are summarised below.

### Drax Augustinian Priory (SM1016857)

- 8.6.7. The Priory is located immediately north of the Existing Drax Power Station Complex, and the existing cooling towers dominate views north and restrict long distance views. A small plantation of trees (North Station Wood) and a 0.2km stretch of woodland on land thought to be the location of an old asbestos site helps to create a degree of visual separation and buffer between the Existing Drax Power Station Complex and the farmland in which the monument lies. East of the priory is a large extraction site that is clearly visible and audible from the asset. At present, the asset cannot be easily interpreted by the public as there are no information boards, signposts or public access to it.
- 8.6.8. The Priory resides in a setting largely altered by large-scale infrastructure and modern field systems. Although the asset is historically linked to nationally important Heritage Assets in the area, there is no intervisibility between them. The presence of the Existing Drax Power Station Complex and associated development in the immediate area detracts from the understanding of the asset as an isolated priory set in a rural context. It is therefore considered that the setting makes a **minor (low)** contribution to the cultural heritage significance of the asset.
- 8.6.9. A proposed construction laydown and/or contractor car parking area will be located to the east of the asset (Development Parcel A) which is anticipated to necessitate temporary land

take of arable farmland and will introduce lighting to this area at night. Changes to nearby farmland during the construction period, will not strongly conflict with the character of the surrounding landscape. The land take is expected to last over 3 years (7 if both units are built), and could be easily reversed to approximate the pre-development conditions.

- 8.6.10. The retention of North Station Wood and the woodland belt between the Heritage Asset will provide a screen from visual impacts resulting from the use of Development Parcel B as a construction/compound area. There will therefore be no impact on the Heritage Asset from this element of the Proposed Scheme.
- 8.6.11. The contribution of the setting of the cultural heritage asset to its cultural heritage significance will be slightly degraded as a result of the use of Development Parcel A during the Stage 1. It is considered there will be minor harm (small adverse) to the setting. Therefore, there is likely to be a **direct, temporary short-term adverse effect of minor significance**.
- 8.6.12. Due to distance, the instalment of the Gas Pipeline, the AGI and the GRF will not be experienced from the asset, therefore these elements of the Proposed Scheme pose no harm to its setting.
- 8.6.13. Any high level machinery such as tower cranes, may be seen from the asset during the construction of Unit X. It is however considered that any construction related activity taking place within the curtilage of the Existing Drax Power Station Complex will not increase the degree of harm that this development currently has upon the setting of the asset, therefore the impact on the setting will be **negligible**.

#### **Scruff Hall Moated Site (SM1017485)**

- 8.6.14. The limits of the scheduled area are clearly defined by trees, hedgerows and Rusholme Lane, a single track asphalt road which follows a meandering course through an expanse of rural farmland. Through its definition in the landscape, the scale of the manor and its once elite status as a vill can be appreciated. Farmland envelops the monument creating the agricultural scene which dominates this setting. Power-related structures in the area are prevalent and include Rushholme Windfarm immediately east of the asset and high voltage electricity towers that string out across the flat terrain. The Existing Drax Power Station Complex can be seen from the southern approach along Rusholme Lane, however views are long distance and as a consequence, this development does not dominate the wider setting. Rusholme Lane terminates at a holiday cottage and because of this a significant absence of through traffic creates a relatively tranquil environment, although this is significantly reduced during harvest time.
- 8.6.15. The moated site resides in a setting that largely retains its agricultural characteristics and has a strong sense of tranquillity and seclusion. The asset has a contemporary link to multiple nationally important assets in the wider area. These elements make a **substantial (major)** contribution to the cultural heritage significance of the asset.
- 8.6.16. It is anticipated that during the construction period of the Gas Pipeline and the AGI, construction related traffic is likely to use a route between the Power Station Site and the A645 via Rusholme Lane which also provides access to Scruff Hall. The introduction of construction related noise, lighting and movement will reduce the degree of tranquillity but not to the extent that it reduces the appreciation of the moated site.

- 8.6.17. Due to distance, the instalment of the GRF will not be experienced from the asset, therefore these elements of the Proposed Scheme pose no harm to its setting.
- 8.6.18. Any high level machinery such as tower cranes, may be seen at a distance from the asset during the construction of Unit X. It is however considered that any construction related activity taking place within the curtilage of the Existing Drax Power Station Complex will not increase the degree of harm that this development currently has upon the setting of the asset, therefore the impact on the setting will be negligible.
- 8.6.19. The contribution of the setting of the cultural heritage asset to its cultural heritage significance will be slightly degraded as a result of the Proposed Scheme during Stage 1. It is considered there will be minor harm (small adverse) to the setting, therefore, there is likely to be **a direct, temporary short-term adverse effect of minor significance.**

### Stage 2 – Operation of Unit X and Construction of Unit Y Setting

- 8.6.20. Harm to the settings of Designated Heritage Assets during Stage 2 has been assessed against the introduction of a new built form in the landscape resulting from the operation of Unit X, the AGI and the GRF as well as the construction of Unit Y and the use of Development Parcel A and B as temporary construction/compound areas.
- 8.6.21. The operation of Unit X would introduce up to two flues comprising two HRSGs and two exhaust stacks. The flues and stacks will measure 120 m in height and will appear slightly taller than the 12 existing cooling towers that measure 115 m. Although the new stacks will be considerably smaller in diameter than the existing cooling towers, they will increase the massing of the power station which already dominates the wider landscape and is in stark contrast to the expanse of farmland in which it is situated.
- 8.6.22. The proposed stacks will be located within the curtilage of the Existing Drax Power Station Complex and will therefore not increase its extent. The diameters of the stacks will be considerably less than the existing cooling towers, which will remain the dominant structures in the landscape when viewed close up and at a distance. There will be no introduction of movement or changes in land use or open spaces that will be visible from any designated heritage asset.
- 8.6.23. The four stacks would protrude above the horizontal lines created by the tops of the cooling towers, but this would still form a strong contrast to the existing mass which is coherent in form. The stacks would visually “clutter” the top of the towers resulting in a slightly discordant view from certain angles
- 8.6.24. It is anticipated that the setting of Drax Augustinian Priory (SM1016857) will be slightly harmed during Stage 2. The setting assessment for this Heritage Asset is presented in full in Section 8 of the Cultural Heritage Desk Based Assessment (Appendix 8.1) and the results of the assessment are summarised below.

#### **Drax Augustinian Priory (SM1016857)**

- 8.6.25. The addition of the stacks will act cumulatively with the existing cooling towers to increase the massing of the power station, which will be experienced in close proximity to the asset, and therefore creating an unwanted visual distraction from the asset. North Station Wood and

connecting woodland belt that currently provides screening between the energy infrastructure and farmland will however be retained and will continue to separate these two landscape elements.

- 8.6.26. The contribution of the setting of the cultural heritage asset to its cultural heritage significance will be slightly degraded as a result of the operation of Unit X. It is considered there will be minor harm (small adverse) to the setting, therefore, there is likely to be **a direct, permanent long-term adverse effect of minor significance**.
- 8.6.27. The effects of the construction of Unit Y and the use of Development Parcel A as a temporary construction/compound area upon the setting of the asset will be the same as for Stage 1. It is considered there will be minor harm (small adverse) to the setting, therefore, there is likely to be **a direct, temporary short-term adverse effect of minor significance**.
- 8.6.28. As in Stage 1, the woodland belt will also screen any visual impacts resulting from the use of Development Parcel B as temporary construction/compound area. There will therefore be no impact on the Heritage Asset from this element of the Proposed Scheme.
- 8.6.29. Due to distance, the operation of the AGI or the GRF will not be experienced from the asset, therefore these elements of the Proposed Scheme pose no harm to its setting.

#### **Other Scheduled Monuments**

- 8.6.30. Out of the other 17 scheduled monuments identified in the 10 km wider study area, the setting of 13 monuments will be subject to no change / no harm as a result of the operation of Unit X and the construction of Unit Y as either the four stacks or high level construction equipment will be visible. These Heritage Assets are presented in Table 1 in Appendix C of the Cultural Heritage Desk-Based Assessment.
- 8.6.31. As a result of those attributes of the Proposed Scheme highlighted above in sections 8.6.20 and 8.6.21 a total of four scheduled monuments may be subject to a negligible level of harm as a result of the Proposed Scheme. Although the stacks are likely to be visible at a distance, the Proposed Scheme will not alter the contribution of the settings to the significance of the four Designated Heritage Assets. These Designated Heritage Assets are presented in Table 2 in Appendix C of the Cultural Heritage Desk-Based Assessment.
- 8.6.32. Due to distance, the use of Development Parcel A as a temporary construction/compound area and the operation of the AGI or the GRF will not be experienced from any of these scheduled monuments. These elements of the Proposed Scheme therefore pose no harm to the settings of these assets.

#### **Grade I Listed Buildings**

- 8.6.33. Of the 11 Grade I listed buildings identified in the 10 km study area, the settings of seven will be subject to no change / no harm as a result of the operation of Unit X and the construction of Unit Y as either the four stacks or high level construction equipment will be visible. These Designated Heritage Assets are presented in Table 3 in Appendix C of the Cultural Heritage Desk-Based Assessment.
- 8.6.34. As a result of the attributes of the Proposed Scheme described above in sections 8.6.20 and 8.6.21 four Grade I listed buildings will be subject to a negligible level of harm as a result of the Proposed Scheme. Although the stacks are likely to be visible, the Proposed Scheme will

not alter the contribution of setting to the significance of the Designated Heritage Assets. These Designated Heritage Assets are presented in Table 4 in Appendix C of the Cultural Heritage Desk-Based Assessment.

