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Paul Edwards
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Heritage Services

Growth, Planning and Trading Standards
Business and Environmental Services
North Yorkshire County Council
Northallerton
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Your ref: Drax Repower Project
Our ref: 151018 Drax Landscape Strategy
Date: 15 October 2018

Contact: John Wainwright
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Dear Michael and Paul

Outline Landscape and Biodiversity Strategy V002 – Comment for Landscape and Biodiversity

The Outline Landscape and Biodiversity Strategy V002 is welcome but lacks clarity and would provide only limited landscape and visual benefit in its current form.

Our overall impression is that the ‘Strategy’ is too heavily focussed on optioneering a select number of sites, rather than on need and how it can be achieved, or a review of the wider options to compensate by improving green infrastructure. The optioneering table is overly negative focussing on commercial interests and justifying what cannot be achieved, when it should be about investigating positive opportunities for landscape and biodiversity mitigation, compensation and enhancement.

The document should follow a logical progression referring back to key impacts in the ES and then identifying the ‘need’ for mitigation, compensation and enhancement requirements. Once need has been identified then the options for delivery can be assessed (landscape and biodiversity grounds). These options should consider which areas of land offer the best opportunities to deliver the needs taking into account current land use, links to other habitat, wider green infrastructure and connectivity.

The LVIA has identified that there would be significant adverse landscape and visual effects of the Proposed Scheme, particularly within the 3km study area (para. 2.21 and Table 2.1). The strategy should explain what mitigation and compensation needs are required to reduce these effects.

From a biodiversity perspective, the commitments within land parcels in the strategy are considered suitable; however undertaking enhancement measures in the wider area would provide a different suite of benefits in terms of habitat connectivity. The last biodiversity net gain report showed a large net loss of linear features including hedgerows. The revised strategy is not accompanied by an updated net gain report and as such it is not clear to what extent this has been addressed and therefore what further compensation or enhancement measures may be required in the wider area.

Commitment to monitoring and management are welcomed but the focus should be on the timescale for delivery of the ‘need’ rather than just a standard maintenance period. For some areas of land, management for the life of the development may be justified.

On a project of this scale we would expect the Strategy to consider the Leeds City Region Green Blue Infrastructure Strategy which sets out broader landscape objectives for woodland, water management, multi-functional corridors and networks. Drax also falls within the Dales to Vale Rivers Network Catchment Partnership area, which also has objectives to improve and promote river catchment areas.

The Strategy does not sufficiently demonstrated that the spirit of these policies has been taken into account, by enhancing existing green infrastructure or providing new green infrastructure in order to mitigate, offset or minimise significant adverse landscape and visual effects.

There may be real opportunities to work with these strategies and Partnerships to offset some of the effects and provide some community benefit. Key contact details were provided to Drax Power Ltd in July as a means to facilitate discussion.

A further suggested list of potential opportunities is provided below:

Landscape / Biodiversity / Green Infrastructure Priority	Potential Opportunities within 3km	Potential Partners
Replace Direct Loss and Provide New Green Infrastructure	Replace / restore agricultural land, hedgerows, woodland, habitat	Local land owners and farmers, FWAG Association, Yorkshire Wildlife Trust
Protect Landscape Character & Setting	Reinstate / reinforce key landscape characteristics and features (LCT 23 Levels Farmland, LCT 24 River Floodplains, LCT4 River Corridors, Lower Derwent ILA	Natural England, NYCC, SDC, other key partners
Screen Views of the Development	Direct screening of residential properties, recreational receptors and PROW, local transport, education facilities. Plant and manage woodland screening and hedgerows.	Local parish councils, schools, local land owners and farmers, FWAG Association
Effective Water Management and Flood Risk Reduction	Sustainable drainage schemes and natural flood management . Plant and manage woodland across catchment areas. Targeted planting along watercourses. Manage meadows, floodplains and lngs.	Environment Agency, Dales to Vale River Network , Woodland Trust, Forestry Commission, Flood Plain Meadows Partnership
Build GBI into Physical Development	Provide new GI as part of development in addition to mitigation and compensation	Drax Power Ltd, Selby DC Partnerships Manager, Local Nature Partnership
Enhance Green and Blue Corridors and Networks	Management of priority habitats including SINCS. Develop connectivity and wildlife corridors	Natural England, Yorkshire Wildlife Trust, Woodland Trust
Heighten Community Access to and Enjoyment of GBI	Easy access to open space, river corridors, woodland and trees Development of Regional / local footpath links and cycle network Education and interpretation opportunities	Trans Pennine Trail, Sustrans, Local Nature Partnership, Selby DC Partnerships Manager
Suggested broad themes, opportunities and partners, likely to require cross working between organisations and partners.		

The provision and improvement of green infrastructure is supported by EN1 and Selby DC Policy (SP12, SP18 and SP19). Selby DC policy guidance makes specific reference to the Leeds City Region Green Infrastructure Strategy e.g. SP18 7.71

Further work is needed to identify wider opportunities to reduce significant effects.

We would be happy to provide more detailed comments once the overall principles of the Strategy have been resolved.

Please contact me if you need any further information on the above.

John Wainwright
Principal Landscape Architect

Copy to Julia Casterton, Principal Ecologist NYCC

Internal Review:

Reviewed By:	Signature: Liz Small	Date: 15 October 2018
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