

From: Emerick, Keith [REDACTED]@HistoricEngland.org.uk>
Sent: 06 July 2023 15:33
To: YorkshireGreen <YorkshireGreen@planninginspectorate.gov.uk>
Subject: Yorkshire GREEN Deadline 5 submission

To the Examining Authority,
Please find attached our advice letter issued in February 2023, which we would like to bring to your attention.

If you need further clarification of our position, please contact me using this email address or the 'phone numbers listed below.

Regards

Keith Emerick

Keith Emerick
Inspector of Ancient Monuments
Regions: North East and Yorkshire
Historic England, 37 Tanner Row, York, YO1 6WP
[REDACTED]

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Mr Emer McDonnell
National Grid Electricity Transmission plc
1-3 Strand
London
WC2N 5EH

Direct Dial: [REDACTED]

Our ref: PL00792043

16 February 2023

Dear Mr McDonnell

Application for Development Consent for electricity network reinforcement comprising a new 400kV and 275kV electricity transmission connection and associated development, known as “Yorkshire GREEN” (‘the Proposal’)
PINS Reference: EN020024

1. Introduction

Historic England (“HE”) is the government’s statutory adviser on all matters relating to the historic environment, including historic buildings and areas, archaeology and historic landscapes. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. We are an executive non-departmental public body, and we answer to Parliament through the Secretary of State for Culture, Media and Sport.

We can confirm that HE has been party to extensive pre-application discussions in relation to the Proposal, and the results of these discussions are reflected in the Statement of Common Ground.

2. The Proposal

National Grid propose to upgrade and reinforce the electricity transmission system in Yorkshire. This reinforcement is needed to improve the transfer of clean energy across the country. Reinforcement of the network would enable an increase in the transfer of clean energy, increasing network capacity and avoiding constraint costs.

The Yorkshire Green project comprises both new infrastructure and works to existing transmission infrastructure and facilities. The Project is divided into six sections, located within six Local Authority boundaries. The physical works include improvements to existing substations, the construction of new substations, replacing overhead line conductors and works to pylon foundations, installing new overhead



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lines and providing temporary infrastructure to enable the proposed works.

The proposed works will take place between Osbaldwick (City of York) and Monk Fryston (Selby District).

3. Representation

We support the aspiration behind the Proposal, which is intended to improve the transfer of clean electricity across the county. In view of the limited nature of the impact of the Proposal on the historic environment, Historic England does not consider it necessary to participate in the DCO Examination as an Interested Party, or to attend the preliminary meeting.

4. Historic Environment

The Proposal lies on a route commencing east of York at Osbaldwick, then curves in an arc around the north of York to Overton, north west of York, and then continues to run roughly north to south on the west side of York to Monk Fryston.

York is an internationally renowned centre of cultural significance, but its penumbra also includes a range of highly sensitive designated heritage assets. The elevated nature of the proposal and associated works implies that the works could be highly visible over a considerable distance. Of particular concern was the possible negative impact on views from York Minster to the North York Moors; views to and from Beningbrough Hall and gardens (specifically views from the first and upper floors of the Hall eastwards towards York); the impact on views to and from Marston Moor, 1644 Registered Battlefield (NHLE 1000020) and Towton Moor, 1461 Registered Battlefield (NHLE 1000040) during the works process, and finally possible physical impacts on the scheduled 'Medieval manorial complex, garden and water management features, St Mary's chapel, and a linear earthwork forming part of the Aberford Dyke system', NHLE 1020326.

We have considered a range of material from the applicant during the course of pre-application discussion and at application stage. The Environmental Statement as it applies to the historic environment (Document 5.2.7 ES Chapter 7: Historic Environment, PINS ref: EN020024, and Document 5.3.7F ES Chapter 7, Appendix 7F - Technical Note for Beningbrough Hall, PINS ref EN020024) successfully summarises the significance of heritage assets and analyses the impacts of the proposed scheme on that significance. We consider that the supporting information in the DCO



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application is of a high standard and we broadly accept the conclusions presented.

5. Impacts on the historic environment

Our primary consideration throughout the pre-application discussions has been the impact of the Proposal on the historic environment, particularly the highly designated assets directly within the order limits.

We have worked with the applicant, other statutory bodies and local authority colleagues on this issue. We have sought to secure avoidance, prevention or reduction of any harms through design and where this cannot be achieved, reduce and help to develop mitigation strategies.

The only highly designated asset within the proposed order limits is a scheduled monument known as “Medieval manorial complex, garden and water management features, St Mary’s Chapel, and a linear earthwork forming part of the Aberford Dyke system” (NHLE 1020326). This site is located south west of York, in Selby District, but is also immediately south west of the Registered Battlefield of Towton Moor, 1461 (NHLE 1000040).

Access will be required by the Applicant through the scheduled monument to pylon XC498. A method to enable safe and non-intrusive access has been agreed between Historic England and the Applicant in order to prevent direct harm to the scheduled monument. Normally this proposal would require Scheduled Monument Consent in order to secure the conditions and work method, but this will be covered by the DCO. The agreed access method is described at ES 5.3.7G Technical Note for Scheduled Monument at Lead, APP-122. All necessary land for access is within the proposed order limits.

The method of access agreed between the Applicant and HE has been fully described in the Environmental Statement (Technical Note APP122). It is essential therefore that the agreed method of working is adhered to and secured by the DCO.

During the pre-application stage, we had concerns about the impact of the proposal on the significance of Beningbrough Hall (Hall, NHLE 1150998; Park and Garden NHLE 1001057), specifically through impacts to its setting as a result of the visibility of new and improved overhead cabling in views from and to the Grade I Hall and Grade II Registered Park and Garden. However, these concerns have now all been addressed by the Applicant to our satisfaction. The Technical Note for Beningbrough (Document



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5.3.7F ES Chapter 7F Technical Note for Beningbrough Hall, APP121) clearly sets out that the only permanent change will be to a small number of pylons which will be replaced by the same number of pylons on a slightly different alignment. Therefore, the quantum of change to views to and from Beningbrough, and thus the impact on significance will be as currently experienced.

Similarly, we are content that the works methodology outlined in the ES confirms to our satisfaction that the construction process will not generate a negative impact on views from York Minster or on the significance of Marston Moor, 1644 Registered Battlefield (NHLE 1000020) and Towton Moor, 1461 Registered Battlefield (NHLE 1000040).

The Statement of Common Ground sets out the agreed position that HE has reached with the Applicant on all other issues following our pre-application engagement.

We are aware that the Proposal will result in a range of potentially significant impacts on a number of Gr II designated assets and other non-designated assets. We are confident that local authority heritage advisors are well equipped to respond to these impacts and advise as necessary on locally specific issues.

6. Conclusion

For the reasons given above, HE does not consider it necessary to be an Interested Party in this DCO Examination but would like to be consulted should the application proposals be amended.

Provided the mitigation measures described in this letter [and in the Statement of Common Ground] are secured in the DCO, we do not object to Development Consent being granted.

Yours sincerely,

Keith Emerick

Keith Emerick
Ancient Monuments Inspector
Keith.Emerick@HistoricEngland.org.uk

cc: Peter Rowe, Principal Archaeologist, NYCC
Claire MacRae, Principal Archaeologist, City of York Council



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