- 8.6.35. Due to distance, the use of Development Parcel A as a temporary construction/compound area and the operation of the AGI or the GRF will not be experienced from any Grade I listed building. These elements of the Proposed Scheme therefore pose no harm to the settings of these assets.

#### **Grade II\* Listed Buildings**

- 8.6.36. Out of the 17 Grade II\* Listed Buildings identified in the 10 km wider study area, the setting of 15 buildings will be subject to no change / no harm as a result of the operation of Unit X and the construction of Unit Y as neither the four stacks nor high level construction equipment will be visible. These Designated Heritage Assets are presented in Table 5 in Appendix C of the Cultural Heritage Desk-Based Assessment.
- 8.6.37. As a result of those attributes of the Proposed Scheme highlighted above in sections 8.6.20 and 8.6.21, two Grade II\* Listed Buildings will be subject to a negligible level of harm as a result of the Proposed Scheme. Although the stacks are likely to be visible, the Proposed Scheme will not alter the contribution of setting to the significance of the heritage assets. These Designated Heritage Assets are presented in Table 6 in Appendix C of the Cultural Heritage Desk-Based Assessment.
- 8.6.38. Due to distance, the use of Development Parcel A as a temporary construction/compound area and the operation of the AGI or the GRF will not be experienced from any Grade II\* listed building. These elements of the Proposed Scheme therefore pose no harm to the settings of these assets.

#### **Grade II Listed Buildings**

- 8.6.39. Out of the 440 Grade II Listed Buildings identified in the 10 km wider study area, the setting of 408 buildings will be subject to no change / no harm as a result of the operation of Unit X and the construction of Unit Y as either the four stacks or high level construction equipment will be visible. These Designated Heritage Assets are presented in Table 7 in Appendix C of the Cultural Heritage Desk-Based Assessment.
- 8.6.40. As a result of those attributes of the Proposed Scheme highlighted above sections 8.6.20 and 8.6.21, 32 buildings will be subject to a negligible level of harm as a result of the operation of Unit X. Although the stacks are likely to be visible, the Proposed Scheme will not alter the contribution of setting to the significance of the Designated Heritage Assets. These Designated Heritage Assets are presented in Table 8 in Appendix C of the Cultural Heritage Desk-Based Assessment.
- 8.6.41. Due to distance, the use of Development Parcel A as a temporary construction/compound area and the operation of the AGI or the GRF will not be experienced from any Grade II listed building. These elements of the Proposed Scheme therefore pose no harm to the settings of these assets.

## Conservation Areas

- 8.6.42. Of the nine conservation areas identified in the 10 km wider study area, the setting of seven will be subject to no change / no harm as a result of the operation of Unit X and the construction of Unit Y as either the four stacks or high level construction equipment will be visible. These Designated Heritage Assets are presented in Appendix C of the Cultural Heritage Desk-Based Assessment.
- 8.6.43. As a result of these attributes of the Proposed Scheme highlighted above in sections 8.6.20 and 8.6.21, a total of two conservation areas will be subject to a negligible level of harm as a result of the Proposed Scheme. Although the stacks are likely to be visible, the Proposed Scheme will not alter the contribution of setting to the significance of the Designated Heritage Assets. These Designated Heritage Assets are presented in Table 10 in Appendix C of the Cultural Heritage Desk-Based Assessment

Due to distance, the use of Development Parcel A as a temporary construction/compound area and the operation of the AGI or the GRF will not be experienced from any conservation area. These elements of the Proposed Scheme therefore pose no harm to the settings of these assets

### Stage 3 – Operation of Units X and Y

#### Setting

- 8.6.44. Harm to the settings of Designated Heritage Assets during Stage 3 has been assessed against the introduction of a new built form in the landscape resulting from the operation of both Unit X and Unit Y.
- 8.6.45. Units X and Y will together feature up to eight stacks in total comprising four HRSGs and four exhaust stacks. They will introduce a slightly greater mass of development and more structures compared to the operation of Unit X only. The eight stacks would protrude above the horizontal lines created by the tops of the existing cooling towers and form a strong contrast to the existing mass which is coherent in form. The stacks would visually “clutter” the top of the towers resulting in a slightly discordant view from certain angles. The proposed stacks will be located within the curtilage of the Existing Drax Power Station Complex and will therefore not increase its extent.

#### Drax Augustinian Priory (SM1016857)

- 8.6.46. As a result of the attributes of the Proposed Scheme highlighted above in section 1.8.17, it is considered there will be a negligible difference between the impacts of the operation of Unit X in Stage 2 and the operation of Units X and Y in Stage 3 on the setting of Drax Augustinian Priory, which will result in a direct, permanent long-term adverse effect of minor significance.

#### Other Scheduled Monuments, all Grade I, Grade II\*, Grade II Listed Buildings and Conservation Areas

- 8.6.47. It is considered there will be a negligible difference between the effects of Stages 2 and 3 on the setting of these assets, which will remain unchanged or negligible.

## Decommissioning

The removal of stacks would result in the reversal of any effects on setting incurred by the operation of Units X and Y and the effects of construction associated with decommissioning would be largely temporary and similar to those described for the construction of Units X and Y.

### 8.7 Mitigation and Enhancement Measures

- 8.7.1. A programme of mitigation (secured by a requirement to the draft DCO (document reference 3.1) has been devised in consultation with the PA and includes a strip, map and record excavation to be undertaken prior to construction at the location of the AGI and a programme of archaeological monitoring to be undertaken during the excavation of the pipe trench, easements and also during ground moving activities associated with the installation of the temporary compound/laydown area (Development Parcel A), the GRF and the passing place at the Rusholme Lane Area.
- 8.7.2. Current legislation draws a distinction between archaeological remains of national or international importance and other remains considered to be of lesser importance. Those perceived to be of international or national importance may require preservation in situ, whilst those of lesser importance may undergo archive recording, where they are of Regional/County or Local/Borough importance.
- 8.7.3. HE guidelines (Ref 8.15) for mitigation of the impact of a development on the setting of a heritage asset suggest that in the first instance impacts are best mitigated for either by relocation of the development or changes to its design.
- 8.7.4. For some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by fundamental issues such as the proximity, location, scale, prominence or noisiness of a development. In other cases, good design may reduce or remove the harm, or provide enhancement, and design quality may be the main consideration in determining the balance of harm and benefit.
- 8.7.5. Although no significant impacts are predicted on any settings of Heritage Assets as a result of the Proposed Scheme, it has been agreed that enhancement mitigation for Drax Augustinian Priory will include the instalment of informative and engaging interpretation panels on the PRoW passing along the boundary of Development Parcel B to the north of the Power Station Site and in the visitor centre (secured by a requirement to the draft DCO (document reference 4.1). This will improve the degree to which the setting's relationship with the asset can be appreciated by the public.

### 8.8 Residual Effects

- 8.8.1. The mitigation for the below-ground archaeological resource will remove that resource and result in a site archive and publication. Therefore, there will be no residual effects on these Heritage Assets.

#### Stage 0 – Reconfiguration Works

- 8.8.2. No residual effects are anticipated during this stage.

### Stage 1 – Construction of Unit X, the Gas Pipeline, AGI and GRF.

- 8.8.3. **Drax Augustinian Priory and Scurff Hall:** There is likely to be a direct, temporary, short term residual adverse effect of minor significance on these Heritage Assets resulting from the use of Development Parcel A as a construction/compound area and the instalment of the Gas Pipeline and the AGI.

### Stage 2 – Operation of Unit X and the Construction of Y.

- 8.8.4. **Drax Augustinian Priory:** There is likely to be a direct, temporary, short term residual adverse effect of minor significance on this Heritage Asset resulting from the use of Development Parcel A as a construction/compound area during the construction of Unit Y and a direct, permanent, long term residual adverse effect of minor significance resulting from the impact of a new built form in the landscape (Unit X).

### Stage 3 – Operation of Units X and Y

- 8.8.5. **Drax Augustinian Priory:** There is likely to be a direct, permanent, long term residual adverse effect of minor significance on this Heritage Asset resulting from the cumulative impact of a new built form in the landscape (Unit X and Y).

### Decommissioning

- 8.8.6. No residual effects are anticipated during this stage.

## 8.9 Limitations and Assumptions

- 8.9.1. The findings within this Chapter are based on the desk-based assessment and fieldwork undertaken to date and there are no further requirements for investigative fieldwork for the purposes of this assessment, as discussed with the PA.

## 8.10 Summary

- 8.10.1. The assessment has concluded that there will be likely significant effects on below-ground archaeological remains associated with ground moving activities along the Gas Pipeline, the Rusholme Lane Area and Development Parcel. However, following mitigation these will be reduced to negligible.
- 8.10.2. It is anticipated that the settings of Designated Heritage Assets with the Study Area will be subject to less than substantial harm, graded slight harm or minor adverse impact, during Stages 0-3. The setting of Drax Augustinian Priory (SM1016857) will be subject to less than substantial harm, graded slight harm or minor adverse impact, in Stages 1-3 and the setting of Scurff Hall Moated Site (SM1017485) will be subject to less than substantial harm, graded slight harm or minor adverse impact, in Stage 1. Although no significant impacts are predicted at Drax Augustinian Priory, it has been agreed that enhancement mitigation for the Proposed Scheme will include an interpretation panel on the PRow passing between the Heritage Asset and the boundary of Development Parcel B. This will improve the degree to which the setting's relationship with the asset can be appreciated by the public.

Table 8-18 - Summary of Effects Table for the Historic Environment Chapter

Description of Effects	Receptor	Significance and Nature of Effects Prior to Mitigation / Enhancement	Summary of Mitigation / Enhancement	Significance and Nature of Effects Following Mitigation / Enhancement (Residual)
<b>Stage 0 – Site Reconfiguration Works</b>				
N/A	N/A	N/A	N/A	N/A
<b>Stage 1 – Construction of Unit X, the Gas Pipeline, AGI and GRF</b>				
Disturbance of below-ground archaeological remains resulting from ground disturbance during the installation of the Gas Pipeline and Development Parcel A	Below Ground Remains	Minor/Moderate / - / P / D / LT	A programme of mitigation has been devised in consultation with the NYCC and includes a strip, map and record excavation to be undertaken prior to construction at the location of the AGI and a watching brief (archaeological monitoring) to be undertaken during the excavation of the pipe trench, easements and also during ground moving activities associated with the installation of the temporary compound/laydown area and passing place at the Rusholme Lane Area	Following mitigation the significance of effect would be reduced to Negligible
Minor Harm to setting resulting from the use of Development Parcel A as a construction/compound area and the instalment of the Gas Pipeline and the AGI.	Drax Augustinian Priory and Scurff Hall	Minor/-/T/D/ST	No mitigation recommended	Minor/-/T/D/ST

Description of Effects	Receptor	Significance and Nature of Effects Prior to Mitigation / Enhancement	Summary of Mitigation / Enhancement	Significance and Nature of Effects Following Mitigation / Enhancement (Residual)
<b>Stage 2 – Operation of Unit X and Construction of Unit Y</b>				
Minor Harm to setting resulting from the use of Development Parcel A as a construction/compound area during the construction of Unit Y	Drax Augustinian Priory	Minor/-/T/D/ST	No mitigation recommended	Minor/-/T/D/ST
Minor Harm to setting resulting from the cumulative impact of a new built form in the landscape (Unit X).	Drax Augustinian Priory	Minor/-/P/D/LT	Enhancement mitigation will comprise an interpretation panel on the PRow passing between the Heritage Asset and the boundary of Development Parcel B. This will improve the degree to which the setting's relationship with the asset can be appreciated by the public.	Minor/-/P/D/LT
<b>Stage 3 – Operation of Units X and Y</b>				
Minor Harm to setting resulting from the cumulative impact of a new built form in the landscape (Units X and Y).	Drax Augustinian Priory	Minor/-/P/D/LT	Enhancement mitigation will comprise an interpretation panel on the PRow passing between the Heritage Asset and the boundary of Development Parcel B. This will improve the degree to which the setting's relationship with the asset can be appreciated by the public.	Minor/-/P/D/LT
<b>Decommissioning</b>				

Description of Effects	Receptor	Significance and Nature of Effects Prior to Mitigation / Enhancement	Summary of Mitigation / Enhancement	Significance and Nature of Effects Following Mitigation / Enhancement (Residual)
N/A	N/A	N/A	N/A	N/A

Key to table: + / - = Positive or Negative P / T = Permanent or Temporary, D / I = Direct or Indirect, ST / MT / LT = Short Term, Medium Term or Long Term N/A = Not Applicable



**Key**

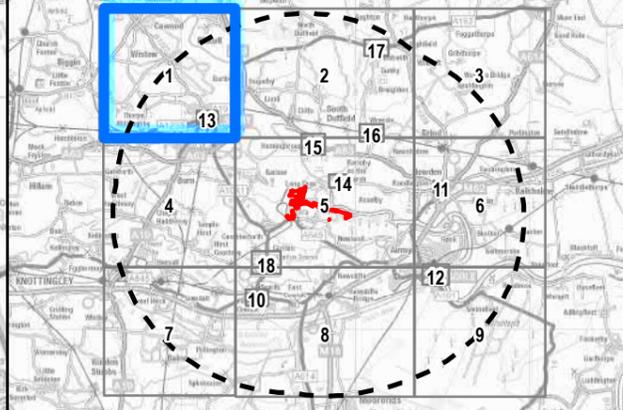
- Site Boundary
- 10km Buffer
- Scheduled Monument
- Selby District Conservation Area

**Listed Building**

- Grade I
- Grade II\*
- Grade II

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TITLE: **Figure 8.1a  
Designated Heritage Asset  
Constraints Plan  
Sheet 1**

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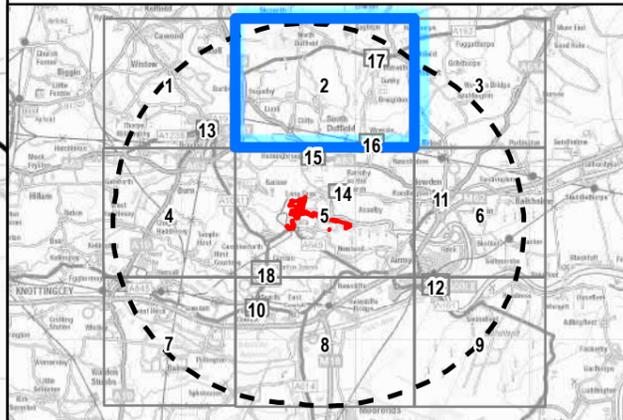
- Site Boundary
- 10km Buffer
- Scheduled Monument
- Selby District Conservation Area

**Listed Building**

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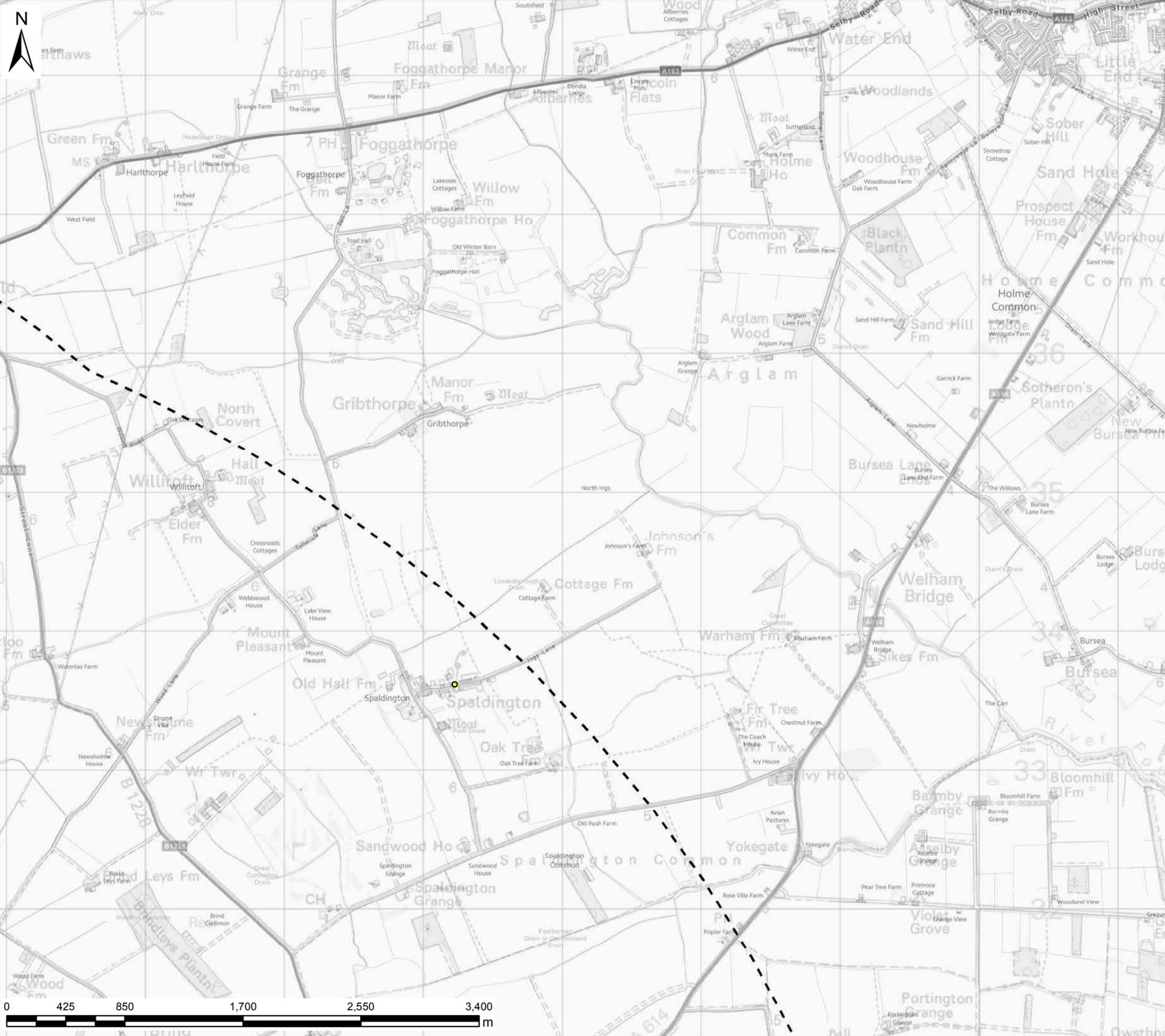
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PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.1b  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 2**

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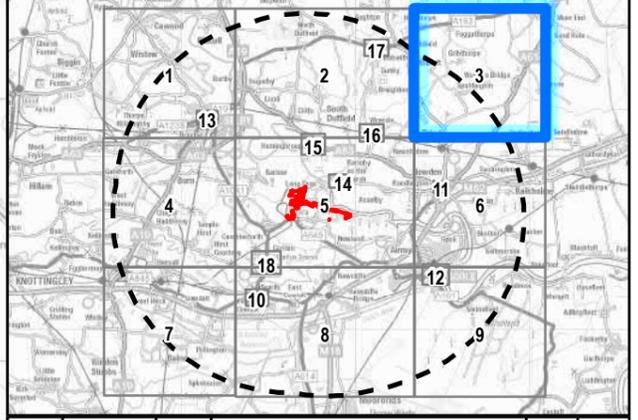
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- Key**
- Site Boundary
  - 10km Buffer
  - Grade I
  - Grade II\*
  - Grade II

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TITLE: **Figure 8.1c  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 3**

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**Key**

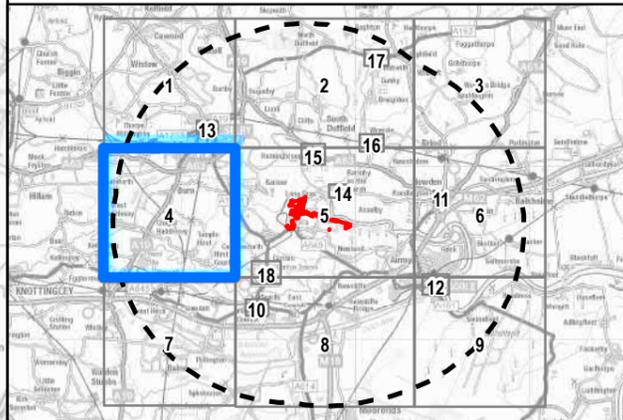
- Site Boundary
- 10km Buffer
- Scheduled Monument
- Selby District Conservation Area

**Listed Building**

- Grade I
- Grade II\*
- Grade II

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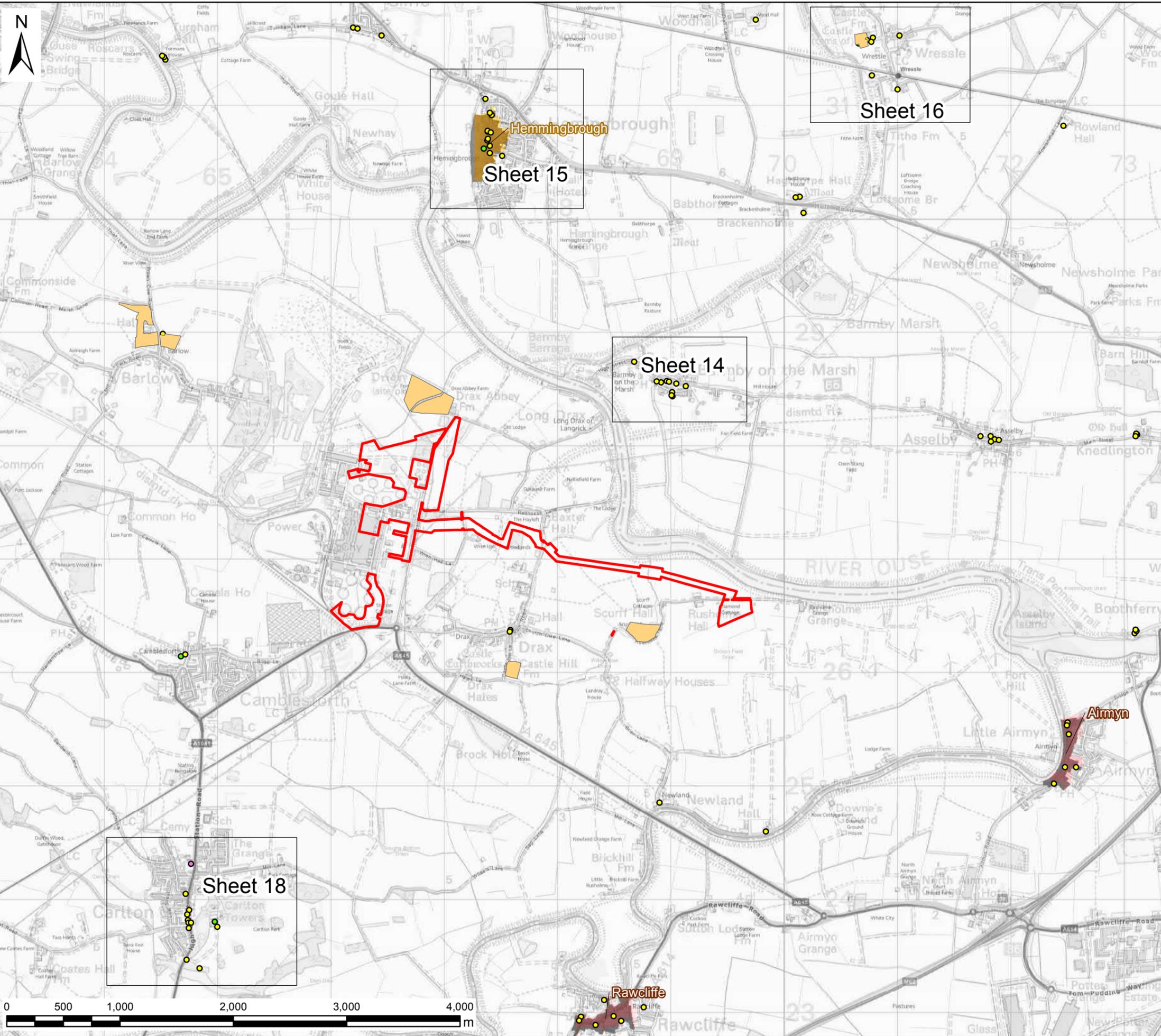
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PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.1d  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 4**

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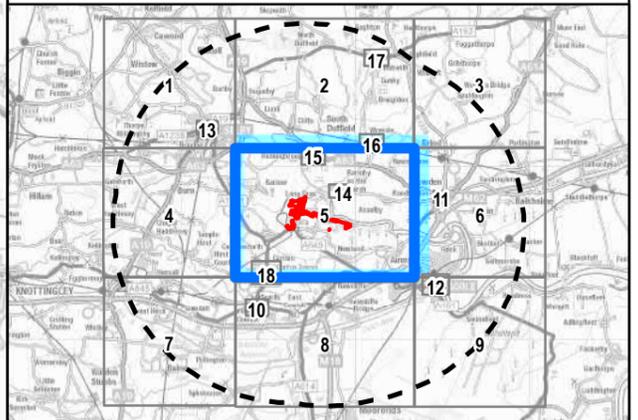
- Site Boundary
- 10km Buffer
- Scheduled Monument
- East Riding of Yorkshire Council Conservation Area
- Selby District Conservation Area

**Listed Building**

- Grade I
- Grade II\*
- Grade II

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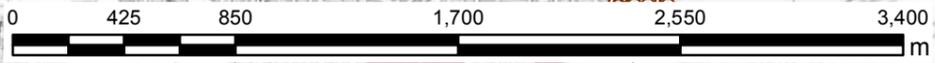


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TITLE: **Figure 8.1e  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 5**

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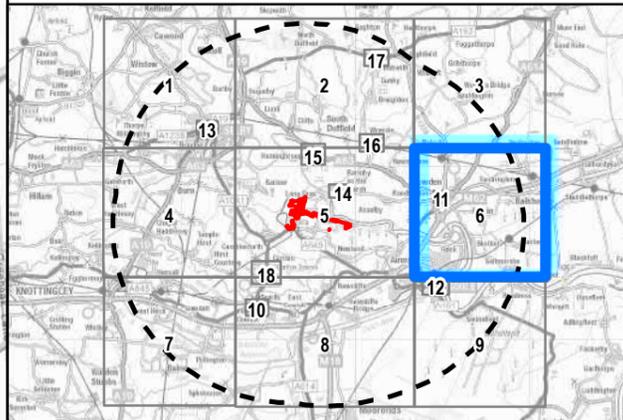
- Site Boundary
- 10km Buffer
- Scheduled Monument
- East Riding of Yorkshire Council Conservation Area

**Listed Building**

- Grade I
- Grade II\*
- Grade II

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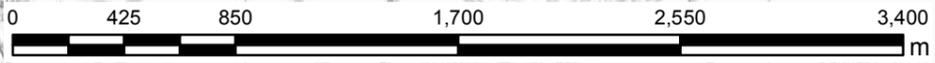
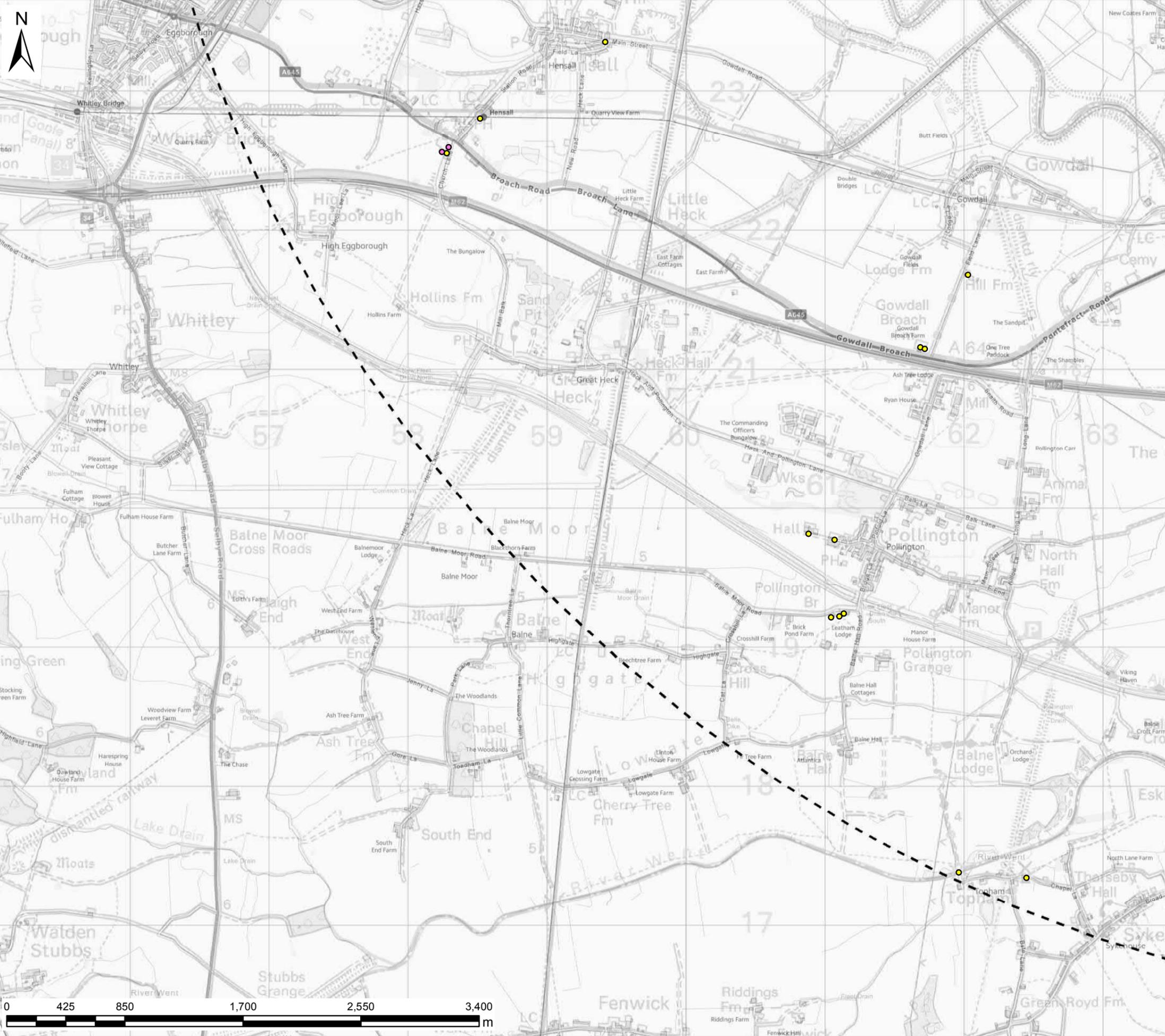
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PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.1f  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 6**

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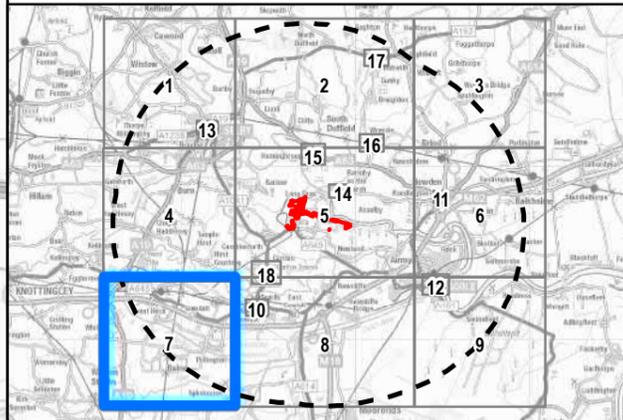
- Site Boundary
- 10km Buffer

**Listed Building**

- Grade I
- Grade II\*
- Grade II

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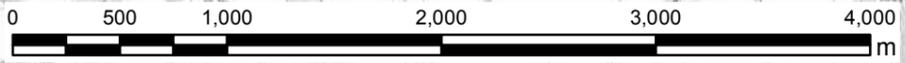
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PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.1g  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 7**

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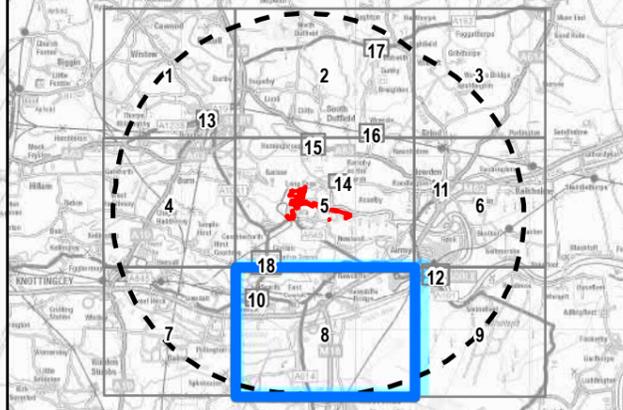
- Site Boundary
- 10km Buffer
- Scheduled Monument
- East Riding of Yorkshire Council Conservation Area

**Listed Building**

- Grade I
- Grade II\*
- Grade II

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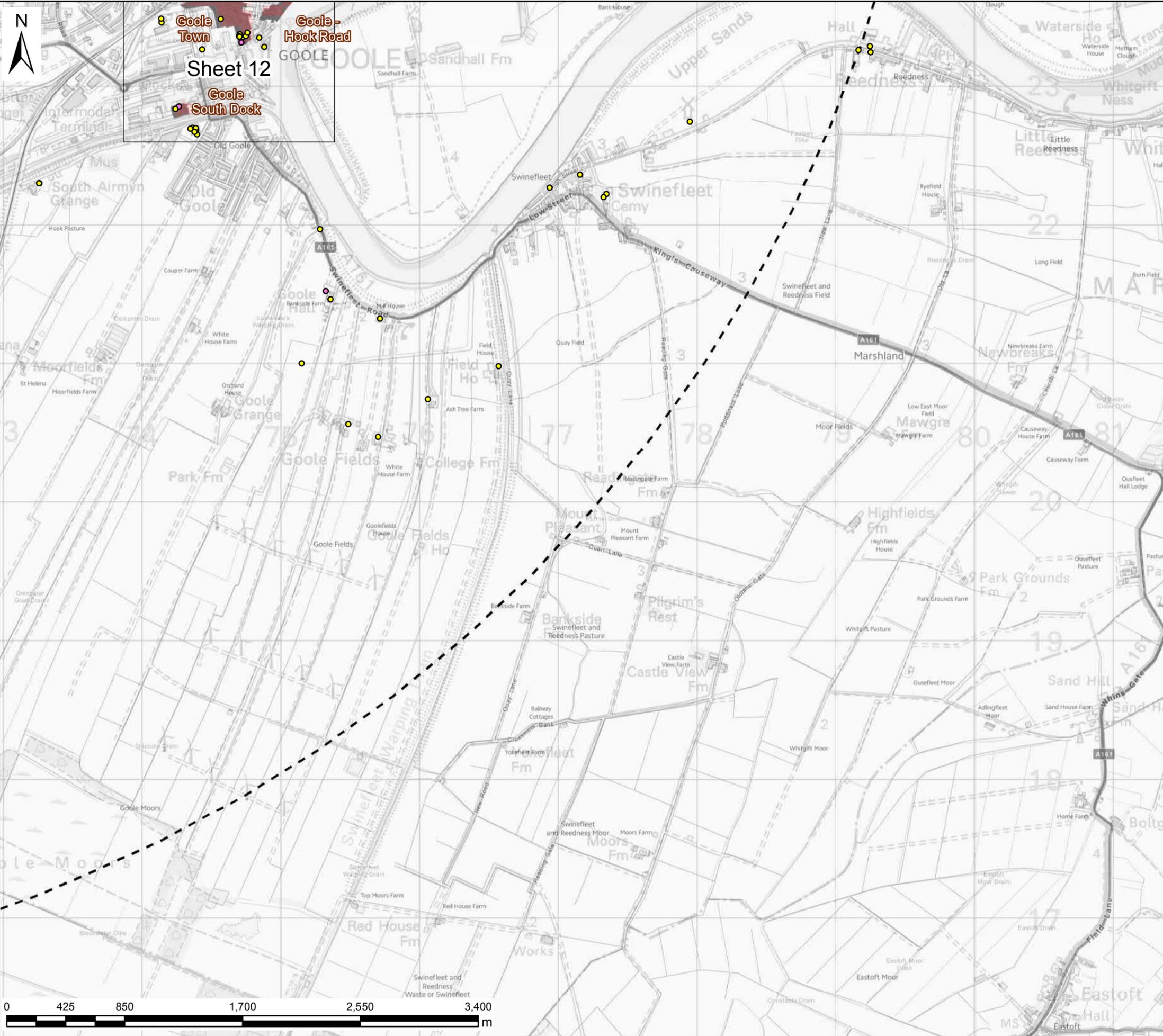
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PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.1h  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 8**

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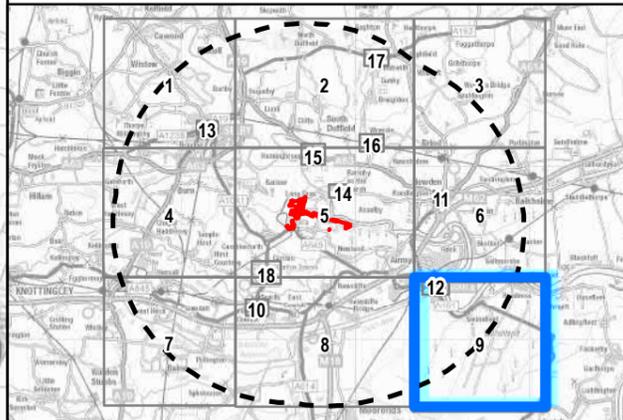
**Sheet 12**

Goole Town  
 Goole Hook Road  
 Goole South Dock

- Key**
- Site Boundary
  - 10km Buffer
  - East Riding of Yorkshire Council Conservation Area
- Listed Building**
- Grade I
  - Grade II\*
  - Grade II

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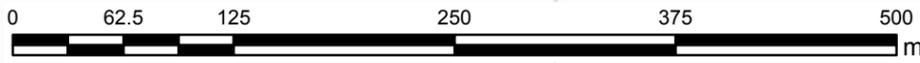
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 Designated Heritage Asset  
 Constraints Plan  
 Sheet 9**

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**Key**

- Site Boundary
- 10km Buffer

**Listed Building**

- Grade I
- Grade II\*
- Grade II

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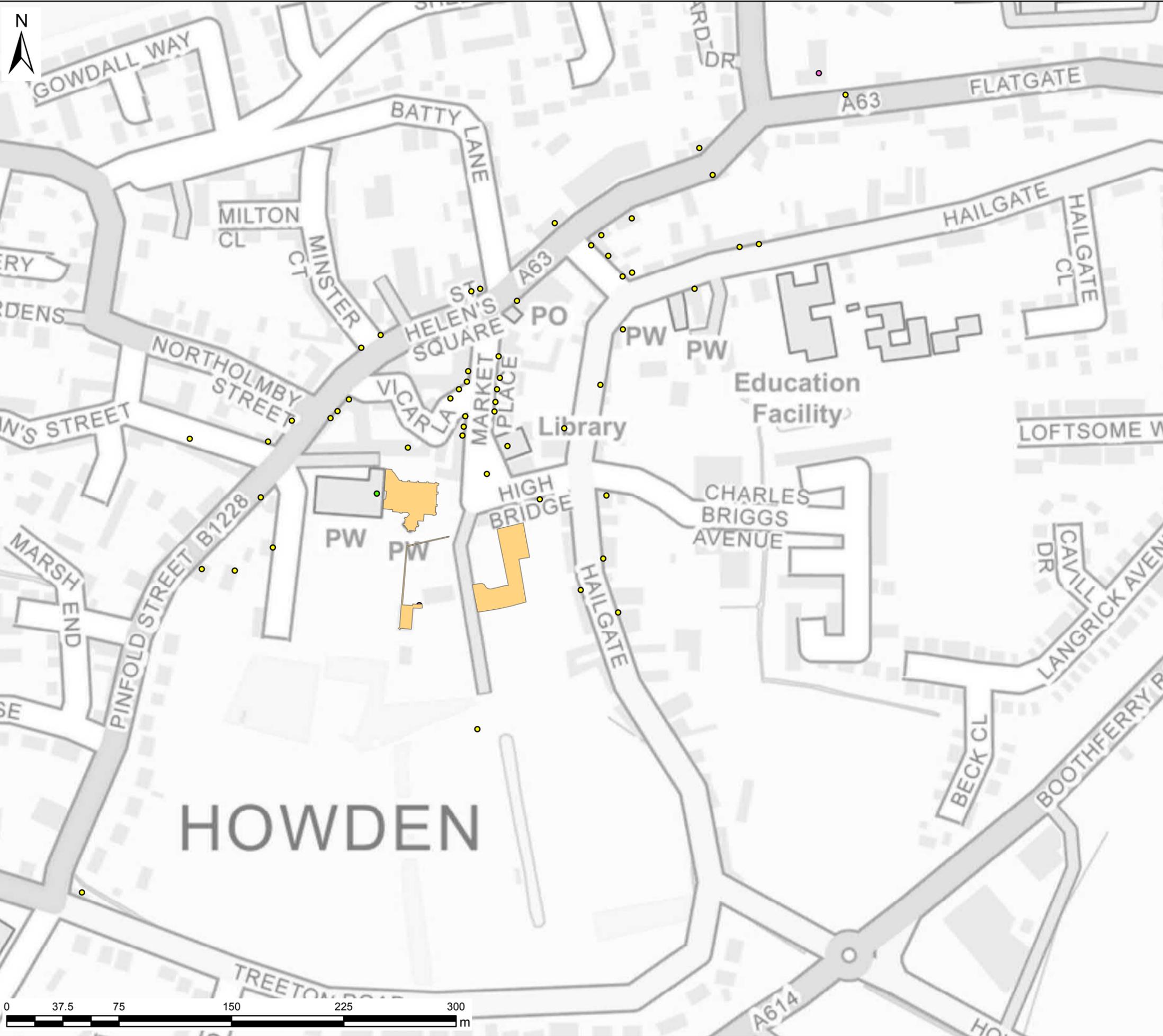
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PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.1j  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 10**

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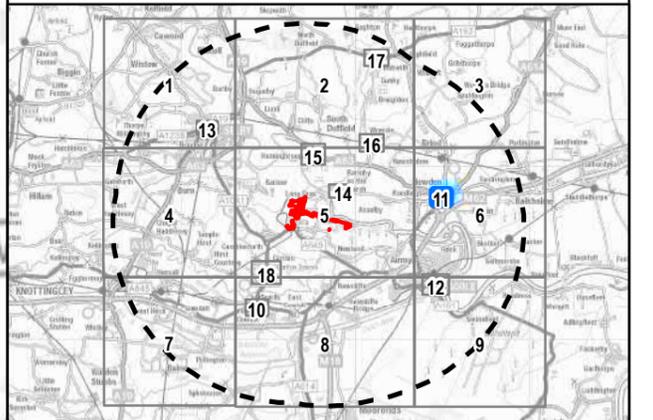
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- Key**
- Site Boundary
  - 10km Buffer
  - Scheduled Monument
- Listed Building**
- Grade I
  - Grade II\*
  - Grade II

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TITLE: **Figure 8.1k  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 11**

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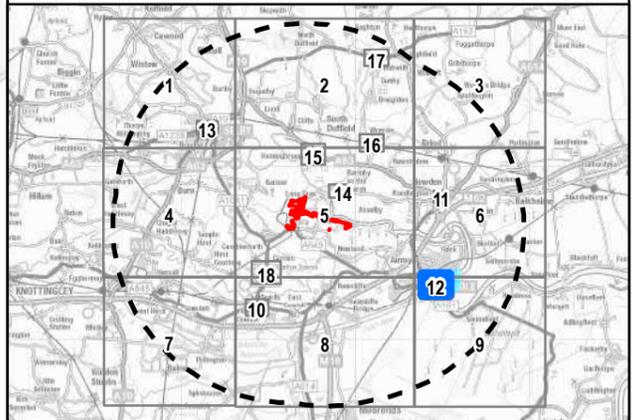
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- Key**
- Site Boundary
  - 10km Buffer
  - Grade I
  - Grade II\*
  - Grade II

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TITLE: **Figure 8.11  
Designated Heritage Asset  
Constraints Plan  
Sheet 12**

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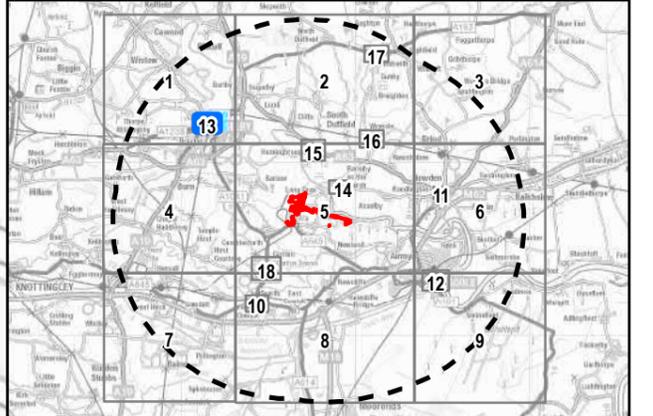
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- Key**
- Site Boundary
  - 10km Buffer
  - Scheduled Monument
- Listed Building**
- Grade I
  - Grade II\*
  - Grade II

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**drax**

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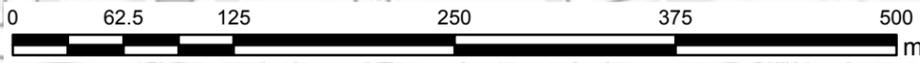
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 Designated Heritage Asset  
 Constraints Plan  
 Sheet 13**

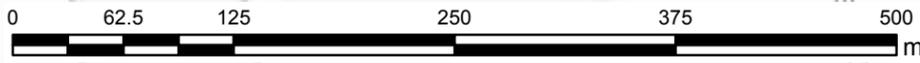
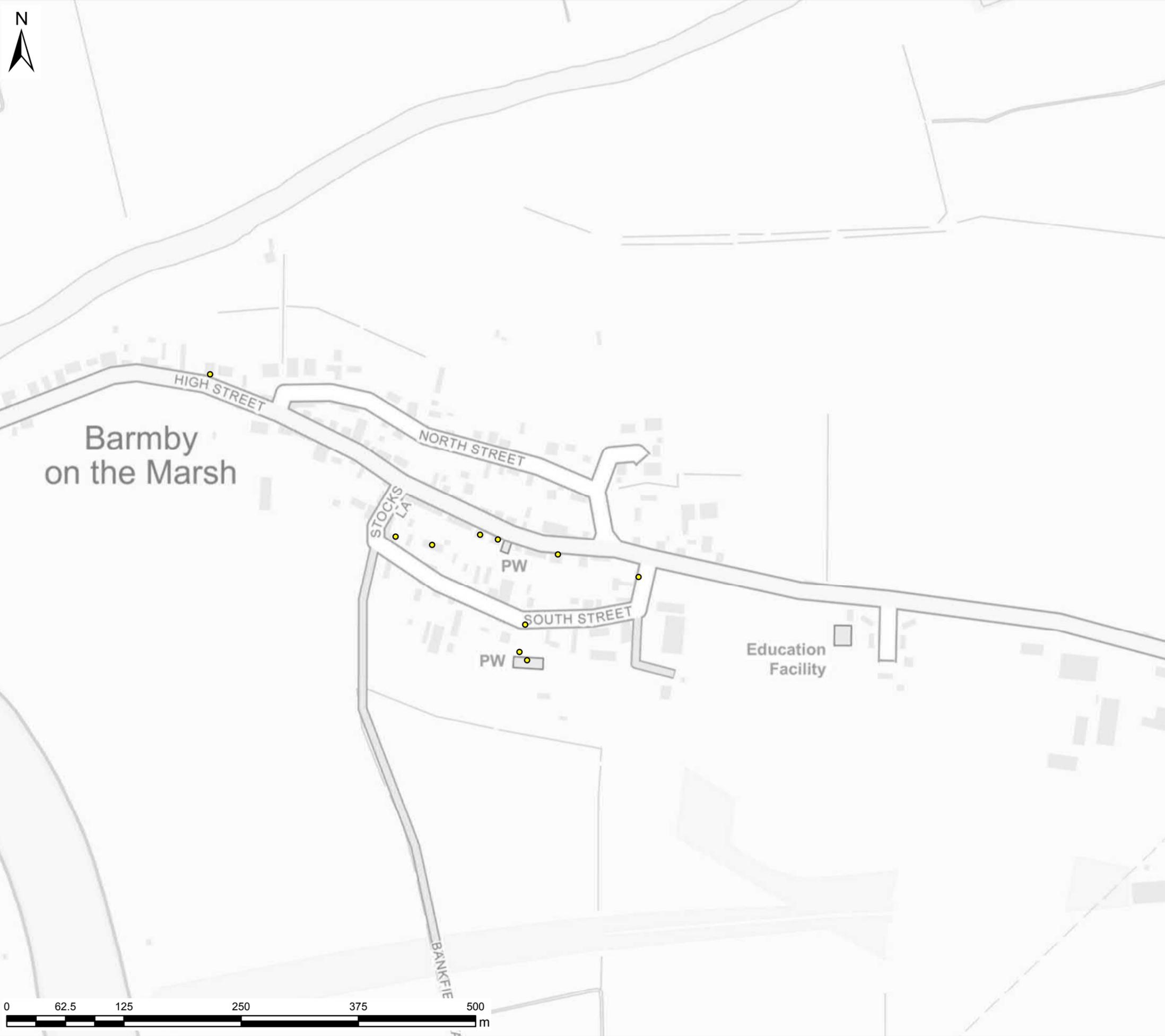
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**Key**

- Site Boundary
- 10km Buffer
- Listed Building**
- Grade I
- Grade II\*
- Grade II

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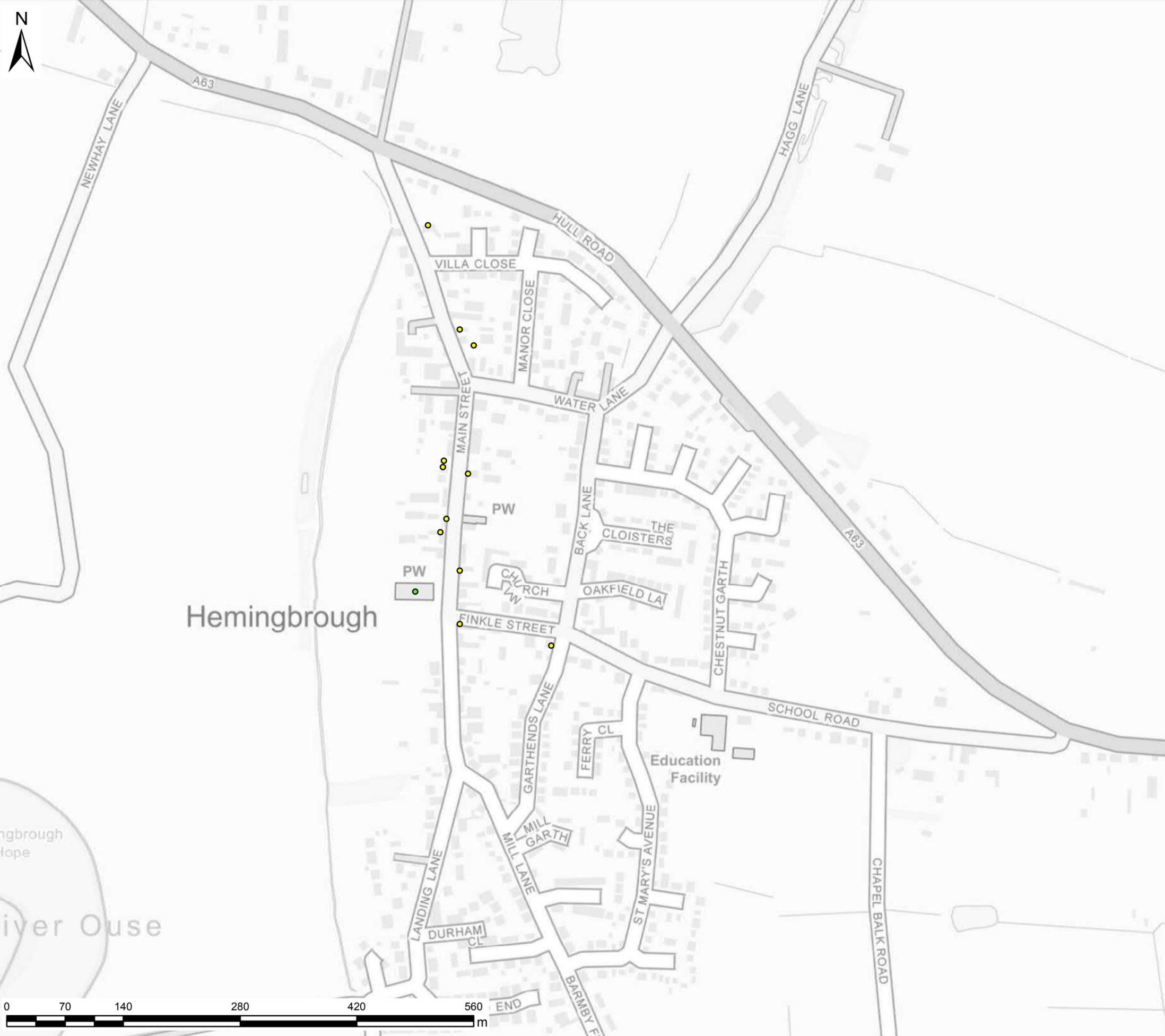
CLIENT:

PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.1n  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 14**

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**Key**

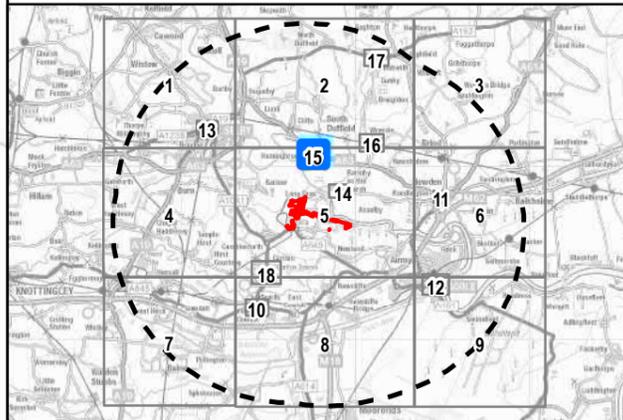
- Site Boundary
- 10km Buffer

**Listed Building**

- Grade I
- Grade II\*
- Grade II

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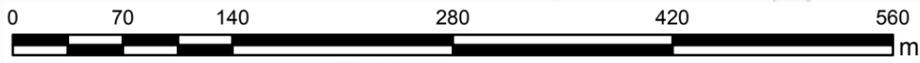
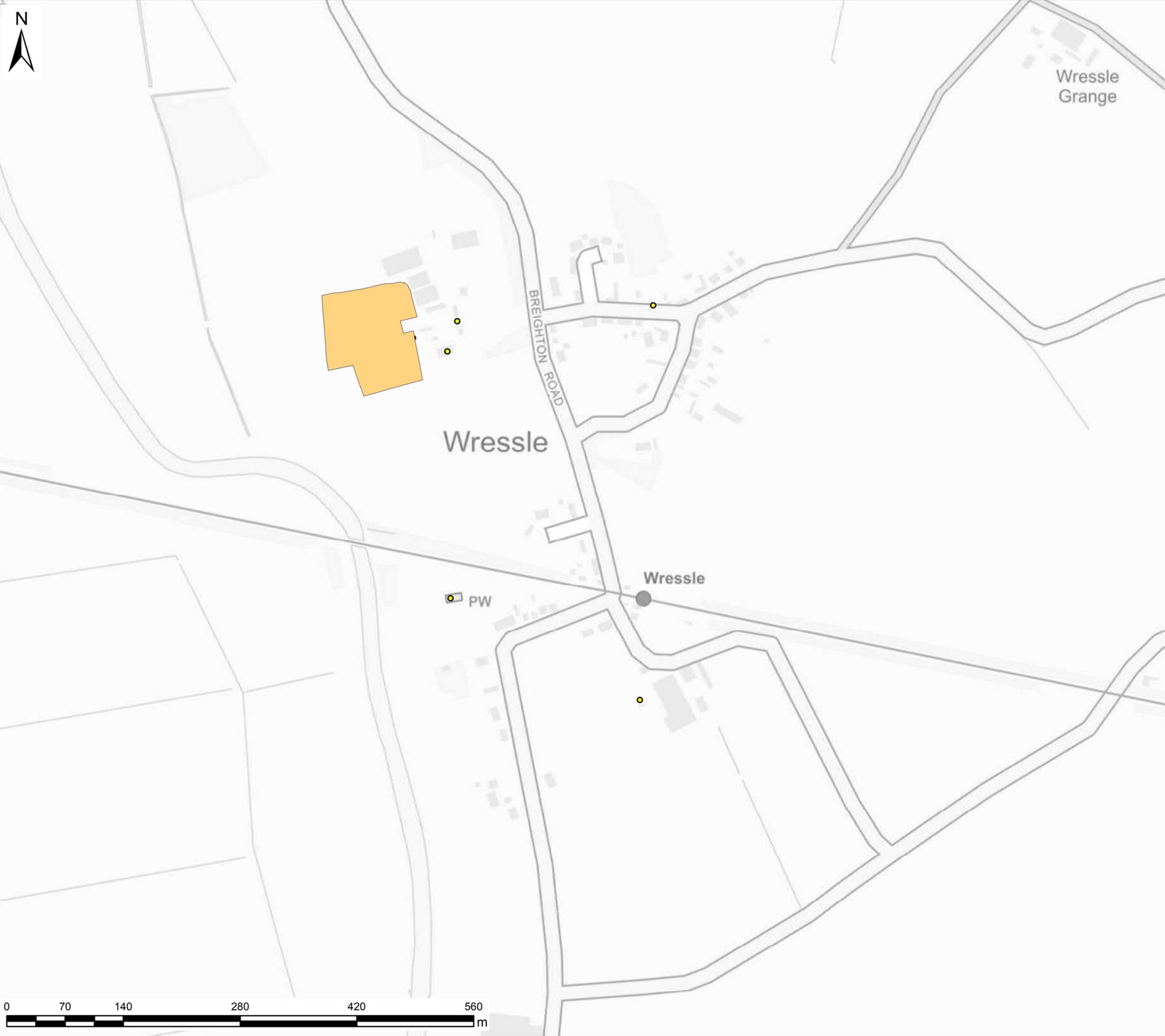
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PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.10  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 15**

SCALE @ A3: 4,500 @ A3	CHECKED: CV	APPROVED: CT
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DRAWING No: 70037047-8.10		DATE: 23/04/2018
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**Key**

- Site Boundary
- 10km Buffer
- Scheduled Monument

**Listed Building**

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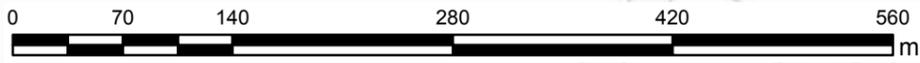
CLIENT:

PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.1p  
Designated Heritage Asset  
Constraints Plan  
Sheet 16**

SCALE @ A3: <b>4,500 @ A3</b>	CHECKED: CV	APPROVED: CT
PROJECT No: 70037047	DESIGNED: CV	DRAWN: RMcc
DRAWING No: <b>70037047-8.1p</b>		DATE: 23/04/2018
		REV: A

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**Key**

- Site Boundary
- 10km Buffer

**Listed Building**

- Grade I
- Grade II\*
- Grade II

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PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.1q  
 Designated Heritage Asset  
 Constraints Plan  
 Sheet 17**

SCALE @ A3: 4,500 @ A3	CHECKED: CV	APPROVED: CT
PROJECT No: 70037047	DESIGNED: CV	DRAWN: RMCC
DRAWING No: 70037047-8.1q		DATE: 23/04/2018
		REV: A

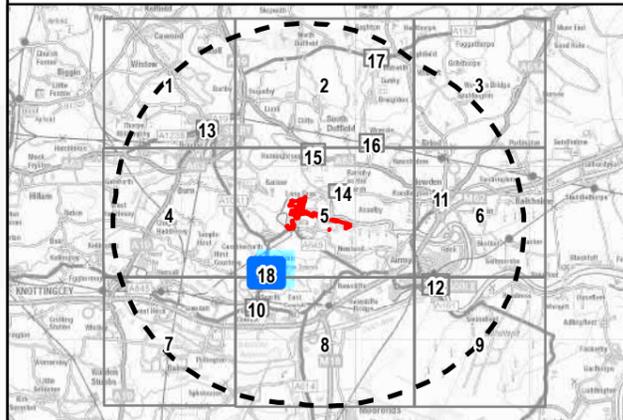
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- Key**
- Site Boundary
  - 10km Buffer
  - Grade I
  - Grade II\*
  - Grade II

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PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.1r  
Designated Heritage Asset  
Constraints Plan  
Sheet 18**

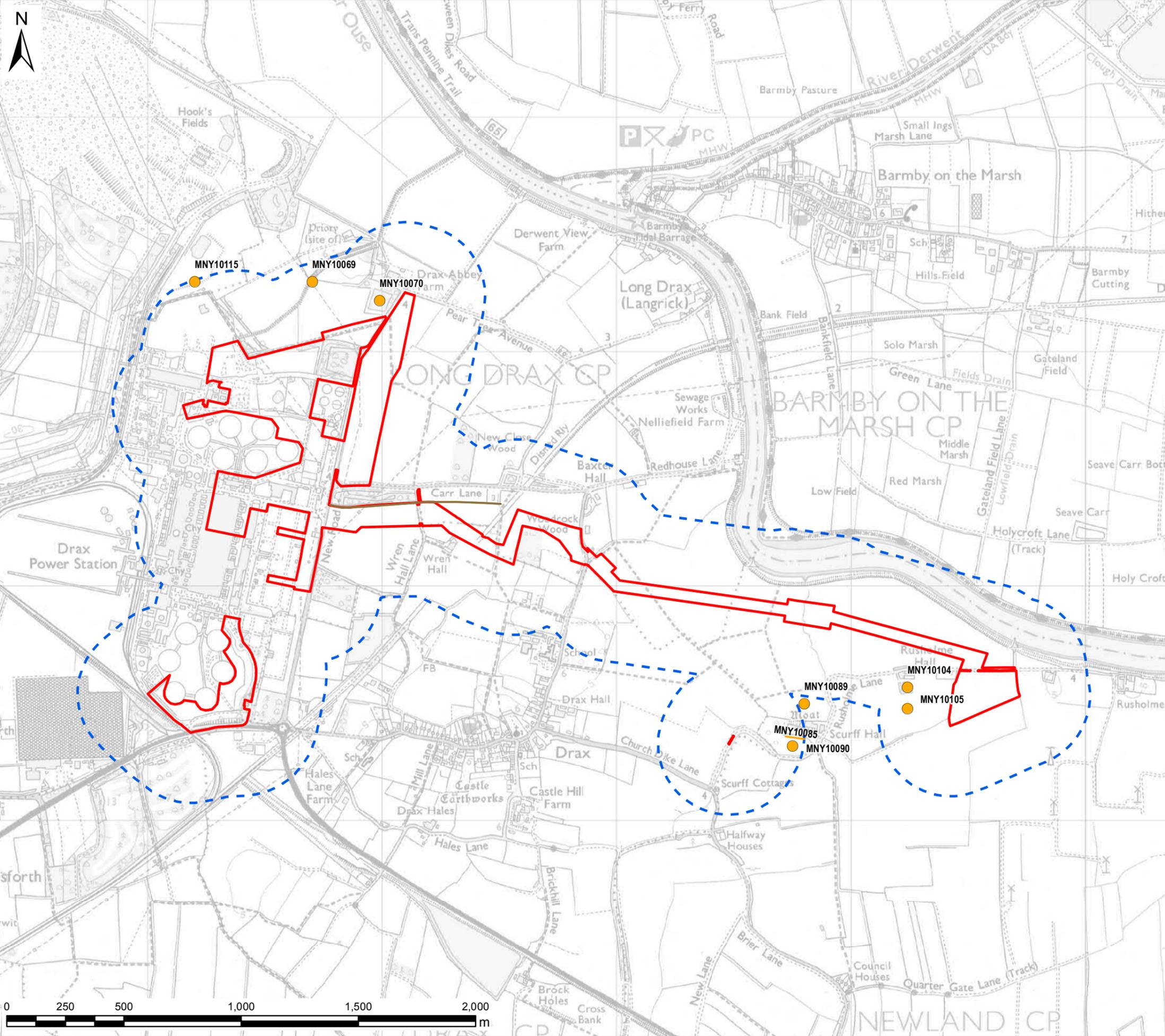
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 Document Path: \\uk.wspgroup.com\central\data\Projects\70037047 - DRAX Re-powering\GIS\MapDocs\IES\_Fig8.2\_NonDesignatedHeritage.mxd



**Key**

- Site Boundary
- 300m Study Area
- HER - Monuments**
- Heritage Asset
- Historic Field Boundary
- Linear Heritage Asset
- Area of Earthwork

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PROJECT: **The Drax Power (Generating Stations) Order**

TITLE: **Figure 8.2  
 Non-Designated Heritage Asset  
 Constraints Plan**

SCALE @ A3: 16,000 @ A3	CHECKED: CV	APPROVED: CT	
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DRAWING No: 70037047-8.2			REV: A

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